IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

KATHLEEN JENNINGS, Attorney General of the State of Delaware,	)	
Plaintiff,	)	
v.	)	C.A. No. _____
OYSTER INVESTMENTS LLC, a Delaware limited liability company, SMILE TECHNOLOGIES S.A. LLC, a Delaware limited liability company, SMILEPAYMENTS, LLC, a Delaware limited liability company, and WATER HILL CORP, a Delaware corporation,	)	
Defendants.	)	

VERIFIED COMPLAINT

Plaintiff Kathleen Jennings, Attorney General of the State of Delaware, by and through undersigned counsel, for her complaint against Defendants Oyster Investments LLC, Smile Technologies S.A. LLC, SMILEPAYMENTS, LLC, and WATER HILL CORP (collectively the "Defendants"), alleges, upon verified information, as follows:

Nature of the Action

1. This is an action for the cancellation of the certificates of formation of three Delaware limited liability companies and one Delaware corporation that were recently placed on the United States Department of the Treasury Office of Foreign Asset Control ("OFAC") Specially Designated Nationals List ("SDN") for

involvement in laundering money obtained by narcotics trafficking into the United States.

2. Under Section 18-112 of Delaware's Limited Liability Company Act, 6 *Del. C.* § 18-101, *et seq.* ("LLC Act"), the Attorney General is authorized to request that the Court of Chancery cancel the certificate of formation of a Delaware limited liability company when the powers, privileges, or existence of that limited liability company have been abused or misused.

3. Under 8 *Del. C.* § 284, the Attorney General is authorized to request that the Court of Chancery revoke or forfeit the charter of any corporation for abuse, misuse or nonuse of its corporate powers, privileges or franchises.

4. The Attorney General seeks cancellation of Defendants' certificates of formation and corporate charter because each of the Defendants has been implicated in money laundering and other felony criminal offenses relating to drug trafficking. The Attorney General also seeks cancellation of Defendants' certificates of formation and corporate charter because the Defendants have been placed on the OFAC sanctions list for violations of the Foreign Narcotics Kingpin Designation Act (the "Kingpin Act"), 21 U.S.C. §§ 1901 *et seq*. Additionally, these entities have serious deficiencies in compliance with the requirement to retain their Delaware entity status, as described in further detail below.

5. Delaware law has never permitted or condoned the use of business entities formed under its laws for unlawful or nefarious purposes. Defendants SDN designation by OFAC, and failure to comply with Delaware legal requirements, establish that Defendants' have abused and misused their respective entity powers and privileges. Having abandoned the responsibilities that come with status as Delaware limited liability companies and Delaware corporations, Defendants must be forever denied the rights and privileges that also come with that status, and their certificates of formation or charter must therefore be canceled.

Parties

6. Plaintiff Kathleen Jennings ("Attorney General") is the Attorney General of the State of Delaware.

7. Defendant Oyster Investments LLC is a limited liability company organized under the laws of the State of Delaware which had a Registered Agent known as Harvard Business Services, Inc. The Registered Agent resigned as of July 11, 2019.[1]

8. Defendant Smile Technologies S.A. LLC is a limited liability company organized under the laws of the State of Delaware which had a Registered Agent

[1] The formation documents for this entity are attached as Exhibit A. The resignation documents for the Registered Agent are also included with this exhibit.

known as Worldwide Incorporators, Inc. The Registered Agent resigned as of May 31, 2019.[2]

9. Defendant SMILEPAYMENTS, LLC is a limited liability company organized under the laws of the State of Delaware, with a Registered Agent for service of process. The Registered Agent is known as InCorp Services, Inc. Its registered office is listed as 919 North Market Street, Suite 425, Wilmington, Delaware 19801.[3]

10. Defendant WATER HILL CORP is a corporation organized under the laws of the State of Delaware, with a Registered Agent for service of process. The Registered Agent is known as Celera Services, Inc. Its registered office is listed as 19 Holly Cove Lane, Dover, Delaware 19901.[4]

11. The OFAC administers and enforces economic and trade sanctions based on United States foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those

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[2] The formation documents for this entity are attached as Exhibit B. The resignation documents for the Registered Agent are also included with this exhibit.

[3] The formation documents for this entity are attached as Exhibit C.

[4] The incorporation documents for this entity are attached as Exhibit D.

engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security.[5]

12. OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of targeted countries, terrorists and narcotics traffickers known as the SDN. These entities assets are blocked and United States citizens are generally prohibited from dealing with them.[6]

13. The Delaware Department of State ("DOS") enacted regulations, effective January 1, 2019 to require registered agents to verify the identity of their customer business entities.[7] In addition to the collection of background identifying information, this regulation mandates that registered agents check the OFAC listings prior to filing on behalf of a business entity and to periodically update the entity's status on the SDN to ensure that such entities are blocked from conducting business. These regulations may be found at 20 Del. Admin. Code § 101.[8]

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[5] https://www.treasury.gov/about/organizational-structure/offices/pages/office-of-foreign-assets-control.aspx

[6] https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx

[7] House Bill 404 of the 149th Delaware General Assembly, as amended by House Amendment No. 1 and Senate Amendment No. 2, 81 *Del. Laws*, Ch. 334, modified 8 *Del.C.* §132; 6 *Del.C.* §§15-111, 17-104 and 18-104 to enable the Secretary to establish regulations for Registered Agents to verify the identification of their customer business entities.

[8] A copy of the Regulations is attached as Exhibit E.

Factual Allegations

United States v. Conrado Adolfo Frenzel *et al*

14. On or about September 11, 2018, the United States Government indicted the operators of a website known as "Goldpharma" in the matter of *United States of America v. Conrado Adolfo Frenzel, Jorge Alejandro Paura, Santiago Videmato, Luciano Brunetti, and Lucas Daniel Paura*, C.A. No. 2:18-cr-00175-JPS. This was followed by a Superseding Indictment on or about October 10, 2018. The charges in the Superseding Indictment are conspiracy to distribute controlled substances; delivery, distribution, or dispensation of controlled substances by means of the Internet; using the Internet to advertise the sale of and to offer to sell, distribute, and dispense controlled substances where such sale, distribution, or dispensing is not authorized by law; conspiracy to import controlled substances; knowingly attempting to import Oxycodone into the United States; importing Tramadol and Alprazolam into the United State; importing Carisprodol and Diazepam into the United States; importing Codeine into the United States; and importing Tapentadol into the United States.[9]

[9] A copy of this Superseding Indictment is attached as Exhibit F.

15. The individuals listed in this Superseding Indictment, along with unindicted co-conspirators, are alleged by the federal government to control the operations of the Defendants.

16. On or about May 23, 2019, the United States Government placed the Defendants on the OFAC list for violations of the Foreign Narcotics Kingpin Designation Act (the "Kingpin Act"), 21 U.S.C. §§ 1901 *et seq*. and notified Delaware of this decision.

17. Delaware placed the entities on its OFAC list on or about May 29, 2019, forbidding the transfer of assets to or from these Delaware entities.

18. The United States Department of the Treasury issued the following statement on May 23, 2019:

> In addition, the OFAC action targets Argentine nationals Sergio David Ferrari, Gaston Tomaghelli, and Roberto Javier Perez Santoro for their involvement in Goldpharma's money laundering activities. Ferrari operates a network of entities in multiple countries, known collectively as the "Smile Group," which funnels the proceeds of Goldpharma's narcotics sales back to Argentina. Several of the entities belonging to the "Smile Group" were designated today, including Smile Technologies S.A. (registered in Argentina), SmileWallet S.A.S. (registered in Colombia), Smile Property & Travel Ltd. (registered in the United Kingdom), Smile Technologies Canada Ltd. (registered in Canada), and SmileWallet B.V. (registered in the Netherlands).
>
> Seven U.S. companies owned or controlled by designated members of Goldpharma have also been blocked as part of

> today's action. These entities include two companies registered in Delaware: SmilePayments LLC and Oyster Investments LLC; three companies registered in Texas: Smilewallet, LLC, Smile Property & Travel Ltd., and Smile Technologies S.A. LLC; and two companies registered in Florida: La Florida Investments Group LLC and Water Hill Corp.
> As a result of today's action, four condominiums in the Miami, Florida area tied to Oyster Investments LLC have also been blocked.[10]

19. Each of the Defendants has also garnered significant deficiencies which hinder their ability to retain Delaware entity status.

20. Oyster Investments LLC has failed to appoint a registered agent.

21. Smile Technologies S.A. LLC has failed to appoint a registered agent.

22. SMILEPAYMENTS, LLC has failed to pay its Delaware taxes.

23. WATER HILL CORP has failed to pay its Delaware taxes.

24. The placement of the Defendants on the OFAC list, combined with their Delaware-specific deficiencies, prove that the powers, privileges, or existence of the limited liability companies and the corporation have been abused or misused by the Defendants.

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[10] A copy of this Statement is attached as Exhibit G. A copy of a chart documenting the connections between the individuals relevant to this OFAC designation is attached as Exhibit H. A copy of the Federal Register notice is attached as Exhibit I.

Causes of Action

Count I—Cancellation of Certificate of formation of Oyster Investment LLC

25. Paragraphs 1 through 24 of this Complaint are repeated and realleged as if fully set forth herein.

26. Section 18-112 of the LLC Act authorizes the Court of Chancery, upon motion of the Attorney General, to cancel the certificate of formation of a Delaware limited liability company when the powers, privileges, or existence of that limited liability company have been abused or misused.

27. On information and belief, Oyster Investment LLC is controlled by the owners and operators of Goldpharma.

28. The owners and operators of Goldpharma have been indicted for drug trafficking charges.

29. All identified corporate entities and assets controlled or possessed by the owners and operators of Goldpharma have been subjected to OFAC listing, and their assets have been frozen.

30. Oyster Investment LLC has been placed on the OFAC list.

31. Oyster Investment LLC has also failed to appoint a registered agent.

32. The above-referenced placement on the OFAC list as a SDN establishes that Oyster Investment LLC has engaged in acts of fraud, immorality, or violations of statutory law in connection with its operations.

33. Oyster Investment LLC has abused the powers, privileges, and existence granted to it as a Delaware limited liability company, as a result of which it should be denied the rights and privileges that also come with status as a Delaware limited liability company, and its certificate of formation should therefore be canceled.

34. The Attorney General has no adequate remedy at law.

Count II-
Cancellation of Certificate of Formation
of Smile Technologies S.A. LLC

35. Paragraphs 1 through 34 of this Complaint are repeated and realleged as if fully set forth herein.

36. Section 18-112 of the LLC Act authorizes the Court of Chancery, upon motion of the Attorney General, to cancel the certificate of formation of a Delaware limited liability company when the powers, privileges, or existence of that limited liability company have been abused or misused.

37. On information and belief, Smile Technologies S.A. LLC is controlled by the owners and operators of Goldpharma.

38. The owners and operators of Goldpharma have been indicted for drug trafficking charges.

39. All identified corporate entities and assets controlled or possessed by the owners and operators of Goldpharma have been subjected to OFAC listing, and their assets have been frozen.

40. Smile Technologies S.A. LLC has been placed on the OFAC list.

41. Smile Technologies S.A. LLC has also failed to appoint a registered agent.

42. The above-referenced placement on the OFAC list as a SDN establishes that Smile Technologies S.A. LLC has engaged in acts of fraud, immorality, or violations of statutory law in connection with its operations.

43. Smile Technologies S.A. LLC has abused the powers, privileges, and existence granted to it as a Delaware limited liability company, as a result of which it should be denied the rights and privileges that also come with status as a Delaware limited liability company, and its certificate of formation should therefore be canceled.

44. The Attorney General has no adequate remedy at law.

Count III-
Cancellation of Certificate of Formation
of SMILEPAYMENTS LLC

45. Paragraphs 1 through 44 of this Complaint are repeated and realleged as if fully set forth herein.

46. Section 18-112 of the LLC Act authorizes the Court of Chancery, upon motion of the Attorney General, to cancel the certificate of formation of a Delaware limited liability company when the powers, privileges, or existence of that limited liability company have been abused or misused.

47. On information and belief, SMILEPAYMENTS LLC is controlled by the owners and operators of Goldpharma.

48. The owners and operators of Goldpharma have been indicted for drug trafficking charges.

49. All identified corporate entities and assets controlled or possessed by the owners and operators of Goldpharma have been subjected to OFAC listing, and their assets have been frozen.

50. SMILEPAYMENTS LLC has been placed on the OFAC list.

51. SMILEPAYMENTS LLC has also failed to pay its Delaware taxes.

52. The above-referenced placement on the OFAC list as a SDN establishes that SMILEPAYMENTS LLC has engaged in acts of fraud, immorality, or violations of statutory law in connection with its operations.

53. SMILEPAYMENTS LLC has abused the powers, privileges, and existence granted to it as a Delaware limited liability company, as a result of which it should be denied the rights and privileges that also come with status as a Delaware

limited liability company, and its certificate of formation should therefore be canceled.

54. The Attorney General has no adequate remedy at law.

Count IV—Cancellation of Corporate Charter of WATER HILL CORP

55. Paragraphs 1 through 54 of this Complaint are repeated and realleged as if fully set forth herein.

56. Under 8 *Del. C.* § 284, the Attorney General is authorized to request that the Court of Chancery revoke or forfeit the charter of any corporation for abuse, misuse or nonuse of its corporate powers, privileges or franchises.

57. On information and belief, Water Hill Corp. is controlled by the owners and operators of Goldpharma.

58. The owners and operators of Goldpharma have been indicted for drug trafficking charges.

59. All identified corporate entities and assets controlled or possessed by the owners and operators of Goldpharma have been subjected to OFAC listing, and their assets have been frozen.

60. WATER HILL CORP has been placed on the OFAC list.

61. WATER HILL CORP has also failed to pay Delaware taxes.

62. The above-referenced placement on the OFAC list as a SDN establishes that WATER HILL CORP has engaged in acts of fraud, immorality, or violations of statutory law in connection with its operations.

63. WATER HILL CORP has abused the powers, privileges, and existence granted to it as a Delaware corporation, as a result of which it should be denied the rights and privileges that also come with status as a Delaware corporation, and its corporate charter should therefore be canceled.

64. The Attorney General has no adequate remedy at law.

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WHEREFORE, the Attorney General prays for judgment and requests that the Court enter an Order:

A. Directing the Delaware Division of Corporations to cancel the certificate of formation of Oyster Investments LLC;

B. Directing the Delaware Division of Corporations to cancel the certificate of formation of Smile Technologies S.A. LLC;

C. Directing the Delaware Division of Corporations to cancel the certificate of formation of SMILEPAYMENTS, LLC;

D. Directing the Delaware Division of Corporations to cancel the corporate charter of WATER HILL CORP, and

E. Granting such other and further relief as the Court deems just and appropriate.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Lawrence W. Lewis
Lawrence W. Lewis (#2539)
Oliver J. Cleary (#5830)
Deputy Attorneys General
Delaware Department of Justice
Carvel State Office Building
820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8400

Attorneys for Kathleen Jennings, Attorney General of the State of Delaware

Dated: September 19, 2019

EXHIBIT A

State of Delaware
Secretary of State
Division of Corporations
Delivered 02:53 PM 01/22/2013
FILED 11:46 AM 01/22/2013
SRV 130073062 - 5277495 FILE

CERTIFICATE OF FORMATION

OF

Oyster Investments LLC

(A Delaware Limited Liability Company)

First: The name of the limited liability company is:
Oyster Investments LLC

Second: Its registered office in the State of Delaware is located at 16192 Coastal Highway, Lewes, Delaware 19958, County of Sussex. The registered agent in charge thereof is Harvard Business Services, Inc.

IN WITNESS WHEREOF, I Richard H. Bell, being fully authorized to execute and file this document have signed below and executed this Certificate of Formation on this January 22, 2013.

Richard H. Bell

Harvard Business Services, Inc.
By: Richard H. Bell, Organizer

State of Delaware
Secretary of State
Division of Corporations
Delivered 04:40 PM 07/11/2019
FILED 04:40 PM 07/11/2019
SR 20195928481 - File Number 6745962

CERTIFICATE OF RESIGNATION

OF

REGISTERED AGENT

Pursuant to Section 18-104(d) of the Delaware Limited Liability Company Act, Harvard Business Services, Inc. does hereby resign as registered agent for:

(941 Companies – See attached List)

Written notice of the resignation was given to the limited liability companies at least 30 days prior to the filing of the certificate by mail to the last known address for the limited liability companies. The letter was mailed on June 10, 2019.

I, Richard H. Bell, II, Chairman of the Board of Harvard Business Services, Inc. do hereby sign this document to resign as registered agent of the above limited liability companies on this date of July 11, 2019.

Richard H. Bell

Richard H. Bell, II
Chairman of the Board
Harvard Business Services, Inc.

Company Name

File Number

[redacted]

[redacted]

Oyster Investments LLC 5277495

EXHIBIT B

State of Delaware
Secretary of State
Division of Corporations
Delivered 01:50 PM 10/11/2017
FILED 01:50 PM 10/11/2017
SR 20176573298 - File Number 6575464

CERTIFICATE OF FORMATION

Of

Smile Technologies S.A. LLC

FIRST: The name of the limited liability company is: Smile Technologies S.A. LLC

SECOND: The address of its registered agent is 3411 Silverside Road, Tatnall Building, Suite 104, Wilmington, DE, 19810, New Castle County. The name of its registered agent at such address is Worldwide Incorporators Ltd.

THIRD: The purpose of the limited liability company shall be to engage in any lawful act or activity for which a limited liability company may be formed under the Limited Liability Company Law of the State of Delaware.

FOURTH: The limited liability company shall have perpetual existence unless dissolved by law.

FIFTH: The name and address of the person forming the limited liability company at the instruction of its members is as follows:

Worldwide Incorporators Ltd.
3411 Silverside Road, Tatnall Building, Suite 104
Wilmington, DE 19810

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation of Smile Technologies S.A. LLC on this 11th day of October, 2017.

/S/ Alexa Siemienski
Worldwide Incorporators Ltd. - Organizer
By: Alexa Siemienski - Special Secretary

State of Delaware
Secretary of State
Division of Corporations
Delivered 03:58 PM 05/31/2019
FILED 03:58 PM 05/31/2019
SR 20195088705 - File Number 6575464

STATE OF DELAWARE
CERTIFICATE OF RESIGNATION
OF REGISTERED AGENT WITHOUT APPOINTMENT
OF A SUCCESSOR REGISTERED AGENT

Pursuant to the provisions of Section 18-104 of Title 6 of the Delaware Limited Liability Company Act, the Undersigned agent for service of process, in order to resign as agent without appointment of a successor agent, hereby certifies that:

1. The Name of the Limited Liability Company is **SMILE TECHNOLOGIES S.A. LLC**

2. The name of the resigning agent is Worldwide Incorporators Ltd.

3. The written notice of resignation was given to affected Limited Liability Company at least 30 days prior to the filing of the certificate by mailing or delivering such notice to the Limited Liability Company at its address last known to the registered agent on 4/30/2019

IN WITNESS WHEREOF, the undersigned agent has caused this certificate to be signed on its behalf by its officer this 31st day of May, A.D. 2019.

S:// Jennifer Toscano-Goetz
Jennifer Toscano-Goetz, President
On behalf of Worldwide Incorporators Ltd.

EXHIBIT C

State of Delaware
Secretary of State
Division of Corporations
Delivered 08:30 AM 04/27/2015
FILED 08:30 AM 04/27/2015
SRV 150566997 - 5736292 FILE

STATE *of* DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE *of* FORMATION

First: The name of the limited liability company is:

SMILEPAYMENTS, LLC

Second: The address of its registered office in the State of Delaware is **One Commerce Center, 1201 Orange St. #600, in the City of Wilmington County of New Castle Zip Code 19899**. The name of its Registered agent at such address is **Incorp Services, Inc.**

Third: (Use this paragraph only if the company is to have a specific effective date of dissolution: "The latest date on which the limited liability company is to dissolve is.")

Fourth: (Insert any other matters the members determine to include herein.): **N/A**

In Witness Whereof, the undersigned have executed this Certificate of Formation

This 22 day of April, 2015.

By: _____
Authorized Person (s)

Name: **SERGIO DAVID FERRARI**

State of Delaware
Secretary of State
Division of Corporations
Delivered 08:00 AM 04/26/2016
FILED 08:00 AM 04/26/2016
SR 20162625028 - File Number 3470656

CERTIFICATE OF CHANGE OF ADDRESS OF REGISTERED OFFICE OF REGISTERED AGENT PURSUANT TO SECTION 18-104(B) OF THE LIMITED LIABILITY ACT

The undersigned Agent for service of process, in order to change the address of the registered office of the Limited Liability Companies for which it is registered agent, hereby certifies that:

1. The name of the registered agent is: InCorp Services, Inc.

2. The address of the old registered office was:
One Commerce Center - 1201 Orange St. #600
Wilmington, DE 19899 County of New Castle

3 The address to which the registered office is to be changed is:
919 North Market Street, Suite 425
Wilmington, DE 19801 County of New Castle

4. The new address will be effective on: May 2, 2016

IN WITNESS WHEREOF, said agent has caused this certificate to be signed this 25th day of April, A.D. 2016.

BY: _____
Registered Agent / Authorized Person(s)

NAME: Jeffrey Steffen, Secretary for InCorp Services, Inc.
Print or Type

EXHIBIT D

STATE *of* DELAWARE
CERTIFICATE *of* INCORPORATION
A STOCK CORPORATION

- **First:** The name of this Corporation is WATER HILL CORP

- **Second:** Its registered office in the State of Delaware is to be located at 19 Holly COVE LN Street, in the City of DOVER, DE County of KENT Zip Code 19901. The registered agent in charge thereof is CELERA SERVICES, Inc.

Third: The purpose of the corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware.

- **Fourth:** The amount of the total stock of this corporation is authorized to issue is 1,000 shares (number of authorized shares) with a par value of 1.0000000000 per share.

- **Fifth:** The name and mailing address of the incorporator are as follows:
  Name Gaston Tomaghelli
  Mailing Address San Martin 551, piso 4 oficina 66
  C.A.B.A, Argentina Zip Code 1004

- **I, The Undersigned,** for the purpose of forming a corporation under the laws of the State of Delaware, do make, file and record this Certificate, and do certify that the facts herein stated are true, and I have accordingly hereunto set my hand this 4 day of JULY, A.D. 20 16.

BY: _____
(Incorporator)

NAME: Gaston Tomaghelli
(type or print)

State of Delaware
Secretary of State
Division of Corporations
Delivered 09:53 AM 07/05/2016
FILED 09:53 AM 07/05/2016
SR 20164767279 - File Number 6087358

EXHIBIT E

DEPARTMENT OF STATE
Division of Corporations

101 Registered Agent Customer Entity Verification Requirements

1.0 Enabling Legislation

House Bill 404 of the 149th Delaware General Assembly, as amended by House Amendment No. 1 and Senate Amendment No. 2, 81 **Del. Laws**, Ch. 334, modifies 8 **Del.C.** §132; 6 **Del.C.** §§15-111, 17-104 and 18-104 to enable the Secretary to establish regulations for Registered Agents to verify the identification of their customer business entities.

2.0 Purpose

The purpose of this regulation is to clarify the obligation of Registered Agents in Delaware to comply with regulations issued by the Secretary pertaining to Business Entity Formation in matters involving filings submitted to the Secretary on behalf of corporations, partnerships, trusts, limited partnerships, and limited liability companies. This regulation outlines the standards for Registered Agents regarding verification of customer entities in accordance with House Bill 404 of the 149th Delaware General Assembly, as amended by House Amendment No. 1 and Senate Amendment No. 2, 81 **Del. Laws**, Ch. 334.

3.0 Definitions

The following words and terms, when used in this regulation, shall have the following meaning unless the context clearly indicates otherwise:

"**Business Entity Formation**" means the act of any person, partnership, association, corporation, company, singly or jointly with others, in organizing under the Delaware Code and filing the required documents with the Division of Corporations in the Department of State.

"**Business Entity Representation**" means any person, partnership (whether general (including a limited liability partnership) or limited (including a limited liability limited partnership)), association, corporation, company, singly or jointly with others, that acts on behalf of any person or entity as a registered agent.

"**Corporation**" means an entity that is organized or incorporated in accordance with the Delaware Code and as expressly set forth at Title 8 of the Delaware Code.

"**Customer**" means the person or persons intending to form, and/or otherwise conduct activities through, a business entity formed, registered or qualified in Delaware.

"**Customer Information**" means any and all information or documents relating to the true and correct identity of a potential customer of a Registered Agent that includes, but is not limited to, full name, complete address (to include background information related to a P.O. Box address), photographs, background information, or any other information as needed to verify identification.

"**Department**" means the Delaware Department of State.

"**Limited Liability Company**" means an entity that is organized or created in accordance with the requirements of a "limited liability company" or a "series" as set forth in the Delaware Code and as expressly defined at 6 **Del.C.** §18-101, as amended.

"**Limited Partnership**" means an entity that is organized or created in accordance with the requirements of a "limited liability partnership" as set forth in the Delaware Code and as expressly defined at 6 **Del.C.** §17-101 as amended.

"**Office of Foreign Assets Control**" means the office or its equivalent office(s) as created by federal laws and administered by order of the United States Department of the Treasury or its successor(s) or equivalent department(s).

"**Partnership**" means an entity that is organized or created in accordance with the requirements of a "partnership" as set forth in the Delaware Code at 6 **Del.C.** §15-202 as amended.

"**Registered Agents**" means an agent or agents as defined or described in accordance with the Delaware Code and as expressly set forth at 8 **Del.C.** §132 and 6 **Del.C.** §§15-111, 17-104 and 18-104.

"**Secretary**" means the Secretary of the Delaware Department of State.

"**Specially Designated Nationals and Blocked Persons (SDN)**" means individuals, groups and entities as defined or described as "Specially Designated Nationals" by the Office of Foreign Assets Control.

"**Trust**" means a statutory trust as set forth in the Delaware Code and as expressly defined in 12 **Del.C.** Ch. 38 as amended.

4.0 Procedures

4.1 Registered Agents are required to complete the following steps to verify filings submitted to the Secretary on behalf of corporations, partnerships, limited partnerships, trusts, and limited liability companies in the course of Business Entity Representation:

4.1.1 Prior to engaging in business:

4.1.1.1 Registered Agents will take reasonable steps to verify the identity of potential customers. Such steps may include, but are not limited to, manual verification, the use of software or third party services to perform background or identification verification or obtaining such documents sufficient for identity.

4.1.2 New Customer Information:

4.1.2.1 Registered Agents shall compare new customer information against the register and lists of the Office of Foreign Assets Control ("OFAC"), before performing services on behalf of any new customer. Customer information shall include the full name and complete address of the submitting customer (whether business or individual).

4.1.2.2 For Business Entity Formation or Business Entity Representation, Registered Agents shall collect and retain the full name, business address and business telephone number of the current communications contact(s) and any other such information that shall hereafter be required by statute. In addition, Registered Agents may collect additional information, including, but not limited to officers, directors, members, managing members, partners, or owners. All such information collected shall be compared against OFAC.

4.1.3 Updating names and addresses of related parties:

4.1.3.1 Registered Agents shall request (at minimum annually) updates to the communications contact(s) and any other information required by statute. To the extent additional information has been collected, Registered Agents may, at their discretion, request updates to such information. All updated information shall be compared against OFAC.

4.1.4 Entity and Customer Information transferred from another Registered Agent:

4.1.4.1 Registered Agents shall compare all entity and customer information transferred from another registered agent against the register and lists of OFAC, or its successor, before accepting the customer.

4.1.4.2 Entity information shall include the full name, business address and business telephone number of communications contact(s), any other information required by statute along with any additional information collected by the previous registered agent.

4.1.5 Quarterly Review:

4.1.5.1 Registered Agents shall review complete customer registry against the OFAC register or lists at a minimum on a quarterly basis.

4.1.6 Notifications:

4.1.6.1 Registered Agents shall sign up for notifications and updates from OFAC, to include but not limited to updates on specific sanctions.

4.1.7 OFAC Search Lists:

4.1.7.1 Registered Agents shall search for either individuals or corporate entities on all OFAC lists, to include but not limited to "Specially Designated Nationals" and "Blocked Persons" lists. Registered Agents may use software or third party services to perform a search of OFAC lists.

EXHIBIT F

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED
2018 OCT 10 P 12: 12
STEPHEN C. DRIES
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

SEALED

Case No. 18-CR-175
[21 U.S.C. §§ 841(a)(1) 841(b)(1)(C), 841(b)(2), 841(h)(1)(A), 841(h)(1)(B), 846, 843(c)(2)(A), 843(d)(1), 952(a), 952(b), 960(a)(1), 960(b)(3), 960(b)(6), and 963; 18 U.S.C. § 2]

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen,"aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

Defendants.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning in at least 2012 and continuing until on or about September 11, 2018, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

and others, known and unknown to the Grand Jury, knowingly and intentionally

conspired to distribute controlled substances, including Oxycodone, a Schedule II controlled substance; Hydrocodone, a Schedule II controlled substance; Codeine, a Schedule II controlled substance; Tapentadol, a Schedule II controlled substance; Amphetamine, a Schedule II controlled substance; Methylphenidate, a Schedule II controlled substance; Tramadol, a Schedule IV controlled substance; Alprazolam, a Schedule IV controlled substance; Carisoprodol, a Schedule IV controlled substance; Zolpidem, a Schedule IV controlled substance; and Diazepam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(2).

In violation of Title 21, United States Code Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Beginning in at least 2012 and continuing until on or about September 11, 2018, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

and others known and unknown to the Grand Jury, did knowingly and intentionally deliver, distribute, and dispense a controlled substance by means of the internet, including by using websites www.goldpharma-24.com, Rxpharma24.com, Goldenpharma.com, Goldpharma24.com, Pharmgolden.com, Rxpharmatoday.com, goldpharmanew.com, and other websites to distribute controlled substances over the internet.

In violation of Title 21, United States Code, Sections 841(h)(1)(A), 841(h)(1)(B), 841(b)(l)(C), and 841(b)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

Beginning in at least 2012 and continuing until on or about September 11, 2018, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

and others known and unknown to the Grand Jury, did knowingly and intentionally use the internet and cause the internet to be used, to advertise the sale of and to offer to sell, distribute, and dispense, controlled substances where such sale, distribution, or dispensing is not authorized by law.

In violation of Title 21, United States Code, Sections 843(c)(2)(A) and 843(d)(1), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

Beginning in at least 2012 and continuing until on or about September 11, 2018, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

and others known and unknown to the Grand Jury, knowingly and intentionally conspired with each other to import into the United States from any place outside thereof mixtures and substances containing a detectable amount of controlled substances including Oxycodone, a Schedule II controlled substance; Hydrocodone, a Schedule II controlled substance; Codeine, a Schedule II controlled substance; Tapentadol, a Schedule II controlled substance; Amphetamine, a Schedule II controlled substance; Methylphenidate, a Schedule II controlled substance; Tramadol, a Schedule IV controlled substance; Alprazolam, a Schedule IV controlled substance; Carisoprodol, a Schedule IV controlled substance; Zolpidem, a Schedule IV controlled substance; and Diazepam, a Schedule IV controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 952(b), 960(a)(1), 960(b)(3), 960(b)(6), and 963.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

On or about June 25, 2015, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly attempted to import a mixture and substance containing Oxycodone, a Schedule II controlled substance, from India into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(3), and 963, and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

On or about September 9, 2015, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly imported mixtures and substances containing Tramadol, a Schedule IV controlled substance, and Alprazolam, a Schedule IV controlled substance, from Romania and India into the United States.

In violation of Title 21, United States Code, Sections 952(a), 952(b), 960(a)(1), and 960(b)(6), and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

On or about September 11, 2015, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly imported mixtures and substances containing Carisoprodol, a Schedule IV controlled substance, and Diazepam, a Schedule IV controlled substance, from Romania and India into the United States.

In violation of Title 21, United States Code, Sections 952(b), 960(a)(1), and 960(b)(6), and Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

On or about August 13, 2016, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly imported a mixture and substance containing Codeine, a Schedule II controlled substance, from Romania into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(3), and Title 18, United States Code, Section 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES:

On or about November 22, 2016, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly imported a mixture and substance containing Codeine, a Schedule II controlled substance, from Romania into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(3), and Title 18, United States Code, Section 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES:

On or about December 27, 2016, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly imported a mixture and substance containing Codeine, a Schedule II controlled substance, from Romania into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(3), and Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES:

On or about April 24, 2017, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly imported a mixture and substance containing Codeine, a Schedule II controlled substance, from Romania into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(3), and Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES:

On or about September 4, 2018, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly imported a mixture and substance containing Tapentadol, a Schedule II controlled substance, from Singapore into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(3), and Title 18, United States Code, Section 2.

FORFEITURE NOTICE

1. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Twelve of this Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. §§ 853 and 970, 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds obtained as a result of the offense.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), the United States of America shall be entitled to forfeit substitute property, including, but not limited to, the following:

a. The residential real property located at 600 NE 27 Street, Unit 1104, Miami, Florida;

b. The residential real property located at 1401 Village Boulevard, Unit 1514, West Palm Beach, Florida;

c. The residential real property located at 6950 NW 186th Street, Unit 2-302, Hialeah, Florida;

d. The residential real property located at 1701 Washington Street, #603, Hollywood, Florida;

e. The residential real property located at 1701 Washington Street, #201, Hollywood, Florida;

f. The residential real property located at 4709 Sable Pine Circle, #C1, West Palm Beach, Florida;

g. The residential real property located at 2825 NE 201st Terrace, #M226, Miami, Florida;

h. The residential real property located at 1106 Green Pine Boulevard, A2, West Palm Beach, Florida;

i. The residential real property located at 706 Executive Center, #11, West Palm Beach, Florida;

j. The residential real property located at 718 Executive Center, #11, West Palm Beach, Florida;

k. The residential real property located at 1025 92nd Street, Unit 804, Bay Harbour, Florida;

l. The residential real property located at 1104 18th Street, Unit #1, West Palm Beach, Florida;

m. The residential real property located at 1777 Venice Lane, #233, North Miami Beach, Florida;

n. The residential real property located at 1860 Venice Park Drive, #201, North Miami Beach, Florida;

o. The residential real property located at 712 Sunny Pine Way, H3, Greenacres, Florida;

p. The residential real property located at 1855 NE 121st Street, #30, North Miami, Florida;

q. The residential real property located at 1410 Teal Court, Kissimmee, Florida;

r. The residential real property located at 3901 South Ocean Drive, #11, Hollywood, Florida;

s. The residential real property located at 1300 NE Miami Gardens Drive, #1005E, Miami, Florida;

t. The residential real property located at 1025 92nd Street, #407, Bay Harbor, Florida;

u. The residential real property located at 7612 Forest City Road, Unit G, Orlando, Florida;

v. The residential real property located at 7644 Forest City Road, Unit E, Orlando, Florida;

w. The residential real property located at 7604 Forest City Road, Unit B, Orlando, Florida;

x. The residential real property located at 210 NW 10th Avenue, South Bay, Florida;

y. The residential real property located at 400 Kings Point Drive, #621, Sunny Isles Beach, Florida;

z. The residential real property located at 1010 South West 2nd Avenue, #1101, Miami, Florida;

aa. The residential real property located at 1010 South West 2nd Avenue, #1507, Miami, Florida; and

bb. The residential real property located at 1701 Washington, #301, Hollywood, Florida.

A TRUE BILL:

[redacted]

FOREPERSON

Date: 10-10-18

MATTHEW D. KRUEGER
United States Attorney

EXHIBIT G

PRESS RELEASES

Treasury Sanctions Argentina-based Goldpharma

May 23, 2019

Goldpharma network of illegal online pharmacies traffics opioids to the United States

Washington – Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) identified the Argentina-based Goldpharma Drug Trafficking and Money Laundering Organization (Goldpharma DTO/MLO) as a significant foreign narcotics trafficker pursuant to the Foreign Narcotics Kingpin Designation Act (Kingpin Act). OFAC also designated eight Argentine nationals for their role in the Goldpharma DTO/MLO, as well as nine entities located in Argentina, Colombia, Canada, the United Kingdom, and the Netherlands.

"Treasury's action alongside our Argentine counterparts to shut down the Goldpharma network is part of this administration's broader strategy to combat the synthetic opioid crisis, and to prevent narcotics

traffickers and money launderers use to capitalize on the Internet and online pharmacy sites to sell highly addictive illicit narcotics around the world. This action leverages Treasury's unique tools to disrupt the complex global financial and logistics networks that drug kingpins rely on, and complements the efforts of our law enforcement partners who work relentlessly to combat these threats."

As a result of today's action, all property and interests in property of the designated persons in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. OFAC's regulations generally prohibit all dealings by U.S. persons or within (or transiting) the United States that involve any property or interests in property of blocked persons.

The 2019 U.S. National Drug Control Strategy, produced by the Office of National Drug Control Policy (ONDCP), highlights the need to address the role of DTOs in fueling the current opioid abuse epidemic in the United States, noting that "[w]hile DTOs often are involved in poly-drug trafficking and other criminal activity, the unprecedented rise in deaths from the opioid crisis demands that we prioritize U.S. government efforts on the individuals and groups involved in the smuggling and sale of the most deadly drugs such as synthetic opioids and heroin." The 2019 ONDCP strategy also makes note of the role of the Internet — both the clear web and the dark web — in providing a platform for such drug sales.

The Goldpharma DTO/MLO, while physically based in Buenos Aires, Argentina, operates virtually, via a network of online "pharmacy" websites, which sell both legitimate and clandestinely produced Schedule II and Schedule IV narcotics to customers (including Oxycodone, Hydrocodone, and Tramadol), without a prescription. Goldpharma sells the vast majority of its illicit opioids to customers located in the United States.

Five of the Argentine individuals designated today have been indicted in the U.S. District Court for the Eastern District of Wisconsin for their role in the Goldpharma DTO: Conrado Adolfo Frenzel, Jorge Alejandro Paura, Luciano Brunetti, Lucas Daniel Paura, and Santiago Videmato.

"The levels of addiction and overdose deaths caused by opioids in the U.S. are unacceptable," said Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin. "The opioid epidemic is being driven by illegal drug trafficking not only on street corners but also through the Internet. This prosecution underscores the federal government's commitment to work with international partners like Argentina to shut down drug trafficking online. We commend OFAC for taking action against the Goldpharma drug trafficking organization and preventing it from benefitting from the proceeds of its crimes."

In addition, the OFAC action targets Argentine nationals Sergio David Ferrari, Gaston Tomaghelli, and Roberto Javier Perez Santoro for their involvement in Goldpharma's money laundering activities. Ferrari

to the "Smile Group" were designated today, including Smile Technologies S.A. (registered in Argentina), SmileWallet S.A.S. (registered in Colombia), Smile Property & Travel Ltd. (registered in the United Kingdom), Smile Technologies Canada Ltd. (registered in Canada), and SmileWallet B.V. (registered in the Netherlands).

Seven U.S. companies owned or controlled by designated members of Goldpharma have also been blocked as part of today's action. These entities include two companies registered in Delaware: SmilePayments LLC and Oyster Investments LLC; three companies registered in Texas: Smilewallet, LLC, Smile Property & Travel Ltd., and Smile Technologies S.A. LLC; and two companies registered in Florida: La Florida Investments Group LLC and Water Hill Corp.
As a result of today's action, four condominiums in the Miami, Florida area tied to Oyster Investments LLC have also been blocked.

OFAC closely coordinated within Treasury with the Internal Revenue Service (IRS) and the Financial Crimes Enforcement Network (FinCEN), and with the Department of Justice, the Drug Enforcement Administration (DEA), and the Government of Argentina in order to execute today's action.

"This announcement illustrates the ongoing collaboration between the Drug Enforcement Administration and our law enforcement partners to unmask these transnational drug trafficking organizations who hide behind computers in order to profit from the opioid crisis. These OFAC sanctions are an essential tool in disrupting the financial abilities of these entities," said DEA Special Agent in Charge Brian M. McKnight.

"IRS-Criminal Investigation (CI) is committed to using our forensic accounting skills to assist in complex fraud and financial schemes," said IRS-CI Special Agent in Charge Gabriel Grchan. "We are proud to work with our law enforcement partners to help investigate individuals, and to help put a stop to this and other types of illegal activity."

Since June 2000, more than 2,200 entities and individuals have been named pursuant to the Kingpin Act for their role in international narcotics trafficking. Penalties for violations of the Kingpin Act sanctions range from civil penalties of up to $1,466,485 per violation to more severe criminal penalties. Criminal penalties for corporate officers may include up to 30 years in prison and fines up to $5 million. Criminal fines for corporations may reach $10 million. Other individuals could face up to 10 years in prison and fines pursuant to Title 18 of the United States Code for criminal violations of the Kingpin Act.

Identifying information on the individuals designated today.

The Kingpin Act chart on individuals and entities designated today.

Information about the Kingpin Act.

####

August 21, 2019

Treasury Targets Chinese Drug Kingpins Fueling America's Deadly Opioid Crisis

August 20, 2019

Treasury Designates Dominican Republic-Based Peralta Drug Trafficking Organization Under the Kingpin Act

August 15, 2019

Treasury International Capital Data for June

August 9, 2019

Treasury and IRS Issue Improved Form W-4 for 2020 to Simplify Filing and Increase Transparency

August 6, 2019

Treasury Underscores U.S. Commitment to Humanitarian Support for Venezuelan People

BUREAUS

Alcohol and Tobacco Tax and Trade (TTB)

Bureau of Engraving and Printing (BEP)

Bureau of the Fiscal Service (BFS)

Financial Crimes Enforcement Network (FinCEN)

Internal Revenue Service (IRS)

Office of the Comptroller of the Currency (OCC)

U.S. Mint

INSPECTOR GENERAL SITES

Office of Inspector General (OIG)

Report Scams, Fraud, Waste & Abuse

U.S. GOVERNMENT SHARED

Enterprise Business Solutions

Administrative Resource Center (ARC)- Bureau of the Fiscal Service

Treasury Direct Services for Governments

ADDITIONAL RESOURCES

Privacy Act

Small Business Contacts

Budget and Performance

TreasuryDirect.gov Securities/Bonds

Freedom of Information Act (FOIA)

No FEAR Act Data

Whistleblower Protection

OTHER GOVERNMENT SITES

USA.gov

USAJOBS.gov

OPM.gov

MyMoney.gov

Data.gov

Forms.gov

Regulations.gov

PaymentAccuracy.gov

my Social Security

العربية | 中文 | Español | 한국어 | Tagalog | TiếngViệt

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Required Plug-ins Adobe® Reader®

EXHIBIT H

Foreign Narcotics Kingpin Designation Act
May 2019

U.S. Department of the Treasury
Office of Foreign Assets Control

GOLDPHARMA

Drug Trafficking Organization

Operators of Buenos Aires-based GOLDPHARMA illegal online pharmacy network

All five individuals indicted in 2018 in Eastern District of Wisconsin for conspiring to import and distribute illegal controlled substances, including Oxycodone, in the United States

Conrado Adolfo FRENZEL
a.k.a. "Otto"
DOB 07 Nov 1968
POB Buenos Aires, Argentina
Passport AAA435057
DNI 20608046
CUIT 23206080469
Nationality Argentina

Jorge Alejandro PAURA
a.k.a. "Larry"
DOB 31 Oct 1967
POB Buenos Aires, Argentina
Passport AAB376848
DNI 18580686
CUIT 20185806864
Nationality Argentina

Luciano BRUNETTI
a.k.a. "Biff Tannen"
DOB 30 Aug 1988
POB Argentina
Passport AAC206993
DNI 34142353
Nationality Argentina

Lucas Daniel PAURA
DOB 04 Jan 1988
POB Buenos Aires, Argentina
Passport 33533978N
DNI 33533978
Nationality Argentina

Santiago VIDEMATO
a.k.a. "James Duggan"
a.k.a. "Ramona Ibarra"
DOB 04 Oct 1983
POB Buenos Aires, Argentina
Passport AAAA920679
DNI 30555776
Nationality Argentina

Entities owned/controlled by Conrado Adolfo FRENZEL and/or Jorge Alejandro PAURA

B-WORK S.A.S.
Buenos Aires, Argentina

BAJER S.R.L.
Buenos Aires, Argentina
CUIT 30712314156

HIGH NUTRITION S.R.L.
Buenos Aires, Argentina

Blocked U.S. entity
LA FLORIDA INVESTMENTS GROUP LLC
Miami, Florida
Registration ID L12000070773

Foreign Narcotics Kingpin Designation Act
May 2019

U.S. Department of the Treasury
Office of Foreign Assets Control

GOLDPHARMA

Money Laundering Organization

Individuals involved in laundering proceeds of GOLDPHARMA Drug Trafficking Organization

Sergio David FERRARI
a.k.a. "Yagy"
DOB 10 Feb 1968
POB Buenos Aires, Argentina
Passport AAA760416
DNI 2001866
CUIT 20200108664
Nationality Argentina

Roberto Javier PEREZ SANTORO
a.k.a. Javier PEREZ SANTORO
DOB 10 Sep 1983
POB Buenos Aires, Argentina
Passport AAB523976
DNI 30312556
Nationality Argentina

Gaston TOMAGHELLI
DOB 17 Nov 1977
POB Argentina
Passport AAD186419
DNI 26201272
Nationality Argentina

"Smile Group" – Entities owned/controlled by Sergio David FERRARI and/or Roberto Javier PEREZ SANTORO

SMILE TECHNOLOGIES S.A.
a.k.a. SMILE PAYMENTS
a.k.a. SMILE WALLET LTD
Buenos Aires, Argentina
www.smiletechnologies.com.ar
smilepayments.com
CUIT 30715339176

SMILE TECHNOLOGIES CANADA LTD
a.k.a. SMILE WALLET
a.k.a. SMILETRAVELS
a.k.a. SWEET APARTMENTS
Mississauga, Ontario, Canada;
www.smiletraveltours.com
www.sweetaparts.com
Company Number 2592364 (Canada)
MSB Registration Number M18867067 (Canada)

SMILE PROPERTY & TRAVEL LTD
a.k.a. QUARTIERLATINAPARTMENTS
a.k.a. SMILE BITCARD
Islington, London, United Kingdom;
Haslemere, Surrey, United Kingdom;
quartierlatinapartments.com
smilebitcard.com
Company Number 08220547 (UK)

SMILEWALLET B.V.
Amsterdam, Netherlands
www.smilewallet.com
Chamber of Commerce Number 70004676 (Netherlands)
RSIN 858100034 (Netherlands)

SMILEWALLET S.A.S.
Bogota, D.C., Colombia
NIT No. 9011450176

Blocked U.S. entities

SMILEWALLET, LLC
San Antonio, Texas
Tax ID No. 32065536529

SMILEPAYMENTS, LLC
Wilmington, Delaware
File Number 5736292

SMILE PROPERTY & TRAVEL LTD.
San Antonio, Texas
Tax ID No. 32066912794

SMILE TECHNOLOGIES S.A. LLC
San Antonio, Texas
Tax ID No. 32066912711

Entities owned/controlled by Gaston TOMAGHELLI

DTS CONSULTING S.A.
Buenos Aires, Argentina

Blocked U.S. entities

OYSTER INVESTMENTS LLC
Lewes, Delaware
Miami, Florida
File Number 5277495

WATER HILL CORP.
Miami, Florida
Identification Number P16000064887

EXHIBIT I

the number of vehicle rolls or turns. A review of this data did not show any fatalities in the subject and peer vehicles involved in rollover crashes. The NASS records contain four, non-fatal incidents involving the subject vehicles (two on Chevrolet Tahoe and two on GMC Yukon) and a total of 10 non-fatal incidents on the peer vehicles, again showing the subject vehicles did not stand out from the peers. The number of vehicle rolls ranged from one quarter turn to nine quarter turns.

Conclusion

Based on the information available at the present time, NHTSA does not believe that a safety-related defect currently exists in the design of the rollover side curtain air bags in the MY 2010 Chevrolet Tahoe and other similarly designed Chevrolet Tahoe and GMC Yukon vehicles. Therefore, the petition is denied. However, the agency will take further action if warranted by changing future circumstances.

Authority: 49 U.S.C. 30162(d); delegations of authority at CFR 1.50 and 501.8.

Jeffrey Mark Giuseppe,
Associate Administrator for Enforcement.

[FR Doc. 2019–11188 Filed 5–28–19; 8:45 am]
BILLING CODE 4910–59–P

DEPARTMENT OF THE TREASURY

Office of Foreign Assets Control

Notice of OFAC Sanctions Actions

AGENCY: Office of Foreign Assets Control, Department of the Treasury.

ACTION: Notice.

SUMMARY: The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is publishing the names of one or more persons that have been placed on OFAC's Specially Designated Nationals and Blocked Persons List based on OFAC's determination that one or more applicable legal criteria were satisfied. All property and interests in property subject to U.S. jurisdiction of these persons are blocked, and U.S. persons are generally prohibited from engaging in transactions with them.

DATES: See **SUPPLEMENTARY INFORMATION** section.

FOR FURTHER INFORMATION CONTACT: *OFAC:* Associate Director for Global Targeting, tel.: 202–622–2420; Assistant Director for Licensing, tel.: 202–622–2480; Assistant Director for Regulatory Affairs, tel.: 202–622–4855; Assistant Director for Sanctions Compliance & Evaluation, tel.: 202–622–2490; or the Department of the Treasury's Office of the General Counsel: Office of the Chief Counsel (Foreign Assets Control), tel.: 202–622–2410.

SUPPLEMENTARY INFORMATION:

Electronic Availability

The Specially Designated Nationals and Blocked Persons List (SDN List) and additional information concerning OFAC sanctions programs are available on OFAC's website (*https://www.treasury.gov/ofac*).

Notice of OFAC Action(s)

On May 23, 2019, OFAC determined that the property and interests in property subject to U.S. jurisdiction of the following persons are blocked under the relevant sanctions authority listed below.

Individuals

1. BRUNETTI, Luciano (a.k.a. "BIFF TANNEN"; a.k.a. "LUCHO"), Buenos Aires, Argentina; DOB 30 Aug 1988; POB Argentina; nationality Argentina; Gender Male; Passport AAC206993 (Argentina); D.N.I. 34142353 (Argentina) (individual) [SDNTK]. Designated pursuant to section 805(b)(3) of the Foreign Narcotics Kingpin Designation Act ("Kingpin Act"), 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, the GOLDPHARMA DRUG TRAFFICKING & MONEY LAUNDERING ORGANIZATION, a foreign person identified as a significant foreign narcotics trafficker pursuant to the Kingpin Act.

2. FERRARI, Sergio David (a.k.a. "Yagy"), Chivilcoy 3157 Piso 2 Depto D, Buenos Aires 1417, Argentina; Buenos Aires, Argentina; DOB 10 Feb 1968; POB Buenos Aires, Argentina; nationality Argentina; Gender Male; Passport AAA760416 (Argentina); D.N.I. 20010866 (Argentina); C.U.I.T. 20200108664 (Argentina) (individual) [SDNTK] (Linked To: SMILE TECHNOLOGIES S.A.; Linked To: SMILE PROPERTY & TRAVEL LTD; Linked To: SMILEWALLET S.A.S.; Linked To: SMILE TECHNOLOGIES CANADA LTD). Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, the GOLDPHARMA DRUG TRAFFICKING & MONEY LAUNDERING ORGANIZATION, a foreign person identified as a significant foreign narcotics trafficker pursuant to the Kingpin Act.

3. FRENZEL, Conrado Adolfo (a.k.a. "OTTO"), Buenos Aires, Argentina; DOB 07 Nov 1968; POB Buenos Aires, Argentina; nationality Argentina; Gender Male; Passport AAA435057 (Argentina); D.N.I. 20608046 (Argentina); C.U.I.T. 23206080469 (Argentina) (individual) [SDNTK] (Linked To: HIGH NUTRITION SOCIEDAD DE RESPONSABILIDAD LIMITADA; Linked To: B–WORK S.A.S.). Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, the GOLDPHARMA DRUG TRAFFICKING & MONEY LAUNDERING ORGANIZATION, a foreign person identified as a significant foreign narcotics trafficker pursuant to the Kingpin Act.

4. PAURA, Jorge Alejandro (a.k.a. "LARRY"), Buenos Aires, Argentina; DOB 31 Oct 1967; POB Buenos Aires, Argentina; nationality Argentina; Gender Male; Passport AAB376848 (Argentina); D.N.I. 18580686 (Argentina); C.U.I.T. 20185806864 (Argentina) (individual) [SDNTK] (Linked To: BAJER S.R.L.; Linked To: HIGH NUTRITION SOCIEDAD DE RESPONSABILIDAD LIMITADA). Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, the GOLDPHARMA DRUG TRAFFICKING & MONEY LAUNDERING ORGANIZATION, a foreign person identified as a significant foreign narcotics trafficker pursuant to the Kingpin Act.

5. PAURA, Lucas Daniel, Buenos Aires, Argentina; DOB 04 Jan 1988; POB Buenos Aires, Argentina; nationality Argentina; Gender Male; Passport 33533978N (Argentina); D.N.I. 33533978 (Argentina) (individual) [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, the GOLDPHARMA DRUG TRAFFICKING & MONEY LAUNDERING ORGANIZATION, a foreign person identified as a significant foreign narcotics trafficker pursuant to the Kingpin Act.

6. PEREZ SANTORO, Roberto Javier (a.k.a. PEREZ SANTORO, Javier), Buenos Aires, Argentina; DOB 10 Sep 1983; POB Buenos Aires, Argentina; nationality Argentina; Gender Male; Passport AAB523976 (Argentina); D.N.I. 30312556 (Argentina) (individual) [SDNTK] (Linked To: SMILE TECHNOLOGIES S.A.; Linked To: SMILE PROPERTY & TRAVEL LTD; Linked To: SMILEWALLET S.A.S.; Linked To: SMILEWALLET B.V.). Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, the GOLDPHARMA DRUG TRAFFICKING & MONEY LAUNDERING ORGANIZATION, a foreign person identified as a significant foreign narcotics trafficker pursuant to the Kingpin Act.

7. TOMAGHELLI, Gaston, Buenos Aires, Argentina; DOB 17 Nov 1977; POB Argentina; nationality Argentina; Gender Male; Passport AAD186419 (Argentina); D.N.I. 26201272 (Argentina) (individual) [SDNTK] (Linked To: DTS CONSULTING S.A.). Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, the GOLDPHARMA DRUG TRAFFICKING & MONEY LAUNDERING ORGANIZATION, a foreign person identified as a significant foreign narcotics trafficker pursuant to the Kingpin Act.

8. VIDEMATO, Santiago (a.k.a. "JAMES DUGGAN"; a.k.a. "RAMONA IBARRA"), Buenos Aires, Argentina; DOB 04 Oct 1983; POB Buenos Aires, Argentina; nationality Argentina; Gender Male; Passport AAA920679 (Argentina); D.N.I. 30555776 (Argentina) (individual) [SDNTK].

Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, the GOLDPHARMA DRUG TRAFFICKING & MONEY LAUNDERING ORGANIZATION, a foreign person identified as a significant foreign narcotics trafficker pursuant to the Kingpin Act.

Entities

1. BAJER S.R.L. (a.k.a. BAJER SOCIEDAD DE RESPONSABILIDAD LIMITADA), Nazarre 3336, Buenos Aires 1417, Argentina; C.U.I.T. 30712314156 (Argentina) [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, Jorge Alejandro PAURA, a foreign person designated pursuant to the Kingpin Act.

2. B–WORK S.A.S., Libertador del Av. 6025 piso 4, Buenos Aires, Argentina [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, Conrado Adolfo FRENZEL, a foreign person designated pursuant to the Kingpin Act.

3. DTS CONSULTING S.A., 25 de Mayo 611, piso 4 of. 2, Buenos Aires, Argentina [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, Gaston TOMAGHELLI, a foreign person designated pursuant to the Kingpin Act.

4. GOLDPHARMA DRUG TRAFFICKING & MONEY LAUNDERING ORGANIZATION (a.k.a. GOLDPHARMA DRUG TRAFFICKING AND MONEY LAUNDERING ORGANIZATION), Buenos Aires, Argentina [SDNTK]. Identified as a significant foreign narcotics trafficker pursuant to section 805(b)(1) of the Kingpin Act, 21 U.S.C. 1904(b)(1).

5. HIGH NUTRITION SOCIEDAD DE RESPONSABILIDAD LIMITADA (a.k.a. HIGH NUTRITION S.R.L.), Adolfo Carranza 2216, Buenos Aires, Argentina [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, Jorge Alejandro PAURA, a foreign person designated pursuant to the Kingpin Act.

6. LA FLORIDA INVESTMENTS GROUP LLC, Sunny Isles, FL, United States; Registration ID L12000070773 (United States) [SDNTK]. Property within the United States that is owned or controlled by Jorge Alejandro PAURA and Conrado Adolfo FRENZEL, and therefore is blocked pursuant to section 805(b) of the Kingpin Act, 21 U.S.C. 1904(b).

7. OYSTER INVESTMENTS LLC, Lewes, DE, United States; 1250 S Miami Ave, Unit 1004, Miami, FL, United States; 1250 S Miami Ave, Unit 1603, Miami, FL, United States; 170 SE 14 St, Unit 1606, Miami, FL, United States; 170 SE 14 St, Unit 2405, Miami, FL, United States; File Number 5277495 (United States) [SDNTK]. Property within the United States that is owned or controlled by Gaston TOMAGHELLI, and therefore is blocked pursuant to section 805(b) of the Kingpin Act, 21 U.S.C. 1904(b).

8. SMILE PROPERTY & TRAVEL LTD (a.k.a. QUARTIERLATINAPARTMENTS; a.k.a. SMILE BITCARD; a.k.a. SMILE PROPERTY AND TRAVEL LTD), Flat 1 73a White Lion Street, Islington, London N1 9PF, United Kingdom; 72 High Street Haslemere, Surrey GU27 2LA, United Kingdom; website *quartierlatinapartments.com;* alt. Website *smilebitcard.com;* Company Number 08220547 (United Kingdom) [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, Sergio David FERRARI and Roberto Javier PEREZ SANTORO, foreign persons designated pursuant to the Kingpin Act.

9. SMILE PROPERTY & TRAVEL LTD. (a.k.a. SMILE PROPERTY AND TRAVEL LTD.), San Antonio, TX, United States; Tax ID No. 32066912794 (United States) [SDNTK]. Property within the United States that is owned or controlled by Sergio David FERRARI, and therefore is blocked pursuant to section 805(b) of the Kingpin Act, 21 U.S.C. 1904(b).

10. SMILE TECHNOLOGIES CANADA LTD (a.k.a. SMILE TECHNOLOGIES CANADA LIMITED; a.k.a. SMILE WALLET; a.k.a. SMILETRAVELS; a.k.a. SMILEWALLET; a.k.a. SWEET APARTMENTS), 5825 Tiz Road, Mississauga, Ontario L5N0B6, Canada; 731 States Street, Mississauga, Ontario L5R 0B6, Canada; 2 Robert Speck Parkway, 7th Floor, Mississauga, Ontario L4Z 1H8, Canada; website *www.smiletraveltours.com;* alt. Website *www.sweetaparts.com;* Company Number 2592364 (Canada); MSB Registration Number M18867067 (Canada) [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, Sergio David FERRARI, a foreign person designated pursuant to the Kingpin Act.

11. SMILE TECHNOLOGIES S.A. (a.k.a. SMILE PAYMENTS; a.k.a. SMILE WALLET LIMITED; a.k.a. SMILE WALLET LTD), Avenida Chivilcoy 3157, piso 2, departamento D, Buenos Aires, Argentina; website *www.smiletechnologies.com.ar;* alt. Website *smilepayments.com;* C.U.I.T. 30715339176 (Argentina) [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, Sergio David FERRARI and Roberto Javier PEREZ SANTORO, foreign persons designated pursuant to the Kingpin Act.

12. SMILE TECHNOLOGIES S.A. LLC, San Antonio, TX, United States; Tax ID No. 32066912711 (United States) [SDNTK]. Property within the United States that is owned or controlled by Sergio David FERRARI, and therefore is blocked pursuant to section 805(b) of the Kingpin Act, 21 U.S.C. 1904(b).

13. SMILEPAYMENTS, LLC, Wilmington, DE, United States; File Number 5736292 (United States) [SDNTK]. Property within the United States that is owned or controlled by Sergio David FERRARI, and therefore is blocked pursuant to section 805(b) of the Kingpin Act, 21 U.S.C. 1904(b).

14. SMILEWALLET B.V., Herengracht 420, Amsterdam 1017BZ, Netherlands; website *www.smilewallet.com;* Chamber of Commerce Number 70004676 (Netherlands); RSIN 858100034 (Netherlands) [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, Roberto Javier PEREZ SANTORO, a foreign person designated pursuant to the Kingpin Act.

15. SMILEWALLET S.A.S., CR 15 #146 29 Casa 1, Bogota, DC, Colombia; NIT #9011450176 (Colombia) [SDNTK]. Designated pursuant to section 805(b)(3) of the Kingpin Act, 21 U.S.C. 1904(b)(3), for being owned, controlled, or directed by, or acting for or on behalf of, Sergio David FERRARI and Roberto Javier PEREZ SANTORO, foreign persons designated pursuant to the Kingpin Act.

16. SMILEWALLET, LLC, San Antonio, TX, United States; Tax ID No. 32065536529 (United States) [SDNTK]. Property within the United States that is owned or controlled by Sergio David FERRARI, and therefore is blocked pursuant to section 805(b) of the Kingpin Act, 21 U.S.C. 1904(b).

17. WATER HILL CORP., Miami, FL, United States; Identification Number P16000064887 (United States) [SDNTK]. Property within the United States that is owned or controlled by Gaston TOMAGHELI, and therefore is blocked pursuant to section 805(b) of the Kingpin Act, 21 U.S.C. 1904(b).

Dated: May 23, 2019.

Andrea M. Gacki,

Director, Office of Foreign Assets Control.

[FR Doc. 2019–11146 Filed 5–28–19; 8:45 am]

BILLING CODE 4810–AL–P

DEPARTMENT OF VETERANS AFFAIRS

Solicitation of Nominations for Appointment to the Veterans' Family, Caregiver and Survivor Advisory Committee

ACTION: Notice.

SUMMARY: The Department of Veterans Affairs (VA) is seeking nominations of qualified candidates to be considered for appointment to the Veterans' Family, Caregiver and Survivor Advisory Committee (hereinafter in this section referred to as "the Committee").

DATES: Nominations for membership on the Committee must be received no later than 5:00 p.m. EST on July 1, 2019.

ADDRESSES: All nominations should be mailed to the Veterans Experience Office, Department of Veterans Affairs, 810 Vermont Avenue NW (30), Washington, DC 20420; or sent electronically to the Advisory Committee Management Office mailbox at *vaadvisorycmte@va.gov.*

FOR FURTHER INFORMATION CONTACT: Dr. Betty Moseley Brown, Designated

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

KATHLEEN JENNINGS, Attorney General of the State of Delaware,	)	
Plaintiff,	)	
v.	)	C.A. No. _____
OYSTER INVESTMENTS LLC, a Delaware limited liability company, SMILE TECHNOLOGIES S.A. LLC, a Delaware limited liability company, SMILEPAYMENTS, LLC, a Delaware limited liability company, and WATER HILL CORP, a Delaware corporation,	)	
Defendants.	)	

VERIFICATION OF JOSEPH RAGO

STATE OF DELAWARE)
) SS:
COUNTY OF NEW CASTLE)

Joseph Rago, being duly sworn, does depose and say:

1. I have read the foregoing VERIFIED COMPLAINT and it is true and correct.

_____
Joseph Rago, Department of Justice

SWORN AND SUBSCRIBED before me this 17 day of SEPTEMBER, 2019

_____
Notary Public