



October 2015

U.S. Sanctions Mexican Executive, Airline, and Newspaper Tied to Drug Trafficking Organization

On Dec. 16, 2015, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated a Mexican national, Naim Libien Tella, and four Mexican entities linked to Libien Tella, under the Kingpin Act. The new designations, which include a Mexican airline and newspaper, stem from Libien Tella's narco-trafficking activities in association with the Los Cuinis cartel.

The sanctioned individual and entities now listed on OFAC's Specially Designated Nationals (SDN) List are:

- LIBIEN TELLA, NAIM, of Toluca, Mexico;
- AEROLINEAS AMANECER, S.A. DE C.V. (aka AEROAMANECER), of Mexico City, Mexico;
- DIARIO AMANECER, of Mexico City, Mexico;
- UNOMASUNO (aka UNO MAS UNO), of Mexico City, Mexico; and
- VALGO GRUPO DE INVERSION S.A. DE C.V., of Guadalajara, Mexico.

Under the Kingpin Act and other sanctions programs, U.S. persons are prohibited from dealings with individuals and entities named on OFAC's SDN List. More challenging from a compliance standpoint, however, U.S. persons are likewise prohibited from dealings with entities that are not specifically enumerated on the SDN List, but are owned 50% or more in the aggregate by any designated entities or individuals.

Even non-U.S. individuals and entities that have had business dealings with the recently-designated Kingpin Act entities and individual should carefully review their relationships and assess the potential risk for future interactions or transactions. Although the Kingpin Act designation does not bar all transactions, and generally addresses only assets or transactions in the United States or in the possession or control of U.S. persons, a violation of the Kingpin Act can result in both criminal and civil enforcement in the United States. Additionally, entities or individuals that are deemed to be providing material support to any designated individuals or entities run the risk of becoming the target of U.S. sanctions

themselves.

Based in Washington, D.C., our Export Controls team advises and represents clients on the full range of international goods, software and technology transfer issues. We have broad experience providing export controls and related regulatory counsel to both U.S. and foreign businesses. Our industry-specific experience includes assisting companies in a wide range of industries such as aerospace, defense, firearms and ammunition, electronics, software and information technology, financial services, food, consumer products, biotechnology, medical device, and engineering services.

This *GT Alert* was prepared by **Kara M. Bombach** and **Cyril T. Brennan**.

- > [Kara M. Bombach](#) | +1 202.533.2334 | bombachk@gtlaw.com
- > [Michael X. Marinelli](#) | +1 512.320.7236 | marinellimx@gtlaw.com
- > [Renee A. Latour](#) | +1 202.533.2358 | latourr@gtlaw.com
- > [Julia P. Sorrentino](#) | +1 202.533.2376 | sorrentinoj@gtlaw.com
- > [Cyril T. Brennan](#) | +1 202.533.2342 | brennanct@gtlaw.com
- > [Sandra D. Gonzalez](#) | +1 512.320.7234 | gonzalezsd@gtlaw.com
- > [Sandra K. Jorgensen](#) | +1 202.530.8569 | jorgensens@gtlaw.com
- > Or your [Greenberg Traurig](#) attorney

Albany
+1 518.689.1400

Delaware
+1 302.661.7000

New York
+1 212.801.9200

Silicon Valley
+1 650.328.8500

Amsterdam

Denver

Northern Virginia

Tallahassee

+ 31 20 301 7300	+1 303.572.6500	+1 703.749.1300	+1 850.222.6891
Atlanta +1 678.553.2100	Fort Lauderdale +1 954.765.0500	Orange County +1 949.732.6500	Tampa +1 813.318.5700
Austin +1 512.320.7200	Houston +1 713.374.3500	Orlando +1 407.420.1000	Tel Aviv[^] +03.636.6000
Berlin⁻ +49 (0) 30 700 171 100	Las Vegas +1 702.792.3773	Philadelphia +1 215.988.7800	Tokyo[⌘] +81 (0)3 3216 7211
Berlin-GT Restructuring⁻ +49 (0) 30 700 171 100	London[*] +44 (0)203 349 8700	Phoenix +1 602.445.8000	Warsaw[~] +48 22 690 6100
Boca Raton +1 561.955.7600	Los Angeles +1 310.586.7700	Sacramento +1 916.442.1111	Washington, D.C. +1 202.331.3100
Boston +1 617.310.6000	Mexico City⁺ +52 55 5029.0000	San Francisco +1 415.655.1300	Westchester County +1 914.286.2900
Chicago +1 312.456.8400	Miami +1 305.579.0500	Seoul[∞] +1 82-2-369-1000	West Palm Beach +1 561.650.7900
Dallas +1 214.665.3600	New Jersey +1 973.360.7900	Shanghai +86 21 6391 6633	

This Greenberg Traurig Alert is issued for informational purposes only and is not intended to be construed or used as general legal advice nor as a solicitation of any type. Please contact the author(s) or your Greenberg Traurig contact if you have questions regarding the currency of this information. The hiring of a lawyer is an important decision. Before you decide, ask for written information about the lawyer's legal qualifications and experience. Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, P.A. ⁻Greenberg Traurig's Berlin office is operated by Greenberg Traurig Germany, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ⁻ Berlin - GT Restructuring is operated by Köhler-Ma Geiser Partnerschaft Rechtsanwälte, Insolvenzverwalter. ^{}Operates as Greenberg Traurig Maher LLP. ^{**}Greenberg Traurig is not responsible for any legal or other services rendered by attorneys employed by the strategic alliance firms. ⁺Greenberg Traurig's Mexico City office is operated by Greenberg Traurig, S.C., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. [∞]Operates as Greenberg Traurig LLP Foreign Legal Consultant Office. [^]Greenberg Traurig's Tel Aviv office is a branch of Greenberg Traurig, P.A., Florida, USA. [⌘]Greenberg Traurig Tokyo Law Offices are operated by GT Tokyo Horitsu Jimusho, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. [~]Greenberg Traurig's Warsaw office is operated by Greenberg Traurig Grzesiak sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. Certain partners in Greenberg Traurig Grzesiak sp.k. are also shareholders in Greenberg Traurig, P.A. Images in this advertisement do not depict Greenberg Traurig attorneys, clients, staff or facilities. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. ©2015 Greenberg Traurig, LLP. All rights reserved.*