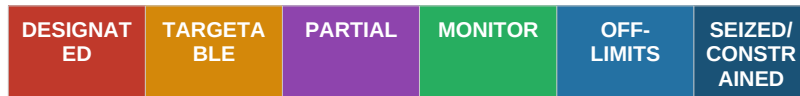


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STRATEGIC ENFORCEMENT NODE INDEX

SENI — v5.0 | Complete Global Register

373 Nodes | 15 Sections | March 2026



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This document is independent academic policy research. All analysis is based on open-source, publicly available information. No classified or controlled information was used.

I. Russia-China Infrastructure

Energy infrastructure, shadow finance, Arctic military, shadow fleet, key persons, dual-use technology, and transshipment architecture

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Taishet Hub	Irkutsk Oblast, Russia	Transneft (state)	Oil Pipeline Origin	TARGET ABLE	EO 14024 §1(a)(i). ESPO system start point — disruption severs entire downstream chain. Multilateral designation required for full effect.
Angarsk Refinery	Angarsk, Irkutsk Oblast	Rosneft (state)	Oil Refinery	TARGET ABLE	EO 14024. Major East Siberian refining hub. Designate Rosneft subsidiaries; requires EU/UK alignment for full effect.
Skovorodino Hub	Amur Oblast, Russia	Transneft (state)	Pipeline Fork — TIER I	TARGET ABLE	HIGHEST PRIORITY. Single switch for all ESPO land oil to China (~30M tons/yr direct spur). EO 14024. Disruption severs China-bound land oil supply; Kozmino maritime exports (~40-45M tons/yr) remain intact. Not a total ESPO shutdown — correctly characterized as severing the China-bound spur specifically.
Mohe / Lianyin Crossing	Heilongjiang, China	CNPC (Chinese state)	Pipeline Border Crossing	OFF-LIMITS	Chinese sovereign infrastructure. Monitor throughput via satellite imagery. No US designation path.
Kozmino Bay Terminal	Primorsky Krai, Russia	Transneft (state)	Maritime Oil Terminal	PARTIAL	Partially sanctioned via EU/UK tanker bans. Designate all shadow fleet tankers loading here under EO 14024.
Nakhodka Port	Primorsky Krai, Russia	FESCO / state ports	Maritime Hub / Shadow Fleet	PARTIAL	Shadow fleet staging. Designate port service providers under EO 14024. AIS gap tracking via Windward/Pole Star.
Komsomolsk Refinery	Khabarovsk Krai, Russia	Rosneft (state)	Oil Refinery — Far East	TARGET ABLE	EO 14024. Coordinate designation with Angarsk for maximum refining disruption.
Daqing Petrochemical	Heilongjiang, China	PetroChina / CNPC (Chinese state)	Oil Refinery — ESPO Terminus	OFF-LIMITS	Chinese sovereign. Monitor ESPO Blend intake volumes via satellite thermal imaging.
Zhanaarka / Atasu Node	Karaganda, Kazakhstan	KazMunayGas / Transneft (mixed)	Pipeline Transit Node	MONITOR	Kazakhstan sovereign. Monitor Russian crude volumes transiting Atasu-Alashankou.
Alashankou / Dzungarian Gate	Xinjiang, China	CNPC (Chinese state)	Pipeline/Rail Border Gate	OFF-LIMITS	Chinese sovereign. No US designation path. Monitor pipeline flow volumes.
Dushanzi Refinery	Karamay, Xinjiang, China	PetroChina (Chinese state)	Oil Refinery — Western China	OFF-LIMITS	Chinese sovereign. Track throughput as Russia-Kazakhstan-China flow proxy.
Lanzhou Refinery	Lanzhou, Gansu, China	PetroChina (Chinese state)	Oil Refinery — Inland	OFF-LIMITS	Chinese sovereign. Monitor only.
Chayanda Gas Field	Sakha Republic, Russia	Gazprom (state)	Gas Field — PoS1 Feeder	TARGET ABLE	EO 14024. Primary PoS1 feeder. Designate Gazprom extraction subsidiaries to constrain future throughput.
Kovykta Gas Field	Irkutsk Oblast, Russia	Gazprom (state)	Gas Field — PoS1 Feeder	TARGET ABLE	EO 14024. Secondary PoS1 feeder. Coordinate with Chayanda for maximum supply disruption.
Heihe Border Crossing (PoS1)	Heihe, Heilongjiang, China	CNPC / Gazprom JV	Gas Pipeline Border / Grid Node	OFF-LIMITS	Chinese-Russian JV on Chinese territory. PoS1 entry and HVDC digital node. Monitor only.
PoS-2 Planned Entry	Mongolia / Russia	Gazprom (planned)	Gas Pipeline —	MONITOR	Not operational. Diplomatic pressure on Mongolia to delay transit

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(Mongolia)	border corridor		Future	R	rights would disrupt PoS-2 viability.
Dalnerechensk Far East Route	Primorsky Krai / China border	Gazprom / CNPC (planned)	Gas Pipeline — Future	MONITOR	Operational target Jan 2027. Pre-emptive designation of Gazprom construction entities could delay commissioning.
Zhengzhou Gas Hub	Henan, China	CNPC / PipeChina (Chinese state)	Gas Distribution Hub	OFF-LIMITS	Chinese sovereign. PoS1 inland distribution. Monitor only.
Sabetta LNG Terminal	Yamal-Nenets AO, Russia	Novatek (majority); CNPC / CNOOC (Chinese equity ~20%)	LNG Export Terminal — Arctic	PARTIAL	PRIORITY. Partially sanctioned EU/UK. CNPC/CNOOC equity stakes create leverage point. Designate all Novatek operating subsidiaries and individual shadow fleet tankers loading here under EO 14024.
Arctic LNG 2 Plant	Gydan Peninsula, Russia	Novatek (majority); Chinese/Japanese/French equity withdrawn	LNG Plant — Sanctioned	DESIGNATED	Under US/EU/UK sanctions. Still shipping via shadow fleet to Beihai. Enforce tanker-level secondary sanctions — designate each vessel individually by IMO number.
Saam FSU (Murmansk)	Barents Sea, near Murmansk	Novatek (operated)	Floating Storage — STS Transfer	DESIGNATED	Designated. Ship-to-ship transfer point. Monitor for replacement FSU deployment.
Kamchatka FSU	Pacific, off Kamchatka	Novatek (operated)	Floating Storage — Pacific STS	TARGETABLE	EO 14024. Far East LNG transshipment to standard tankers. Designate vessel; track replacement.
Beihai LNG Terminal	Guangxi, China	CNOOC (Chinese state)	LNG Import Terminal — China	OFF-LIMITS	Chinese sovereign. Primary receiving terminal for sanctioned Arctic LNG 2. Off-limits for direct action. Indirect pressure via shipping insurance and flagging state designations on delivering vessels.
Murmansk Port	Murmansk Oblast, Russia	FGUP Rosmorport (state)	Arctic Port — NSR Western Gate	TARGETABLE	EO 14024. NSR western terminus. Designate port service companies and Atomflot icebreakers supporting Arctic energy exports.
Norilsk — Nornickel	Krasnoyarsk Krai, Russia	Nornickel (Vladimir Potanin, ~35% controlling stake)	Mining — Ni/Cu/Pd/Pt	PARTIAL	EO 14024 §1(a)(i)/(iii); CAATSA §226. Norilsk Nickel (Nornickel) is the world's largest palladium producer (~40% global supply) and major nickel and platinum producer. ENFORCEMENT CONSTRAINT — DOMESTIC INDUSTRY IMPACT: U.S. automotive, defense, and semiconductor sectors are significant palladium consumers. An uncoordinated Nornickel designation would create immediate domestic supply chain disruption in catalytic converter manufacturing, fuel cell technology, and defense electronics procurement — not merely allied market disruption. This domestic political barrier is the primary impediment to OFAC action, not just allied coordination requirements. Enforcement must be preceded by: (1) domestic palladium stockpile assessment (DoD strategic stockpile evaluation), (2) alternative supplier identification (South Africa: Amplats/Impala, Zimbabwe: Zimplats), and (3) pre-designation notification to affected domestic industries. ALLIED COORDINATION REQUIREMENT: Coordinate with EU/UK before designation to manage PGM market disruption — approximately 35–40% global palladium supply would be affected. Sequential rather than simultaneous allied action risks market arbitrage. ENFORCEMENT THEORY: Designate Nornickel subsidiaries with direct Russian defense/state revenue exposure rather than full parent SDN. Reduces domestic industry impact while

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					maintaining enforcement pressure. Long-term substitute: accelerate DoD strategic materials diversification program.
Tomtor REE Deposit	Sakha Republic, Russia	Polymetal / Russian state development interest	Mining — Rare Earths / Niobium	MONITOR	Currently undeveloped. Monitor Chinese investment structures. Pre-emptive designation of Chinese JV partners once investment formalized.
Krasnokamensk Uranium Hub	Zabaykalsky Krai, Russia	Rosatom / ARMZ (state)	Mining — Uranium Processing	TARGETABLE	EO 13382. ARMZ is Rosatom subsidiary. Fuel supply for Tianwan and Xudapu NPPs. TVEL designation is the recommended instrument but is operationally constrained: designating fuel supply to two operating Chinese civilian reactors creates a genuine nuclear safety argument that Beijing would exploit internationally. Interagency consultation with DOE/NNSA (policy practice rather than a statutory prerequisite) is not procedural formality — it is politically difficult given reactor operational status. Coordinate with DOE/NNSA and allied nuclear regulators before proceeding.
Ganzhou REE Hub	Jiangxi, China	China Rare Earth Group (Chinese state)	REE Processing — Global Monopoly	OFF-LIMITS	Chinese sovereign. Near-global monopoly on heavy REE. Off-limits. Long-term: build allied refining capacity (MP Materials, Lynas).
Zabaykalsk Gauge Switch / Grain Terminal	Zabaykalsky Krai, Russia	Russian Railways / Zarubezhstroy (state)	Rail Chokepoint / Grain Terminal — TIER I	TARGETABLE	TIER I. All Russian solid mineral and grain exports to China transit here. Secondary sanctions on Chinese logistics buyers (COFCO, Sinograin). Note: RZD itself has been under EU sanctions since 2022 and extensive US sectoral restrictions; subsidiary designation recommendations are sound but RZD's well-documented evasion architecture through non-sanctioned subsidiaries makes this a recurring enforc
Manzhouli Border Entry	Inner Mongolia, China	China Railway (state)	Rail Border Crossing	OFF-LIMITS	Chinese sovereign rail. Monitor cargo volumes as Russia-China trade proxy.
Tongjiang / Nizhneleninskoye Rail Bridge	Amur River — Russia/China border	RZD (Russia) / Heilongjiang Longjiang Rail (China)	Rail Bridge — Amur Crossing	MONITOR	Opened 2022. Russian side targetable under EO 14024 (RZD). Chinese side off-limits. Monitor mineral throughput.
Zeya Hydroelectric Dam	Amur Oblast, Russia	RusHydro (state)	Hydropower — Export Feeder	TARGETABLE	EO 14024. Designate RusHydro subsidiaries operating cross-border export functions.
Bureya Hydroelectric Dam	Amur Oblast, Russia	RusHydro (state)	Hydropower — Export Feeder	TARGETABLE	EO 14024. Coordinate with Zeya designation to remove surplus power base underpinning cross-border exports.
Amurskaya Substation	Amur Oblast, Russia	FGC UES / Rosseti (state)	HVDC Grid — Master Switch — TIER I	TARGETABLE	TIER I. Master switch for all Russian power exports to China. Designate Rosseti subsidiaries. Physical disruption severs cross-border electrical supply entirely.
Heihe HVDC Converter	Heihe, Heilongjiang, China	State Grid Corporation of China	HVDC Converter — China Side	OFF-LIMITS	Chinese sovereign grid. Russian side is actionable node. Monitor grid import volumes.
Tianwan NPP	Lianyungang, Jiangsu, China	JNPC (China) / Rosatom tech+fuel (Russia)	Nuclear Power — Russian-Built	PARTIAL	EO 13382. TVEL designation would cut fuel supply from Krasnokamensk to operating Chinese civilian reactors. Highest-constraint action in the index: nuclear safety arguments are

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					internationally exploitable and would complicate any allied coordination. Action requires DOE/NNSA interagency consultation, allied nuclear regulator consultation, and pre-positioned alternative fuel supply pathway before execution.
Xudapu NPP	Huludao, Liaoning, China	CNNC (China) / Rosatom tech+fuel (Russia)	Nuclear Power — Russian-Built	PARTIAL	EO 13382. Coordinate TVEL designation with Tianwan action. Same nuclear safety constraint applies — see Tianwan entry. Do not execute without DOE/NNSA interagency consultation and allied nuclear regulator coordination.
Polar Express: Teriberka	Murmansk Oblast, Russia	FSUE Morsvyazsputnik (state)	Submarine Cable — Origin	MONITOR	12,650km Russian Arctic cable manufactured with Chinese optical fiber. No current US designation authority over Russian domestic cable. NATO monitoring.
Polar Express: Tiksi	Sakha Republic, Russia	FSUE Morsvyazsputnik (state)	Submarine Cable — Dual-Use Node	MONITOR	DUAL-USE: cable landing AND nearest Arctic port to Tomtor REE deposit. Monitor.
Polar Express: Petropavlovsk-Kamchatsky	Kamchatka Krai, Russia	FSUE Morsvyazsputnik / Pacific Fleet (dual)	Submarine Cable — Military Dual-Use	MONITOR	CRITICAL DUAL-USE: collocated with Pacific Fleet submarine base. Disruption affects civil comms AND naval C2. NATO/INDOPACOM monitoring priority.
Polar Express: Vladivostok	Primorsky Krai, Russia	FSUE Morsvyazsputnik / Eastern Military District	Submarine Cable — Eastern Terminus	MONITOR	Eastern terminus. Planned connections to Chinese networks. Eastern Military District HQ. Monitor connection point designation.
Moscow BRICS Bridge CBDC Node	Moscow, Russia	Bank of Russia (state)	CBDC — Sovereign Settlement	DESIGNATED	Bank of Russia fully designated. BRICS Bridge bypasses SWIFT. No short-term US interdiction vs. central-bank CBDC. BIS multilateral audit demand is only near-term lever.
Shanghai BRICS Bridge / Ag Hub	Shanghai, China	People's Bank of China / COFCO	CBDC / Agricultural Trade Hub	OFF-LIMITS	Chinese sovereign. Five Russian agricultural attachés. 1M+ tons/yr vegetable oil. Off-limits. Monitor flows as sanctions compliance indicator.
ABCeX Exchange	Federation Tower, Moscow	Undisclosed Russian principals	Crypto OTC Exchange	TARGETABLE	GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) + EO 14024. Reportedly \$11B+ processed (blockchain intelligence estimates; [TRM Labs / Chainalysis enterprise blockchain analytics — cite primary report before publication]). DO NOT designate entity alone. Simultaneously de-peer Aeza Group / Media Land via IEEPA and execute Tether freeze.
Garantex (Mirror Wallets)	Moscow (distributed)	Garantex Europe OÜ (sanctioned)	Crypto Exchange — Designated	DESIGNATED	OFAC-designated. Still processing Reportedly ~\$10B/yr via mirror wallets (blockchain intelligence estimates; cite TRM Labs or Chainalysis primary reporting before release). Tether freeze on identified mirror wallet cluster.
Aifory Pro	Moscow / Dubai / Turkey	Undisclosed — FEA Payment Agent	USDT Virtual Card Agent	TARGETABLE	EO 14024 §1(a)(iii). CAATSA §226 on UAE/Turkish correspondent banks.
BitRiver (Bratsk)	Bratsk, Irkutsk Oblast, Russia	BitRiver AG (Swiss-registered, Russian-operated)	Crypto Mining / Dual-Use Compute — TIER	TARGETABLE	TIER I. EO 14024 §1(a)(i). Sole economically viable large-scale A7A5 compute in Russia. Collocated with Bratsk Dam. Replacement timeline is contested — Russian crypto mining infrastructure has

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			I		demonstrated improvisation capacity. The 90-day estimate is a lower bound; equivalent-scale substitution is structurally constrained by power availability, not hardware alone.
Grinex / Meer (A7A5 Issuer)	Bishkek, Kyrgyzstan	Undisclosed Kyrgyz-registered principals	Stablecoin Issuer — A7A5	TARGET ABLE	EO 13694 (as amended EO 14306). Grinex/Meer is the A7A5 stablecoin issuer — the primary ruble-denominated stablecoin used by Garantex and ABCeX for sanctions evasion. GENIUS Act §4(a)(5) (A) [Pub. L. 119-27, effective July 18, 2025 — implementing regulations pending as of March 2026] mandatory freeze/burn/seize authority applies upon issuer identification. Simultaneous Tether freeze and ISP de-peering required — sequential action allows network adaptation. FinCEN Section 311 for any US-nexus financial institution processing A7A5 transactions. Coordinating with EU regulators on parallel freeze action under EU Reg 833/2014 Art 5aa. Blockchain forensics and wallet cluster identification via TRM Labs/Chainalysis are the correct first-order action.
Hong Kong OTC Cluster	Hong Kong SAR, China	Multiple shell-structured resellers	Crypto OTC / Dual-Use Procurement	TARGET ABLE	EO 13382 + EO 14024 §1(a)(iii). Designate freight forwarders and resellers SIMULTANEOUSLY. TRM Labs exposure mapping required first.
Severomorsk — Northern Fleet HQ	Kola Peninsula, Murmansk Oblast, Russia	Russian Navy / Ministry of Defence	Military — Naval HQ	MONITOR	Northern Fleet HQ. Six nuclear-armed submarines based here. Kola Peninsula hosts a substantial share of Russia's second-strike nuclear capability (commonly cited as approximately two-thirds per open-source defense literature ([IISS Military Balance (current year) and CRS RL33396 — cite both before publication; figure varies by analyst methodology])). Key constraint on any Arctic interdiction operation.
Gadzhiev Submarine Base	Kola Peninsula, Murmansk Oblast, Russia	Russian Navy (Northern Fleet)	Military — Submarine Base	MONITOR	Expanded post-2022. Hosts SSBN and SSN assets protecting Northern Sea Route. Constrains naval interdiction options in Barents/Kara Sea.
Nagurskoye Air Base (Franz Josef Land)	Alexandra Land, Franz Josef Land, Russia	Russian Aerospace Forces / FSB	Military — Arctic Air Base	MONITOR	Russia's northernmost military base. 3,500m runway (expanded 2020). Can stage MiG-31, Su-34. S-300/S-400/Pantsir-S1 deployed. Arctic Shamrock autonomous base collocated. Severely constrains NATO freedom of operation in High Arctic. Key enforcement context node.
Rogachevo Air Base (Novaya Zemlya)	Novaya Zemlya, Arkhangelsk Oblast, Russia	Russian Aerospace Forces	Military — Arctic Air Base	MONITOR	S-400 SAM systems deployed. Protects Yamal/Sabetta LNG infrastructure from western approach. Also Novaya Zemlya nuclear test site (high readiness maintained). Constrains Western Arctic access.
Northern Clover Base (Kotelny Island)	New Siberian Islands, Sakha Republic, Russia	Russian Armed Forces (99th Arctic Tactical Group)	Military — Arctic Autonomous Base	MONITOR	Laptev Sea. 250 troops. Regional air defense, radar, early warning. Covers central NSR corridor. Constrains Arctic mineral interdiction options between Tiksi and Pevek cable/logistics nodes.
Tiksi Military Airfield	Sakha Republic, Russia	Russian Aerospace Forces / Northern Fleet	Military — Airfield (Collocated with Cable Node)	MONITOR	DUAL-USE collocation: military airfield and Polar Express cable landing station. Military presence constrains physical cable interdiction. Monitor for Arctic Tactical Group forward deployments.
Petropavlovsk-Kamchatsky — Pacific	Kamchatka Krai, Russia	Russian Navy (Pacific Fleet)	Military — Submarine Base (Collocated with	MONITOR	DUAL-USE: Polar Express cable landing and Pacific Fleet submarine base. SSBNs and SSNs based here. Physical cable interdiction at this node would require naval operation in contested waters.

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Fleet Sub Base			Cable Node)		
Pavlodar Refinery (Kazakhstan)	Pavlodar, Kazakhstan	KazMunayGas (state)	Oil Refinery — Kazakhstan Transit	MONITOR	Entry point where Russian West Siberian crude enters Kazakhstan-China pipeline via Omsk-Pavlodar connection. Monitor Russian crude volumes. Diplomatic sensitivity high — Kazakhstan is CSTO member.
Omsk Refinery (Russia)	Omsk Oblast, Russia	Gazprom Neft (state)	Oil Refinery — Kazakhstan Transit Feeder	TARGETABLE	EO 14024. Feeds Russian crude into Omsk-Pavlodar-Atasu-Alashankou Kazakhstan transit route. Designate Gazprom Neft subsidiaries.
Uzbekistan Gas Transit Nodes	Tashkent, Uzbekistan	Uzbekneftegaz (state)	Gas Transit — Central Asian Pipeline	MONITOR	Uzbekistan feeds into China-Central Asia gas pipeline alongside Russian volumes. Monitor for Russian gas substitution volumes as direct PoS alternatives.
Turkmenistan — TAPI / CAGP Node	Ashgabat, Turkmenistan	Turkmengaz (state)	Gas Transit — China-Central Asia	MONITOR	ANALYTICAL NOTE — COUNTER-DEPENDENCY NODE, NOT A TARGET: The Turkmenistan China-Central Asia Gas Pipeline (CAGP) carries Turkmen gas to China and is the primary structural alternative to Russian gas in China's supply mix. It is included here for analytical completeness, not as an enforcement target. STRATEGIC LOGIC: CAGP throughput directly reduces Chinese dependency on Russian gas (Power of Siberia 1). Disrupting CAGP would benefit Russian gas export leverage over China — the opposite of U.S. enforcement interests. This is an asset to monitor and protect from disruption, not a sanctions target. CORRECT POLICY POSTURE: Encourage CAGP expansion and Turkmen diversification of gas export routes. Support Central Asian energy independence from Russian pipeline dependency. Consider this node in the context of the Turkmenistan-Afghanistan-Pakistan-India (TAPI) pipeline framework — same logic applies. STATUS: MONITOR — track throughput volumes as indicator of Chinese Russia-gas dependency trajectory. No enforcement action applicable.
Erenhot — Mongolia Rail Hub	Inner Mongolia, China	China Railway (state)	Rail Hub — Mongolia Transit	OFF-LIMITS	Chinese sovereign. PoS-2 planned entry corridor. Diplomatic pressure on Mongolia is the indirect lever for constraining this corridor.
Ulaanbaatar Rail Junction	Ulaanbaatar, Mongolia	UBTZ (Mongolian/Russian JV — RZD 50%)	Rail Junction — Mongolia Transit	MONITOR	RZD holds 50% of Ulaanbaatar Railway. RZD is designated — this JV is a secondary sanctions exposure point. Monitor for PoS-2 pipeline construction activity and Mongolian government negotiations.
Christophe de Margerie	Sabetta → China/India (NSR year-round)	Sovcomflot / Novatek (operated)	Shadow Fleet — Arc7 LNG Tanker	DESIGNATED	EU-sanctioned. Russia's first Arc7 LNG tanker. Has drifted in Kara Gate area. Individually designate under EO 14024 via SDN listing by IMO number.
Alexey Kosygin	Arctic LNG 2 → Beihai (NSR winter)	Novatek / Zvezda (newly commissioned)	Shadow Fleet — Arc7 LNG Tanker	TARGETABLE	Newly commissioned from Zvezda Shipyard. First domestically completed Arc7. Designate upon formal IMO registration. Cutting off further Arc7 deliveries from Zvezda is the upstream interdiction point.
Buran (ex-North Air)	Yamal LNG / Arctic LNG 2 → China (NSR summer)	Shell company — undisclosed	Shadow Fleet — Arc4 LNG Tanker	DESIGNATED	EU-sanctioned Dec 2024. Previously named North Air. Changed flag to Russia 2025. NSR sailing permission granted 2025. Designate under EO 14024.
Voskhod (ex-North)	Yamal/Arctic LNG	Shell company —	Shadow Fleet —	DESIGNATED	EU-sanctioned Dec 2024. Three name changes. Currently Russian

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Mountain, ex-Samsung 2580)	2 → China (NSR summer)	undisclosed	Arc4 LNG Tanker	TED	flag. Drifting Barents Sea. EO 14024 designation.
Iris (ex-North Sky, ex-North Star)	Yamal/Arctic LNG 2 → China (NSR summer)	Shell company — undisclosed	Shadow Fleet — Arc4 LNG Tanker	DESIGNATED	EU-sanctioned Dec 2024. Multiple name changes. EO 14024 designation.
Zarya (ex-North Way, ex-North Wind)	Yamal/Arctic LNG 2 → China (NSR summer)	Shell company — undisclosed	Shadow Fleet — Arc4 LNG Tanker	DESIGNATED	EU-sanctioned Dec 2024. Multiple name changes. EO 14024 designation.
Valera (ex-Velikiy Novgorod)	Portovaya → Beihai (China) via NSR/Suez	Sovcomflot-affiliated	Shadow Fleet — Conventional LNG Tanker	DESIGNATED	US/UK/EU/Canada/Switzerland sanctioned. AIS dark operations confirmed. Delivered cargo to Beihai Dec 2025. Diverted to Norway Feb 2026. Enforce port denial across allied jurisdictions.
Pioneer	Arctic LNG 2 → Asia (Suez/Cape)	Shell entity — Dubai	Shadow Fleet — Conventional LNG Tanker	DESIGNATED	OFAC-designated Aug 2024. First shadow LNG tanker loading at Arctic LNG 2. AIS spoofing confirmed. 19-year-old vessel (built 2005).
Asya Energy (ex-Trader IV)	Arctic LNG 2 → Asia (Red Sea/Suez)	Same management as Pioneer and Everest Energy	Shadow Fleet — Conventional LNG Tanker	DESIGNATED	OFAC-designated Aug 2024. Flag-hopped Liberia → Palau May 2024. AIS spoofing and offshore bunkering confirmed. Built 2002.
Everest Energy (ex-Metagas Everest)	Arctic LNG 2 → Asia (Red Sea/Suez)	Same management as Pioneer / Asya Energy	Shadow Fleet — Conventional LNG Tanker	DESIGNATED	OFAC-designated Aug 2024. Built 2003. Red Sea crossing confirmed June 2024.
Arctic Metagas	Arctic LNG 2 → China (attempted NSR)	Undisclosed	Shadow Fleet — Conventional LNG Tanker	DESIGNATED	EU-sanctioned May 2025 (17th package). Stuck in East Siberian Sea Aug 2025 — no icebreaker escort. Near-total navigation incompetence in Arctic conditions. Designate under EO 14024. High accident risk.
La Perouse	Arctic LNG 2 → China (NSR)	Undisclosed	Shadow Fleet — LNG Tanker	DESIGNATED	EU-sanctioned. Sailed twice from Arctic LNG 2 to China through western NSR in 2025. EO 14024 designation.
Perle	Portovaya → Malaysia (STS) → Asia	Dreamer Shipmanagement Ltd (Dubai)	Shadow Fleet — LNG Tanker	DESIGNATED	EU-sanctioned. AIS spoofing confirmed Oct 2025 during STS transfer off Malaysia. Managed by Dreamer Shipmanagement, Dubai. Designate Dreamer under CAATSA §226 as FFI-equivalent ship manager.
Mires	NSR: China → St. Petersburg	Undisclosed	Shadow Fleet — Oil Tanker	DESIGNATED	EU/US-sanctioned. No ice class, sailed NSR Sep 2025 WITHOUT icebreaker escort. 20-year-old vessel. Enforce port denial.
Lynx	Murmansk → China (NSR)	Undisclosed	Shadow Fleet — Oil Tanker	DESIGNATED	EU/US-sanctioned. Trapped in Arctic ice for days — loaded with 150,000 tons of oil. No icebreaker booked. Not in NSR Administration public records. 14-year-old vessel. Enforce port denial.
Eagle S	Baltic/NSR routes	Undisclosed	Shadow Fleet — Oil Products Tanker	SEIZED	Seized by Finnish Police/Coast Guard Dec 2024 after suspected deliberate cable damage (Elisa C-Lion1 cable). Under criminal investigation for sabotage. IMO 9449218. Key interdiction precedent.
Fitburg	St. Petersburg → Haifa	Undisclosed	Shadow Fleet — Cargo Ship	SEIZED	Captured by Finnish Coast Guard Dec 2024 carrying sanctioned structural steel. Suspected cable damage. Two crew arrested. Enforcement precedent.

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Seahorse	Caribbean — Venezuela	Undisclosed	Shadow Fleet — Oil Tanker	DESIGNATED	Intercepted by USS Stockdale Nov 2025. Forced to divert to Cuba. Demonstrates US Navy willingness to physically interdict. Enforcement model for Arctic shadow fleet operations.
Yamal LNG — CNPC Stake	Sabetta, Russia	CNPC (20% equity stake in Yamal LNG)	Chinese Equity — LNG	MONITOR	CNPC holds 20% equity in Yamal LNG. This equity position is itself a US sanctions exposure under EO 14024 if Novatek is more broadly designated. CNPC equity stake is the leverage point for secondary sanctions pressure. Value: ~\$3-4B at pre-sanctions valuation.
Arctic LNG 2 — CNOOC/CNOOC Gas Stake	Gydan Peninsula, Russia	CNOOC (10%) + CNOOC Gas (unconfirmed additional)	Chinese Equity — LNG	PARTIAL	CNOOC holds equity in sanctioned facility. CNOOC has not formally withdrawn. US should formally require CNOOC equity divestiture as condition of avoiding secondary SDN designation. Leverage point.
Sakhalin-1 (CNPC via ONGC JV)	Sakhalin, Russia	Rosneft (operator); ONGC (India, 20%); CNPC indirect exposure via downstream offtake	Chinese Equity — Oil	MONITOR	Rosneft designated. Chinese downstream offtake contracts from Sakhalin-1 continue. Monitor contract structure for secondary sanctions exposure.
ICBC — Russian Energy Financing	Beijing, China	ICBC (Chinese state bank)	Chinese Banking — Energy Finance	MONITOR	ICBC provided significant project financing for Arctic energy infrastructure pre-2022. Post-designation, ICBC has reduced direct exposure but indirect financing via Chinese subsidiaries continues. CAATSA §226 pressure point if specific transaction evidence obtained.
Bank of China — Trade Finance	Beijing, China	Bank of China (Chinese state)	Chinese Banking — Trade Finance	MONITOR	Provides trade finance for Russia-China commodity flows. Has maintained USD-clearing exposure cautiously. Target of OFAC informal pressure. Secondary sanctions threat is the primary deterrent instrument.
COSCO Shipping — Shadow Fleet Exposure	Shanghai, China	COSCO Shipping Group (Chinese state)	Chinese Shipping — Potential Exposure	MONITOR	COSCO has publicly distanced from shadow fleet operations following US pressure. Monitor for subsidiary or affiliated vessel management companies providing services to sanctioned tankers. Any confirmed connection triggers EO 14024 secondary designation analysis.
Ingosstrakh — Shadow Fleet Insurer	Moscow, Russia	Ingosstrakh PJSC (partially state-linked via Rosneft/VTB exposure)	Insurance — Shadow Fleet Hull	TARGETABLE	Primary hull insurer for Russian shadow fleet after P&I clubs withdrew. EO 14024 §1(a)(i). Designate to remove insurance coverage from shadow fleet. Without Ingosstrakh coverage, many shadow vessels become uninsurable even in non-Western markets.
Russian National Reinsurance Company (RNRC)	Moscow, Russia	Bank of Russia (state)	Insurance — State Reinsurer	DESIGNATED	RNRC is the state-owned reinsurer of last resort for sanctioned entities. Already under EU/UK sanctions. US should designate under EO 14024 to complete insurance chain disruption.
Palau Ship Registry	Palau (Pacific Islands)	Government of Palau / private registry management	Flag State — Shadow Fleet	MONITOR	Favorite flag state for shadow LNG fleet (Pioneer, Asya Energy). US should apply diplomatic pressure for mandatory AIS compliance and port state control cooperation. Palau is a Compact of Free Association partner — leverage exists.
Gabon Ship Registry	Libreville, Gabon	Government of Gabon / ANUTTC registry	Flag State — Shadow Fleet Oil	MONITOR	Frequently used by shadow oil tankers. US should require flag state cooperation on AIS monitoring or risk Gabon vessels being treated as presumptively sanctioned.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
Cameroon Ship Registry	Yaoundé, Cameroon	Government of Cameroon	Flag State — Shadow Fleet	MONITOR	Secondary flag state for shadow fleet. Diplomatic engagement required.
Dreamer Shipmanagement (Dubai)	Dubai, UAE	Undisclosed — UAE-registered	Ship Manager — Shadow Fleet	TARGETABLE	Manages Perle LNG tanker. No proven compliance record. AIS spoofing confirmed. CAATSA §226 designation as FFI-equivalent ship manager. UAE correspondent bank pressure.
Zvezda Shipyard — Chinese Input Node	Bolshoy Kamen, Primorsky Krai, Russia	Rosneft / Gazprombank (state)	Shipbuilding — Chinese Tech Input	TARGETABLE	TIER I. Chinese optical fiber, steel, navigation systems critical to Arc7 production. Designate Chinese component suppliers under EO 14024 §1(a)(iii). Without Chinese inputs, Arc7 production halts.
Wärtsilä Replacement — Russian ASKU-TP	Moscow (distributed production)	Russian state enterprises (after Western vendor withdrawal)	Industrial Control Systems — Pipeline	MONITOR	Russian ASKU-TP systems replaced Western (Emerson/Honeywell/Schneider) ICS on ESPO pipeline following vendor withdrawal. Monitor for vulnerability mapping of non-hardened domestic ICS. Potential cyber vector for pipeline disruption.
GTT Membrane License — Chinese Substitute	France / China	GTT (France) — license; Chinese shipyards attempting substitute	LNG Tech — Membrane License	MONITOR	GTT (France) withdrew licensing for Arctic LNG 2 membrane containment systems. Russia and China are attempting to develop a domestic substitute for GTT membrane technology. Monitor Chinese shipyard (Hudong-Zhonghua) membrane system development as potential sanctions gap.
Samsung / Hyundai Arc7 Propulsion Gap	South Korea	Samsung Heavy Industries / HD Hyundai	Shipbuilding — Azipod Propulsion	MONITOR	Samsung Heavy Industries withdrew from Arc7 program under US/EU sanctions pressure. Russia/Zvezda attempting to produce Azipod-type thrusters domestically. Monitor Chinese propulsion system suppliers (CSSC) for potential substitute supply. Any Chinese Azipod-equivalent export to Zvezda is a secondary sanctions trigger.
Shenzhen Component Cluster — HK OTC Downstream	Shenzhen, Guangdong, China	Multiple Chinese electronics manufacturers	Dual-Use Tech — Missile/Navigation Components	TARGETABLE	TRM Labs / Chainalysis graph tracing shows USDT flows from sanctioned Moscow wallets terminating at Shenzhen electronics firms after multiple layering hops via HK OTC cluster (blockchain analytics methodology; specific hop count is an estimate based on Chainalysis/TRM Labs reporting; verify against primary source before citing). Identify specific firms receiving >90% of funds from single sanctioned source; designate under EO 14024 §1(a)(iii).
Aeza Group — Bulletproof Hosting	Distributed (Russia/Netherlands/Germany ASNs)	Aeza Group (Russian-operated, Netherlands-registered)	Cyber Infrastructure — Bulletproof Hosting	TARGETABLE	IEEPA §1702. Hosts ABCeX and Aifory Pro exchange interfaces. Issue Tier 1 ISP de-peering directive simultaneously with Tether freeze. Target ASNs: AS210644, AS215902. Netherlands registration creates EU coordination requirement.
Media Land LLC — Bulletproof Hosting	Moscow (distributed ASNs)	Media Land LLC (Russian-registered)	Cyber Infrastructure — Bulletproof Hosting	TARGETABLE	IEEPA §1702. Primary bulletproof hoster for Russian cybercrime/sanctions evasion infrastructure. US, Australia, and UK designated Media Land in a trilateral action on November 19, 2025 — not early 2026. Complete Tier 1 ISP de-peering to physically deplatform exchange interfaces.
Skovorodino ESPO Fork			Unknown	MONITOR	EO 14024 — Single switch for all ESPO land oil to China (~30M tons/yr). Cannot be rerouted within any operationally relevant timeframe.
Zvezda Shipyard			Unknown	MONITOR	EO 14024 + Secondary — Russia's ONLY Arc7 facility. Without Arc7 production, Arctic LNG is ice-locked in winter. Chinese component supply is the upstream interdiction point.

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ABCeX (hosting + freeze simultaneously)			Unknown	MONITOR	GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) + IEEPA — \$11B+ current settlement. MUST target via hosting embargo + Tether freeze simultaneously — entity designation alone repeats Garantex failure.
Ingosstrakh (shadow fleet insurance)			Shadow Fleet	MONITOR	EO 14024 — Primary hull insurer for Russian shadow fleet. Designation removes insurance coverage and effectively grounds vessels across non-Western markets.
Tether USDT On/Off Ramp (Russia-China corridor)	BVI / El Salvador (global)	Tether Operations Ltd	Crypto / Finance	TARGETABLE	GENIUS Act §4(a)(5)(A) [Pub. L. 119-27, effective July 18, 2025 — implementing regulations pending as of March 2026]; BSA; EO 14024 — GENIUS Act mandates BSA treatment — Permitted payment stablecoin issuers under the GENIUS Act are subject to BSA treatment with mandatory sanctions screening and freeze/burn/seize capability. OFAC demand letter for identified sanctioned wallet cluster freeze is legally grounded post-Jul 2025. Priority: task TRM Labs cluster analysis to identify USDT wallets with >80% transaction volume traceable to sanctioned Russian sources; submit freeze demand to Tether under GENIUS Act §4(a)(5)(B).
Hong Kong OTC Crypto Cluster	Hong Kong SAR, China	Multiple SFC-licensed VATPs; shell-structured resellers	Crypto / Finance	MONITOR	EO 14024 §1(a)(iii); EO 13382; GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) — Correspondent banking pressure on HSBC/StanChart/Hang Seng is the primary lever — these banks have dollar clearing exposure and cannot afford OFAC secondary sanctions designation. Parallel: OFAC advisory identifying specific OTC desks as high-risk. EU 19th package imposed transaction bans on certain third-country banks and oil traders, including operators in Hong Kong. Replicate designation approach at OFAC level. TRM Labs blockchain analytics required first to identify specific desk wallet clusters.
Crypto Index / Structured Derivative Products	Hong Kong / Cayman Islands	HK-licensed fund managers (undisclosed); Cayman-registered SPVs	Crypto / Finance	MONITOR	EO 14024 §1(a)(iii); GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) BSA — Post-GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) BSA paper trail enables nexus determination. Enforcement theory: §1(a)(iii) — financial services benefiting blocked person (BitRiver/A7A5) indirectly through structured products. OFAC PDVSA bond precedent applies. Action: identify HK-licensed fund managers with documented BitRiver compute or A7A5 settlement exposure; build §1(a)(iii) designation package. SEC coordination required for any US-nexus fund investors.
COFCO / Sinograin Grain Purchases (Zabaykalsk)	Shanghai / Beijing, China	COFCO Group (Chinese state); China Grain Reserves (Sinograin)	Unknown	MONITOR	EO 14024 §1(a)(iii); Section 301 tariffs — Highest-volume yuan-denominated channel. No dollar nexus by design. Enforcement theory: secondary sanctions on specific COFCO/Sinograin subsidiaries if transaction-level evidence establishes Russian sanctioned-entity revenue benefit. Not yet attempted. Requires transaction-level evidence (cargo manifests, settlement records). Section 301 tariff action on Russian-origin agricultural goods re-exported through China is the lower-threshold parallel action available now.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
Sinochem / PetroChina Russian Oil Offtake	Beijing / various, China	Sinochem Holdings; PetroChina (CNPC subsidiary)	Unknown	MONITOR	EO 14024 §1(a)(iii); EO 14114 §11 — PetroChina/Sinochem purchase Russian crude at volumes that directly sustain Rosneft (now fully designated) revenue. Post-Oct 2025 Rosneft designation, any entity providing material support to Rosneft is reachable under EO 14024 §1(a)(iii). EO 14114 §11 secondary sanctions apply to FFIs facilitating significant transactions with blocked Rosneft. Action: build transaction-level evidence package for PetroChina crude purchases from designated Rosneft entities; issue secondary sanctions warning; escalate to designation if purchases continue.
Grinex/Meer A7A5 Stablecoin (Kyrgyz corridor)	Bishkek, Kyrgyzstan	Undisclosed Russian beneficial owners via CIS nominee structures; Keremet Bank; Capital Bank	Crypto / Finance	MONITOR	CAATSA §226; GENIUS Act §18 [Pub. L. 119-27, effective July 18, 2025 — foreign issuer designation implementing regulations pending as of March 2026]; 31 U.S.C. §5318A (Section 311) — Three-track approach: (1) FinCEN Section 311 special measure against Kyrgyz FFIs — immediate, unilateral, no multilateral consensus required. Triggers mandatory EDD on all US correspondent relationships with Kyrgyz banks. (2) GENIUS Act §18 [Pub. L. 119-27, effective July 18, 2025 — foreign issuer designation implementing regulations pending as of March 2026] foreign issuer designation — bars US platforms from facilitating secondary trading of A7A5. (3) CAATSA §226 designation of Keremet Bank and Capital Bank as FFIs providing significant financial services to sanctioned Russian entities. Do not rely on FATF re-referral as primary instrument — 18-24 month timeline is too slow.
Aeza Group / Media Land ASN Infrastructure	Netherlands/ Germany ASNs; Moscow (distributed)	Aeza Group (NL-registered, Russian-operated); Media Land LLC	Cyber Infrastructure	MONITOR	IEEPA §1702; EO 14024 §1(a)(iii); EU Reg. 833/2014 — Bulletproof hosting for ABCeX, Aifory Pro, and Russian cybercrime/evasion infrastructure. ASNs: AS210644, AS215902 (Aeza); Media Land distributed. Action: simultaneous Tier 1 ISP de-peering directive + Tether wallet freeze — NOT sequential entity designation, which replicates the Garantex failure. Netherlands registration requires EU coordination for de-peering. US can execute IEEPA §1702 ISP direction unilaterally for US-nexus routing; EU coordination required for European ASN de-peering.
ICBC / BOC Trade Finance (residual exposure)	Beijing, China	Industrial and Commercial Bank of China; Bank of China (Chinese state)	UAE Transshipment	MONITOR	EO 14114 §11; CAATSA §226 — Tier-1 Chinese state banks have largely self-segmented from direct dollar-clearing on Russia transactions. Residual exposure exists through: (1) yuan-denominated trade finance with Russian commodity exporters; (2) indirect dollar clearing via third-country correspondent chains (UAE, Turkey, Kazakhstan). EO 14114 §11 secondary sanctions deterrence is the primary instrument. Action: OFAC informal communication to compliance functions at ICBC/BOC identifying specific transaction categories that would trigger secondary sanctions review — without formal designation, this has historically produced behavioral change faster than public enforcement.
Nayara Energy (Vadinar Refinery)	Vadinar, Gujarat, India	Rosneft (49.13% via Singapore holdco); Trafigura; UCP	India Transshipment	MONITOR	EO 14024 §1(a)(i)/(iii); OFAC 50% rule / control standard — Post-Oct 2025 Rosneft designation creates 49.13% ownership analysis. Below automatic 50% blocking threshold but OFAC control standard may apply: board composition, operational direction, and ~80%+ Russian crude dependency are evidentiary basis for control determination.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					This is the single most consequential unresolved designation question in the post-Rosneft blocking environment. Action: OFAC formal control determination analysis; if control established, Nayara becomes a blocked entity — 20 MTPA refinery, 6,500 retail outlets, cascading impact on Indian fuel supply. Requires diplomatic pre-coordination with New Delhi before any public action.
Indian Oil Corporation — Russian Crude Offtake	New Delhi, India	Indian Oil Corporation (Indian state, 52% Gov owned)	India Transshipment	MONITOR	EO 14024 §1(a)(iii); EO 14114 §11 — IOC is the largest single purchaser of Russian crude in India, buying at significant discounts to Brent. Post-Rosneft SDN designation, IOC purchases from designated Rosneft entities are potentially reachable under EO 14024 §1(a)(iii) material support theory. EO 14114 §11 secondary sanctions deterrence applies to IOC's dollar-clearing correspondent banks. India-US strategic relationship creates high political constraint — enforcement action against IOC directly would be diplomatically damaging. Preferred approach: informal OFAC communication to IOC compliance function identifying specific transaction categories at risk; escalate if purchases from designated Rosneft entities continue after wind-down period.
UCO Bank / Yes Bank Vostro Accounts (INR-RUB settlement)	Kolkata / Mumbai, India	UCO Bank (Indian state); Yes Bank (private); IndusInd Bank	India Transshipment	MONITOR	CAATSA §226; EO 14024 §1(a)(iii) — Indian banks operating Vostro accounts for Russian correspondent banks are providing significant financial services to sanctioned Russian entities — CAATSA §226 theory. Russia has accumulated estimated \$40B+ rupee surplus; conversion pathways create dollar nexus. Action: OFAC informal communication to specific Indian banks operating largest Vostro balances, identifying Vostro account operations for sanctioned Russian entities as CAATSA §226 exposure. Formal designation of Indian state banks is politically constrained but informal pressure has historically moved RBI. Target the banks with largest Vostro balances and most direct Russian sanctioned-entity relationships.
Litasco Middle East DMCC (Lukoil shadow fleet enabler)	Dubai, UAE	Lukoil (Russian state-linked)	UAE Transshipment	MONITOR	EO 14024 §1(a)(iii); EU 19th package (designated) — EU-designated in 19th package (Oct 2025) as Lukoil's primary shadow fleet enabler. Lukoil now fully SDN-designated (Oct 2025). Litasco Middle East DMCC manages shadow fleet tanker operations from Dubai. OFAC has not yet designated — gap. Action: EO 14024 §1(a)(iii) designation of Litasco Middle East DMCC as entity providing material support to designated Lukoil. EU designation is the precedent; US designation should follow immediately to close the gap and prevent US-nexus transactions.
Dreamer Shipmanagement Ltd (shadow fleet manager)	Dubai, UAE	Undisclosed beneficial owners	UAE Transshipment	MONITOR	EO 14024 §1(a)(iii); CAATSA §226 — Manages Perle LNG tanker (EU-sanctioned). AIS spoofing confirmed Oct 2025 during STS transfer off Malaysia. No US designation yet. Action: EO 14024 §1(a)(iii) designation. Simultaneously apply CAATSA §226 to UAE correspondent banks servicing Dreamer accounts — specifically Emirates NBD and Mashreq Bank, which have dollar-clearing exposure and are sensitive to secondary sanctions risk. UAE FATF compliance pressure is a parallel lever.
UAE Russian Crude Re-	Fujairah / Dubai,	Multiple UAE-	UAE	MONITOR	EO 14024 §1(a)(iii); price cap enforcement via G7 coalition —

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
Export Channel	UAE	registered commodity traders; Gunvor UAE; shadow fleet STS operations	Transshipment	R	Russian crude purchased below price cap (\$60/bbl), shipped to Fujairah STS zone, blended or rebranded as UAE-origin, resold above cap into Western-adjacent markets. This is a price cap violation, not necessarily a primary sanctions violation for non-US persons. Enforcement theory: G7 price cap coalition enforcement against shipping service providers (insurers, brokers, freight forwarders) who knowingly facilitate above-cap transactions. US-nexus exists through dollar-denominated commodity contracts. Action: identify specific UAE trading firms with documented above-cap Russian crude transactions; apply EO 14024 §1(a)(iii) to entities providing commodity trading services that benefit designated Rosneft/Lukoil.
UAE Private Banking / Real Estate (oligarch asset shelter)	Dubai / Abu Dhabi, UAE	Multiple UAE private banks; real estate developers; shell company formation agents	UAE Transshipment	MONITOR	EO 14024 (asset freeze — blocked persons); UAE FATF obligations — UAE functions as primary Western-adjacent shelter for sanctioned Russian oligarch assets: real estate (estimated \$4-7B Russian-linked property purchases since 2022), private banking, shell company formation. UAE FATF grey-listing removal (Feb 2024) created compliance pressure but enforcement is inconsistent. Enforcement leverage: UAE's dependence on dollar clearing and FATF white-list status. Action: targeted OFAC advisory to UAE financial institutions identifying Russian oligarch asset sheltering as high-risk category; follow with specific beneficial ownership requests through bilateral AML cooperation; escalate to CAATSA §226 against specific UAE banks with identified sanctioned oligarch accounts if bilateral engagement fails.
Turkey — Financial Transit and Energy Re-Export	Istanbul / Ankara, Turkey	Ziraat Bank; Halkbank; BOTAS (energy); multiple commodity traders	UAE Transshipment	MONITOR	CAATSA §226; EO 14024 §1(a)(iii); EO 14071 — Turkey functions as a secondary UAE — financial transit hub, energy re-export node (TurkStream gas), and sanctions evasion financial services provider. Turkish state banks (Ziraat, Halkbank) have maintained Russian correspondent relationships and process significant Russian transaction volume. CAATSA §226 is the primary authority — both banks have dollar-clearing exposure. Halkbank has prior US prosecution history (Iranian sanctions evasion) making it acutely sensitive to secondary sanctions pressure. Action: CAATSA §226 informal pressure on Ziraat/Halkbank compliance functions; identify specific transaction categories (Russian energy payments, oligarch asset transfers) that trigger secondary sanctions review.
UAE Gold Export and Laundering Hub	Dubai / Abu Dhabi, UAE	Multiple UAE-registered gold refineries and trading companies; undisclosed Wagner-linked trading entities	UAE Transshipment	MONITOR	E.O. 14024 (Russia nexus); UAE FATF obligations; E.O. 13581 — UAE is the primary export destination for Wagner-origin African gold from CAR, Sudan, and Mali — \$2.5B+ since 2022. UAE's lax AML regulation on artisanal gold trade creates primary enforcement gap. UAE FATF white-list status creates leverage. Action: OFAC advisory to UAE financial institutions identifying Wagner-origin gold trade as high-risk; bilateral AML engagement with UAEFIU requiring enhanced due diligence on African gold imports from CAR/Sudan/Mali; FATF mutual evaluation follow-up on UAE gold sector AML compliance.
PMF-Affiliated Crypto Fundraising Layer	Global (Iraq, Lebanon, Iran)	Undisclosed PMF-affiliated crypto	Crypto Fundraising /	TARGETABLE	EO 13224; GENIUS Act §4(a)(5)(A) [Pub. L. 119-27, effective July 18, 2025 — implementing regulations pending as of March 2026]; BSA

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
		facilitators; Hezbollah-linked exchange houses	Evasion		§5318A — IRGC-aligned PMF factions have adopted crypto fundraising following SWIFT exclusion. TRM Labs has traced PMF-linked wallet clusters.
Garantex / ABCeX Server Infrastructure — Moscow City	Moscow International Business Center (Federation Tower area), Moscow	Undisclosed Russian principals	Crypto / Finance	DESIGNATED	GENIUS Act + EO 14024. Garantex OFAC-designated 2022 — still operating via mirror wallets (~\$10B/yr). ABCeX successor (\$11B+ processed). Server infrastructure hosted on Aeza Group (Netherlands-registered) and Media Land LLC ASNs. IEEPA §1702 de-peering orders required simultaneously with Tether freeze. DO NOT designate ABCeX entity alone — hosting embargo + GENIUS Act §4(a)(5)(A) [Pub. L. 119-27, effective July 18, 2025 — implementing regulations pending as of March 2026] Tether freeze must be simultaneous.
Binance — Former Primary Russian Crypto On-Ramp (Dubai HQ)	Dubai, UAE	Binance Holdings Ltd (Changpeng Zhao, formerly)	Crypto / Finance	PARTIAL	Binance pleaded guilty Nov 2023 to BSA violations — \$4.3B settlement. Now under 5-year monitorship. CZ sentenced to 4 months. Binance has been a primary on/off ramp for Russian USDT flows to sanctioned entities. Post-monitorship compliance monitoring. Key: any Russian-nexus flows through Binance post-settlement create enhanced criminal exposure for the company. OFAC coordination with FinCEN monitorship team.
Strait of Hormuz — Iranian Maritime Chokepoint	Strait of Hormuz, Persian Gulf	International waters — Iranian naval presence	Iran Sanctions Evasion	MONITOR	EO 13599. 20% of global oil transit. Iran has threatened/executed seizures of vessels for leverage. Iranian shadow fleet of ~150+ tankers evades oil price cap through STS transfers in the Gulf of Oman/Strait area. Monitor for vessel dark periods, flag changes, and STS transfers via commercial AIS. Sa'id al-Jamal network routes Iranian crude to Chinese Shandong teapot refineries through this corridor. IFCA/ISA authorities.
Kharg Island Oil Terminal — Iran Crude Export Hub	Kharg Island, Persian Gulf, Iran	NIOC — National Iranian Oil Company (state)	Iran Sanctions Evasion	DESIGNATED	EO 13599. Iran's primary crude oil export terminal. 90%+ of Iranian crude exports originate here. NIOC designated. Monitor vessel traffic via commercial AIS for shadow fleet STS transfers in surrounding waters. Sa'id al-Jamal Adeema Oil network collects crude here for routing to China. CISADA §104(c) for non-US purchasers.
Sa'id al-Jamal Network — UAE Operations Hub	Dubai / Fujairah, UAE	Sa'id al-Jamal (IRGC-QF linked, SDGT); Adeema Oil FZC; Arkan Mars Petroleum DMCC	Iran Sanctions Evasion	DESIGNATED	EO 13224. Sa'id al-Jamal SDGT designated. Routes Iranian crude to Chinese Shandong teapot refineries via UAE front companies. Adeema Oil FZC and Arkan Mars Petroleum DMCC designated. Shandong Province Chinese refineries are the end destination — monitor for secondary sanctions pressure on Shandong buyers. HIFPA/IFCA authorities. CAATSA §226 on UAE FFIs processing payments.
Power of Siberia 1 — Atamanskaya Compressor Station (Russian Side)	Blagoveshchensk area, Amur Oblast, Russia	Gazprom (state)	Natural Gas	TARGETABLE	EO 14024. Primary compressor station on Russian side of PoS1 pipeline at the Chinese border crossing. Reached full capacity ~38 BCM/yr late 2025. Gazprom designated. Critical node for any gas supply interdiction action — disruption at compressor station severs PoS1 before it crosses. Designate Gazprom operating subsidiary running this station.
Novatek LNG — Portovaya Terminal	Portovaya Bay, Leningrad Oblast,	Novatek (majority)	LNG Terminal	PARTIAL	EO 14024. Portovaya is Novatek's Baltic LNG terminal. Valera (designated) delivered Portovaya cargo to Beihai China Dec 2025

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
(Baltic LNG)	Russia				and Jan 2026. Partial EU/US sanctions. EU LNG import ban on short-term contracts effective Apr 25 2026 affects Portovaya-origin cargoes. Monitor AIS for ongoing Portovaya-to-Asia shadow fleet operations.
Hmeimim Air Base — Russia Syria (Latakia)	Latakia, Syria	Russian Aerospace Forces / MoD	Russia Military — Overseas Base	MONITOR	EO 14024. Russia's primary Middle East air base. Operational since 2015. Su-35, Su-34, Su-24 aircraft. S-400 SAM system. Wagner/Africa Corps logistics hub for Africa operations. Used for ISR over Eastern Mediterranean and Africa Corps deployment staging. Commercial satellite imagery (Planet Labs) shows aircraft and rotary wing assets continuously. Hmeimim is the logistics origin point for all Russia Africa Corps deployments — interdiction of Russian military cargo flights through Hmeimim would significantly constrain Africa Corps operational reach.
Tartus Naval Base — Russia Syria	Tartus, Syria	Russian Navy	Russia Military — Overseas Base	MONITOR	EO 14024. Russia's only Mediterranean naval base. Pier infrastructure expanded 2017-2020. Hosts SSK submarines and surface combatants for Mediterranean patrol. Loss of Tartus access would force Russian Navy to transit Bosphorus for every Mediterranean deployment — Montreux Convention complication. Monitor for SLCM (Kalibr) launch preparation via satellite thermal signature. Tartus provides Russia with persistent Mediterranean presence without Black Sea basing vulnerability. EU 19th sanctions package restrictions on Russian naval logistics apply.
Kamaran Island — Houthi/IRGC Maritime Staging (Yemen)	Kamaran Island, Red Sea, Yemen	Houthis (IRGC-supported)	Iran Sanctions Evasion	DESIGNATED	EO 13224. Houthi-controlled island used as maritime staging for Red Sea operations including drone and missile attacks on commercial shipping (2023-2026). IRGC-QF weapons supply chain runs through this area. Satellite imagery has documented weapons transfers and small boat operations. US/UK OPERATION POSEIDON ARCH maritime interdiction operations targeting weapons shipments in this corridor. UN Panel of Experts documentation. Designation of Houthi maritime units under EO 13224. P&I denial for vessels supplying Kamaran. CBP Do Not Load orders for vessels with Kamaran port calls.
IRGC-QF Baghdad Station — Embassy Cover	Baghdad, Iraq (Iranian Embassy / IRGC-QF offices)	IRGC-Quds Force (SDGT/FTO)	Iran Sanctions Evasion	DESIGNATED	EO 13224 / EO 13382. IRGC-QF Baghdad station is the primary operational hub for Iran's Iraq policy — PMF coordination, weapons distribution, financial transfers to KH/AAH/other Iraqi proxy groups. Embedded within Iranian diplomatic mission. Post-Soleimani (Jan 2020), IRGC-QF reorganized Iraq operations under successor commanders. PMF state budget appropriation (~\$2.5B/yr from Iraqi government) is the primary financial mechanism. Target specific PMF faction finance networks rather than the state appropriation. FinCEN §314(a) requests to Iraqi financial institutions processing KH/AAH payroll.
IRGC-QF Damascus Station	Damascus, Syria (Iranian Embassy / IRGC-QF)	IRGC-Quds Force (SDGT/FTO)	Iran Sanctions Evasion	DESIGNATED	EO 13224. IRGC-QF primary Syria hub. Hezbollah weapons pipeline coordination. Assad's fall (December 2024) has significantly disrupted the Damascus-Beirut weapons corridor. IRGC-QF presence in Syria substantially reduced post-HTS takeover. Monitor for reconstitution of weapons transit routes through new Syrian governance. New HTS-led Syrian government has incentive to limit IRGC presence. Financial

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					pressure: EO 13224 designation of any IRGC-QF entities attempting to reconstitute Syria presence. Coordinate with HTS-linked Syrian authorities on IRGC-QF asset identification.
GRU Unit 29155 — Vienna Operations Hub	Vienna, Austria	GRU Unit 29155 / Russian Embassy Vienna	Russia Military — Intel Operations	MONITOR	EO 14024. GRU Unit 29155 — responsible for Salisbury poisoning (Novichok 2018), Skripal assassination attempt, Montenegro coup attempt (2016), multiple Western European assassinations and destabilization operations. Vienna is historically a primary GRU European hub due to Austria's neutral status and historically permissive counterintelligence environment. Multiple 29155 officers documented by Bellingcat/The Insider via passport database analysis. Officers designated by US/EU/UK. Coordinate with Austrian BVT for enhanced monitoring. Global Magnitsky designations for identified 29155 officers.
GRU Unit 26165 (Fancy Bear) — Khimki/Moscow	Khimki, Moscow Oblast, Russia	GRU Unit 26165 (APT28 / Fancy Bear)	Russia Military — Cyber	DESIGNATED	EO 13694 (as amended EO 14306, 90 FR 24723). GRU Unit 26165 — responsible for DNC hack (2016), Macron campaign hack (2017), German Bundestag hack (2015), multiple NATO nation election interference operations. Unit physically located at GRU headquarters complex, Khimki. Officers indicted by DOJ Mueller investigation, Jul 2018. 12 named officers designated. Monitor for spearphishing campaigns targeting policy research institutions. Coordinate with CISA for defensive measures against Unit 26165 TTPs. EU cyber sanctions regime parallel action for European election interference.
SVR Headquarters — Yasenevo, Moscow	Yasenevo, Moscow, Russia	SVR RF (Foreign Intelligence Service)	Russia Military — Intel Operations	DESIGNATED	EO 14024. SVR RF — Russia's foreign intelligence service. Directorate S (illegals program), Directorate X (scientific/technical intelligence). Post-Ukraine, SVR active in Western financial system mapping, sanctions evasion route identification, and energy market manipulation intelligence. The SVR's targeting of Western financial enforcement architecture is directly relevant to sanctions evasion network resilience. Monitor for SVR influence operations targeting Western policy institutions and sanctions enforcement agencies. Coordinate with allied services on SVR illegal officer identification.
Iran Shahed Drone Production — Isfahan Province	Isfahan Province, Iran	IRGC / HESA (Iran Aviation Industries Organization)	Iran Sanctions Evasion	DESIGNATED	EO 13382 / EO 13224. Shahed-136 (Geran-2 in Russian designation) production. Iran has supplied thousands of Shaheds to Russia for Ukraine use. Facility in Isfahan industrial area. Component supply chain: Chinese microelectronics, Iranian-domesticated propulsion. OFAC designated HESA and associated entities. Secondary sanctions on Chinese microelectronics suppliers identified in Shahed components by Ukrainian and Western intelligence. Export control violations: EAR 15 C.F.R. §744.21 for US-origin components found in Shahed circuit boards. Coordinate with allied export control agencies for supply chain interdiction of Chinese component manufacturers.

II. BRI / PRC Military Expansion

Belt and Road Initiative confirmed, negotiating, financial leverage, and digital infrastructure nodes

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
PRC Dual-Use Procurement Network — Missiles and UAVs	Shenzhen / Guangdong, China	Shenzhen Boyu Imports and Exports Co. (designated Oct 2 2024); Shenzhen Jinghon Electronics (designated); Shenzhen Rion Technology Co. (designated)	Unknown	DESIGNATED	E.O. 13224; EAR Entity List; E.O. 13224 §1(a)(iii) — PRC-based suppliers provide missile and UAV components enabling Houthis Red Sea attacks on commercial shipping. Shenzhen Boyu: multiple documented shipments of dual-use components for weapons production. All three firms designated under E.O. 13224. Action: EAR Entity List additions concurrent with OFAC designations; identify and designate successor PRC entities as Shenzhen network reconstitutes under new company names; BIS/OFAC simultaneous action protocol applies.
PLA Navy Support Base — Djibouti	Djibouti, Horn of Africa	People's Liberation Army Navy (PLAN)	PRC Military — Overseas Basing	MONITOR	China's first and currently only acknowledged overseas military base. Operational since 2017. Docks for PLA Navy vessels. Naval gun systems. Collocated with US Camp Lemonnier — intelligence sensitivity high. Controls Bab-el-Mandeb approach. Monitor for expansion: dock lengthening, weapons storage, hardened infrastructure. Officially framed as logistics support facility — assessed as functional military base. EO 13849 potential nexus if base enables Chinese interference with Red Sea shipping. PLA Navy vessels transiting from this base provide pre-positioning capability for any Chinese intervention in Hormuz crisis scenario.
Ream Naval Base — PRC Military Construction (Cambodia)	Ream, Preah Sihanouk Province, Cambodia	Royal Cambodian Navy / PRC construction (suspected exclusive access)	PRC Military — Overseas Basing	MONITOR	Pentagon 2023 report documented Chinese construction activity at Ream. Cambodia denied exclusive Chinese access but US intelligence assessed PRC military use. South China Sea adjacent — potential PLA Navy South Sea Fleet forward staging. US suspended military aid to Cambodia (2017) over Hun Sen political alignment. Monitor for pier construction capable of accommodating PLA Navy surface combatants via commercial satellite. EO 13849 nexus via coercive Chinese economic influence on Cambodia. Ream base would provide PLA Navy with South China Sea access independent of Chinese mainland basing.
Gwadar Port — PRC CPEC / Potential Dual-Use	Gwadar, Balochistan, Pakistan	China Overseas Port Holding Company (COPHC) / Government of Pakistan	PRC Military — Overseas Basing	MONITOR	CPEC terminus. Chinese state operator (COPHC). 40-year lease. Pakistan naval facility collocated. Pentagon reports assess potential future PLA Navy access. 70-80km from Iran Makran complex Node 7 — CPEC-Makran adjacency flagged in WP-2026-INFRA-01 as INFERRED nexus requiring financial intelligence corroboration. CAATSA §9241 potential if Chinese state-affiliated intermediaries connect CPEC to Makran complex. Monitor: pier expansion, submarine infrastructure, hardened storage via Sentinel-2. AIS overlap between Gwadar and Makran Node 7 vessel calls should be monitored continuously.
PRC Military-Civil Fusion — Huawei Marine Networks	Shenzhen, Guangdong, China	Huawei Marine Networks (HMN Technologies) — Huawei subsidiary	PRC Military — Dual-Use Tech	TARGETABLE	HMN Technologies (formerly Huawei Marine Networks) — world's 4th largest submarine cable manufacturer, ~10% global market share. US Commerce Department entity list consideration ongoing. Cable infrastructure built by HMN provides potential intelligence access at

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					landing stations. Clean Cable initiative and US diplomatic pressure documented. Multiple allied nations have rejected HMN contracts under US pressure. EO 13873 (ICT supply chain security) basis for further restrictions. FCC has prohibited HMN from landing new cables in the United States. Secondary sanctions pressure on governments accepting HMN cable contracts.
PRC Overseas Police 'Service Stations'	Multiple countries (Spain/Europe representative centroid)	Fujian Provincial Public Security Bureau / PRC state	PRC Military — Covert Operations	MONITOR	Safeguard Defenders (NGO) documented 50+ PRC overseas police stations in 2022 across Europe, Americas, Asia. Framed as voluntary services for Chinese diaspora — assessed by multiple Western intelligence services as covert PRC law enforcement operations for transnational repression, intelligence collection, and pressure operations against dissidents. Multiple countries (Ireland, Netherlands, UK, Canada) have conducted raids or ordered closures. FARA and 18 U.S.C. §951 (illegal foreign government agent) basis in US context. FBI has investigated US-based operations. DOJ indicted two individuals Oct 2022 for Manhattan operation.
PRC 'Police Station' — New York (Closed/Investigated)	New York City, USA	Fujian Association / PRC MPS (suspected)	PRC Military — Covert Operations	MONITOR	DOJ indicted two individuals Oct 2022 for operating undeclared PRC law enforcement post in Manhattan (110 Grand Street area). Charges: acting as illegal agents of Chinese government under 18 U.S.C. §951. Safeguard Defenders documented as part of global network. Station officially closed but investigation ongoing. FARA / 18 U.S.C. §951 (illegal foreign government agent). FBI field office active case. Broader US-based PRC transnational repression infrastructure targeting Chinese dissidents, Uyghurs, Hong Kong activists, and Taiwanese nationals on US soil.
PRC Overseas Police Network — Dublin (Closed 2023)	Dublin, Ireland	Fujian Provincial PSB / PRC state (denied)	PRC Military — Covert Operations	MONITOR	Garda (Irish police) ordered closure 2023. One of most publicly documented PRC overseas police stations in Europe — 7 Capel Street. Operated as volunteering service center for Chinese nationals. Safeguard Defenders documentation. Irish government confirmed closure. Representative node for European PRC transnational repression network. Five Eyes intelligence sharing on this network active. EU member state law enforcement coordination via Europol for mapping remaining operational PRC police station network across Europe.
PRC BRI Port — Hambantota, Sri Lanka	Hambantota, Southern Province, Sri Lanka	China Merchants Port Holdings (99-year lease from 2017)	PRC Military — Overseas Basing	MONITOR	99-year lease to China Merchants Port (state-owned) after Sri Lanka defaulted on Chinese loans. Pentagon and Indian Navy assess potential future PLA Navy dual-use. Indian Ocean strategic position — proximate to major SLOCs. Sri Lanka has resisted PLA Navy docking requests under US and Indian pressure. Monitor for any port infrastructure expansion indicating military rather than commercial use via commercial satellite. Debt-trap diplomacy model — significant for understanding PRC BRI strategic pattern. US and India coordinate diplomatic pressure on Colombo to prevent PLA Navy access.
PRC BRI — Obock, Djibouti (Second Base Negotiation)	Obock, Djibouti	PRC (negotiating second base)	PRC Military — Overseas Basing	MONITOR	Reports (2021-2023) indicate PRC negotiating second Djibouti facility at Obock, north of Camp Lemonnier. Would provide larger pier infrastructure capable of accommodating aircraft carriers. Djibouti President Guelleh has played US, France, China, and Japan against

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					each other for maximum rent-seeking. Monitor for construction activity via Sentinel-2. Colocation with JSOC/AFRICOM infrastructure creates acute ISR sensitivity. US response: enhanced Djibouti basing agreement and economic assistance package to counter Chinese offer.
Equatorial Guinea — PRC Naval Facility Attempt (Bata)	Bata, Equatorial Guinea	PRC (negotiations blocked by US pressure 2021-2022)	PRC Military — Overseas Basing	MONITOR	Wall Street Journal (Dec 2021) reported US intelligence assessed China was secretly negotiating a military facility at Bata port. US conducted high-level diplomatic intervention to prevent establishment. Equatorial Guinea subsequently distanced from deal — not confirmed closed permanently. Atlantic-facing PLA Navy base would be a strategic first — coverage of US East Coast SLOC. Monitor for resumed negotiations. US State Department has made explicit diplomatic demarches to Equatorial Guinea on this issue.
Solomon Islands — PRC Security Pact (Honiara)	Honiara, Guadalcanal, Solomon Islands	Government of Solomon Islands / PRC (security agreement Apr 2022)	PRC Military — Overseas Basing	MONITOR	PRC-Solomon Islands security framework signed April 2022 — allows Chinese naval vessels and security forces to be deployed. Australia, New Zealand, US, and Japan protested strongly. Strategic position: between Australia and major US Pacific SLOC. Prime Minister Sogavare has since moderated rhetoric but agreement remains. Monitor for any PRC naval vessel port calls or facility construction via commercial satellite. AUSMIN identified as priority concern. US opened new embassy in Honiara 2023 as direct response to PRC security agreement.
Chancay Port — Cosco Shipping Pacific Hub	Chancay, Lima Region, Peru	Cosco Shipping Ports (China, 60% stake); Volcan Compania Minera (Peru, 40%)	BRI — Tier 1 Confirmed	MONITOR	First Chinese-owned deep-water port on Pacific coast of South America. Operational November 2024. Cosco Shipping Ports (Chinese state-owned) holds 60% controlling stake. 1 million TEU capacity at opening, expandable to 3.5 million TEU. Direct implications for US logistics in hemisphere — reduces Chinese supply chain dependence on US-controlled Panama Canal routing. CFIUS effective-control test applies: Cosco is COSCO Group subsidiary, directly state-controlled. EO 13873 and EO 13849 potential basis. Monitor for PLA Navy vessel calls. Coordinate with Peru on port security standards.
Gwadar Deep-Water Port — CPEC Maritime Terminus	Gwadar, Balochistan, Pakistan	China Overseas Port Holding Company (COPHC) — 40-year lease	BRI — Tier 1 Confirmed	MONITOR	CPEC maritime terminus. COPHC (Chinese state) 40-year operating lease. Pakistan Naval Station Sehwan collocated. Pentagon assessments identify potential future PLA Navy access. 70-80km from Iran Makran complex Node 7. CAATSA 9241 if Chinese state intermediaries connect CPEC to Makran complex. NEXUS-01 Rung 3 established — COPHC is state-controlled, port serves Chinese strategic interests. Monitor: pier expansion beyond commercial requirements, submarine infrastructure, hardened storage.
Hambantota Port — 99-Year Chinese Lease	Hambantota, Southern Province, Sri Lanka	China Merchants Port Holdings (99-year lease from 2017)	BRI — Tier 1 Confirmed	MONITOR	Debt-trap diplomacy canonical case. Sri Lanka defaulted on Chinese loans — converted to 99-year lease to China Merchants Port (Chinese state-owned). Pentagon and Indian Navy assess potential future PLA Navy dual-use. Indian Ocean strategic position on major SLOCs. Sri Lanka has resisted PLA Navy docking requests under US and Indian diplomatic pressure. NEXUS-01 Rung 3-4: China Merchants Port directly state-controlled. Monitor for dry dock or

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					submarine infrastructure construction via Sentinel-2.
Ream Naval Base — PRC Construction Cambodia	Ream, Preah Sihanouk Province, Cambodia	Royal Cambodian Navy / PRC construction (exclusive access assessed)	BRI — Tier 1 Confirmed	MONITOR	Pentagon 2023 report documented Chinese construction at Ream Naval Base. Cambodia denied exclusive Chinese access but US intelligence assessed PRC military use. South China Sea adjacent — potential PLA Navy South Sea Fleet forward staging. New pier infrastructure capable of accommodating PLA Navy surface combatants visible in commercial satellite imagery. NEXUS-01 Rung 3-4. EO 13849 nexus via coercive economic influence on Cambodia. Hun Manith family links create additional financial crime nexus to Huione Guarantee.
Djibouti PLA Navy Support Base	Djibouti City, Djibouti	People's Liberation Army Navy (PLAN)	BRI — Tier 1 Confirmed	MONITOR	China's first and only acknowledged overseas military base. Operational since 2017. Naval gun systems, docking for PLA Navy vessels, logistics infrastructure. Collocated with US Camp Lemonnier. Controls Bab-el-Mandeb approach. NEXUS-01 Rung 5: acknowledged PLA military facility. EO 13849. Monitor for expansion: dock lengthening for aircraft carrier berthing, hardened weapons storage, submarine infrastructure. Obock second base negotiations ongoing — would provide carrier-capable pier north of current facility.
Kyaukphyu Deep-Water Port — Myanmar CMEC	Kyaukphyu, Rakhine State, Myanmar	CITIC Group (China, 70% stake); Myanmar government (30%)	BRI — Tier 1 Confirmed	MONITOR	China-Myanmar Economic Corridor deep-water port. CITIC Group (Chinese state-owned) holds 70% stake. Bay of Bengal access — strategic value is direct Indian Ocean access bypassing Malacca Strait. EO 14014 (Myanmar blocking authority) applies to military-linked entities. NEXUS-01 Rung 3: CITIC directly state-controlled. Indian Ocean access from Kyaukphyu is a core Chinese strategic objective. Monitor construction tempo via Sentinel-2.
Colombo Port City — Chinese Reclaimed Island	Colombo, Western Province, Sri Lanka	China Harbour Engineering Company (CHEC) — CCCC subsidiary	BRI — Tier 1 Confirmed	MONITOR	269-hectare reclaimed island adjacent to Colombo port. CHEC (subsidiary of CCCC Chinese state-owned) developed. Special economic zone with Chinese corporate governance — functionally a Chinese administrative enclave in Sri Lankan sovereign territory. NEXUS-01 Rung 3-4: CHEC/CCCC directly state-controlled, enclave structure creates Enablement-level nexus. Huawei smart city systems proposed. Monitor for PLA Navy vessel calls to adjacent Colombo International Container Terminals (China Merchants, 85% stake). EO 13873 for Huawei digital infrastructure.
Piraeus Port — COSCO China Gateway to Europe	Piraeus, Attica, Greece	COSCO Shipping Ports (China, 67% stake)	BRI — Tier 1 Confirmed	MONITOR	COSCO Shipping Ports (Chinese state-owned) acquired 67% stake in Piraeus Port Authority — Greece's largest port and Mediterranean entry point. EU member state port under Chinese state operational control. NATO member with Chinese-controlled strategic port infrastructure. NEXUS-01 Rung 3-4: COSCO directly state-controlled. EU Commission launched review of port security implications. Chinese control of Piraeus creates logistics hub for BRI goods entering Europe and potential maritime intelligence collection on NATO naval movements in Eastern Mediterranean.
Haifa Port Bay Terminal — SIPG Israel	Haifa, Israel	Shanghai International Port Group (SIPG) — Chinese state	BRI — Tier 1 Confirmed	MONITOR	Shanghai International Port Group (SIPG Chinese state-owned) operates Bay Port Terminal at Haifa — Israel's primary commercial port. US 6th Fleet regularly calls at Haifa. US Navy formally raised concerns about Chinese port operations adjacent to US naval visits.

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					Israel signed BRI MoU 2017. NEXUS-01 Rung 3-4: SIPG directly state-controlled, operational presence at port where US Navy vessels dock. US pressure on Israel to restrict SIPG operations documented. Intelligence concern: Chinese port operators have physical access to areas where US naval vessels moor.
Obock — PRC Second Djibouti Base (Negotiating)	Obock, Northern District, Djibouti	PRC (negotiations ongoing)	BRI — Tier 2 Negotiation	MONITOR	Reports (2021-2024) indicate PRC negotiating second Djibouti facility at Obock, north of existing PLA base. Would provide larger pier infrastructure capable of accommodating aircraft carriers — current base cannot berth carriers. Djibouti President Guelleh leveraging US, France, China, Japan for maximum economic concessions. Monitor for construction activity via Sentinel-2. Colocation with JSOC/AFRICOM creates acute ISR sensitivity if established. US diplomatic counteroffer: enhanced basing agreement and economic assistance. NEXUS-01 Rung 2 currently.
Bata Port — PRC Naval Facility Attempt (Blocked)	Bata, Litoral Province, Equatorial Guinea	PRC (negotiations — US intervention 2021-22)	BRI — Tier 2 Negotiation	MONITOR	WSJ (Dec 2021) reported US intelligence assessed China secretly negotiating military facility at Bata port. US conducted high-level diplomatic intervention — reported to have blocked the deal. Equatorial Guinea distanced from agreement but deal not confirmed permanently closed. Atlantic-facing PLA Navy base would be a strategic first — direct coverage of US East Coast SLOC. NEXUS-01 Rung 1-2 currently. US State Department made explicit diplomatic demarches. Monitor for resumed negotiations via commercial satellite construction activity.
Solomon Islands — PRC Security Pact	Honiara, Guadalcanal, Solomon Islands	Government of Solomon Islands / PRC (security agreement Apr 2022)	BRI — Tier 2 Negotiation	MONITOR	PRC-Solomon Islands security framework signed April 2022 — allows Chinese naval vessels and security forces to be deployed. Australia, NZ, US, Japan protested strongly. Strategic position between Australia and major US Pacific SLOC. PM Sogavare moderated rhetoric post-2023 election but agreement remains operative. US opened new embassy Honiara 2023 as direct diplomatic response. NEXUS-01 Rung 2-3: security agreement provides legal framework for PLA Navy access. AUSMIN priority concern. Monitor for PLA Navy vessel port calls via commercial satellite.
Vanuatu — Luganville Wharf Upgrade	Luganville, Espiritu Santo, Vanuatu	Chinese state-funded construction (completed 2019)	BRI — Tier 2 Negotiation	MONITOR	Chinese state-funded wharf upgrade at Luganville — capable of berthing PLA Navy vessels. Australian intelligence assessed potential dual-use in 2018 (leaked to Fairfax Media). Vanuatu government denied military use. Strategic South Pacific position — proximity to Australia and New Zealand. NEXUS-01 Rung 2: Chinese state funding and construction documented, military use not confirmed. Australia and New Zealand diplomatic pressure on Vanuatu ongoing. Monitor for any follow-on Chinese infrastructure investment.
Kiribati — Kanton Island Airstrip Rehabilitation	Kanton Island, Phoenix Islands, Kiribati	Kiribati government / PRC-funded (negotiating)	BRI — Tier 2 Negotiation	MONITOR	Kiribati President Maamau re-established diplomatic relations with PRC (2019) and discussed Chinese rehabilitation of WWII-era Kanton Island airstrip. Kanton is strategically located in central Pacific — within range of Hawaii and US Pacific logistics infrastructure. US conducted diplomatic engagement with Kiribati to counter Chinese influence. NEXUS-01 Rung 1-2: PRC diplomatic relationship and funding discussions documented. Monitor for any construction activity

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					via commercial satellite. Rehabilitation of Kanton airstrip would represent significant PLA Air Force Pacific reach extension.
Tanzania — Dar es Salaam Port Expansion	Dar es Salaam, Tanzania	China Merchants Port Holdings (concession negotiations)	BRI — Tier 2 Negotiation	MONITOR	China Merchants Port Holdings negotiating concession for Dar es Salaam port expansion. East Africa's largest port. Strategic Indian Ocean position with access to landlocked East African states. Tanzania has \$10B+ in Chinese BRI loans. NEXUS-01 Rung 2-3: China Merchants Port state-controlled, concession negotiations documented. Indian Ocean positioning creates potential PLA Navy logistics access. EO 13849 applicable if concession terms create debt leverage similar to Hambantota model.
Malaysia — East Coast Rail Link ECRL	Peninsular Malaysia (East-West corridor)	China Communications Construction Company (CCCC) — Chinese state	BRI — Tier 2 Negotiation	MONITOR	CCCC (Chinese state-owned) constructs 688km East Coast Rail Link — connects South China Sea coast to Straits of Malacca bypassing Singapore. Originally canceled by Mahathir government (2018) on debt grounds — renegotiated at reduced cost. Strategic value: rail link bypassing Singapore Strait creates alternative logistics corridor from South China Sea to Indian Ocean without Malacca transit. NEXUS-01 Rung 3: CCCC directly state-controlled. Monitor for dual-use infrastructure elements along ECRL route.
Pakistan — Karachi Shipyard CPEC Modernization	Karachi, Sindh, Pakistan	China Shipbuilding Industry Corporation (CSIC) / CPEC framework	BRI — Tier 2 Negotiation	MONITOR	CSIC (Chinese state-owned, world's largest shipbuilder) involvement in Karachi shipyard modernization under CPEC. Pakistan Naval Dockyard collocated. Arabian Sea access. NEXUS-01 Rung 3-4: CSIC directly state-controlled, shipyard dual-use for PLA Navy vessel maintenance in Indian Ocean. CAATSA 231 potential if Russia-China defense cooperation involves Karachi facilities. Monitor for PLA Navy vessel maintenance calls. Complement to Gwadar — Karachi provides shipyard capability Gwadar lacks.
Myanmar — Yunnan-Kyaukphyu Oil and Gas Pipeline	Yunnan-Rakhine corridor, Myanmar	China National Petroleum Corporation (CNPC) — Chinese state	BRI — Tier 1 Confirmed	MONITOR	CNPC (Chinese state-owned) operates 1,700km oil and gas pipeline from Kyaukphyu (Bay of Bengal) to Yunnan Province — China's only pipeline bypassing Malacca Strait. 22 million tons/yr oil capacity. Resolves China's Malacca Dilemma for ~12% of Chinese oil imports. EO 14014 (Myanmar blocking) applies to military-linked pipeline security entities. NEXUS-01 Rung 4: CNPC state-controlled, pipeline serves core Chinese energy security interest. Myanmar military (Tatmadaw) provides pipeline security — EO 14014 nexus. Monitor pipeline operational status as China-Myanmar strategic relationship indicator.
Colombo International Container Terminals — China Merchants	Colombo Port, Western Province, Sri Lanka	China Merchants Port Holdings (85% stake)	BRI — Tier 1 Confirmed	MONITOR	China Merchants Port Holdings (Chinese state-owned) holds 85% stake in Colombo International Container Terminals. Combined with Hambantota 99-year lease, China Merchants Port controls both of Sri Lanka's major port facilities. Indian Ocean strategic position on world's busiest shipping lane (80% of global oil trade transits Indian Ocean). NEXUS-01 Rung 4: state-controlled operational control of two ports in same country creates Enablement-level strategic infrastructure control. India deeply concerned — Sri Lanka sits astride Indian Ocean SLOC between India and key trade partners.
Kenya SGR — Mombasa	Mombasa, Coast County, Kenya	Kenya Ports Authority / China	BRI — Tier 3 Financial	MONITOR	Kenya Standard Gauge Railway (SGR) — \$5B Chinese Exim Bank loan. Mombasa Port and Kenya Ports Authority used as collateral.

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Port Collateral		Exim Bank (loan collateral)	Leverage		Kenya defaulted on repayment schedule — renegotiation ongoing. AidData documented secret collateral clause granting China access to KPA revenues and potentially port operations upon default. NEXUS-01 Rung 2-3: financial leverage creates coercive dependency. EO 13849 applicable if China exercises collateral enforcement. Debt-trap model: if China calls collateral, gains operational access to East Africa's largest port.
Ethiopia — Addis-Djibouti Railway Chinese Debt	Addis Ababa, Ethiopia	Ethiopian Railways Corporation / China Exim Bank	BRI — Tier 3 Financial Leverage	MONITOR	\$4B Chinese Exim Bank loan for Addis-Djibouti railway — Ethiopia's only rail access to sea. Ethiopia in debt distress (G20 Common Framework restructuring). Railway operated by Chinese firms (Africom and CCECC) under management contract. NEXUS-01 Rung 3: Chinese state firms operate critical infrastructure under management contract. Operational dependency: Chinese firms control the only rail link connecting landlocked Ethiopia to Djibouti port. EO 13849 applicable if debt leverage used coercively.
Laos-China Railway — Debt Trap Model	Vientiane, Laos	Laos-China Railway Company (70% Chinese state)	BRI — Tier 3 Financial Leverage	MONITOR	\$6B Laos-China Railway — debt equivalent to approximately half of Laos GDP. Chinese state entities hold 70% of railway operating company. Laos debt ratio makes default structurally likely. Railway connects Yunnan Province to Vientiane — extends Chinese logistics reach into Southeast Asia. NEXUS-01 Rung 3-4: Chinese state holds majority operational control. IMF assessed Laos debt as unsustainable (2022). Default scenario: China converts debt to equity, gains full operational control. Rail corridor from Yunnan to Thailand border enables rapid Chinese logistics deployment into mainland Southeast Asia.
Montenegro — Bar-Boljare Highway (NATO Member Debt)	Podgorica, Montenegro	Montenegro government / China Exim Bank (\$944M loan)	BRI — Tier 3 Financial Leverage	MONITOR	\$944M Chinese Exim Bank loan for Bar-Boljare highway — Montenegro GDP approximately \$5.5B. Montenegro required IMF bailout (2021) partly due to this debt. Loan terms included clause allowing China to seize Montenegrin land as collateral and bar Montenegro from seeking international arbitration. EU ultimately provided refinancing to prevent Chinese collateral enforcement. NEXUS-01 Rung 2-3: financial leverage with enforced collateral documented on NATO member. EO 13849 basis if coercive enforcement attempted. Precedent case for Chinese debt leverage on NATO members.
Argentina — Patagonia Dams Chinese Financing	Santa Cruz Province, Argentina	China Gezhouba Group + China Three Gorges (Chinese state)	BRI — Tier 3 Financial Leverage	MONITOR	Kirchner-era BRI agreement: two Patagonian dams financed by Chinese state banks, constructed by China Gezhouba Group and China Three Gorges Corporation. Approximately \$5B deal includes requirement that 20% of electricity output goes to Chinese-owned aluminum smelters. Structural failures documented (7,600+ cracks). NEXUS-01 Rung 3: Chinese state firms construct and partially control output of critical infrastructure. Milei government reviewing BRI agreements. Monitor for renegotiation — Chinese response to contract cancellation would be instructive for BRI enforcement mechanism analysis.
Ecuador — Coca Codo Sinclair Dam (Oil-for-	Napo Province, Ecuador	Sinohydro (Chinese state) construction;	BRI — Tier 3 Financial	MONITOR	\$2.2B Chinese Exim Bank loan. Coca Codo Sinclair dam constructed by Sinohydro (Chinese state). Ecuador pre-sold oil to China to service

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Loan)		Ecuador government	Leverage		debt — oil-for-loan structure bypassing financial system. Structural failures: 7,600+ cracks in turbines (NYT investigation 2019). Oil-for-loan structure gives China physical commodity flow leverage independent of financial system — harder to interdict than financial flows. NEXUS-01 Rung 3. Monitor Sinohydro involvement in other Latin American infrastructure for same defect pattern and oil-for-loan replication.
Venezuela — Chinese BRI Debt Exposure (\$60B+)	Caracas, Venezuela	PDVSA / Chinese state banks (CDB, China Exim)	BRI — Tier 3 Financial Leverage	DESIGNATED	Venezuela borrowed \$60B+ from Chinese state banks under oil-for-loan arrangements. PDVSA (blocked entity) oil shipments to China service debt. China repeatedly restructures rather than calling default — preserving Venezuelan access to Chinese capital while maintaining commodity flow. EO 13884 / EO 14373 (Venezuela blocking). China-Venezuela BRI relationship creates Russia-Iran-Venezuela-China sanctions evasion quadrilateral. Chinese financial institutions processing PDVSA payments exposed to EO 13884 secondary sanctions. Coordinate Treasury and State engagement with China on Venezuela debt to prevent Chinese financial rescue enabling Maduro regime continuation.
Bolivia — Lithium BRI Agreements (CATL/CITIC)	Oruro / Potosi, Bolivia	CATL / CITIC / YLB (Bolivian state lithium)	BRI — Tier 3 Financial Leverage	MONITOR	Bolivia holds world's largest lithium reserves (~21M tons). CATL and CITIC (Chinese state-linked) secured lithium processing agreements with Bolivian state lithium company (YLB). Chinese control of Bolivian lithium creates battery supply chain dependency — EV and defense applications. NEXUS-01 Rung 2-3: Chinese state-linked firms hold processing agreements for critical defense mineral. EO 14105 (outbound investment screening) applicable to US investment in Bolivia lithium if Chinese SOE partners involved. Critical minerals strategy: Bolivian lithium under Chinese processing control constrains US battery supply chain independence.
Cambodia — Sihanoukville SEZ (99-Year Chinese Enclave)	Sihanoukville, Preah Sihanouk Province, Cambodia	Union Development Group (Chinese state-linked) — 99-year lease	BRI — Tier 3 Financial Leverage	MONITOR	Union Development Group (Chinese state-linked) holds 99-year lease on Sihanoukville SEZ — functionally a Chinese administrative enclave in Cambodia. SEZ adjacent to Ream Naval Base (Chinese construction, within 20km). Sihanoukville casino-SEZ complex is documented money laundering hub for Chinese criminal networks — Huione Guarantee connects here. EO 13849 and Kingpin Act nexus. NEXUS-01 Rung 3-4: 99-year lease with Chinese corporate governance creates Enablement-level control. Combined with Ream Naval Base: Chinese state has both military basing and administrative enclave within 20km radius.
HMN Technologies — Global Submarine Cable Network	Shenzhen, Guangdong, China (HQ); cable landings globally	HMN Technologies (formerly Huawei Marine Networks)	BRI — Tier 4 Digital Infrastructure	TARGETABLE	HMN Technologies — world's 4th largest submarine cable manufacturer (~10% global market share). Built or upgraded 100+ cable systems globally. FCC prohibited HMN from landing new cables in US. Clean Cable initiative and US diplomatic pressure documented — multiple allied nations rejected HMN contracts. EO 13873 (ICT supply chain security) primary authority. BIS Entity List consideration ongoing. PEACE Cable (Pakistan-East Africa-Europe) built by HMN — deliberately avoids US landing. Secondary sanctions pressure on governments accepting HMN cable contracts.

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Huawei Safe City — Belgrade Serbia Surveillance	Belgrade, Serbia	Huawei Technologies (Chinese state-linked)	BRI — Tier 4 Digital Infrastructure	TARGETABLE	Huawei deployed Safe City surveillance system in Belgrade — 1,000+ AI-enabled cameras with facial recognition, integrated with Serbian Ministry of Interior. EU candidate country with Chinese surveillance infrastructure. NEXUS-01 Rung 3-4: Huawei state-linked, surveillance data potentially accessible to PRC state under National Intelligence Law Art. 7. EO 13873 basis. EU accession process creates leverage — EU digital sovereignty requirements incompatible with Chinese surveillance. Huawei Safe City deployed in 80+ countries including Pakistan, Kenya, Zimbabwe, Ecuador. Each deployment is potential PRC intelligence collection node.
BeiDou Global Navigation — Ground Station Network	Beijing, China (operations); stations in 30+ countries	China Satellite Navigation Office (Chinese state)	BRI — Tier 4 Digital Infrastructure	MONITOR	BeiDou satellite navigation system — 35 satellites, global coverage since 2020. Ground stations in 30+ BRI countries including Pakistan, Saudi Arabia, Thailand, and multiple African states. BeiDou provides PLA-independent precision navigation for military operations, cruise missile guidance, and autonomous vehicle systems. BRI countries adopting BeiDou for civilian infrastructure create dual-use dependency. NEXUS-01 Rung 4-5: BeiDou is a military-civil fusion system operated by Chinese state for both civilian and PLA applications. Monitor BeiDou ground station construction in new BRI countries as indicator of deepening strategic integration.
PRC PEACE Submarine Cable — Pakistan/East Africa Landing	Karachi, Pakistan (landing); Kenya, Ethiopia, Egypt landings	HMN Technologies construction; PEACE Cable International Network	BRI — Tier 4 Digital Infrastructure	MONITOR	PEACE Cable (Pakistan and East Africa Connecting Europe) — HMN Technologies built, landed 2022. Connects Pakistan, Kenya, Ethiopia, Egypt, and Europe. Strategic concern: HMN construction means Chinese state has potential access at landing stations and amplifier housings along entire cable route. FCC prohibited HMN from landing in US — this cable deliberately routed to avoid US landing. Clean Cable initiative: US and allied pressure on Pakistan and East Africa to remove HMN equipment. EO 13873 basis for secondary pressure on financial institutions financing HMN cable contracts.
Huawei Safe City — Nairobi Kenya	Nairobi, Kenya	Huawei Technologies (Chinese state-linked)	BRI — Tier 4 Digital Infrastructure	MONITOR	Huawei Safe City surveillance deployment in Nairobi — AI cameras, facial recognition, integrated command center. Kenya is regional East African hub — surveillance data collection includes diplomatic, commercial, and intelligence community personnel transiting Nairobi. NEXUS-01 Rung 3-4. EO 13873. Nairobi hosts US Embassy East Africa, multiple Western intelligence stations, and African Union headquarters. Huawei surveillance creates potential collection architecture against US and allied personnel. Coordinate with State and CIA Station on surveillance infrastructure documentation and diplomatic pressure.
Digital Silk Road — Saudi Arabia Vision 2030 Tech	Riyadh, Saudi Arabia	Huawei / Alibaba Cloud / STC joint ventures	BRI — Tier 4 Digital Infrastructure	MONITOR	Saudi Arabia Vision 2030 technology partnerships with Huawei and Alibaba Cloud — data centers, 5G infrastructure, smart city deployments. Saudi Arabia is simultaneously pursuing US F-35 sale and deepening Chinese digital infrastructure dependency. NEXUS-01 Rung 3: Chinese state-linked firms providing core digital infrastructure to US strategic partner. Creates intelligence collection risk against US military cooperation data transiting Huawei-equipped Saudi networks. EO 13873. Monitor for any Saudi military communications infrastructure with Huawei components — direct SIGINT vulnerability

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					for US-Saudi defense cooperation.
Huawei 5G — Pakistan PTCL Core Network	Islamabad, Pakistan	Huawei Technologies / Pakistan Telecom PTCL	BRI — Tier 4 Digital Infrastructure	TARGET ABLE	Huawei provides core network infrastructure for Pakistan 5G rollout — PTCL Huawei-dependent. Pakistan is CPEC anchor state — Chinese infrastructure investment across transport, energy, telecom creates comprehensive intelligence collection architecture. EO 13873 primary authority. Clean Network initiative pressure on Pakistan limited by CPEC dependency. NEXUS-01 Rung 3-4: Huawei state-linked, 5G core network provides deep packet inspection capability potentially accessible to PRC state under National Intelligence Law. Monitor for any US DoD or intelligence community data transiting Huawei-equipped Pakistani networks.
Huawei African Research Center — Pretoria South Africa	Pretoria, South Africa	Huawei Technologies (Chinese state-linked)	BRI — Tier 4 Digital Infrastructure	MONITOR	Huawei African Research Center in Pretoria — primary hub for Huawei Africa technology development, talent pipeline, and government relations across 54 African countries. South Africa hosts BRICS summit infrastructure. Huawei provides backbone networks for majority of African telecommunications infrastructure. NEXUS-01 Rung 3-4. EO 13873. African telecommunications dependency on Huawei creates continental-scale potential intelligence collection architecture. Monitor for any US government or allied personnel data transiting Huawei-equipped African networks. Coordinate with US Africa Command on network security implications.

III. Russian Nuclear Fuel Cycle

Enrichment, fabrication, conversion, reprocessing, weapons complex, research reactors, and Western financial counterparty nodes

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Natanz FEP — Fuel Enrichment Plant	Natanz, Isfahan Province, Iran	AEOI / IRGC (state)	Iran Nuclear — Enrichment	DESIGNATED	DAMAGED by Operation Midnight Hammer (June 2025). IAEA access blocked since June 2025. Reconstruction activity observed in commercial imagery Nov 2025. EO 13382 designated. Site of primary enrichment infrastructure before strikes. Contains unknown quantity of 60%-enriched UF6. Critical monitoring priority.
Fordow FFEP — Fordow Fuel Enrichment Plant	Near Qom, Qom Province, Iran	AEOI / IRGC (state)	Iran Nuclear — Enrichment	DESIGNATED	DAMAGED — STATUS UNCLEAR after GBU-57 MOP strikes (June 2025). Built inside mountain — hardened against conventional attack. IAEA access blocked since June 2025. Fordow's underground configuration makes battle damage assessment from commercial imagery unreliable. EO 13382. Possible reconstitution activity.
Isfahan UCF + IFEP — Uranium Conversion Facility	Isfahan, Isfahan Province, Iran	AEOI (state)	Iran Nuclear — Conversion	DESIGNATED	HEAVILY DAMAGED by Operation Midnight Hammer (June 2025). IAEA states location of IFEP now unknown — may have been relocated. EO 13382. Central node for UF6 conversion. Damage to UCF disrupts the feed material pipeline from Natanz/Fordow even if centrifuges survive.
Saghand Uranium Mine	Yazd Province, Iran	AEOI (state)	Iran Nuclear — Mining	PARTIAL	OPERATIONAL. Declared safeguarded uranium mine. Primary domestic uranium ore source. EO 13382 AEOI designation. FDPR block on mining equipment suppliers. Monitor production tempo as indicator of reconstitution activity.
Novouralsk — UECC	Sverdlovsk Oblast, Russia	TVEL / Rosatom (state)	Nuclear — Enrichment (CONSTRAINED)	CONSTRAINED	EO 13382. TVEL SDN April 2024 — constructive coverage applies. CONSTRAINED — D3=1 HARD STOP: UECC operates approximately 20% of global enrichment capacity (SWU basis). Sudden designation without Western capacity precondition creates 11–13M SWU/year deficit not absorbable within a single fuel cycle. PRECONDITION FRAMEWORK: Full UECC SDN deferred until Western enrichment capacity reaches 85%+ of UECC displaced volume — estimated 2028–2030. OFAC should prepare designation package now for immediate execution upon precondition confirmation. ESCALATION LADDER (pre-precondition): Step 1 — BIS Entity List (technology supply chain, no enrichment capacity impact). Step 2 — OFAC designation of UECC financial subsidiaries and export-facing commercial entities only (not enrichment operational entities). Step 3 — Full UECC SDN upon 85% capacity threshold confirmation. MONITORING INDICATORS: Urenco (Netherlands/UK/Germany) and Orano (France) expansion milestones; Centrus Energy HALEU production at Piketon, Ohio. Three-indicator composite must reach 85% threshold before Step 3 execution.
Seversk — Siberian Chemical Combine (SCC)	Tomsk Oblast, Russia (ZATO)	TVEL / Rosatom (state)	Nuclear — Enrichment / Weapons Legacy (ZATO)	CONSTRAINED	EO 13382. TVEL constructive coverage applies; explicit SDN listing recommended. ZATO closed city — independent financial profile absent from OSINT. Dual predicate: Rosatom subsidiary chain plus weapons-grade legacy infrastructure. IAEA consultation required

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
					before designation given ZATO status.
Zelenogorsk — Electrochemical Plant (ECP)	Krasnoyarsk Krai, Russia (ZATO)	TVEL / Rosatom (state)	Nuclear — Enrichment / Isotopes (ZATO)	CONSTRAINED	EO 13382. TVEL SDN constructive coverage applies. Isotope JSC financial channel runs through ECP isotope production — Isotope JSC designation is the higher-priority action. 9th-generation centrifuges commissioned 2021; 12M SWU/yr planned capacity. ZATO status limits financial intelligence. Explicit ECP SDN listing recommended to close compliance ambiguity.
Angarsk — Angarsk Electrochemical Combine (AECC)	Irkutsk Oblast, Russia	TVEL / Rosatom / IUEC (multilateral JV)	Nuclear — Enrichment / IUEC (Multilateral)	CONSTRAINED	EO 13382. IUEC (International Uranium Enrichment Centre) creates multilateral constraint — Kazakhstan, Mongolia, Ukraine, Armenia hold equity stakes. Designation requires IAEA coordination and would generate allied friction. Surgical designation of specific TVEL operating entities (not IUEC JV) is the available instrument. IAEA consultation recommended before action.
Elektrostal — MSZ Fuel Fabrication	Elektrostal, Moscow Oblast, Russia	TVEL / Rosatom (state)	Nuclear — Fuel Fabrication	TARGETABLE	EO 13382. TVEL SDN constructive coverage applies; explicit MSZ/Elektrostal listing recommended for VVER-1000 supply enforcement. Primary export fabrication site — produces VVER-440, VVER-1000, RBMK, BN fuel assemblies. EU utility contracts transitioning to Westinghouse/Framatome 2024–2027. Reactor-type differentiation required: VVER-1000 enforcement triggers EU operator transition; RBMK enforcement affects Russian domestic fleet.
Novosibirsk — NCCP Chemical Concentrates Plant	Novosibirsk, Russia	TVEL / Rosatom (state)	Nuclear — Fabrication / Li-6 Dual-Use	TARGETABLE	TIER 1 — INDEPENDENT BIS/ECCN ENFORCEMENT PATHWAY. EO 13382 §1(a)(ii) (TVEL/Rosatom chain) + BIS ECCN 1C233 (Li-6 — enriched lithium-6 isotope, neutron moderator and tritium production precursor with thermonuclear weapons application). ENFORCEMENT PATHWAY — BIS LEADS, OFAC CONFIRMS: Step 1 — BIS Entity List under 15 C.F.R. §744.11 (foreign policy grounds) + ECCN 1C233 specific license requirement. BIS action proceeds independently; no OFAC coordination required. Step 2 — OFAC confirmatory SDN under EO 13382 (TVEL subsidiary). Step 3 — ECCN 1C233 enforcement letters to known Li-6 importers — post-listing transfer constitutes EAR violation (50 U.S.C. §4819, up to 20 years imprisonment willful violation). Li-6 PROLIFERATION SIGNIFICANCE: Separate from civil nuclear reactor operations. Li-6 enforcement does not implicate GL 115C authorization or EU Blocking Statute. EU Blocking Statute civil nuclear carve-out does not extend to Li-6 isotope production. DPRK NEXUS — CONFIDENCE CONSTRAINT: DPRK Li-6 procurement from Russian sources is ANALYTICALLY INFERRED at LOW CONFIDENCE (C3 basis). Do not include DPRK nexus in SDN administrative record without Tier 1 evidentiary development. Use as investigative lead only.
Glazov — ChMP Zirconium Plant	Udmurt Republic, Russia	TVEL / Rosatom (state)	Nuclear — Zirconium / Conversion	TARGETABLE	TIER 1 — HIGHEST PRIORITY NUCLEAR FUEL CYCLE NODE. EO 13382 §1(a)(ii) — WMD proliferator designation predicate: Rosatom/TVEL subsidiary chain. TVEL designated April 12, 2024 (SDN); ChMP explicit SDN listing closes structural compliance gap. ENFORCEMENT PATHWAY: Step 1 — OFAC ChMP-specific SDN under EO 13382. Step 2 — BIS Entity List (15 C.F.R. Part 744, foreign policy grounds). Step 3 — Secondary sanctions notice to

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					D2=[4] EU counterparties (ČEZ, Fortum, MVM Paks, Slovenské elektrárne) under CAATSA §226; 180-day wind-down per GL 115C expiry June 18, 2026. Step 4 — Post-wind-down correspondent denial under 31 U.S.C. §5318A for EU banks processing TVEL/ChMP payments. GEOPOLITICAL CONSTRAINT — HUNGARY/PAKS: MVM Paks is the critical diplomatic obstacle. Hungary under Orbán has sustained TVEL contracts as EU-Hungary political leverage. Enforcement targeting ChMP will draw formal EU Blocking Statute (EU Reg. 2018/1100) objection — that regulation prohibits EU entities from complying with U.S. secondary sanctions on designated Russian civil nuclear entities. Mitigation: frame ChMP enforcement as EO 13382 primary SDN designation (not secondary sanctions measure) to reduce Blocking Statute applicability surface. State/EUR bilateral engagement with Hungary is prerequisite to enforcement. Czech Republic (ČEZ), Finland (Fortum), and Slovakia (Slovenské elektrárne) have demonstrated diversification intent — those three counterparties are available for enforcement sequencing before Hungary. GL 115C ESCALATION TRIGGER: GL 115C expiry June 18, 2026 is the operational enforcement window. Non-renewal activates automatic secondary sanctions exposure on all post-expiry TVEL/ChMP payments from D2=[4] counterparties.
Seversk — SCC Conversion (UF6)	Tomsk Oblast, Russia (ZATO)	TVEL / Rosatom (state)	Nuclear — Conversion (ZATO)	CONSTRAINED	EO 13382. Collocated with SCC enrichment (id:7002). UF6 conversion node for VVER fuel cycle. ZATO constraint applies. IAEA consultation required. Co-located node with SCC enrichment — coordinate designation with id:7002.
Tayshet — BAM Rail Junction	Irkutsk Oblast, Russia	Russian Railways / RZD (state)	Nuclear — Transport / Rail (BAM)	MONITOR	BAM (Baikal-Amur Mainline) western terminus. Primary overland routing for nuclear material transport from Siberian fuel cycle facilities to Pacific ports. BAM routing hypothesis for anomalous nuclear shipments is ANALYTICALLY INFERRED (LOW CONFIDENCE). EO 14024 (RZD designated). Monitoring priority: commercial satellite imagery for rail traffic anomalies consistent with nuclear cargo.
Vanino Port	Khabarovsk Krai, Russia	FESCO / state ports	Nuclear — Transport / Port (MONITORING PRIORITY)	MONITOR	MONITORING PRIORITY — NOT AN ENFORCEMENT TARGET UNDER CURRENT EVIDENCE. BAM Pacific terminus. Nuclear logistics relevance ANALYTICALLY INFERRED from logistics position — no confirmed nuclear cargo evidence. Upgrade trigger: UN Panel or allied intelligence identification of Vanino-originating vessel in nuclear-relevant corridor. FESCO operator — monitoring via AIS/IMO tracking.
Manzhouli — Russia-China Nuclear Boundary	Inner Mongolia, China	China Railway / Chinese state	Nuclear — System Boundary Node (Jurisdictional Limit)	OFF-LIMITS	SYSTEM BOUNDARY NODE — NOT AN ENFORCEMENT NODE. Defines limit of US sanctions jurisdiction for Russian nuclear material transfers to China. No OFAC/BIS/IEEPA instrument applies to Chinese government border operations. Instruments: IAEA safeguards channel; bilateral diplomatic engagement with China; IAEA Board of Governors multilateral track.
Zabaykalsk — Rail Gauge Switch (Nuclear Transit)	Zabaykalsky Krai, Russia	Russian Railways / RZD (state)	Nuclear — Transport / Rail Border	MONITOR	Russian side of the Zabaykalsk/Manzhouli gauge switch — broad-gauge to standard-gauge transfer point for all rail cargo including potential nuclear material. RZD designated under EO 14024.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
					Monitoring priority for nuclear material transport from ARMZ/Krasnokamensk. Nuclear material transit dimension is distinct from existing id:30 (Manzhouli Border Entry, rail/grain).
Ozersk — Mayak Production Association	Chelyabinsk Oblast, Russia (ZATO)	Rosatom (state)	Nuclear — Reprocessing / Weapons Legacy (ZATO)	CONSTR AINED	EO 13382. CONSTRAINED — DUAL LEGAL CONSTRAINT. CONSTRAINT 1 — ZATO: Mayak closed city limits independent financial profile in OSINT; Western financial nexus not established. CONSTRAINT 2 — PMDA: Plutonium Management and Disposition Agreement (2000) creates arms control constraint on weapons-grade Pu enforcement. PMDA governs weapons-grade Pu disposition; arms control framework takes precedence over sanctions instrument for that material stream. ENFORCEMENT PATHWAY — COMMERCIAL TRACK ONLY: Mayak commercial reprocessing of research reactor spent fuel (non-weapons-grade) is legally distinguishable from weapons-legacy infrastructure and is designatable without PMDA implications. LEGAL SEQUENCING: Step 1 — State Department T&V Bureau coordination to confirm PMDA boundary. Step 2 — IAEA consultation to confirm safeguards status of commercial vs. weapons-grade material streams. Step 3 — OFAC designation of Mayak commercial reprocessing entities with explicit PMDA carve-out language in administrative record. Step 4 — BIS Entity List for technology/equipment supply chain to commercial facilities. HARD CONSTRAINT: Do not designate Mayak weapons/military infrastructure without explicit NSC authorization and PMDA legal review. This constraint is non-waivable at OFAC level.
Zheleznogorsk — GKKh Mining Chemical Combine	Krasnoyarsk Krai, Russia (ZATO)	Rosatom (state)	Nuclear — Reprocessing / ZATO (Weapons Complex)	CONSTR AINED	EO 13382. ZATO (Krasnoyarsk-26). RT-2 storage/reprocessing facility — largest Russian spent fuel storage site. MOX fabrication (VNIINM-linked). Former weapons-grade Pu production stopped 2010. Commercial reprocessing of VVER-1000 spent fuel continues. PMDA framework applies to Pu disposition. BIS Entity List action available for technology/equipment supply chain.
Sarov — RFNC-VNIIEF Weapons Design Center	Nizhny Novgorod Oblast, Russia (ZATO)	Rosatom / Russian Ministry of Defense (state)	Nuclear — Weapons Design (ZATO / Active Complex)	CONSTR AINED	EO 13382. Russian Federal Nuclear Center — primary nuclear weapons design facility. ZATO closed city. BIS Entity List for technology supply interdiction. No direct Western financial exposure identified. Enforcement instrument: BIS Entity List (technology supply chain) not OFAC SDN (no financial nexus).
Trekhgorny — Instrument-Making Plant	Chelyabinsk Oblast, Russia (ZATO)	Rosatom / Russian Ministry of Defense (state)	Nuclear — Weapons Assembly (ZATO)	CONSTR AINED	EO 13382. ZATO. Nuclear weapons components assembly — one of two primary Russian warhead assembly facilities (alongside Lesnoy). BIS Entity List for technology supply interdiction. No Western financial exposure identified. Monitoring priority only.
Lesnoy — Sverdlovsk-45 Weapons Assembly	Sverdlovsk Oblast, Russia (ZATO)	Rosatom / Russian Ministry of Defense (state)	Nuclear — Weapons Assembly (ZATO)	CONSTR AINED	EO 13382. ZATO (Sverdlovsk-45). Nuclear warhead assembly facility — with Trekhgorny, the two primary Russian assembly sites. BIS Entity List for technology supply interdiction. No Western financial exposure identified under OSINT conditions. Monitoring priority.
Snezhinsk — RFNC-VNIITF Weapons Design (Secondary)	Chelyabinsk Oblast, Russia (ZATO)	Rosatom / Russian Ministry of Defense (state)	Nuclear — Weapons Design Secondary (ZATO)	CONSTR AINED	EO 13382. ZATO (Chelyabinsk-70). Russia's second nuclear weapons design center — specializes in thermonuclear design, separate from Sarov (fission primary focus). BIS Entity List for technology supply. No Western financial exposure identified.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					Monitoring priority.
Dimitrovgrad — NIIAR Research Complex	Ulyanovsk Oblast, Russia	Rosatom (state) / Isotope JSC (commercial)	Nuclear — Research Reactor / Isotope Production (TIER 1)	TARGETABLE	TIER 1 — RANK 1 IN SENI NUCLEAR ENFORCEMENT SEQUENCING. EO 13382 §1(a)(ii) — WMD proliferator designation predicate: Isotope JSC is Rosatom commercial subsidiary; NIIAR is Isotope JSC primary production facility. Separate BIS predicate: ECCN 1C236 (Cf-252, neutron initiator applications). ENFORCEMENT PATHWAY: Step 1 — Isotope JSC SDN under EO 13382. Zero reactor safety collateral; Cf-252/Mo-99 enforcement does not affect any operating reactor fuel supply. Step 2 — BIS Entity List addition for ECCN 1C236 (Cf-252) and ECCN 1C012 (Mo-99 isotope precursors). Step 3 — FinCEN §314(a) information sharing to identify Isotope JSC payment flows at U.S. financial institutions. Step 4 — OFAC wind-down guidance to Lantheus Medical Imaging (Billerica, MA) and Nordion Inc. (Ottawa). Step 5 — Notification to Wells Fargo Bank N.A. (named Lantheus revolving credit facility lender, SEC S-1 EDGAR CIK 0001521036) as USD clearing nexus — any post-designation Isotope JSC wire transfer through this correspondent constitutes strict liability §5321(a)(1) civil penalty exposure (\$50,000/day). FINANCIAL NEXUS: 18 U.S.C. §981(k) substitute asset jurisdiction attaches to Isotope JSC proceeds transiting Wells Fargo correspondent relationship. NO GEOPOLITICAL CONSTRAINT: Isotope JSC enforcement does not affect any operating Western reactor, does not trigger EU Blocking Statute, and does not implicate PMDA. Clearest enforcement pathway in the SENI nuclear sub-series. No allied coordination required.
Gatchina — PNPI Research Reactor	Leningrad Oblast, Russia	NRC Kurchatov Institute / Rosatom (state)	Nuclear — Research Reactor / Institute	MONITOR	EO 13382 (NRC Kurchatov). Research reactor — WWR-M reactor at Petersburg Nuclear Physics Institute. Lower enforcement priority than NIIAR. No direct Western commercial isotope distribution identified. Monitor for dual-use research cooperation relationships.
Moscow — Bochvar Institute (VNIINM)	Moscow, Russia	Rosatom (state) / VNIINM (federal enterprise)	Nuclear — Research / MOX / Pu Processing	TARGETABLE	EO 13382. Non-ZATO Moscow location — more accessible commercial banking than ZATO sites. VNIINM is Rosatom's nuclear materials research institute: MOX fuel design, Pu metallurgy, fuel cycle technology development. Post-2022 financial insulation caveat: Moscow Rosatom subsidiaries have reduced Western correspondent banking dependency through domestic substitution and CNY migration. Legal designation predicate strong; operational enforcement impact uncertain relative to pre-2022. Closes the Pu pathway: Mayak/GKhK (separation) to VNIINM (MOX fabrication) to BN-800/BN-1200 (deployment).
Lantheus Medical Imaging	Billerica, MA, USA	Lantheus Holdings Inc. (NYSE: LNTX)	Nuclear — Western Financial Nexus (FPA-01)	MONITOR	FPA-01 FINANCIAL NEXUS NODE. Lantheus Medical Imaging is the primary U.S. customer for Mo-99 sourced through Isotope JSC (NIIAR/NCCP) via Nordion Inc. (Ottawa). Wells Fargo Bank N.A. named as Lantheus revolving credit facility lender via SEC S-1 (EDGAR CIK 0001521036) — the named USD clearing nexus for the Isotope JSC chain. Lantheus is not itself a sanctions target — it is a U.S. commercial entity establishing U.S. financial jurisdiction over the Isotope JSC chain.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
Nordion Inc.	Ottawa, Ontario, Canada	Sterigenics International (private)	Nuclear — Western Financial Nexus (FPA-01)	MONITOR	FPA-01 CHAIN NODE. Nordion is the Canadian intermediary in the Isotope JSC — Nordion — Lantheus Mo-99 chain. Exclusive Western distributor agreement with Isotope JSC signed 2010 in presence of Rosatom Director General and Canadian Ambassador. Nordion is not a sanctions target — it is the named commercial counterparty establishing the Canadian nexus in the chain.
ČEZ Group — Dukovany / Temelín NPP	Czech Republic (Dukovany site)	ČEZ Group (Czech state majority)	Nuclear — EU Utility Counterparty (FPA-02)	MONITOR	FPA-02 COUNTERPARTY NODE. ČEZ documented as receiving TVEL-supplied nuclear fuel incorporating ChMP zirconium cladding. Westinghouse VVER-440 contract signed March 2023 — deliveries commenced 2024. Framatome VVER-1000 contract 2022. Three-year fuel reserve maintained. ČEZ is not a sanctions target — it is the named EU utility counterparty establishing the EUR payment nexus for the ChMP/TVEL chain. GL 115C (expires June 18, 2026) currently authorizes TVEL-related civil nuclear transactions.
MVM Paks NPP	Paks, Tolna County, Hungary	MVM Group (Hungarian state)	Nuclear — EU Utility Counterparty (FPA-02)	MONITOR	FPA-02 COUNTERPARTY NODE — HIGHEST DEPENDENCY. MVM Paks is the most TVEL-dependent EU operator as of March 2026. Confirmed approximately €124M/year Russian fuel purchases (2023). No defined Russian fuel phase-out date. Paks II expansion (Rosatom) in progress — creates structural political constraint on any ChMP/TVEL enforcement action affecting Hungary. Westinghouse and Framatome contracts signed for future deliveries but transition timeline uncertain under Orbán government.
Fortum — Loviisa NPP	Loviisa, Finland	Fortum Oyj (Finnish state majority)	Nuclear — EU Utility Counterparty (FPA-02)	MONITOR	FPA-02 COUNTERPARTY NODE. Fortum (Loviisa NPP, 2 VVER-440 units) has TVEL fuel contract in force through 2027. APIS consortium member for VVER-440 alternative fuel qualification. Westinghouse/Framatome transition planned post-2027. Fortum is not a sanctions target — named EU utility counterparty in ChMP/TVEL chain.
Slovenské elektrárne — Bohunice / Mochovce NPP	Mochovce, Slovakia	Slovenské elektrárne (Italian Enel + Slovak state)	Nuclear — EU Utility Counterparty (FPA-02)	MONITOR	FPA-02 COUNTERPARTY NODE. Slovenské elektrárne operates 5 VVER-440 units at Bohunice and Mochovce. Framatome long-term fuel contract signed 2024 — deliveries from 2027. Imported record 230 tons Russian fuel in 2023 (assessed as multi-year stockpiling). Fico government poses political risk to diversification timeline. Named EU utility counterparty in ChMP/TVEL chain.

IV. Terrorist Finance Networks

Hezbollah, Hamas/PIJ, and associated financing and facilitation infrastructure

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Lebanese Exchange House Network (Hezbollah finance team)	Beirut, Lebanon	Ossama Jaber; Ja'far Qasir; Samer Kasbar (all designated Nov 2025); Hokoul SAL Offshore	Terrorist Finance — Hezbollah	TARGETABLE	E.O. 13224; HIFPA 2015/2018 — Primary post-Assad cash conversion layer. Between Sep 2024 and Feb 2025, Jaber collected/converted tens of millions via Lebanese money changers. Action: Designate each new exchange house as identified; apply HIFPA correspondent account prohibition to Lebanese banks servicing these exchange houses. FinCEN Section 311 against Lebanese financial institutions with documented Hezbollah exchange house exposure.
Al-Qard Al-Hassan Association (AQAH)	Beirut, Lebanon (branches Nigeria, West Africa)	Hezbollah-controlled microfinance/charity front; OFAC-designated 2007	Terrorist Finance — Hezbollah	DESIGNATED	Hezbollah-controlled microfinance/charity front; OFAC-designated 2007 — Designated 2007. Still operating via digital payment services Whish Money and OMT in Lebanon (Oct 2025 reports). Instructs donors to send to private individual digital wallets — evades sanctions screening on institutional accounts. Action: Target Whish Money and OMT as FFIs under HIFPA if they knowingly process AQAH-directed transfers. GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) BSA mandate requires these platforms to screen sanctioned wallets.
Nazem Said Ahmad Diamond/Gems Network	Beirut / Dubai / Johannesburg / Hong Kong	Nazem Said Ahmad (SDGT designated Dec 2019); 52 associated individuals and entities designated Apr 2023	Terrorist Finance — Hezbollah	DESIGNATED	E.O. 13224; HIFPA 2015/2018 — Facilitates payment via diamonds, precious gems, and art for Hezbollah. Network spans South Africa, Angola, DRC, Cote d'Ivoire, Belgium, UK, Hong Kong. All 52 entities designated Apr 2023. Action: Monitor for reconstitution through new nominee structures. FinCEN art/luxury goods AML guidance (Feb 2022) applies — designated entities cannot be cleared through art or gem market intermediaries.
Tri-Border Area (TBA) — Argentina/Brazil/Paraguay	Ciudad del Este (Paraguay) / Foz do Iguacu (Brazil) / Puerto Iguazu (Argentina)	Amer Akil Rada (designated); Samer Akil Rada (designated); multiple commercial enterprises	Terrorist Finance — Hezbollah	PARTIAL	E.O. 13224; HIFPA 2015/2018; DEA NDDS — Amer Akil Rada (designated Sep 2023) ran charcoal exports from Colombia to Lebanon funneling 80% of proceeds to Hezbollah. BCI Technologies C.A. (Venezuela) designated 2023 — Hezbollah-linked crypto firm. Action: Continued DEA/OFAC coordination on TBA commercial network; target new nominee structures replacing Rada network; apply HIFPA to South American banks processing trade proceeds for designated TBA entities.
Venezuelan Gold/Crypto Network	Caracas / Orinoco River region, Venezuela	BCI Technologies C.A. (designated 2023); Hezbollah-linked OTC brokers; Iranian intermediaries	Terrorist Finance — Hezbollah	TARGETABLE	E.O. 13224; E.O. 13850 (Venezuela); GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) §4 — Hezbollah purchases Venezuelan gold through local intermediaries, resells to Iran, which resells to Turkey and Middle East buyers. Maduro capture (Jan 2026) disrupted Venezuelan government support infrastructure. BCI Technologies designated for Hezbollah-linked crypto operations. USDT-based laundering via Caracas OTC market. Action: Post-Maduro, target Venezuelan military officials who replaced CLAP/Cartel of Suns support for Hezbollah; apply GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) BSA mandate to

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					Caracas crypto OTC desks with US-nexus transactions.
Captagon Trafficking Network (Syria/Lebanon)	Syria / Lebanon (distributed)	Former Assad regime affiliates; Hezbollah production and distribution infrastructure; designated May 2025	Terrorist Finance — Hezbollah	TARGETABLE	E.O. 13224; E.O. 13382 (WMD/narcotics nexus); Caesar Syria Civilian Protection Act — Captagon (amphetamine) is a billion-dollar illicit enterprise with Hezbollah production and distribution infrastructure post-Assad. May 2025 OFAC designated three Captagon trafficking individuals alongside Hezbollah finance designations. Action: Coordinate DEA/OFAC Captagon-specific designations targeting production nodes now operating without Assad protection; apply Caesar Act authorities to Syrian entities supporting Hezbollah Captagon infrastructure.
Iran IRGC-QF to Hezbollah Financial Pipeline	Tehran, Iran / Beirut, Lebanon	IRGC-QF (FTO designated); multiple designated intermediaries	Terrorist Finance — Hezbollah	DESIGNATED	E.O. 13224; E.O. 13382; IFCA; IRGC FTO designation (Apr 2019) — IRGC-QF is the primary Hezbollah funder — historically routing through Syria (now degraded). Current pipeline uses Iranian exchange networks and direct cash transfers via Lebanese intermediaries. Action: Continue targeting each new financial conduit as identified; HIFPA correspondent account prohibition on any bank processing IRGC-QF-to-Hezbollah transfers; coordinate with Israeli CTF authorities on real-time wallet identification.
Hamas Istanbul Investment Portfolio (Jabarin network)	Istanbul, Turkey	Zaher Jabarin (Hamas finance director, designated); Trend GYO (real estate, designated); multiple portfolio companies	Terrorist Finance — Hamas	PARTIAL	E.O. 13224; CAATSA §226 (Turkish FFIs) — Jabarin portfolio: ~\$500M in Turkish real estate and stocks. Trend GYO designated, but Dudin attempted post-designation ownership transfer to obscure affiliation. Portfolio is operationally independent of Hamas political leadership location — functions regardless of Qatar expulsion. Action: Designate each successor entity as ownership transfers are identified; apply CAATSA §226 to Turkish banks (Ziraat, Halkbank, VakifBank) servicing Jabarin portfolio accounts; Turkish MASAK (financial intelligence) bilateral engagement required.
Qatar Doha NGO Financing Network	Doha, Qatar	Multiple Qatar-registered charities and NGOs; Filistin Vakfi (designated Jun 2025); Muslim Brotherhood-linked organizations (MB International designat	Terrorist Finance — Hamas	MONITOR	E.O. 13224; HIFPA; FATF MENAFATF mechanisms — Qatar channels funds via four parallel routes to Gaza money changers. Route 1 (Iran-Lebanon-Turkey-Gaza) degraded by Dec 2025. Routes 2-4 through Doha NGO nodes remain active. Filistin Vakfi designated Jun 2025 for raising funds for Hamas military wing. Jan 2026 MB International designation disrupted part of the network. Action: Section 311 against Qatar's charity sector for PMLC designation; bilateral US-Qatar MOU (signed Jul 2017) provides enforcement mechanism — invoke formal compliance obligations; target each Doha-registered NGO feeding Istanbul portfolio with IRGC-linked funds.
Gaza Exchange House and Crypto Layer (BuyCash / Shamlakh network)	Gaza / diaspora distributed	Shamlakh family (designated Jan 2024 — primary IRGC-QF-to-Hamas conduit); BuyCash (designated Oct 2023); Ahmed Alaqaq (designated)	Terrorist Finance — Hamas	DESIGNATED	E.O. 13224; 18 U.S.C. §981(a)(1)(G)(i) (terrorism forfeiture) — Shamlakh family: main endpoint for IRGC-QF-to-Hamas and PIJ fund transfers in Gaza — tens of millions of dollars. BuyCash: Gaza-based crypto exchange used by Hamas, al-Qaida affiliates, and ISIS. DOJ civil forfeiture complaint (Oct 2023) traced ~150 digital asset wallets. Action: Continue wallet-level OFAC SDN additions as new Hamas exchange house addresses are identified; GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) BSA mandate requires all permitted stablecoin issuers to

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
					screen against these wallets; Chainalysis/TRM Labs tasking to trace IRGC-QF-to-Shamlakh crypto flows.
Sudan-Based Hamas Investment Infrastructure	Khartoum, Sudan	Abdelbasit Hamza (designated Oct 2023 — transferred ~\$20M to Hamas); multiple Sudanese portfolio companies	UAE Transshipment	PARTIAL	E.O. 13224; E.O. 13067 (Sudan) — Hamza managed numerous Hamas portfolio companies in Sudan. Transferred nearly \$20M to Hamas including funds to senior commanders. Sudan's political instability creates enforcement gap — no functioning central government to apply bilateral AML pressure. Action: OFAC SDN designation of each identified Sudanese portfolio entity; coordinate with UAE (which has influence in Sudan) for informal enforcement pressure on Sudanese financial institutions servicing Hamas portfolio.
Hamas-IRGC-QF Currency Exchange Network	Tehran, Iran / Turkey / Lebanon / Gaza	IRGC-QF (FTO); Muhammad Ahmad Abd Al-Dayim Nasrallah (Qatar-based, designated Oct 2023 — tens of millions transferred); multiple exchange intermediari	Terrorist Finance — Hamas	DESIGNATED	E.O. 13224; IFCA; IRGC FTO (Apr 2019) — IRGC-QF provides significant funding to both Hamas and PIJ. Nasrallah (Qatar-based) designated for providing tens of millions to Hamas with close Iranian regime ties. Turkey-Lebanon-Gaza routing partially degraded Dec 2025. Action: Target each new currency exchange intermediary as identified; HIFPA correspondent account prohibition on Turkish and Lebanese banks processing IRGC-to-Hamas transfers; Israeli NBCCTF wallet seizure coordination.
IRGC-QF Currency Exchange Network (Hezbollah/Hamas/Houthi financing)	Tehran / Beirut / Sanaa / Gaza (distributed)	Multiple OFAC-designated exchange networks; FinCEN May 2024 Advisory (FIN-2024-A001) identified typologies	UAE Transshipment	DESIGNATED	E.O. 13224; E.O. 13382; IFCA; IRGC FTO designation — FinCEN FIN-2024-A001 (May 8 2024) provides detailed red flag indicators for IRGC-QF-linked transactions across Hezbollah, Hamas, Houthi networks. ~\$9B shadow banking system (FinCEN Oct 23 2025 examination) using UAE/Turkey front companies to move IRGC money through US correspondent accounts. Action: HIFPA and CISADA correspondent account prohibitions on identified FFIs; GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) BSA mandate requires US-nexus platforms to screen IRGC-designated wallet clusters; FinCEN advisory mandatory review by US financial institutions.
Venezuela-Iran-Hezbollah Nexus (Adel el Zabayar network)	Caracas, Venezuela / Lebanon / Tehran	Adel el Zabayar (PSUV; Federation of Arab Associations in Venezuela); Hezbollah operatives in Venezuela	Terrorist Finance — Hezbollah	NEXUS	E.O. 13224; E.O. 13692; E.O. 13382 — El Zabayar assessed as middleman between Venezuelan drug networks and Middle Eastern militias. Hezbollah used Venezuelan government support (documents, safe travel, financial channels) — Maduro capture disrupts but does not eliminate this nexus. Iranian UAV sale to Venezuela confirms ongoing Iran-Venezuela weapons relationship. Action: Post-Maduro, target el Zabayar and Arab federation infrastructure specifically; coordinate with Treasury CTF on Hezbollah financiers who operated through Venezuelan channels.
Al-Qard Al-Hassan / Cuba-Hezbollah Financial Transit	Havana, Cuba / Beirut, Lebanon	Hezbollah operatives using Cuba as transit point; historic Iranian diplomatic infrastructure in Havana	Terrorist Finance — Hezbollah	NEXUS	E.O. 13224 (SDGT); CACR; SST (Cuba) — Cuba's SST designation and GAESA control of foreign financial flows makes Cuba a documented transit point for Iran and Hezbollah financial networks in the Western Hemisphere. Iranian diplomatic presence in Havana provides cover infrastructure. Action: Post-SST redesignation, heightened OFAC scrutiny of all Cuban financial transactions for Hezbollah/IRGC-QF layering patterns; coordinate with Treasury CTF on Cuba-based Hezbollah facilitators identified in FinCEN FIN-2024-

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
					A001 advisory.
Sinaloa-Venezuela-Hezbollah Weapons-for-Cocaine Triangle	Venezuela / Mexico / Lebanon / Ireland	Sinaloa Cartel; Venezuelan Cartel of Suns network; Hezbollah ESO (External Security Organization); Kinahan cartel (Ireland)	Terrorist Finance — Hezbollah	DESIGNATED	18 U.S.C. §2339B; E.O. 13224; E.O. 13692 (Venezuela); 21 U.S.C. §960a (narco-terrorism) — Jul 2025 Irish court confirmed Hezbollah organized cocaine shipment from Venezuela via Kinahan cartel. US DOJ (Shea/Berman) documented Hamas/Hezbollah weapons-for-cocaine agreements with Sinaloa/FARC/Venezuelan officials — anti-tank rocket launchers supplied in exchange for cocaine. Adel el Zabayar assessed as primary Venezuela-Middle East militia nexus. All three parties now FTO/SDGT-designated. Action: SDNY prosecution theory for US-nexus portions of weapons-for-cocaine triangle under 21 U.S.C. §960a narco-terrorism statute; coordinate with DEA/FBI on Hezbollah-Sinaloa-Venezuela financial flows; target el Zabayar and Irish Kinahan network under E.O. 13224.
Houthi Crypto and Money Services Network (al-Jamal wallet cluster)	Yemen / Turkey / UAE / distributed	Sa'id al-Jamal (designated; 5 crypto wallets designated); Al-Ridhwan Exchange (Sana'a/Hudaydah, designated Jan 2026); Hasan Jafari (Turkey-based Irani)	UAE Transshipment	DESIGNATED	E.O. 13224; GENIUS Act §4(a)(5)(A) [Pub. L. 119-27, effective July 18, 2025 — implementing regulations pending as of March 2026]; BSA — Al-Jamal crypto network cashed out >\$200M through mainstream exchanges including Turkey-based platforms. Al-Ridhwan Exchange designated for financing weapons purchases. Garantex (sanctioned) used in Houthi flows before Mar 2025 shutdown. Action: GENIUS Act BSA mandate requires all permitted stablecoin issuers to screen al-Jamal designated wallet cluster; CAATSA §226 on Turkish correspondent banks processing Jafari-linked transfers; continuous blockchain address addition to SDN list as new al-Jamal wallet clusters are identified.
Iraqi State PMF Budget Appropriation	Baghdad, Iraq	PMM (PMF Commission); Abu Fadak (Secretary-General); Iranian-aligned faction commanders	State Finance / IRGC-QF pipeline	PARTIAL	EO 13224; EO 14024 (material support); CAATSA §226 — Iraqi state budget allocates ~\$2.5B/yr to PMF. Iranian-aligned factions receive disproportionate share. Treasury has designated individual faction leaders but not the PMF budget mechanism itself. OFAC action: designate PMM as material support conduit under EO 13224 §1(c).
Kata'ib Hezbollah (KH) Financial Network	Iraq / Iran / Syria	Abu Mahdi al-Muhandis (deceased); current KH leadership; IRGC-QF Quds Force	Terrorist Financing / Weapons Procurement	DESIGNATED	EO 13224; FTO designation (Jan 2009); UNSCR 1267 list — KH designated FTO and SDGT. Receives weapons, funding, and direction from IRGC-QF. Conducted Oct 2023–Feb 2024 drone/rocket campaign against US forces. Monitor for new financial facilitation structures post-Muhandis (killed Jan 2020).
Asa'ib Ahl al-Haq (AAH) Revenue Network	Iraq / Lebanon	Qais al-Khazali (AAH Secretary-General, designated); IRGC-QF liaison officers	Terrorist Financing / Political Influence	DESIGNATED	EO 13224 (Oct 2019); FTO designation (Oct 2019) — AAH designated FTO/SDGT Oct 2019. Qais al-Khazali designated. Operates legal political party (Sadiqoun) and media network (Al-Ahd TV) as revenue and influence layer. Designate Al-Ahd TV and Sadiqoun financial structures under EO 13224 material support provisions.
Harakat Hezbollah al-Nujaba (HHN)	Iraq / Syria	Akram al-Kaabi (HHN Secretary-General, designated)	Terrorist Financing / Syria Operations	DESIGNATED	EO 13224 (Jan 2020); FTO designation (Jan 2020) — HHN and al-Kaabi designated Jan 2020. Operates in Syria under IRGC-QF direction. Publicly called for attacks on US forces and Israel. Monitor for front company financial structures in Iraq and Lebanon.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
PMF Oil Revenue Diversion — Kirkuk / Basra Fields	Northern and Southern Iraq	Iranian-aligned PMF faction commanders; oil field checkpoint operators	Revenue Diversion / Smuggling	TARGET ABLE	EO 13224 §1(c); IEEPA §1702; Iraqi law enforcement cooperation — Iranian-aligned PMF factions extract informal tolls and divert crude from Kirkuk and Basra fields. Estimated \$500M–\$1B/yr diverted outside Iraqi state budget. Coordinate with Iraqi CBI and KRG to map diversion points; designate controlling faction commanders.
PMF Border Taxation — Syria-Iraq Corridor	Al-Qaim / Abu Kamal crossing	Kata'ib Hezbollah checkpoint operators; IRGC-QF logistics officers	Smuggling / Revenue Collection	TARGET ABLE	EO 13224; 18 U.S.C. §981(k). PMF-affiliated militias operate informal taxation checkpoints on the Syria-Iraq border corridor — extracting revenue from commercial trucking. Estimated \$10-50M/yr per major corridor. Kata'ib Hezbollah and AAH are primary operators. Revenue feeds PMF operational finance separate from Iraqi state budget appropriation. Action: FinCEN §314(a) requests to Lebanese and Iraqi financial institutions identified as recipients of checkpoint revenue. Section 311 finding for Syrian and Iraqi exchange houses processing PMF checkpoint revenue. Trace and designate entities and identified checkpoint commanders.
Al-Nujaba / KH Crypto Fundraising Layer	Global (Iraq, Lebanon, Iran)	Undisclosed PMF-affiliated crypto facilitators; Hezbollah-linked exchange houses	Crypto Fundraising / Evasion	TARGET ABLE	EO 13224; GENIUS Act §4(a)(5)(A) [Pub. L. 119-27, effective July 18, 2025 — implementing regulations pending as of March 2026]; BSA §5318A — IRGC-aligned PMF factions have adopted crypto fundraising following SWIFT exclusion. TRM Labs has traced PMF-linked wallet clusters. Task OFAC to issue crypto wallet designations for identified PMF-affiliated addresses.
ELN (Ejército de Liberación Nacional) Finance Network	Colombia / Venezuela / Ecuador	Antonio García (ELN commander); regional finance commanders	Terrorist Financing / Drug Revenue	DESIGNATED	EO 13224; FTO designation (Oct 2023); Kingpin Act (pending) — ELN designated FTO Oct 2023 following peace talks collapse. Revenue from cocaine, extortion, oil pipeline attacks, and illegal mining. Kingpin designation for senior leadership warranted. Coordinate with Colombian UIAF and Venezuelan partners on cross-border finance mapping.
PMF Border Taxation — Syria-Iraq Al-Qaim Corridor	Al-Qaim / Abu Kamal crossing	KH checkpoint operators; IRGC-QF logistics officers	Smuggling / Revenue Collection	TARGET ABLE	EO 13224; IEEPA §1702 — KH controls the Al-Qaim crossing — primary Iran-Iraq-Syria land corridor. Key node for weapons, personnel, and currency transfer between IRGC-QF, KH, and Hezbollah.
Hezbollah Southern Lebanon Military Infrastructure (Dahiyeh)	Dahiyeh (Southern Suburbs), Beirut, Lebanon	Hezbollah (FTO/SDGT)	Terrorist Finance — Hezbollah	DESIGNATED	EO 13224. Hezbollah's primary Beirut-area military/political infrastructure cluster. Multiple US, Israeli, and Lebanese strikes have targeted this area. Financial network includes Al-Qard Al-Hassan (microfinance front), exchange house network. Post-October 2024 IDF operations have significantly degraded Hezbollah military capability. Monitor reconstruction and rearmament activity via Sentinel-2. HIFPA 2015/2018 authorities.
Hezbollah South Lebanon Tunnel Network (Estimated)	South Lebanon, near Israeli border	Hezbollah (FTO/SDGT)	Terrorist Finance — Hezbollah	DESIGNATED	EO 13224. Hezbollah's cross-border tunnel network — used for weapons smuggling and potential attack staging. Constructed with Iranian IRGC-QF technical assistance. Multiple tunnels exposed and destroyed by IDF. Monitor for reconstruction activity via synthetic aperture radar ground deformation analysis. Financing through Al-Qard Al-Hassan network and IRGC-QF transfers.
Hamas Gaza Underground Command	Gaza Strip, Palestinian	Hamas (FTO/SDGT/SDNT)	Terrorist Finance — Hamas	DESIGNATED	EO 13224. Hamas extensive tunnel and underground command network. Post-October 7 Israeli operations have significantly

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Infrastructure (Estimated)	Territory				degraded above-ground infrastructure. Financial flows: Qatar Doha NGO network, Turkish banking corridors, Gaza crypto layer (BuyCash/Shamlakh network — designated Jan 2024). Shamlakh family designated — IRGC-QF linked. 18 U.S.C. §981(a)(1)(G)(i) (terrorism asset forfeiture).
Hamas Istanbul Financial Network (Jabarin)	Istanbul, Turkey	Zaheer Jabarin (Hamas finance director, designated)	Terrorist Finance — Hamas	DESIGNATED	EO 13224. Zaheer Jabarin (Hamas finance director) — designated. Istanbul investment portfolio managing Hamas external financial reserves. Turkish banking sector exposed to secondary sanctions risk via CAATSA §226. FinCEN §314(a) requests to Turkish FFIs holding Hamas-linked funds. FATF MENAFATF mechanisms for Turkey-based Hamas finance.
IRGC-QF Beirut Station	Beirut, Lebanon (Hezbollah-controlled southern suburbs)	IRGC-Quds Force / Hezbollah (SDGT/FTO)	Terrorist Finance — Hezbollah	DESIGNATED	EO 13224 / HIFPA 2015/2018. IRGC-QF Beirut station embedded within Hezbollah operational infrastructure. Post-Nasrallah assassination (Sep 2024) and IDF degradation of Hezbollah military capacity, IRGC-QF has been rebuilding Hezbollah command structure. Monitor for reconstitution of precision missile program. Financial flows: Al-Qard Al-Hassan microfinance network, exchange house network across West Africa and Latin America diaspora, and IRGC-QF direct transfers via Lebanese banking system. HIFPA 2018 secondary sanctions on any financial institution maintaining correspondent relationships with Al-Qard Al-Hassan. Section 311 for Lebanese exchange houses processing IRGC-QF transfers.

V. Iran Nuclear / Makran

Iranian nuclear program facilities and Makran coast military-industrial infrastructure

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
MODAFL / HESA UAV and Missile Procurement Network	Tehran, Iran (global procurement nodes: UAE, Turkey, China, Germany, Hong Kong)	MODAFL (Ministry of Defense, SDGT); HESA (UAV manufacturer, designated); KIPAS (designated Oct 2021); 32 entities/individuals designated Nov 12 2025	India Transshipment	DESIGNATED	E.O. 13382; E.O. 13224; UNSCR snapback (Sep 27 2025); NSPM-2 — HESA manufactures Ababil-series UAVs deployed by IRGC and transferred to Russia (battlefield Ukraine) and Venezuela. KIPAS subsidiary PARPO produced hundreds of UAV components through early 2025. Nov 2025 OFAC designated 32 entities/individuals across Iran, UAE, Turkey, China, HK, India, Germany, Ukraine. Action: Continue entity-by-entity designation of each procurement node as identified; EAR Entity List additions for all Chinese and HK suppliers; CAATSA §231 secondary sanctions for Russian entities receiving Iranian UAVs.
Iranian Shadow Fleet — Oil Export Evasion	Persian Gulf / Strait of Hormuz / global tanker routes	Multiple undisclosed Iranian-operated tankers; Chinese teapot refineries (several designated 2025); ship-to-ship transfer networks	Iran Sanctions Evasion	PARTIAL	E.O. 13599; IFCA; ISA; Iran Sanctions Act; CISADA — Iran exports ~1.5-2M bpd to China via shadow fleet, providing primary revenue stream despite sanctions. Chinese teapot refineries designated throughout 2025 for purchasing sanctioned Iranian crude. Apr 2025 OFAC shipping guidance on detecting Iranian oil evasion. Iran GL T (Jan 23 2026) issued for safety/offloading transactions involving newly blocked vessels. Action: Continue tanker-level SDN additions by IMO number; CISADA §104 correspondent account prohibition on Chinese banks financing teapot refinery purchases; coordinate with EU port state control for Iranian shadow fleet vessel interception.
Iran-Venezuela UAV and Weapons Trade	Tehran, Iran / Caracas, Venezuela	Pardisan Rezvan Shargh (designated Dec 30 2025); multiple Venezuelan intermediaries; Adel el Zabayar (PSUV member, Arab federation middleman)	Iran Sanctions Evasion	DESIGNATED	E.O. 13382; E.O. 13850 (Venezuela); NSPM-2 — Dec 30 2025 OFAC designated Venezuela-Iran UAV procurement network — Venezuelan company acquiring Iranian-designed combat drones for Venezuelan armed forces. US characterized Iran's conventional weapons provision to Venezuela as threat to US Western Hemisphere interests. Adel el Zabayar assessed as middleman between Cartel of Suns and Middle Eastern militias (Hamas/Hezbollah weapons-for-cocaine). Action: Continue E.O. 13382 designations of each identified Venezuela-Iran arms transfer node; post-Maduro, target remaining Venezuelan military officials maintaining Iran weapons relationship.
IRGC-QF Petrochemical Revenue Network	Iran / UAE / Turkey / China	Multiple petrochemical front companies; UAE exchange houses; Turkish gold-for-oil intermediaries (CISADA targets)	UAE Transshipment	PARTIAL	CISADA §104; ISA §5(a); E.O. 13846; IFCA — IRGC-QF generates revenue through petrochemical exports routed via UAE exchange houses and Turkish gold-for-oil schemes. CISADA §104 provides the strongest authority — correspondent account prohibition for FFIs engaged in significant petrochemical transactions with Iran. Turkey's Halkbank prior prosecution history for Iranian sanctions evasion is the leverage point. Action: CISADA §104 informal pressure on UAE and Turkish banks identified in IRGC-QF petrochemical chains; OFAC SDN designation of each UAE exchange house identified in Oct 2025 FinCEN shadow banking examination.
Sa'id al-Jamal Network — Iranian Oil to Chinese Teapot Refineries	Yemen / UAE / China (Shandong)	Sa'id al-Jamal (designated IRGC-QF linked); Adeema	UAE Transshipment	DESIGNATED	E.O. 13224; IFCA §104(c); CISADA — Al-Jamal runs Iranian oil-to-Houthi revenue scheme generating ~\$2B/yr. Iranian government provides free monthly oil shipment plus sales via Dubai front

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
		Oil FZC (Dubai, designated Jan 2026); Arkan Mars Petroleum DMCC (Dubai, designated); Chinese teapot			companies. Shandong teapot refineries receive sanctioned Iranian crude — CISADA §104 correspondent account prohibition applies to Chinese banks financing these purchases. Mar 2025 OFAC sanctioned Chinese teapot refinery in this network. Action: Continue teapot refinery SDN designations; CISADA §104 informal pressure on Chinese banks; Chainalysis cluster analysis on al-Jamal crypto wallets (5 addresses designated) for fresh address identification.
UAE Front Company Network — Petroleum and Weapons Financing	Dubai / Fujairah, UAE	Adeema Oil FZC; Arkan Mars Petroleum DMCC; Alsaar Petroleum and Shipping FZC; Tyba Ship Management DMCC (Muhammad Al-Sunaydar, designated Jul 22 2025)	UAE Transshipment	DESIGNATED	E.O. 13224; HIFPA; CAATSA §226 (UAE FFI exposure) — UAE-based front companies manage Houthi petroleum sales, ship management, and financial services. Al-Sunaydar coordinates Houthi airline acquisition (Barash Aviation, Sama Airline) and attempted Viktor Bout aircraft purchase contact early 2025. Action: CAATSA §226 informal pressure on Emirates NBD and Abu Dhabi Commercial Bank if they service designated Houthi front company accounts; Helms-Burton-adjacent theory inapplicable here but UAE FATF compliance leverage applies; coordinate with UAEFIU (UAE Financial Intelligence Unit) on al-Sunaydar network.
Oman Border Corridor — Weapons Smuggling and Financial Transit	Salalah / Al-Mazyunah, Dhofar Governorate, Oman	Rabya for Trading FZC (Al-Mazyunah, designated Jan 2026 — concealed Kornet missiles); Al-Jabri General Trading and Investment Co (Salalah, designated	Unknown	DESIGNATED	E.O. 13224; secondary sanctions per E.O. 13224 §1(b) — Oman's border with Yemen is the primary weapons smuggling route — Rabya for Trading designated for concealing Kornet anti-tank missiles. Mar 2025 Yemeni authorities intercepted 800 Chinese drone propellers at Omani border. Oman's political neutrality creates enforcement gap. Action: State Department diplomatic engagement with Muscat on border control; OFAC SDN additions for each identified Omani transit company; coordinate with UK OFSI (UK has designated Oman-based Houthi facilitators concurrently).
Pickaxe Mountain (Kuh-e Kolang Gaz La) — Covert Centrifuge Facility	1 mile south of Natanz, Isfahan Province, Iran	IRGC (suspected)	Iran Nuclear — Covert Facility	MONITOR	ACTIVE CONSTRUCTION observed post-strike. IAEA access NEVER granted. Assessed at MODERATE-HIGH concern for covert centrifuge assembly/storage. Underground depth provides protection against conventional strikes. Washington Post/Jewish Chronicle satellite imagery analysis (2025-2026) confirms accelerated construction. Location 1 mile from Natanz enables covert UF6 transfer via suspected underground connection. CRITICAL UNKNOWN — highest priority ISR target.
Parchin: Taleghan 1 & 2 — High Explosive Test Site	Parchin Military Complex, Tehran Province, Iran	IRGC / MoD (state)	Iran Nuclear — Weaponization	DESIGNATED	ACTIVE — BEING HARDENED post-strike. Site of hydrodynamic explosive lens testing (weapons design testing). One brief IAEA visit — incomplete. EO 13382. Seismic signatures from Taleghan-2 distinguishable via CTBTO P-wave/S-wave ratio analysis. Commercial SAR (InSAR ground deformation) applicable for monitoring. Hardening activity indicates continued weapons relevance.
Parchin: Golab Dareh — Status Unknown	Parchin Military Complex, Tehran Province, Iran	IRGC / MoD (state)	Iran Nuclear — Weaponization	MONITOR	STATUS UNKNOWN. IAEA never visited. Located within Parchin military complex. Function not established from open sources. Monitoring priority given Taleghan activity.
Parchin: Shahid Boroujerdi — Status	Parchin Military Complex, Tehran Province, Iran	IRGC / MoD (state)	Iran Nuclear — Weaponization	MONITOR	STATUS UNKNOWN. IAEA never visited. Part of Parchin military complex cluster with weapons-relevant history. Monitor.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
Unknown					
Arak IR-40 Heavy Water Reactor	Arak, Markazi Province, Iran	AEOI (state)	Iran Nuclear — Reactor	PARTIAL	OPERATIONAL (modified per JCPOA redesign to reduce plutonium output). Under safeguards. Produces reduced plutonium. Monitor for compliance with JCPOA modification terms given Iran's post-strike posture and suspension of IAEA access at other sites.
Turqezabad — Uranium Trace Investigation Site	Tehran suburbs, Tehran Province, Iran	AEOI / IRGC (suspected)	Iran Nuclear — Undeclared Activity	MONITOR	INVESTIGATION OPEN. IAEA found uranium traces at this location in 2019 — Iran has not provided satisfactory explanation. Limited IAEA access. EO 13382 investigation nexus. Environmental sampling priority site.
Varamin — Uranium Trace Investigation Site	Varamin, Tehran Province, Iran	AEOI / IRGC (suspected)	Iran Nuclear — Undeclared Activity	MONITOR	INVESTIGATION OPEN. IAEA found uranium traces. Limited access granted. Monitor for activity changes post-June 2025 strikes which may have altered site use patterns.
Marivan Test Site — High Explosive Testing	Kermanshah Province, Iran	IRGC / MoD (state)	Iran Nuclear — Weaponization	MONITOR	STANDBY / PERIODIC. Site of implosion hydrodynamic testing. CTBTO seismic monitoring applicable. One IAEA visit — inadequate. EO 13382 nexus. Remote location limits commercial imagery utility but Sentinel-2 change detection applicable.
Ardakan Uranium Processing Plant	Ardakan, Yazd Province, Iran	AEOI (state)	Iran Nuclear — Processing	PARTIAL	OPERATIONAL. Declared safeguarded uranium yellowcake production. Downstream from Saghand mine. EO 13382 AEOI designation. Supply chain interdiction for chemicals, processing equipment.
Bushehr Nuclear Power Plant	Bushehr, Bushehr Province, Iran	AEOI / Rosatom JV	Iran Nuclear — Reactor	PARTIAL	OPERATIONAL. Russian-managed safeguards. EO 13382 / EO 14024 intersection — Rosatom fuel supply chain. TVEL fuel supply from Krasnokamensk. Monitor for any Russia-Iran nuclear cooperation beyond declared fuel supply. GL considerations apply if any US nexus in fuel chain.
Chalus — Suspected Underground Nuclear Site	Mazandaran Province, Iran (coastal mountain range)	IRGC (suspected)	Iran Nuclear — Suspected Covert	MONITOR	UNKNOWN status. Suspected deep underground facility in Alborz Mountains coastal range. Never visited by IAEA. Depth and terrain make commercial imagery assessment extremely limited. InSAR ground deformation monitoring applicable if baseline established.
Kolahdouz — Suspected Nuclear Facility	Tehran Province, Iran	IRGC (suspected)	Iran Nuclear — Suspected Covert	MONITOR	UNKNOWN status. Suspected facility. Never visited by IAEA. Tehran-proximate. Monitor with commercial imagery.
Makran Node 1 — Power Generation Facility	Northern sector, Makran Coast, Sistan-Baluchestan, Iran	Unknown — IRGC suspected	Iran Makran — Infrastructure	MONITOR	OBSERVED (high confidence). Enclosed generating station with substation and transmission southward. No civilian grid connectivity observed. SPAD priority: turbine maintenance, control system firmware require Western OEM. E.O. 13382 designation of operators/contractors if function confirmed. FDPR block on turbine/generator components (15 C.F.R. §744.21). Level 1 action: Sentinel-2 baseline. Level 4 gate: operator/contractor identity + dual-use confirmation.
Makran Node 2 — Water Treatment / Desalination	Northern sector, ~200m north of Node 1, Makran Coast, Iran	Unknown — IRGC suspected	Iran Makran — Infrastructure	MONITOR	OBSERVED. RO or thermal desalination profile. Confirms design for sustained occupation. SPAD: RO membrane replacement (3-5yr cycles), chemical treatment, pump seals. FDPR block on desalination membranes and pumps (15 C.F.R. §744.21). SLRI monitoring: operational status as readiness indicator.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Makran Node 3 — Large Industrial Complex (PRE-OPERATIONAL) ★ PRIORITY	Central sector, Makran Coast, Sistan-Baluchestan, Iran	Unknown — IRGC suspected	Iran Makran — Infrastructure	MONITOR	CRITICAL PRIORITY. OBSERVED/ASSESSED/INFERRED. Large-footprint construction — foundation complete, structural steel framing, early enclosure as of Oct-Nov 2025. ESTIMATED 12-18 months to operational (uncertainty range applies). End-use NOT established. Adjacency to Node 4, 7, 9 consistent with production-and-logistics design. E.O. 13382 designation GATED at Level 4 — function corroboration required. BIS Entity List for confirmed contractors/suppliers NOW. Section 311 for construction financing. Pre-operational window currently open — supply chain constraint is substantially more achievable than post-operational capability de-risking.
Makran Node 4 — Hardened Secure Industrial Perimeter	Central sector, east of Node 3, Makran Coast, Iran	Unknown — IRGC suspected	Iran Makran — Infrastructure	MONITOR	OBSERVED/ASSESSED. Enclosed compound with perimeter wall, controlled access. Standoff distances atypical for civilian warehousing. Contents NOT observable. Do not assert military or WMD storage based on hardening profile alone — Level 4 corroboration required. E.O. 13382 designation GATED. Maritime enforcement coordination for vessels delivering to adjacent port.
Makran Node 5 — Ocean Water Intake (Primary)	Coastline, southern sector, Makran Coast, Iran	Unknown	Iran Makran — Infrastructure	MONITOR	OBSERVED. Pump house at coastline with intake infrastructure routing northward to Nodes 1 and 2. Primary SPAD target: pump maintenance, marine engineering services, anti-fouling treatments.
Makran Node 6 — Ocean Water Intake (Redundant)	Coastline, southern sector, ~150m west of Node 5, Makran Coast, Iran	Unknown	Iran Makran — Infrastructure	MONITOR	OBSERVED. Redundant intake pair confirms engineering for operational resilience. Dual installation is significant indicator of mission-critical design. SPAD reliability target — same supply chains as Node 5.
Makran Node 7 — Deep-Water Port (PRIORITY)	Eastern sector, coastline, Makran Coast, Iran	Unknown — IRGC suspected	Iran Makran — Maritime	MONITOR	CRITICAL PRIORITY. OBSERVED. Active port construction — pier/quay, breakwater, dredging, landside logistics. Pier scale indicates design for large vessels. All maritime enforcement for Makran complex converges here. PRIMARY SLRI node. AIS data pull is the critical first action (commercial subscription ~\$500-2000/yr). Registry de-flagging notifications. P&I club notification for regularly calling vessels. CBP Do Not Load orders for US-bound vessels (46 U.S.C. §70201).
Makran Node 8 — Protected Communications Facility	Eastern sector, adjacent to Node 7, Makran Coast, Iran	Unknown — IRGC suspected	Iran Makran — Infrastructure	MONITOR	OBSERVED/ASSESSED. Communications facility with hardened structures and antenna profile suggesting long-range capability beyond local maritime VHF. FDPR block on communications equipment, satellite terminals, encryption hardware (15 C.F.R. §744.21). SPAD: block firmware, certification services, maintenance contracts.
Makran Node 9 — Fuel Refinery + Secondary Port (PRIORITY)	Western sector, ~20km west of main complex, Makran Coast, Iran	Unknown — IRGC suspected	Iran Makran — Maritime	MONITOR	CRITICAL PRIORITY. OBSERVED/ASSESSED. Refinery infrastructure with storage tanks, process equipment, flaring, and secondary port enabling direct vessel refueling. Independent fuel eliminates dependence on Iranian national distribution — directly enables shadow fleet operations. Spatial separation from main complex may indicate deliberate OPSEC design (INFERRED). Section 311 for financing/purchasing institutions. CISADA 180-day

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
					warning letters to confirmed non-US product purchasers. E.O. 13382 designation of vessels regularly refueling here. AIS data pull priority alongside Node 7.
Makran Node 10 — Inland Oil/Power Generating Site	Inland, ~20km north of coastal complex, Sistan-Baluchestan, Iran	Unknown	Iran Makran — Infrastructure	MONITOR	OBSERVED/ASSESSED. Oil/gas extraction or backup power generation. Road connections southward to main complex. Inland positioning provides energy independence from coastal vulnerability. FDPR block on drilling/extraction/generation equipment. SLRI secondary monitoring node.

VI. Hormuz / IRGC Military

Strait of Hormuz military posture, IRGC naval nodes, and coalition military infrastructure

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Strait of Hormuz — TSS Narrows	Strait of Hormuz, Persian Gulf / Gulf of Oman	International waters — IRGC control contested	Hormuz — Maritime Chokepoint	MONITOR	20M barrels/day — ~20% global oil consumption. ~25% all seaborne oil trade. IMO TSS: two 3.2km one-way lanes plus 3.2km separation zone. 34km wide at narrowest. Iran pre-positioned 5,000+ naval mines as of June 2025. IRGC declared closure to US/Israeli/Western-allied shipping March 2, 2026. No realistic near-term bypass — Saudi East-West plus Habshan-Fujairah plus Iran Goreh-Jask pipelines cover less than 15% of normal flow. All Qatari LNG must transit with no bypass. Coalition enforcement architecture requires simultaneous MCM deployment, naval escort, and financial pressure on IRGC maritime network.
Abu Musa Island — IRGC Garrison	Abu Musa Island, Strait of Hormuz (UAE sovereignty claim)	IRGC / Iranian Armed Forces (occupied since 1971)	Hormuz — IRGC Military	DESIGNATED	EO 13599. Largest disputed island. Active IRGC garrison. Anti-ship missile batteries. Radar. Airstrip. Commands southern TSS approach. UAE maintains sovereignty claim — China formally backed UAE claim December 2025. Primary IRGC fire-control node for strait closure operations. Mine-laying staging capability. Any reopening architecture must address IRGC military presence on all three Tunbs and Abu Musa simultaneously. HIFPA/IFCA authorities for financial pressure on IRGC units. P&I denial and vessel designation for ships supplying IRGC garrison. Seizure option assessed as high-escalation with occupation obligation consequences under Hague Regulations.
Greater Tunb Island — IRGC Overwatch	Greater Tunb Island, Strait of Hormuz	IRGC (occupied since 1971)	Hormuz — IRGC Military	DESIGNATED	EO 13599. IRGC base. Fire-control and radar overwatch of BOTH TSS lanes. Commands northern approach. Paired with Abu Musa for triangulated fire coverage of strait. UAE sovereignty claim. Any mine countermeasures or strait-reopening operation requires IRGC fire-control here suppressed before MCM operations can proceed safely. Financial pressure on IRGC units: EO 13599, HIFPA 2012/2015/2018. Designation of IRGC Navy units operating here under EO 13224 and EO 13382.
Lesser Tunb Island — IRGC Surveillance	Lesser Tunb Island, Strait of Hormuz	IRGC (occupied since 1971)	Hormuz — IRGC Military	DESIGNATED	EO 13599. Small IRGC patrol station. Primarily surveillance and early warning value. UAE sovereignty claim. Part of three-island IRGC control architecture for the strait mouth.
Farur Island — IRGC Naval Special Forces	Farur Island, Persian Gulf	IRGC Naval Special Forces	Hormuz — IRGC Military	DESIGNATED	EO 13599. IRGC Naval Special Forces staging base. Primary node for vessel seizure operations, mine-laying, and maritime sabotage. This is the tactical origin point for IRGC fast-boat swarm tactics and tanker seizures. Suppression of Farur would significantly degrade IRGC asymmetric maritime capability.
Qeshm Island — IRGC Naval / Submarine	Qeshm Island, Strait of Hormuz, Iran	IRGC Navy / Iranian Navy	Hormuz — IRGC Military	DESIGNATED	EO 13599. Iran's largest island. IRGC naval facilities. Submarine basing. Significant military value but located inside Iranian territorial waters — action here constitutes direct attack on Iranian sovereign territory under UNCLOS/UN Charter. Escalation threshold substantially higher than Farur or Tunbs.
Kharg Island — Iran	Kharg Island,	NIOC — National	Hormuz — Iran	DESIGNATED	EO 13599. 90-98% of Iranian crude exports. ~2.5-3M bpd throughput.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Primary Crude Export Terminal	Northern Persian Gulf, Iran	Iranian Oil Company (state)	Revenue Node	TED	NIOC designated. The principal Iranian oil-export revenue node — defines the upper bound of economic pressure on Iran. Located 483km northwest of strait — NOT in strait itself. Kharg seizure (Posture 3) assessed: high-escalation, creates belligerent occupation under Hague Regulations Arts. 42-56, ~10,000 permanent civilian residents. Axios (March 8, 2026) reported US officials actively discussing seizure as contingency. Threat of seizure is more durable leverage than actual seizure given occupation obligation consequences.
Bandar Abbas — IRGC Navy HQ + Minelaying Base	Bandar Abbas, Hormozgan Province, Iran	IRGC Navy / Iranian Regular Navy	Hormuz — IRGC Military	DESIGNATED	EO 13599. Primary IRGC Navy headquarters and fleet base. Mine-laying vessel home port. Fast-attack craft (FAC) base. Primary node for anti-ship missile operations against TSS traffic. The operational command center for any IRGC strait-closure campaign. Commercial satellite imagery has documented extensive naval infrastructure expansion post-2020.
Bandar-e Bushehr — Iranian Navy / Submarine Base	Bushehr, Bushehr Province, Iran	Iranian Navy (IRIN)	Hormuz — IRGC Military	DESIGNATED	EO 13599. Iranian regular navy (IRIN) submarine base. Kilo-class submarines operated from here. Secondary to Bandar Abbas but provides submarine depth for Gulf operations. Proximate to Bushehr NPP (Russian-managed) — colocation of nuclear facility and naval base creates targeting complexity requiring deconfliction in any strike planning. IRIN Kilo-class submarines are primary mine-laying and anti-ship torpedo threat in deeper Gulf waters. P&I denial for vessels supplying naval base. Monitor via commercial AIS for submarine departure patterns as escalation indicator.
South Pars / Asaluyeh — Iran LNG / Gas Hub	Asaluyeh, Bushehr Province, Iran	NIOC / POGC (state)	Hormuz — Iran Revenue Node	DESIGNATED	EO 13599. World's largest natural gas field (shared with Qatar's North Dome). Iran's primary LNG and gas condensate export hub. 29 development phases. Supply chain interdiction for compressor equipment and LNG liquefaction technology. South Pars gas condensate is a significant revenue source separate from crude — monitor for shadow fleet condensate exports bypassing price cap. CISADA §104(c) for non-US purchasers of South Pars condensate. Section 311 for financial institutions processing South Pars revenue. FDPR block on LNG technology suppliers.
NSA Bahrain — US 5th Fleet HQ	Manama, Bahrain	US Navy / 5th Fleet	Hormuz — US/Coalition Military	MONITOR	US 5th Fleet headquarters. Combined Maritime Forces (CMF) with 38 partner nations. Primary escort operations platform. MCM assets forward-deployed here. Analytically favored as primary hub for Posture 2 reinforced distributed architecture. Bahraini government interest in sustained US presence documented. Monitor: Iranian ballistic missile targeting of Bahrain naval infrastructure in any escalation scenario. CMF coordination mechanism for coalition burden-sharing on escort and MCM missions throughout theater.
Al Udeid Air Base — AFCENT HQ	Al Udeid, Qatar	US Air Force / AFCENT	Hormuz — US/Coalition Military	MONITOR	Largest US air base in Middle East. Air Forces Central Command HQ. ISR and tanker aircraft. Special operations aircraft. Iranian ballistic missile strike on Al Udeid reported June 2025 (Tier 2 open-source). Qatar's continued hosting of AFCENT despite Iranian pressure is a documented strategic constraint. Monitor: Qatari political tolerance for continued US air operations as crisis duration extends. Al Udeid hosts

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					B-52 rotational deployments providing strategic bomber reach throughout theater.
Fujairah Port — UAE Gulf of Oman Staging Hub	Fujairah, UAE (Gulf of Oman side)	UAE / US forward staging	Hormuz — US/Coalition Military	MONITOR	Assessed as optimal permanent MCM basing location (MODERATE-HIGH confidence, analytically inferred). Gulf of Oman side — accessible during active strait closure when Persian Gulf access is contested. UAE political relationship supports presence. Key oil tanker staging area — approximately 15M barrels stored at any given time. Habshan-Fujairah pipeline terminates here (~1.5M bpd bypass capacity). Fujairah anchorage is primary STS transfer point for Gulf shadow fleet operations — AIS monitoring here provides shadow fleet intelligence.
Camp Lemonnier — AFRICOM/JSOC Horn of Africa	Djibouti, Horn of Africa	US AFRICOM / JSOC	Hormuz — US/Coalition Military	MONITOR	JSOC forward operating base for Horn of Africa and Red Sea operations. Drone operations (MQ-9). P-8 Poseidon maritime patrol. Critical for any extended Hormuz crisis requiring sustained ISR over Iranian naval assets and Bab-el-Mandeb secondary chokepoint. Djibouti also hosts Chinese PLA Navy Support Base — dual-basing creates intelligence sensitivity. Camp Lemonnier provides basing for maritime patrol aircraft monitoring IRGC-QF weapons shipments to Houthis in Red Sea corridor.
Diego Garcia — B-2/B-52 Strike Staging	British Indian Ocean Territory	US Navy / RAF (joint)	Hormuz — US/Coalition Military	MONITOR	B-2 Spirit and B-52 strategic bomber forward staging. Primary long-range strike platform for Iranian nuclear or naval infrastructure campaign. GBU-57 MOP (Massive Ordnance Penetrator) capable — the weapon used in Operation Midnight Hammer June 2025. Indian Ocean location provides reach into Iran without requiring regional basing access. UK sovereign territory — RAF joint use. Diego Garcia is the only US basing option that does not require regional partner consent for long-range strike missions against Iran.
Chabahar Port — India Strategic Foothold	Chabahar, Sistan-Baluchestan, Iran	India (IPGL, \$85M investment) / Iran (CAICT)	Hormuz — Regional Geopolitics	MONITOR	India's \$85M investment documented. Indian strategic autonomy doctrine creates explicit constraint on US sanctions enforcement targeting Chabahar — India obtained exemption from Iran sanctions for Chabahar development (2018, renewed). Located ~70km from Makran complex Node 7 — potential logistical overlap. Monitor for any Chabahar-Makran infrastructure connection or vessel traffic overlap. India's independent Iran relationship is a structural constraint on full coalition enforcement — must be managed through bilateral diplomatic channel rather than secondary sanctions pressure.
Iran Goreh-Jask Pipeline — Persian Gulf Bypass	Jask, Hormozgan Province, Iran	NIOC (state)	Hormuz — Iran Bypass Infrastructure	MONITOR	Iran's strategic bypass pipeline terminating at Jask on the Gulf of Oman — designed specifically to allow oil exports without transiting Hormuz. Capacity: ~1M bpd (part of less than 15% total bypass). Represents Iran's own recognition of Hormuz vulnerability. Operational status 2021+. Sanctions interdiction of Jask terminal equipment and operators (EO 13599) can limit effectiveness of this bypass route. FDPR block on pipeline equipment suppliers. Monitor via Sentinel-2 for tanker loading operations at Jask terminal as indicator of bypass route activation during strait closure.
Aden — Coalition	Aden, Yemen	Saudi-led coalition / UAE-backed STC	Hormuz — US/Coalition	MONITOR	Saudi-led coalition and UAE-backed STC primary Yemen southern hub. US-designated shipping protection coordination. Monitor Houthi

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Counter-Houthi Operations Hub			Military		Red Sea attack patterns via AIS vessel dark period analysis. Red Sea attacks have displaced shipping from Suez route — affecting global container shipping costs. Relevant to Hormuz crisis as Houthi activation is documented IRGC-QF tool for maritime pressure. Coalition enforcement coordination here is essential complement to Hormuz maritime security architecture — Bab-el-Mandeb and Hormuz must be addressed simultaneously to prevent Iranian two-front maritime pressure.

VII. Cartel / Narcotics Finance

Sinaloa, CJNG, and associated precursor supply chain and financial infrastructure

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
PRC Fentanyl Precursor Supply Chain (Shenzhen/Wuhan chemical clusters)	Shenzhen / Wuhan / Guangzhou, China	Multiple undisclosed PRC chemical manufacturers; Shenzhen electronics/chemical OTC network	Cartel Finance	TARGETABLE	FEND Off Fentanyl Act; 18 U.S.C. §2339B (post-FTO); E.O. 13224 (SDGT); EAR Entity List — FTO designation of Sinaloa/CJNG (Feb 20 2025) converts PRC precursor suppliers from export control targets to §2339B material support targets — 20-year maximum sentences. Enhanced Notice of End-User Status procedure (ARCH-03) eliminates good-faith defense after delivery notification. Al Kassab (660 F.3d 108) precedent supports extraterritorial jurisdiction. Action: DOJ/HSI task force targeting PRC chemical manufacturers with documented Sinaloa/CJNG supply relationships; FEND Off Fentanyl Act OFAC designations; EAR Entity List additions; Section 311 PMLC designation for Shenzhen OTC chemical-to-crypto payment networks.
Bulk Cash Smuggling and US Real Estate Laundering	US-Mexico border / Los Angeles / Chicago / Phoenix	Multiple cartel-controlled money service businesses; real estate shell companies; hawala networks	Cartel Finance	MONITOR	Cartels launder billions through US real estate using all-cash purchases and shell companies. FinCEN Real Estate Reporting Rule (finalized 2024) requires disclosure of beneficial owners in all-cash real estate transactions. FTO designation creates additional BSA SAR obligation for financial institutions identifying cartel-linked transaction patterns. Action: FinCEN Real Estate Reporting Rule enforcement targeting identified cartel-linked shell companies; §2339B prosecution theory for US real estate attorneys and agents knowingly facilitating cartel money flows; IRS Criminal Investigation coordination for tax nexus.
Trade-Based Money Laundering (TBML) — Black Market Peso Exchange	US / Mexico / Colombia (distributed)	Multiple import/export businesses; Black Market Peso Exchange brokers; Chinese manufactured goods intermediaries	Cartel Finance	MONITOR	18 U.S.C. §1956; BSA; Kingpin Act; §981(k) asset substitution — TBML/Black Market Peso Exchange remains the highest-volume cartel laundering mechanism — drug proceeds converted to trade goods (Chinese electronics, appliances) invoiced at manipulated prices. §981(k) asset substitution allows US to seize equivalent value from US correspondent accounts of foreign banks facilitating TBML transactions. Action: FinCEN TBML red flag implementation; §981(k) actions against identified Mexican banks with documented TBML exposure; coordinate with CBP on over/under-invoicing detection at US ports.
CJNG Methamphetamine and Synthetic Drug Production Infrastructure	Jalisco / Michoacan / Guanajuato, Mexico	CJNG (FTO/SDGT Feb 20 2025); Nemesio Oseguera Cervantes 'El Mencho' (Kingpin Act, SDN); Cartel de Santa Rosa de Lima (designated Dec 2025 for Pemex fu	Cartel Finance	DESIGNATED	Kingpin Act; 21 U.S.C. §960a; 18 U.S.C. §2339B; E.O. 13224 — CJNG controls primary meth production and fentanyl mixing infrastructure in Mexico. Cartel de Santa Rosa de Lima designated Dec 2025 for Pemex pipeline theft (huachicol) — billions in illicit revenue, cross-border energy black market. El Mencho on SDN/Kingpin list with \$10M US reward. Action: §2339B prosecutions for US-nexus CJNG material support including financial services, legal representation, and logistics; DEA Operation Phantom targeting CJNG chemical supply chains; OFAC secondary sanctions on Mexican financial institutions with documented CJNG account relationships.
AGC European Cocaine	Colombia /	AGC export	Cocaine Export /	PARTIAL	Kingpin Act; 21 U.S.C. §959; EU narcotics enforcement cooperation

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
Supply Chain	Spain / Netherlands / Belgium	coordinators; European port cartel contacts (Rotterdam, Antwerp, Algeciras)	Port Corruption		— AGC supplies ~70% of European cocaine through Rotterdam, Antwerp, and Spanish ports. Corruption of port workers documented in Rotterdam and Antwerp. Coordinate OFAC/EUROJUST joint designation of identified European financial intermediaries and logistics controllers.
FARC EMC (Estado Mayor Central) Coca Revenue	Colombia (Cauca, Nariño, Meta, Putumayo)	Iván Mordisco (EMC commander); regional front commanders	Coca Cultivation / Cocaine Processing	DESIGNATED	EO 13224; FTO designation (FARC 1997, maintained for dissidents); Kingpin Act — EMC controls largest coca-growing departments post accord fragmentation. Iván Mordisco designated. Revenues fund armed operations against Colombian state. Coordinate with Colombian UIAF for front company financial intelligence.
Segunda Marquetalia — Venezuela-Based Operations	Venezuela / Colombia / Ecuador	Iván Márquez (deceased 2023) / successor leadership; Venezuelan military protection	Cocaine Production / Venezuela Safe Haven	DESIGNATED	EO 13224; EO 13692 (Venezuela); FTO designation — Segunda Marquetalia operates from Venezuelan territory under state protection. Post-Maduro capture (Jan 2026), monitor for operational disruption. Designate Venezuelan military officers providing safe haven under EO 13692.
AGC / FARC Money Laundering — Colombian Financial System	Colombia / Panama / US	AGC financial controllers; Panama-based front companies; Colombian casas de cambio	Money Laundering / TBML	PARTIAL	Kingpin Act; BSA §5318A; 18 U.S.C. §1956; FATF R.15/R.16 — Cocaine revenues laundered through Colombian real estate, cattle ranching, gold mining, and Panama-based shell companies. FinCEN Section 311 action against identified Colombian casas de cambio warranted. Coordinate with UIAF Colombia.
AGC Cryptocurrency Revenue Layer	Global / Colombia	AGC crypto facilitators; peer-to-peer exchange operators	Crypto Laundering	TARGETABLE	Kingpin Act; GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026); BSA §5318A; 18 U.S.C. §1956 — AGC and FARC dissidents increasingly use cryptocurrency for cross-border value transfer. TRM Labs has identified associated wallet clusters. Coordinate OFAC crypto wallet designation package with DEA SOTU.
Kinahan OCG Dubai Financial Hub	Dubai, UAE	Daniel Kinahan (designated, \$5M reward); Christopher Kinahan Sr. (designated); Tiger Capital Group; Ducati LLC; various Dubai-registered entities	Money Laundering / OCG Finance	DESIGNATED	Kingpin Act (Apr 2022); UAE-US law enforcement cooperation — KOCG primary financial operations run from Dubai. Daniel Kinahan, Christopher Sr. and Jr. all designated with \$5M rewards. UAE cooperation has been partial. Apply CAATSA §226-equivalent Kingpin secondary pressure on UAE financial institutions knowingly facilitating KOCG transactions.
KOCG European Cocaine Distribution Network	Ireland / UK / Spain / Netherlands / Belgium	KOCG senior lieutenants; Spanish costal logistics operators; Dutch port contacts	Cocaine Distribution / Wholesale Brokerage	DESIGNATED	Kingpin Act; 21 U.S.C. §959; EU narcotics enforcement — KOCG brokers cocaine from AGC and other Colombian producers to European markets. Spanish operations centered on Costa del Sol (Marbella/Malaga). Coordinate OFAC/Europol/EUROJUST for financial intelligence sharing on identified European KOCG financial controllers.
MTK Global / Boxing Promotion Cover (Dissolved)	Dubai / Ireland / UK	Daniel Kinahan (former MTK chairman); MTK	Legitimate Business Cover (Dissolved)	SEIZED	Kingpin Act; corporate dissolution proceedings — MTK Global dissolved following OFAC designation Apr 2022. Monitor for successor sports/entertainment entities used as financial cover.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
		Global Ltd (dissolved post-designation)			Daniel Kinahan reported to have interests in other sports management entities.
KOCG Cryptocurrency Financial Layer	Global / UAE / Ireland	KOCG-affiliated crypto facilitators; UAE-based OTC desks	Crypto Money Laundering	TARGET ABLE	Kingpin Act; GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026); BSA §5318A; 18 U.S.C. §1956 — KOCG has adopted cryptocurrency for value transfer and money laundering following increased banking sector scrutiny post-designation. TRM Labs and Chainalysis have identified associated wallet clusters. Issue OFAC crypto wallet designations for confirmed KOCG-linked addresses.
KOCG Real Estate and Business Portfolio — Dubai / Spain	Dubai, UAE / Spain	KOCG beneficial owners; Dubai-registered holding companies; Spanish real estate	Asset Concealment / Money Laundering	PARTIAL	Kingpin Act; UAE asset recovery cooperation; Spanish judicial cooperation — KOCG holds significant real estate and business assets in Dubai and Spain. Post-designation asset freezes partially executed in Spain. UAE asset recovery cooperation remains incomplete. Coordinate with UAE AMLSCU for comprehensive asset freeze enforcement.
Sinaloa Cartel — Culiacán Operations Hub	Culiacán, Sinaloa, Mexico	Sinaloa Cartel (Kingpin Act / FTO)	Cartel Finance	DESIGNATED	Kingpin Act. Sinaloa Cartel designated FTO Feb 2025. Culiacán is the primary cartel operational hub — logistics, command, financial processing. DEA/OFAC coordination. Section 311 special measures for Mexican financial institutions knowingly processing cartel funds. TBML networks operating through import/export businesses here. Ismael 'El Mayo' Zambada arrested 2024; leadership transition disrupted but not eliminated organizational capacity.
CJNG — Guadalajara/Jalisco Operations Hub	Guadalajara, Jalisco, Mexico	Cartel Jalisco Nueva Generación (Kingpin Act / FTO)	Cartel Finance	DESIGNATED	Kingpin Act. CJNG designated FTO Feb 2025. Primary fentanyl precursor procurement and distribution network. Nemesio 'El Mencho' Oseguera Cervantes — \$10M USD DEA reward. FEND Off Fentanyl Act authorities applicable to PRC precursor suppliers. Guadalajara logistics and financial processing hub. US-Mexico border crossing contamination via legitimate trade vehicles.
PRC Fentanyl Precursor Hub — Wuhan Chemical District	Wuhan, Hubei Province, China	Multiple undisclosed PRC chemical manufacturers	Cartel Finance — Precursor	TARGET ABLE	FEND Off Fentanyl Act (enacted 2024). Multiple undisclosed PRC chemical manufacturers supplying fentanyl precursors (4-ANPP, NPP, 4-AP) to Mexican cartel networks. OFAC/DEA joint designations of specific PRC companies ongoing. Secondary sanctions on Chinese financial institutions processing payments for precursor shipments. Shenzhen, Wuhan, and Guangzhou are primary sourcing clusters. EO 14024 §1(a)(iii) potential if nexus to sanctioned cartel entities established.
Clan del Golfo — Urabá Coca Hub	Urabá Region, Antioquia/Chocó, Colombia	Clan del Golfo / AGC (SDNT)	Cartel Finance	DESIGNATED	Kingpin Act / SDNT. Colombia's largest drug trafficking organization. Urabá-Chocó primary cocaine production and maritime export hub. Uses Pacific and Caribbean coastal routes. AGC leadership designated. Colombian security forces conducting ongoing operations. OFAC coordination with Colombian FIU (UIAF). Monitor for US-bound cocaine shipment patterns through Central American transit.
Sinaloa Cartel — Tijuana Border Operations	Tijuana, Baja California, Mexico (US border)	Sinaloa Cartel / Tijuana Faction	Cartel Finance	DESIGNATED	Kingpin Act. Primary fentanyl and methamphetamine US border crossing point. CBP targeting of specific border crossing lanes and legitimate commercial vehicles used for contamination. FinCEN SAR

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					monitoring of cash flow in Tijuana financial sector. DEA intel collection on cartel-controlled warehousing in Otay Mesa area.

VIII. DPRK Finance and WMD

North Korean illicit finance, crypto operations, nuclear and missile program nodes

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Lazarus Group / TraderTraitor — Crypto Heist Infrastructure	Pyongyang, DPRK (global operations)	RGB 3rd Bureau / Lazarus Group (SDGT designated Sep 2019); APT38; TraderTraitor; Jade Sleet	DPRK Finance	DESIGNATED	E.O. 13722; E.O. 13687; UNSCR 1718/2094/2270; NKSPEA — Bybit hack (Feb 2025): \$1.5B ETH — largest crypto theft in history. TraderTraitor methodology: compromise Safe(Wallet) multi-sig infrastructure via spearphishing. Post-theft laundering: rapid conversion to BTC, dispersal across thousands of addresses, cross-chain bridges, OTC brokers. Action: Real-time wallet SDN additions post-hack (OFAC has established this practice); coordinate with Tether for immediate USDT freeze on identified Lazarus-linked addresses under GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) §4(a)(5)(B); Chainalysis/Elliptic continuous cluster monitoring.
DPRK IT Worker Fraud Network (Amnokgang / RGB)	Vietnam, Laos, China, Russia (distributed)	Amnokgang Technology Development Company (designated Mar 12 2026); Nguyen Quang Viet (Vietnam, designated); Yun Song Guk (Laos, designated); 6 individ	DPRK Finance	DESIGNATED	E.O. 13722; NKSPEA; 18 U.S.C. §1349 (wire fraud conspiracy) — IT workers obtain remote employment at US companies using stolen identities and deepfakes. DPRK seizes majority of salaries. Generated ~\$800M in 2024. Mar 12 2026 OFAC action designated 21 crypto addresses across ETH/Tron/BTC. Recruiter pivot to Upwork/Freelancer platforms. Action: FBI/HSI employer awareness program; identity verification requirements for remote contractors; GENIUS Act (Pub. L. 119-27, July 18, 2025 — implementing regulations pending as of March 2026) BSA mandate — US employers paying remote contractors via stablecoin must screen recipient wallets against SDN list.
Huione Pay / Southeast Asian OTC Laundering Network	Cambodia / Vietnam / Southeast Asia	Huione Pay (Cambodia-based payments company); multiple SE Asian OTC brokers	DPRK Finance	TARGETABLE	E.O. 13722; 31 U.S.C. §5318A (Section 311) — Lazarus-associated wallets documented sending funds to Huione Pay accounts. US sanctions targeting Chinese and Russian OTC brokers who launder DPRK proceeds. Section 311 special measure against Cambodian financial institutions is the most direct enforcement lever — unilateral US action, no multilateral consensus required. Action: FinCEN Section 311 designation of Huione Pay as PMLC if transaction evidence meets threshold; parallel OFAC SDN designation of identified OTC broker wallet clusters.
Chinese Front Companies — DPRK Procurement Support	Shenyang / distributed China	Shenyang Geumpungri Network Technology Co. (designated Aug 2025); Korea Sinjin Trading Corporation (designated Aug 2025); multiple undisclosed PRC fro	DPRK Finance	PARTIAL	E.O. 13722; NKSPEA; EAR Entity List; UNSCR 2270 — PRC front companies provide critical procurement support for DPRK WMD and ballistic missile programs — electronics, dual-use materials, financial intermediation. Aug 2025 OFAC designated Shenyang Geumpungri and Korea Sinjin for facilitating IT worker schemes. MSMT (11-nation monitoring team, Feb 2025) lacks UN authority and excludes China/Russia — effectiveness limited. Action: Continue entity-by-entity EAR Entity List additions; EO 14024 §1(a)(iii) secondary sanctions theory against PRC entities providing material support to DPRK designated persons.
DPRK-Russia	Pyongyang /	DPRK Ministry of	DPRK Finance	PARTIAL	NKSPEA; E.O. 13722; UNSCR 1718/2270; E.O. 14024 (Russia

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Arms/Technology Exchange	Moscow	Munitions Industry; Korea Mining Development Trading Corporation (KOMID, designated); Russian MoD intermediaries			nexus) — DPRK supplying ballistic missiles (documented battlefield use Ukraine) and troops to Russia under Jun 2024 mutual defense pact. Russia releasing frozen DPRK assets; advanced space/missile technology transfer in exchange. KOMID is the primary DPRK arms export entity. Action: NKSPEA §104 secondary sanctions on any entity facilitating DPRK-Russia arms transfer; EO 14024 §1(a)(iii) for Russian entities receiving DPRK arms; coordinate with MSMT partners on evidence packages for specific transactions.
Russia-Based Weapons and Grain Procurement (Ghairat Network)	Russia (distributed)	Hushang Ghairat (Russia-based Afghan national, designated Apr 2 2025); Sohrab Ghairat (designated Apr 2 2025); associated shipping companies	DPRK Finance	DESIGNATED	E.O. 13224; EO 14024 (Russia nexus) — Russia-based Afghan nationals facilitated Houthi weapons procurement and transport of stolen Ukrainian grain to Houthi territory. Eight crypto addresses designated Apr 2 2025 supporting weapons/commodities procurement. Russia-Houthi cooperation documented alongside DPRK-Russia and Iran-Russia alignment — converging threat actor network. Action: EO 14024 §1(a)(iii) designation of Russian entities providing material support to Houthi-designated persons; coordinate crypto wallet SDN additions with Chainalysis/TRM Labs monitoring of Ghairat network blockchain activity.
Yongbyon Nuclear Complex	Yongbyon, North Pyongan Province, DPRK	DPRK / General Department of Atomic Energy	DPRK Nuclear	DESIGNATED	EO 13722. Primary nuclear weapons complex. 5MW(e) gas-graphite reactor, reprocessing facility, uranium enrichment plant. IAEA monitoring suspended since 2009. Plutonium reprocessing campaigns detectable via commercial satellite thermal and water-use signatures. Atmospheric krypton-85 sampling applicable for reprocessing detection. UNSCR 1718/2094/2270 designations. Most comprehensively monitored non-declared nuclear facility in open-source literature (38 North, Planet Labs).
Punggye-ri Nuclear Test Site	North Hamgyong Province, DPRK	DPRK military	DPRK Nuclear	DESIGNATED	EO 13722. Six nuclear tests conducted (2006-2017). 2018 tunnel collapse visible in commercial imagery. CTBTO seismic monitoring active. Portal construction/activity observable via Planet Labs. Any new tunnel activity would indicate preparation for 7th test. High-priority monitoring node — 7th test would be a major strategic escalation indicator.
Sanumdong Missile Research/Assembly Facility	Pyongyang, DPRK	DPRK / Second Economic Committee	DPRK Missiles	DESIGNATED	EO 13722. Primary ICBM and large rocket assembly facility. Hwasong-15/17/18 ICBMs assembled here. 38 North and Planet Labs identify rail-mounted transporter activity as launch preparation indicator. Secondary sanctions on any entity providing materials to this facility.
Sinpo South Shipyard — SLBM Development	Sinpo, South Hamgyong Province, DPRK	DPRK Navy	DPRK Missiles	DESIGNATED	EO 13722. SLBM development and submarine construction. Pukguksong SLBM tested from here. Submarine launch pad (SLP) and experimental barge observable via commercial imagery. Submersible barge activity indicates test launch preparation. 38 North continuous monitoring.
Lazarus Group Infrastructure Node (Pyongyang)	Pyongyang, DPRK	RGB 3rd Bureau / Lazarus Group (SDGT)	DPRK Finance — Cyber	DESIGNATED	EO 13722. Lazarus Group (SDGT designated Sep 2019) — primary state-sponsored cyber theft and crypto heist operation. \$3B+ stolen in crypto since 2017. TraderTraitor campaign targeting crypto exchanges. Tornado Cash and cross-chain bridge exploitation for laundering. OFAC designated. Monitor for new exchange registrations

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					and wallet cluster activity via TRM Labs/Chainalysis.
Lazarus Group Crypto Laundering — Singapore Hub	Singapore	Front companies — RGB-linked (SDGT)	DPRK Finance — Crypto	DESIGNATED	EO 13722. Singapore-domiciled front companies used by Lazarus Group for crypto laundering after heists. SDGT-designated entities. MAS (Monetary Authority of Singapore) has taken enforcement action on some entities. Section 311 / CAATSA §226 against Singaporean financial institutions knowingly processing Lazarus-linked flows. TRM Labs tracking: Tornado Cash successors and cross-chain bridges used for layering.
Huione Guarantee — Cambodia Crypto Laundering Platform	Phnom Penh, Cambodia	Huione Group (Hun Manith-linked)	DPRK Finance — Crypto	DESIGNATED	EO 13722 / Section 311. FinCEN proposed Section 311 special measures against Huione Guarantee (May 2024) as primary money laundering concern for crypto crime proceeds including DPRK Lazarus Group. \$11B+ processed. Cambodian PM Hun Sen family links (Hun Manith). Southeast Asia's largest pig-butcher and crypto fraud-to-clean-money platform. US Treasury formally identified as primary money laundering concern.
DPRK Munitions Plant — Hamhung Chemical Complex	Hamhung, South Hamgyong Province, DPRK	Second Economic Committee / Korean Workers Party	DPRK — Weapons Production	DESIGNATED	EO 13722. Primary DPRK chemical weapons production and ballistic missile propellant manufacturing. Hamhung chemical complex is one of the DPRK's largest industrial sites — historically where VX nerve agent production has been assessed. 38 North monitoring via commercial satellite. UN Panel of Experts on DPRK documented. Dual-use: legitimate chemical industry cover for CW/missile propellant production. DPRK-Russia arms transfers (artillery shells, ballistic missiles for Ukraine) originate from DPRK production complex including Hamhung. FDPR block on chemical processing equipment. Coordinate with OPCW for attribution of DPRK CW agent production.
DPRK-Russia Arms Transfer Hub — Rajin Port	Rajin (Rason), North Hamgyong Province, DPRK	DPRK military / Russian logistics coordination	DPRK Finance	DESIGNATED	EO 13722 / EO 14024. Commercial satellite imagery (Planet Labs) and US/South Korean government statements documented Russian military cargo ships loading at Rajin port 2023-2024 — confirming DPRK ballistic missile and artillery shell transfers to Russia for Ukraine use. Volume estimated at millions of artillery shells and multiple ballistic missile systems. UN Security Council Panel of Experts documented before Russia vetoed panel extension (Mar 2024). Rajin is the physical chokepoint for this arms pipeline. Designate Russian military logistics vessels calling at Rajin under EO 14024. Coordinate with South Korea and Japan for maritime surveillance.

IX. Venezuela / Cuba Evasion

PDVSA sanctions evasion, Cuban state enterprise, and associated proxy finance

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
PDVSA Shadow Fleet — Post-Maduro Oil Evasion Residual	Caribbean / global tanker routes	PDVSA (blocked since Aug 2019); multiple shadow fleet tankers (series of Dec 2025 designations); Corniola Limited / Krape Myrtle Co LTD (designated Dec 2025)	Iran Sanctions Evasion	PARTIAL	E.O. 13884; E.O. 13850; E.O. 14373; maritime interdiction authority — Dec 2025: US seized tanker carrying Venezuelan oil to Iran (joint FBI/DHS/Coast Guard/Pentagon operation). Trump ordered partial blockade of sanctioned oil tankers. Dec 31 2025 OFAC designated additional PDVSA-linked shadow fleet operators. GL 50A (Feb 18 2026) now authorizes oil/gas sector operations for certain entities as post-Maduro transition accelerates. Action: Distinguish between legacy Maduro-era shadow fleet enforcement and post-transition licensed operations under GL 50A; continue SDN additions for shadow fleet operators not covered by new licenses.
Tren de Aragua (TdA) Financial Network	Venezuela / Colombia / US (distributed)	FTO/SDGT (designated Feb 20 2025); 7 leaders designated Jun-Jul 2025; support network (Jimena Navarro et al., designated Dec 2025)	Venezuela Evasion	DESIGNATED	E.O. 14157; E.O. 13224 (post-FTO designation); 18 U.S.C. §2339B (material support) — FTO designation (Feb 2025) created §2339B material support exposure for all TdA supporters. Jul 2025 OFAC designated top leaders. Dec 2025 designated Jimena Navarro network for funding TdA through nightclub events, drug-fueled parties, and money laundering across Colombia and Venezuela. US military carried out lethal strikes on drug vessels in Caribbean/Pacific from Sep 2025. Action: §2339B prosecutions for US-nexus material support; OFAC secondary sanctions on financial institutions processing TdA money flows; Alien Enemies Act removal proceedings for identified US-present TdA members.
CLAP Program Corruption and Food-for-Money Laundering	Caracas, Venezuela / Mexico / Turkey	CLAP (Comite Local de Abastecimiento y Produccion) — Maduro food distribution program; multiple designated officials and front companies	Venezuela Evasion	PARTIAL	E.O. 13692; E.O. 13850; Kingpin Act — CLAP operated as a corruption vehicle — overpriced food contracts generating regime revenue. Mexico FIU froze accounts of 19 CLAP-linked companies in Jul 2019 for \$150M+ money laundering irregularities. Turkish companies documented as CLAP intermediaries. Post-Maduro, CLAP infrastructure may be repurposed by remaining regime loyalists. Action: Trace CLAP payment flows to Turkish and Mexican intermediaries; Kingpin Act designations for CLAP-linked drug corruption networks; coordinate with Mexico FIU on outstanding CLAP investigations.
Cartel de los Soles — Venezuelan Military Drug Corruption Network	Caracas, Venezuela (distributed military network)	Nicolas Maduro (in US custody); Diosdado Cabello (designated); Vladimir Padrino Lopez (designated); multiple military officials	Venezuela Evasion	DESIGNATED	E.O. 13692; E.O. 13884; Kingpin Act; 21 U.S.C. §960a (narco-terrorism) — Revised Jan 2026 Maduro indictment characterizes Cartel de los Soles as a drug-trafficking-backed patronage system rather than a formal cartel — legally significant for prosecution strategy. Maduro facing SDNY charges including narco-terrorism. Cabello and Padrino Lopez designated but remain in Venezuela. Action: Continue Kingpin Act designations for military officials maintaining narco-corruption network post-Maduro; SDNY prosecution of Maduro proceeds; target remaining loyalists using Venezuelan military assets for drug trafficking.
GAESA — Military Holding Company (Core)	Havana, Cuba	GAESA (Grupo de Administracion)	Cuba Evasion	DESIGNATED	CACR (31 C.F.R. Part 515); E.O. 13959; Libertad Act (Helms-Burton Title III/IV); SST designation — GAESA controls ~60-80% of Cuba's

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Economic Control)		Empresarial SA) — Cuban military controlled; Luis Alberto Rodriguez Lopez-Calleja (GAESA president, designated)			foreign-currency economy through subsidiaries spanning tourism (Gaviota), retail (TRD), telecommunications (ETECSA), finance, and import/export. Lopez-Calleja designated. Helms-Burton Title III enables civil suits against entities trafficking in US-confiscated Cuban property — creates private enforcement layer beyond OFAC. Action: Systematic designation of each identified GAESA subsidiary as it engages in US-nexus transactions; Title III litigation as concurrent private enforcement; coordinate with EU on GAESA entity exposure given EU-Cuba economic relationships.
Havanatur / Gaviota Tourism Revenue Network	Havana, Cuba (global tourism distribution)	Gaviota SA (GAESA tourism subsidiary, designated); Havanatur (tourism operator, GAESA-linked); multiple international hotel and tour partners	Cuba Evasion	DESIGNATED	CACR §515.201; E.O. 13959; SST secondary sanctions — Tourism generates primary foreign currency for Cuban military through GAESA. International hotel chains and tour operators doing business with Gaviota face CACR and Helms-Burton exposure. SST redesignation creates secondary sanctions risk for non-US financial institutions processing GAESA/Gaviota revenues. Action: CACR enforcement against US persons facilitating Gaviota transactions; Helms-Burton Title III suits against foreign hotel operators on confiscated Cuban property; OFAC advisory to international financial institutions on GAESA secondary sanctions risk post-SST.
ETECSA — Telecommunications Surveillance Infrastructure	Havana, Cuba	ETECSA (Empresa de Telecomunicaciones de Cuba SA — GAESA subsidiary); Huawei (equipment supplier, Chinese state-linked)	Cuba Evasion	PARTIAL	ETECSA is Cuba's state-controlled telecommunications monopoly, used for domestic surveillance of dissidents. Chinese telecom equipment (Huawei) documented in ETECSA infrastructure — creates EAR export control nexus. Aug 2021 OFAC guidance on supporting Cuban internet freedom. Action: EAR denial orders on US-origin technology reaching ETECSA; target Huawei Cuba operations under EAR Entity List; OFAC license framework for internet freedom tools while maintaining GAESA/ETECSA transaction prohibitions.
Cuba-Russia-Venezuela Trilateral Financial Network	Havana / Moscow / Caracas	Cuban state entities; Russian financial intermediaries; Venezuelan PDVSA-linked networks	Venezuela Evasion	NEXUS	CACR; E.O. 13884 (Venezuela); EO 14024 (Russia); SST secondary sanctions — Cuba relies on Venezuela for subsidized oil (historically) and on Russia for financial lifeline. Russian vessels docking in Cuba (post-Seahorse interdiction precedent); Venezuelan Cartel of Suns used Cuba as drug transit. SST designation creates additional secondary sanctions risk for Russian and Venezuelan entities engaging in significant transactions with Cuban government. Action: EO 14024 secondary sanctions analysis for Russian entities providing material support to GAESA-controlled Cuban government entities; monitor Cuban port calls by Russian and Venezuelan vessels for sanctions evasion activity.
Cartel Crypto Laundering Network	US / Mexico / Venezuela / distributed	Multiple crypto OTC desks; USDT-based cartel payment networks; identified cartel-linked wallet clusters	Venezuela Evasion	TARGETABLE	18 U.S.C. §2339B (post-FTO); Kingpin Act; GENIUS Act §4(a)(5)(A) [Pub. L. 119-27, effective July 18, 2025 — implementing regulations pending as of March 2026]; BSA — Cartels increasingly use USDT for cross-border drug proceeds transfer and precursor payment to PRC suppliers. GENIUS Act §4(a)(5)(A) [Pub. L. 119-27, effective July 18, 2025 — implementing regulations pending as of March 2026] BSA mandate requires all permitted stablecoin issuers to maintain AML programs screening cartel-linked wallets. FTO designation means cartel wallet support is now §2339B material support — dramatically expanding criminal liability beyond BSA violations.

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTIONS
					Action: GENIUS Act enforcement demands to Tether for wallet freeze on identified Sinaloa/CJNG USDT clusters; Chainalysis/TRM Labs cartel wallet cluster mapping; prosecute crypto exchange personnel who knowingly facilitate post-FTO cartel USDT transactions under §2339B.
TdA Venezuela-US Financial Corridor	Venezuela / Colombia / US	TdA financial facilitators; Venezuelan money service businesses	Money Laundering / TBML	TARGETABLE	EO 13224; EO 13692 (Venezuela); Kingpin Act; BSA §5318A — TdA revenue generated in US repatriated to Venezuela through informal value transfer and cryptocurrency. Coordinate with OFAC Venezuela desk for joint designation package targeting identified financial facilitators in both jurisdictions.
Miraflores Palace — Maduro Regime Command Node	Caracas, Venezuela	Nicolas Maduro (SDNT)	Venezuela Evasion	DESIGNATED	EO 13884 / EO 14373. Maduro designated. Venezuela government blocked entity. Miraflores is operational command of PDVSA-linked shadow fleet operations, CLAP food corruption, and Tren de Aragua state tolerance. Russia-Iran-Venezuela trilateral oil evasion triangle. Monitor for gold-for-oil barter arrangements with Iran and Russia that bypass US financial system entirely.
El Palito Refinery — PDVSA Residual Operations	Puerto Cabello, Carabobo, Venezuela	PDVSA (blocked since Aug 2019)	Venezuela Evasion	DESIGNATED	EO 13884. PDVSA blocked. One of Venezuela's remaining functional refineries. Shadow fleet tankers operate from adjacent terminal for crude/refined product export to Cuba and China. Monitor AIS for PDVSA-linked vessels. Chevron GL 41 carve-out for limited JV operations — monitor for compliance with GL scope.

X. Wagner / Africa Corps

Wagner Group successor operations, resource extraction finance, and African deployment nodes

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Meroe Gold / Sudan Gold Operations (RSF support)	North Sudan / UAE (export routing)	Meroe Gold (M Invest subsidiary, designated Jul 2020); M Invest LLC (Prigozhin-linked, designated); RSF (Rapid Support Forces) — Wagner SAM supply rec	UAE Transshipment	DESIGNATED	E.O. 14024; E.O. 13581 (transnational criminal organization); EO 14098 (Sudan) — Wagner/Africa Corps extracted \$1.9B+ in Sudanese gold. Meroe Gold designated Jul 2020; M Invest designated. Supplies SAMs to RSF fighting Sudan's army — prolonging conflict and protecting mining access. Gold smuggled to UAE: world's top importer of undeclared African artisanal gold. Action: E.O. 14098 Sudan sanctions on RSF commanders receiving Wagner weapons; UAE AML pressure on gold import/refining firms handling Wagner-origin Sudanese gold; OFAC SDN designation of Africa Corps financial infrastructure replacing Meroe Gold.
CAR Gold and Diamond Mining Network (Lobaye Invest / Midas)	Central African Republic / UAE / Russia	Lobaye Invest SARLU (CAR, Prigozhin-linked, designated); Midas Resources SARLU (CAR, designated); Diamville SAU (CAR, designated); OOO DM (Russia, des	UAE Transshipment	DESIGNATED	E.O. 14024; E.O. 13581 — Wagner controls significant CAR gold and diamond mining concessions via Lobaye Invest and Midas Resources — violently displacing artisanal miners. Diamville and OOO DM designated Jun 2023 for illicit gold dealings. Wagner revenue from CAR operations funds Ukraine combat operations and Africa expansion. Action: Continue E.O. 14024 designations of new corporate vehicles replacing designated CAR entities; Belgium/Antwerp diamond trade AML pressure for Wagner-origin CAR diamonds; coordinate with CAR government (limited effectiveness given political dependency on Wagner/Africa Corps protection).
Africa Corps — Mali Successor Operations	Mali (Bamako / northern regions)	Africa Corps (Russian MoD-controlled, Wagner successor); Ivan Maslov (head of Wagner Mali, designated May 2023); Africa Politology (influence operatio	Wagner / Africa Corps	PARTIAL	E.O. 14024; HARM Act 2.0 (H.R. 7415, pending) — Wagner withdrew from Mali Jun 2025; Africa Corps remains. Trump administration lifted sanctions on three Malian officials Feb 27 2026 — tension with ongoing Africa Corps presence. Mali junta paid Wagner ~\$200M for combat services. Africa Politology runs influence operations discrediting UN/press. HARM Act 2.0 pending in Congress for specific Africa Corps designation. Action: Monitor HARM Act 2.0 passage for new designation authority; maintain E.O. 14024 designations on Africa Corps financial infrastructure; do not extend sanctions relief to officials with continuing Africa Corps coordination roles.
Russia-Africa Arms and Technology Transfer (Africa Corps MoD Supply Chain)	Moscow / distributed Africa	Russian Ministry of Defense (Africa Corps direct controller); Russian state arms exporters; Rosoboronexport (designated)	Wagner / Africa Corps	PARTIAL	E.O. 14024; CAATSA §231; Arms Export Control Act — Africa Corps, unlike Wagner, is directly under Russian MoD — making Russian government arms transfers to Africa Corps subject to E.O. 14024 §1(a)(i) as Russian government property interests. Rosoboronexport is designated. Africa Corps arms deliveries to Sahel junta governments (CAR, Mali, Burkina Faso, Niger) constitute material support under E.O. 14024 §1(a)(iii) for those junta entities. Action: CAATSA §231 secondary sanctions on third-country entities facilitating significant arms transfers enabling Africa Corps operations; AECA restrictions on US arms to governments providing material support to Africa Corps.
Russian Private Military	UAE / Sudan /	Africa Corps	PMC Finance /	PARTIAL	EO 14024; EO 13581 (TOC). Russian Private Military Finance —

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Finance — Africa Corps Cover Entities	CAR / Libya	financial controllers; UAE-based logistics companies; Prigozhin successor entities	Resource Extraction		Africa Corps cover entities provide the commercial and financial infrastructure sustaining Africa Corps deployments in Mali, CAR, Libya, Sudan, Burkina Faso, and Niger. ENFORCEMENT THEORY: Designate cover entities under EO 13581 (transnational criminal organization blocking) or EO 14024 (Russia-linked entities) — these entities function as financial conduits for state-directed paramilitary operations. Cross-reference with Bangui HQ node (id:5006), Meroe Gold Sudan operations (id:5009), and Kidal compound (id:5005) for operational nexus. NOTE: Trump administration lifted sanctions on three Malian officials February 27, 2026, citing counterterrorism cooperation. Do not extend relief to officials with continuing Africa Corps coordination roles — the sanctions relief was for specific named individuals, not for the broader cover entity financial network.
Africa Corps Cover Entity Finance Network	UAE / Sudan / CAR / Libya	Africa Corps financial controllers; UAE-based logistics companies; Prigozhin successor entities	PMC Finance / Resource Extraction	PARTIAL	EO 14024; EO 13581. Africa Corps Cover Entity Finance Network — commercial front companies, resource extraction contracts, and financial intermediaries sustaining Africa Corps operational presence across sub-Saharan Africa. ENFORCEMENT THEORY: Designation targets the commercial revenue layer that makes Africa Corps economically self-sustaining independent of direct Russian state budget support. Cross-reference with Meroe Gold (id:5009), CAR Gold/Diamonds (id:169), and Russian Private Military Finance (id:191) for the complete financial architecture. PRIORITY: Higher-value enforcement target than individual Africa Corps compounds — disrupting commercial revenue requires more sophisticated evasion than relocating a compound.
Kidal — Wagner/Africa Corps Compound (Mali)	Kidal, Kidal Region, Mali	Africa Corps (Wagner successor, Russian MoD-controlled)	Wagner / Africa Corps	DESIGNATED	EO 14024 (Wagner/Africa Corps). Kidal is northern Mali's strategic hub — Africa Corps presence here followed French Barkhane withdrawal. Documented by UN Panel of Experts and MINUSMA reporting. Wagner/Africa Corps provides security for Malian junta (CNSP) in exchange for mining concessions (gold, lithium). Commercial satellite imagery shows compound infrastructure. Financial flows: mining concession revenue to Russian state via M Invest/Lobaye Invest structure. Designate specific Africa Corps commanders operating from Kidal. Coordinate with EU and MINUSMA successor mechanisms for documentation of Africa Corps activities.
Bangui — Wagner/Africa Corps HQ (CAR)	Bangui, Central African Republic	Africa Corps / Russian MoD (Lobaye Invest SARLU)	Wagner / Africa Corps	DESIGNATED	EO 14024 / EO 13581. Lobaye Invest SARLU (CAR) designated — Prigozhin-linked. Wagner/Africa Corps operationally present in CAR since 2018 — longest-standing Africa deployment. Bangui compound serves as regional HQ. Sewa Security Services provides cover. Revenue: Ndassima gold mine concession. MINUSCO UN mission documented multiple Wagner war crimes. After Prigozhin death (Aug 2023), transitioned to direct Russian MoD (Africa Corps) control. Designate Sewa Security Services under EO 14024. Coordinate with ICC on war crimes documentation for command responsibility analysis.
Bani Walid — Wagner Libya Operations Hub	Bani Walid, Misrata District,	Wagner / Africa Corps (Russian	Wagner / Africa Corps	DESIGNATED	EO 14024. Wagner primary Libya operations hub. Supports LNA (Haftar) forces. CSIS/Planet Labs documented Wagner military

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
	Libya	MoD)			equipment including Pantsir SAM systems, aircraft, and armored vehicles at Jufra. Financial flows: Libyan oil revenue redirection through Haftar-controlled institutions. UN Panel of Experts Libya documented Wagner presence (multiple reports 2019-2025). Coordinate with UN Panel for documentation of arms embargo violations. Section 311 for Libyan financial institutions processing Wagner revenue. Designate Haftar-linked oil revenue intermediaries.
Jufra Air Base — Wagner Libya (Confirmed Satellite)	Jufra, Libya	Wagner / LNA-Haftar (Russian-supported)	Wagner / Africa Corps	DESIGNATED	EO 14024. CSIS/Planet Labs satellite imagery documented Wagner hardware at Jufra — Pantsir-S1 SAM systems, MiG-29 and Su-24 aircraft, and cargo aircraft. Most comprehensively documented Wagner overseas deployment via commercial satellite. UN Panel of Experts Libya documented arms embargo violations. Monitor current status via Planet Labs or Maxar. Designate specific Wagner commanders identified at Jufra. Coordinate with EU Operation IRINI for maritime interdiction of Wagner resupply flights and shipments to Libya.
Meroe Gold Mine — Wagner Sudan Operations	North Sudan (Nile Valley region)	Meroe Gold / M Invest (Prigozhin-linked, designated Jul 2020)	Wagner / Africa Corps	DESIGNATED	EO 14024 / EO 13581. Meroe Gold (M Invest subsidiary) designated July 2020. Wagner used Sudanese gold mining revenue to partially fund Africa operations. RSF (Rapid Support Forces / Hemedti) supported by Wagner. Sudan civil war (2023-present) disrupted Wagner gold operations. Revenue flow: gold extracted to UAE (Dubai) refiners to international markets bypassing sanctions. Monitor Dubai gold import flows for Sudan-origin material. Global Magnitsky designations for RSF commanders linked to Wagner. Section 311 for UAE gold refiners processing Sudan-origin Wagner gold.
Wagner Africa Corps — Burkina Faso (Ouagadougou)	Ouagadougou, Burkina Faso	Africa Corps (Russian MoD)	Wagner / Africa Corps	DESIGNATED	EO 14024. Burkina Faso junta (MPSR) invited Wagner/Africa Corps 2023 following French Sabre force expulsion. Africa Corps now provides junta protection and counterinsurgency support. Pattern matches CAR and Mali deployments: security-for-mining-concessions exchange. Gold and mineral concessions in Burkina Faso under review. Monitor: expanding Africa Corps footprint as France loses influence across Sahel — Niger, Mali, Burkina Faso now all have Africa Corps or Russia-adjacent security relationships. Coordinate with ECOWAS and EU on documentation of Africa Corps activities for Global Magnitsky designation packages.

XI. Russian Covert Finance / Intelligence

GRU/FSB operational finance, influence operations, and covert shell company networks

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
GRU Unit 29155 Operational Finance Network	Russia / Western Europe (UK, France, Germany, Czechia)	GRU 29155 officers (multiple designated post-Salisbury); GRU Main Centre Special Technologies	Intelligence Operations Finance	DESIGNATED	EO 13694 (as amended EO 14306); EO 14024 §1(a)(i); EU Reg. 269/2014 — GRU 29155 responsible for Salisbury poisoning (2018), Skripal assassination attempt, Bulgarian arms dealer poisoning, and multiple European destabilization operations. Multiple officers designated US/EU/UK. Monitor for new operational finance structures using third-country relay jurisdictions (Serbia, Turkey, UAE).
FSB Operational Finance — Western Europe	Russia / Germany / Austria / Hungary	FSB foreign intelligence service officers; diplomatic cover personnel	Intelligence Operations Finance	PARTIAL	EO 14024; EO 13694. FSB maintains operational finance infrastructure across Western Europe through a network of front companies, real estate holdings, and shell corporations in EU jurisdictions with historically permissive AML enforcement. Primary jurisdictions: Cyprus, Malta, Austria, Czech Republic. Bellingcat and The Insider have documented specific FSB officer financial footprints via OSINT. Action: Coordinate with EU FIUs via EGMONT Group for parallel asset freeze. Section 311 findings for identified European exchange houses processing FSB operational finance. CAATSA §226 against EU financial institutions maintaining correspondent relationships with identified FSB front company banking networks.
Internet Research Agency (IRA) / Patriot Media Successor Finance	Russia / US / EU	Prigozhin successors; Kremlin-linked media finance controllers; Social Design Agency (SDA)	Influence Operations Finance	DESIGNATED	EO 13694 (as amended); EO 14024; FARA enforcement — IRA designated following Mueller investigation indictments. Social Design Agency (SDA) designated 2024 as IRA successor for EU influence operations. Coordinate OFAC/DOJ FARA unit for financial mapping of US-based IRA successor operations.
Russian / Chinese Arms Supply Finance	Russia / China / Myanmar	Rostec subsidiaries; CASC (China Aerospace); Myanmar Tatmadaw procurement officers	Arms Procurement	PARTIAL	EO 14014; CAATSA §231 (Russia arms); EO 13382 (proliferation) — SAC receives Su-30 aircraft, air defense systems, and ammunition from Russia and attack helicopters, armored vehicles from China. Rostec/Rosoboronexport already designated. Apply §231 CAATSA secondary sanctions to third-country financial intermediaries facilitating Myanmar arms payments.
Russian Shell Company Network — Cyprus / Malta / Hungary	Cyprus / Malta / Hungary / Liechtenstein	Russian beneficial owners; nominee directors; EU-based law firms	Money Laundering / Covert Operations Finance	PARTIAL	EO 14024; EU Reg. 833/2014 (Art. 5ah); FATF R.15; EU AMLD6 — Cyprus and Malta golden passport era created deep Russian shell company infrastructure. Hungary retains Russian-origin financial structures outside EU enforcement consensus. Coordinate with ECB, EBA, and national FIUs.
Social Design Agency (SDA) / IRA Successor Finance	Russia / US / EU	Prigozhin successors; Kremlin-linked media finance controllers; SDA principals	Influence Operations Finance	DESIGNATED	EO 13694 (as amended); EO 14024; FARA enforcement — IRA designated following Mueller investigation indictments. SDA designated 2024 as IRA successor for EU influence operations. Coordinate OFAC/DOJ FARA unit for financial mapping of US-based successor operations.

XII. BioWeapons / Dual-Use Bio

State biological weapons legacy infrastructure and dual-use research nodes

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Damghan Facility — BW/CW R&D Site	Damghan, Semnan Province, Iran	IRGC / MoD (state)	Iran BioWeapons	DESIGNATED	EO 13382. Assessed biological/chemical weapons-related R&D. Johnston's Archive declassified US WMD facility database. Also listed as chemical warhead development site. IRGC-affiliated. BW agents assessed: anthrax (very likely), botulinum toxin (probable). FDPR block on dual-use fermentation and biological processing equipment.
Imam Khomeini Research Center — BW Research	Karaj, Alborz Province, Iran	IRGC (suspected)	Iran BioWeapons	MONITOR	NCRI alleged anthrax agent work. Proximity to nuclear research infrastructure at Karaj. LOW-MODERATE confidence — NCRI source requires independent corroboration. Monitor for dual-use biological equipment procurement. EO 13382 nexus if function corroborated.
IRGC BW Warhead Program — Eastern Iran (Estimated)	Eastern Iran — IRGC missile bases (specific locations undisclosed)	IRGC Aerospace Force	Iran BioWeapons	MONITOR	Iran International (Jan 2026, anonymous military sources): IRGC Aerospace Force developing biological and chemical warhead integration for ballistic missiles including possible aerosolization optimization for delivery systems. SINGLE SOURCE — LOW CONFIDENCE. Requires independent corroboration before EO 13382 designation action. Monitor IRGC missile base construction via Sentinel-2.
Lugar Center (Richard G. Lugar Center) — Tbilisi	Tbilisi, Georgia	Georgia NCDC / US DoD CTR program (Nunn-Lugar)	Russian IO Target — Biodefense Infrastructure	MONITOR	ANALYTICAL NOTE — IO TRACKING CONTEXT, NOT THREAT NODE: The Lugar Center (Richard G. Lugar Center for Public Health Research, Tbilisi, Georgia) is a U.S.-funded biosafety and public health laboratory operated by Georgia's National Center for Disease Control. It is included here not as a threat infrastructure node but as the primary target of documented Russian information operations claiming it is a U.S. biological weapons facility. IO CAMPAIGN STATUS: Russian state media (RT, Sputnik) and official Russian MoD statements have consistently characterized the Lugar Center as a covert U.S. BW development site. These claims are assessed as disinformation with HIGH CONFIDENCE — no credible evidence of offensive BW research has been identified at this facility; DTRA (Defense Threat Reduction Agency) transparency reporting confirms the facility's public health mandate. ANALYTICAL VALUE: Tracking Russian IO claims about the Lugar Center provides a baseline for assessing the broader Russian narrative architecture around U.S. biodefense programs globally. Claims about this facility are a template used against similar DTRA-funded labs in Ukraine, Kazakhstan, and Armenia. ENFORCEMENT: No U.S. enforcement action applicable. Defensive monitoring only.

XIII. Pakistan Proliferation / CPEC

AQ Khan network and CPEC-adjacent proliferation infrastructure

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
AQ Khan Research Laboratories (KRL) — Kahuta	Kahuta, Rawalpindi District, Punjab, Pakistan	Pakistan Atomic Energy Commission / Military	Pakistan — Proliferation Network	DESIGNATED	Primary centrifuge production and uranium enrichment facility. Historical origin of the AQ Khan proliferation network that provided P-1/P-2 centrifuge designs to Iran, Libya, North Korea. Khan designated SDGT-equivalent by multiple jurisdictions. EO 13382. Current proliferation risk: centrifuge design methodology and key materials science already transferred. Monitor for any Pakistan-Iran centrifuge technology contact.
Gwadar Port — CPEC Terminus (CPEC Adjacency)	Gwadar, Balochistan, Pakistan	China Overseas Port Holding Company (COPHC) / Government of Pakistan	Pakistan — CPEC / Makran Adjacency	MONITOR	CPEC terminus — 70-80km east of Makran complex (Node 7). Chinese state-affiliated operators. Transactions between Makran complex and CPEC-linked entities may involve Chinese state intermediaries subject to CAATSA (22 U.S.C. §9241) and CISADA (22 U.S.C. §8513). INFERRED — do not apply secondary sanctions on adjacency alone. Monitor AIS for vessel overlap between Gwadar and Makran Node 7 calls. Financial intelligence required to establish nexus.

XIV. Russia WMD Programs

Russian chemical weapons research and nuclear test site infrastructure

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Vector Institute — Biopreparat Legacy (Russia)	Koltsovo, Novosibirsk Oblast, Russia	Rospotrebnadzor / Russian state	Russia BioWeapons — Legacy	MONITOR	One of two remaining official WHO repositories for variola (smallpox). Biopreparat-legacy facility. Former offensive BW program infrastructure. Of acute concern given Soviet-legacy Biopreparat scientists recruited by Iran and DPRK in 1990s-2000s. Russia declared compliance with BWC but US assesses Russia maintains BWC-violating BW program. EO 14024 (Russian government designation basis). Monitor for anomalous procurement of stabilization media, aerosol delivery systems.
Novaya Zemlya Nuclear Test Site	Novaya Zemlya Archipelago, Arkhangelsk Oblast, Russia	Russian MoD / Rosatom	Russia Nuclear — Test Site	MONITOR	High-readiness maintained at nuclear test site. Russia conducted nuclear-powered Burevestnik cruise missile test from Novaya Zemlya in 2024. CTBTO IMS monitoring active. Any new nuclear test would be detectable by CTBTO global network. Seismic + radionuclide monitoring stations applicable. Rogachevo Air Base (71.62°N, 52.48°E) provides S-400 SAM defense. Key indicator node for Russian nuclear signaling.
Shikhany — Russian CW Research (State Scientific Research Institute)	Shikhany, Saratov Oblast, Russia	Russian MoD / GosNIIOKhT (state)	Russia CW Program	MONITOR	GosNIIOKhT — Russia's primary chemical weapons research institute. Shikhany is the historical center of Soviet/Russian CW program. Novichok agents developed here. OPCW investigation ongoing post-Salisbury (2018). EO 14024 basis for current Russian state designations. Monitor for procurement of CW precursor chemicals through Russian chemical supply chains. Any CW use triggers 22 U.S.C. §5604 (CWC implementation law) mandatory sanctions.

XV. Myanmar SAC Revenue

Myanmar military council revenue streams and scam compound finance

NODE / FACILITY	LOCATION	OWNER / OPERATOR	CATEGORY	STATUS	ENFORCEMENT THEORY AND ACTION
Myanmar Jade and Ruby Export Revenue	Kachin State (Hpakant jade) / Mogok (rubies)	Myanmar Gems Enterprise (MGE, state-owned); Chinese buying companies; Yunnan brokers	Resource Revenue / Sanctions Evasion	DESIGNATED	EO 14014; BURMA Act 2022; Import Restrictions (31 C.F.R. Part 515) — MGE designated. Myanmar jade exports ~90% to China through Yunnan. US import prohibition on Burma jade and rubies in effect. Coordinate with China MOFCOM pressure on Yunnan buying companies. Target identified Chinese jade import companies for secondary sanctions exposure.
Yadana Natural Gas Pipeline Revenue	Andaman Sea / Thailand border	MOGE (Myanmar Oil and Gas Enterprise, state-owned); TotalEnergies (exited 2022); PTT (Thailand)	Natural Gas Revenue	PARTIAL	EO 14014; BURMA Act 2022; secondary sanctions pressure on PTT — MOGE designated Mar 2022. TotalEnergies and Chevron exited. PTT (Thailand) remains primary revenue recipient. Pipeline generates ~\$1B/yr for SAC. Apply secondary sanctions pressure on PTT through CAATSA-equivalent Burma authority.
Scam Compound Finance — KK Park / Myawaddy	Karen State, Myanmar / Thai border	Saw Chit Thu (KK Park operator, designated Jan 2024); Border Guard Force commanders; Chinese investors	Fraud / Forced Labor / Crypto Laundering	DESIGNATED	EO 14014; Kingpin Act (scam operators); 18 U.S.C. §1589 (forced labor) — KK Park generates \$2–4B/yr through phone/crypto fraud using trafficked forced laborers. Saw Chit Thu designated Jan 2024. Chinese investment companies fund compound construction. Designate identified Chinese investor entities under EO 14014 material support provisions.
Myanmar Foreign Trade Bank (MFTB)	Yangon, Myanmar	MFTB (state-owned, designated Mar 2024); SAC Finance Ministry	State Banking / Sanctions Evasion	DESIGNATED	EO 14014; OFAC SDN (Mar 2024) — MFTB designated Mar 2024 as primary SAC foreign currency clearing bank. Monitor for correspondent banking access through third-country relay banks (China, Singapore, UAE, India).
KK Park — Scam Compound, Karen State	Myawaddy area, Karen State, Myanmar	Saw Chit Thu (designated Jan 2024) / BGF-linked	Myanmar Revenue	DESIGNATED	EO 13818 (Global Magnitsky). Saw Chit Thu designated Jan 2024. KK Park is the largest known forced labor fraud compound in Southeast Asia — thousands of trafficked workers conduct pig-butcher crypto fraud. Revenue flows through Huione Guarantee platform (Section 311 target). Chinese criminal networks primary operators. US DoJ has active prosecutions of US-nexus fraud victims. Asset seizure under 18 U.S.C. §981 applicable to US-nexus proceeds.
Myawaddy — Border Trade and Scam Compound Cluster	Myawaddy, Karen State, Myanmar / Thai border	Multiple BGF/KNU/criminal network-affiliated operators	Myanmar Revenue	DESIGNATED	EO 13818. Karen State scam compound cluster along Thai border. Multiple compound operators. Thai authorities have conducted periodic cross-border operations. Financial flows through Thai and Singaporean banking. Monitor for SAR filings in Thai and Singaporean financial sectors linking to Myawaddy-area operators.

Status Classification Legend

STATUS	DEFINITION AND ENFORCEMENT IMPLICATION
DESIGNATED	Currently under active U.S. or allied sanctions — SDN, EU, or equivalent designation in force.
TARGETABLE	Actionable under existing legal authorities; designation package supportable with current evidence.
PARTIAL	Partially sanctioned or subject to sectoral restrictions; gaps in coverage remain.
MONITOR	Intelligence collection and monitoring priority; no current enforcement action indicated.
OFF-LIMITS	Chinese sovereign, allied sovereign, or multilateral-constrained; political or legal constraints prohibit direct enforcement action.
CONSTRAINED	Enforcement technically available but subject to defined preconditions (capacity gaps, arms control obligations, multilateral constraints).
NEXUS	Cross-domain facilitation node connecting multiple threat networks; not independently designated.
SEIZED	Physically seized, confiscated, or neutralized by U.S. or allied law enforcement or military action.

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