



Council of the  
European Union

Brussels, 10 January 2019  
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**PROPOSAL**

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From: High Representative of the Union for Foreign Affairs and Security Policy,  
signed by Ms Helga Schmid, Secretary General

date of receipt: 10 January 2019

To: Mr Jeppe TRANHOLM-MIKKELSEN, Secretary-General of the Council of  
the European Union

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Subject: Proposal of the High Representative of the Union for Foreign Affairs and  
Security Policy to the Council for a Council Implementing Regulation  
implementing Regulation (EU) No 36/2012 concerning restrictive measures  
in view of the situation in Syria

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Delegations will find attached document HR(2018) 196.

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Encl.: HR(2018) 196

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EUROPEAN EXTERNAL ACTION SERVICE



GREFFE

**Proposal of the High Representative of the Union for Foreign Affairs and Security  
Policy to the Council**

**of 09/01/2019**

**for a Council Implementing Regulation implementing Regulation (EU) No 36/2012  
concerning restrictive measures in view of the situation in Syria**

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**COUNCIL IMPLEMENTING REGULATION (EU) 2019/**

**of [dd/mm/2019]**

**implementing Regulation (EU) No 36/2012 concerning restrictive measures in view of the situation in Syria**

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EU) No 36/2012 of 18 January 2012 concerning restrictive measures in view of the situation in Syria and repealing Regulation (EU) No 442/2011<sup>(1)</sup>, and in particular Article 32(1) thereof,

Having regard to the proposal from the High Representative of the Union for Foreign Affairs and Security Policy,

Whereas:

- (1) On 18 January 2012, the Council adopted Regulation (EU) No 36/2012.
- (2) In view of the joint-ventures formed by certain prominent businessmen and entities with state backed companies to develop expropriated land, those businessmen and entities are supporting and benefiting from the Assad regime including through the use of expropriated property.
- (3) Furthermore, the expropriation of land by the Assad regime from persons displaced by the Syrian war prevents those persons from being able to return to their homes.
- (4) Eleven natural persons and five entities should be added to the list of natural and legal persons, entities or bodies subject to restrictive measures in Annex II to Regulation (EU) No 36/2012.
- (5) Annex II to Regulation (EU) No 36/2012 should therefore be amended accordingly,

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<sup>1</sup> OJ L 16, 19.1.2012, p. 1.

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HAS ADOPTED THIS REGULATION:

*Article 1*

Annex II to Regulation (EU) No 36/2012 is amended as set out in the Annex to this Regulation.

*Article 2*

This Regulation shall enter into force on the date of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

*For the Council*  
*The President*

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### ANNEX

1. The following persons are added to the list set out in section A (Persons) of Annex II to Regulation (EU) No 36/2012:

	Name	Identifying information	Reasons	Date of listing
264.	Anas Talas  (a.k.a. أنس طلس; Anas Talous/ Tals/Tuls/Tlass)	Gender: Male  Position: Chairman of the Talas Group  Date of birth: 25 March 1971  Nationality: Syrian	Leading businessperson operating in Syria, with interests and activities in multiple sectors of Syria's economy. Through his business activities and investments, Anas Talas also benefits from and/or supports the Syrian regime. In 2018 the Talas Group, chaired by Anas Talas, entered into a SYP 23 billion joint venture with Damascus Cham Holding for the construction of Marota City, a regime-backed luxury residential and commercial development.	
265.	Nazir Ahmad JamalEddine  (a.k.a. أحمد نذير محمد الدين جمال; Nazir Ahmad, Mohammed JamalEddine)	Gender: Male  Position: Cofounder and majority shareholder of Apex Development and Projects LLC and founder of A'ayan Company for Projects and Equipment  Date of birth: 1962  Nationality: Syrian	Leading businessperson operating in Syria with significant investments in the construction industry, including a controlling 90% stake in Apex Development and Projects LLC, which has entered into a USD 34.8 million joint venture for the construction of Marota City, a regime-backed luxury residential and commercial development. Through his participation in the Marota City development, Nazir Ahmad JamalEddine benefits from and/or supports the Syrian regime.	
266.	Mazin Al-Tarazi  (a.k.a. المازن التارزي; Mazen al-Tarazi)	Gender: Male  Position: Businessperson  Date of Birth: September 1962  Nationality: Syrian	Leading businessperson operating in Syria, with significant investments in the construction and aviation sectors. Through his investments and activities, Mazin Al-Tarazi benefits from and/or supports the Syrian regime. In particular, Al-Tarazi has concluded a deal with Damascus Cham Holdings for a \$320million investment in the construction of Marota City, a regime-backed luxury residential and commercial development; he has also been granted a licence for a private airline in Syria.	

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	Name	Identifying information	Reasons	Date of listing
267.	Samer Foz  (a.k.a. Samir (فوز) Foz (سامر) / Fawz; Samer Zuhair Foz)	<p>Gender: Male</p> <p>Position: CEO of Aman Group</p> <p>Date of birth: May 1973</p> <p>Place of Birth: Latakia, Syria</p> <p>Nationalities: Syrian, Turkish</p> <p>Address: Aman Group Address: Damascus, <a href="http://www.amangroupco.com/">http://www.amangroupco.com/</a></p> <p>National number: +963-41-4875800</p> <p>Other information: Executive President of Aman Group. Subsidiaries: Foz for Trading, Al-Mohaimen for Transportation &amp; Contracting. Aman Group is the private sector partner in Joint Venture Aman Damascus JSC with Damascus Cham Holding, for which Foz is the individual shareholder. Emmar Industries is a joint venture between Aman Group and the Hamisho Group, in which Foz has the majority stake and is the Chairman.</p>	<p>Leading businessperson operating in Syria, with interests and activities in multiple sectors of Syria's economy, including a regime-backed joint venture involved in the development of Marota City, a luxury residential and commercial development. Samer Foz provides financial and other support to the regime, including funding the Military Security Shield Forces in Syria and brokering grain deals. He also benefits financially from access to commercial opportunities through the wheat trade and reconstruction projects as a result of his links to the regime.</p>	
268.	Khaldoun Al-Zoubi  (a.k.a. Khaldoon al-Zu'bi; Khaldoun Zubi)	<p>Gender: Male</p> <p>Position: Vice-president of Aman Holding</p> <p>Date of birth: 1979</p> <p>Nationality: Syrian</p>	<p>Leading businessperson operating in Syria, with interests and activities in multiple sectors of Syria's economy; including his roles as Vice President of Aman Holding and majority shareholder of Fly Aman airline. In this capacity he is linked to Samer Foz. Aman Holding is represented on the board of, and holds a majority stake in, 'Aman Damascus', a joint</p>	

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	Name	Identifying information	Reasons	Date of listing
			venture in the construction of Marota City, a regime-backed luxury residential and commercial development. Al-Zoubi benefits from and/or supports the regime through his position as Vice President of Aman Holding.	
269.	Hussam Al-Qatirji  (a.k.a. Hussam/Hossam Ahmed/Mohammed/Muhammad al-Katerji حسام القاطرجي)	Gender: Male  Position: CEO of Katerji Group (a.k.a. al-Qatirji Company / Qatirji Company / Khatirji Group / Katerji International Group)  Date of birth: 1982  Place of Birth: Raqqa, Syria  Nationality: Syrian	Leading businessperson operating in Syria, who is also a Member of Parliament for Aleppo. Al-Qatirji supports and benefits from the regime through enabling, and profiting from, trade deals with the regime in relation to oil and wheat.	
270.	Bashar Mohammad Assi	Gender: Male  Position: Chairman of the Board of Directors of “Aman Damascus”. Founding partner of Fly Aman Limited Liability airline.  Date of birth: 1977  Nationality: Syrian	Leading businessperson operating in Syria, with interests and activities in multiple sectors of Syria's economy, including his roles as founding partner of Fly Aman airline and Chairman of the Board of Directors of ‘Aman Damascus’; a joint venture involved in the development of Marota City, a regime-backed luxury residential and commercial development. Assi benefits from and/or supports the regime through his position as Chairman of the Board of Directors of ‘Aman Damascus’.	
271.	Khaled al-Zubaidi  (a.k.a. (Mohammed) Khaled/Khalid (Bassam) (al-) Zubaidi/Zubedi خالد الزبيدي)	Gender: Male  Position: Co-owner of Zubaidi and Qalei LLC, Director of Agar Investment Company, General Manager of Al Zubaidi company and Al Zubaidi & Al Taweeet Contracting Company, Director and Owner of Zubaidi Development Company, and co-owner of Enjaz Investment	Leading businessperson operating in Syria, with significant investments in the construction industry, including a 50% stake in Zubaidi and Qalei LLC, which is constructing the luxury tourist city Grand Town and for which the regime has granted a 45 year agreement in return for 19-21% of its revenue. In this capacity he is linked to Nader Qalei. Khaled al-Zubaidi benefits from and/or supports the regime through his business activities, in particular	

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	Name	Identifying information	Reasons	Date of listing
		Company. Nationality: Syrian	through this stake in the Grand Town development.	
272.	Hayan Mohammad Nazem Qaddour  (a.k.a. Hayyan Kaddour bin Mohammed Nazem)	Gender: Male  Name: Hayan Mohammed Nazem Qaddour  Position: Primary Shareholder of Exceed Development and Investment Company  Date of birth: 1970  Nationality: Syrian	Leading businessperson operating in Syria, who holds a 67% stake in Exceed Development and Investment, which has entered into a USD 17.7 million joint venture for the construction of Marota City, a regime-backed luxury residential and commercial development. Through his participation in the Marota City development, Hayan Mohammad Nazem Qaddour benefits from and/or supports the Syrian regime.	
273.	Maen Rizk Allah Haykal  (a.k.a. Heikal Bin Rizkallah)	Gender: Male  Position: Secondary Shareholder of Exceed Development and Investment Company  Nationality: Syrian	Leading businessperson operating in Syria, who holds a 33% stake in Exceed Development and Investment, which has entered into a USD 17.7 million joint venture for the construction of Marota City, a regime-backed luxury residential and commercial development. Through the participation in the Marota City development, Maen Rizk Allah Haykal benefits from and/or supports the Syrian regime.	
274.	Nader Qalei  (a.k.a. Kalai, Kalei)	Gender: Male  Position: Majority shareholder of Castle Investment Holding, Co-owner of Zubaidi and Qalei LLC, Chairman of Kalai Industries Management  Relatives/business associates or partners/links to listed individuals: Khaled al-Zubaidi  Nationality: Syria  Address: Young Avenue, Halifax, Canada	Leading businessperson operating in Syria, with significant investments in the construction industry, including a 50% stake in Zubaidi and Qalei LLC, which is constructing the luxury tourist city Grand Town and for which the regime has granted a 45 year agreement in return for 19-21% of its revenue. In this capacity, he is linked to Khaled al-Zubaidi. Nader Qalei benefits from and/or supports the regime through his business activities, in particular through this stake in the Grand Town development.	

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2. The following entities are added to the list set out in section B (Entities) of Annex II to Regulation (EU) No 36/2012:

	Name	Identifying information	Reasons	Date of listing
72.	Rawafed Damascus Private Joint Stock Company  (a.k.a. Rawafed/Rawafid/Rawafed (Tributary) <b>روافد</b> Damascus Private Joint Stock Company)	Address: Damascus, Syria	Rawafed Damascus Private Joint Stock Company is a USD\$48.3 million joint venture between Damascus Cham Holdings, Ramak Development and Humanitarian Projects, Al-Ammar LLC, Timeet Trading LLC (also referred to as Ultimate Trading Co. Ltd.), and Wings Private JSC. Rawafed supports and / or benefits from the Syrian regime, including through its participation in the regime-backed luxury development Marota City.	
73.	Aman Damascus Joint Stock Company  (a.k.a. Aman Damascus JSC)	Address: Damascus, Syria	Aman Damascus Joint Stock Company is a USD\$18.9 million joint venture between Damascus Cham Holdings and Aman Group. Through its participation in the regime-backed luxury development Marota City, Aman Damascus supports and/or benefits from the Syrian regime.	
74.	Bunyan Damascus Private Joint Stock Company  (a.k.a. Bunyan Damascus Private JSC)	Address: Damascus, Syria	Bunyan Damascus Private Joint Stock Company is a USD\$34.8 million joint venture between Damascus Cham Holdings and Apex Development and Projects LLC and Tamayoz LLC. Through its participation in the regime-backed luxury development Marota City, Bunyan Damascus Private Joint Stock Company supports and / or benefits from the Syrian regime.	
75.	Mirza	Address: Damascus, Syria	Mirza is a USD\$52.7 million joint venture between Damascus Cham Holding and Talas Group. Through its participation in the regime-backed luxury development Marota City, Mirza supports and/or benefits from the Syrian regime.	

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	<b>Name</b>	<b>Identifying information</b>	<b>Reasons</b>	<b>Date of listing</b>
76.	Developers Private Joint Stock Company  (a.k.a. Developers Private JSC)	Address: Damascus, Syria	Developers Private Joint Stock Company is a USD\$17.7 million joint venture between Damascus Cham Holdings and Exceed Development and Investment. Through its participation in the regime-backed luxury development Marota City, Developers Private Joint Stock Company supports and/or benefits from the Syrian regime.'	