



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

OFFICE OF FOREIGN ASSETS CONTROL

Foreign Narcotics Kingpin Sanctions Regulations  
31 C.F.R. Part 598

GENERAL LICENSE NO. 4G

**Authorizing Certain Transactions Involving the Panamanian Mall and Associated  
Complex, Soho Panama, S.A. (a.k.a. Soho Mall Panama)**

(a) General License No. 4F, dated March 9, 2017, is replaced and superseded in its entirety by this General License No. 4G.

(b) Except as provided in paragraph (c), the following transactions and activities otherwise prohibited by the Foreign Narcotics Kingpin Designation Act, 21 U.S.C. 1901-1908, and the Foreign Narcotics Kingpin Sanctions Regulations, 31 C.F.R. part 598, are authorized through 12:01 a.m. eastern daylight time, June 15, 2017:

(1) All transactions or activities involving non-designated individuals or entities located in the designated Panamanian mall and associated complex, Soho Panama, S.A. (a.k.a. Soho Mall Panama) (hereinafter Soho Mall Panama), for the wind down of operations, contracts, or other agreements involving goods or services, provided that the transactions or activities do not involve any shipment of goods to the mall after May 5, 2016;

(2) All transactions or activities related to building management or maintenance in Soho Mall Panama, provided the transactions or activities do not involve any Specially Designated Nationals (SDN) other than Soho Mall Panama, Westline Enterprises, Inc., or SDNs located in the mall;

(3) All transactions or activities related to the provision of financial services by, for, or on behalf of non-designated financial institutions that were physically located at Soho Mall Panama prior to May 5, 2016, including financial services for non-designated entities located in Soho Mall Panama, provided that the transactions or activities do not otherwise involve financial services for any SDN;

(4) Payments by non-designated individuals or entities located in Soho Mall Panama, and payments by persons providing management or maintenance services under (b)(2) to or for the benefit of the entities Soho Mall Panama or Westline Enterprises, Inc., provided the payments are made into a blocked interest-bearing account in accordance with 31 C.F.R. 598.206(a); and

(5) All transactions and activities that are necessary to facilitate, negotiate, or agree to the sale, disposition, or transfer of Soho Mall Panama or Westline Enterprises, Inc., provided the transactions or activities do not otherwise involve any SDN.

**Note to paragraph (b)(5):** In the event a transaction or activity to facilitate, negotiate, or agree to the sale, disposition, or transfer of Soho Mall Panama or Westline

Enterprises, Inc. involves a U.S. person or is otherwise subject to U.S. jurisdiction, and involves any SDN other than Soho Mall Panama or Westline Enterprises, Inc., a separate license from the Office of Foreign Assets Control is required.

(c) This general license does not authorize:

(1) The unblocking of any accounts blocked pursuant to the Foreign Narcotics Kingpin Designation Act, 21 U.S.C. 1901-1908, and the Foreign Narcotics Kingpin Sanctions Regulations, 31 C.F.R. part 598;

(2) Any transactions or activities to finalize, close, or exchange assets or any other thing of value related to the sale, disposition, or transfer of Soho Mall Panama or Westline Enterprises, Inc.; or

**Note to paragraph (c)(2):** In the event a transaction or activity to finalize, close, or exchange assets or any other thing of value related to the sale, disposition, or transfer of Soho Mall Panama or Westline Enterprises, Inc. involves a U.S. person or is otherwise subject to U.S. jurisdiction, a separate license from the Office of Foreign Assets Control is required.

(3) Any transactions or dealings otherwise prohibited by any Executive order or any other part of 31 C.F.R. chapter V, or with any individual or entity, including any property or interest in property of such individual or entity, that is listed on the Office of

Foreign Assets Control's List of Specially Designated Nationals or Blocked Persons or that otherwise constitutes a person whose property and interests in property are blocked other than the limited transactions with the entities Soho Mall Panama, Westline Enterprises, Inc., or other SDNs located in Soho Mall Panama, that are authorized in paragraphs (b)(1) - (b)(5).

(d) U.S. persons participating in transactions authorized by or related to paragraphs (b)(1), (b)(2), or (b)(5) of this general license are required, within 10 business days after the activities conclude, to file a report on the transactions with the Office of Foreign Assets Control, Sanctions Compliance & Evaluation Division, U.S. Department of the Treasury, 1500 Pennsylvania Avenue N.W., Freedman's Bank Building, Washington, DC 20220. Such reports shall include the following numbered sections and information:

(1) Estimated or actual dollar value of the transaction(s), as determined by the value of the goods, services, or contract;

(2) The parties involved;

(3) The type and scope of activities conducted; and

(4) The dates and duration of the activities.

Reports may also be filed via email to [OFACReport@treasury.gov](mailto:OFACReport@treasury.gov).



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Andrea Gacki  
Acting Director  
Office of Foreign Assets Control

Dated: April 27, 2017