



Council of the
European Union

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LIMITE

CORLX 316
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LEGISLATIVE ACTS AND OTHER INSTRUMENTS

Subject: COUNCIL IMPLEMENTING REGULATION implementing Regulation (EU)
No 36/2012 concerning restrictive measures in view of the situation in Syria

COUNCIL IMPLEMENTING REGULATION (EU) 2023/...

of ...

**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 442/2011¹, 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,

¹ OJ L 16, 19.1.2012, p. 1.

Whereas:

- (1) On 18 January 2012, the Council adopted Regulation (EU) No 36/2012.
- (2) The Council remains deeply concerned about the situation in Syria. After more than a decade, the conflict in Syria is far from over and remains a source of suffering and instability.
- (3) The Council notes that the Syrian regime continues to pursue its policy of repression. In view of the gravity of the situation which persists, the Council considers it necessary to maintain and ensure the effectiveness of the restrictive measures in place by further developing them while maintaining their targeted and differentiated approach, and bearing in mind the humanitarian conditions of the Syrian population. The Council considers that certain categories of persons and entities are of particular relevance for the effectiveness of those restrictive measures, given the specific context prevailing in Syria.

- (4) The Council has assessed that regime-affiliated militias support the Syrian regime in its repressive policies, commit abuses of human rights and violations of international humanitarian law on behalf of the Syrian regime, and that their members present a serious risk of further committing such violations. In recent years there has been a rise of private security companies operating in Syria, which act as shell companies for regime-affiliated militias and support them through activities such as the recruitment of members. The Council therefore considers that further restrictive measures are necessary to freeze all funds and economic resources belonging to, owned, held or controlled by members of Syrian regime-affiliated militias, as well as persons and entities linked to certain private security companies which support such regime-affiliated militias, and to impose restrictions on admission for such persons, as identified by the Council and listed in Annex II to Regulation (EU) No 36/2012.

- (5) The Council is deeply concerned about the rise in narcotics trade originating in Syria. The Council has in particular assessed that the trade in amphetamines has become a regime-led business model, enriching the inner circle of the regime, and providing it with revenue that contributes to its ability to maintain its policies of repression. The Council considers that it should provide for restrictive measures to freeze all funds and economic resources belonging to, owned, held or controlled by certain persons and entities involved in the production or trafficking of narcotics originating in Syria, as identified by the Council and listed in Annex II to Regulation (EU) No 36/2012, and to impose restrictions on admission for such persons, in order to prevent them from providing support to the regime and increase pressure on the regime to change its policies of repression. These measures also aim to reduce the risk of undermining the effectiveness of restrictive measures by targeting the regime's ability to resort to proceeds from narcotics trade to continue its policy of repression.
- (6) In view of the gravity of the situation, the Council considers that 25 persons and 8 entities should be added to the list of natural and legal persons, entities or bodies subject to restrictive measures set out in Annex II to Regulation (EU) No 36/2012.
- (7) Regulation (EU) No 36/2012 should therefore be amended accordingly,

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 ...,

For the Council

The President

ANNEX

Annex II to Regulation (EU) No 36/2012 is amended as follows:

(1) the following entries are added to the list set out in Section A (Persons):

	Name	Identifying information	Reasons	Date of listing
'327.	Wasim Badia AL-ASSAD الأسد بديع وسيم	Date of birth: 18.7.1980; Place of birth: Qardaha/Syria; Nationality: Syrian; Gender: male	Wasim Badia al-Assad is Bashar al-Assad's cousin; he is therefore a member of the Assad family. Wasim Badia al-Assad is also involved in the production and trafficking of Captagon. In particular, he has been involved in the production of Captagon and is responsible for drug shipments. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+

+ OJ: please insert the date of publication of this Regulation.

	Name	Identifying information	Reasons	Date of listing
328.	Samer Kamal AL-ASSAD a.k.a. 'Samir' الأسد كمال سامر	Date of birth: 19.5.1973; Place of birth: Qardaha, Syria; Nationality: Syrian; Gender: male	Samer Kamal al-Assad is a member of the Assad family. He operates in the context of the narcotics trade, in particular in its production. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+
329.	Mudar Rifaat AL-ASSAD a.k.a. 'Rifa'at' الأسد رفعت مضر	Date of birth: 1964; Place of birth: Syria; Nationality: Syrian; Gender: male	Mudar Rifaat al-Assad is Bashar al-Assad's cousin; he is therefore a member of the Assad family.	+

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	Name	Identifying information	Reasons	Date of listing
330.	Mohammad SHALISH شاليش محمد	Nationality: Syrian; Gender: male	Mohammad Shalish has close ties to the regime. He is linked to drug operations and more specifically to the Captagon trade in the Lattakia region. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+
331.	Waseem Omar AL-MASALMA المسالمة عمر وسيم	Date of birth: 27.8.1981; Place of birth: Bosra Al-Sham/Syria; Nationality: Syrian; Gender: male	Waseem Omar al-Masalma is a leader of a regime-affiliated militia. Waseem Omar al-Masalma is involved in the regime-led trade in Captagon in Southern Syria, especially in Deraa. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
332.	Amer Tayseer KHITI خيتي عامر تيسير	Date of birth: 31.7.1980; Place of birth: Douma/Rif Dimashq Governorate/Syria; Nationality: Syrian; Gender: male	Amer Tayseer Khiti is a leading businessperson operating in Syria with interests in real estate, construction and industry. He has close ties to the Assad family. He is a supporter of president al-Assad and organised rallies for him. Amer Tayseer Khiti is also involved in Captagon smuggling operations and bought up real estate in order to invest in packaging facilities used for drug smuggling. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+
333.	Abdellatif HAMID a.k.a. 'Hamida' حميدة اللطيف عبد	Date of birth: 1.12.1977; Place of birth: Aleppo, Syria; Nationality: Syrian; Gender: male	Abdellatif Hamid has close ties to the Assad family. Abdellatif Hamid owns a factory in Aleppo that has been implicated in Captagon production and trafficking. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
334.	Nouh ZAITER Noah ZAITER Noah ZAYTAR زعينر نوح	Date of birth: 1977; Place of birth: Zahle, Lebanon; Nationality: Lebanese; Gender: male	Nouh Zaiter is associated with members of the Assad family. He is involved in the trafficking of Captagon in Lebanon and Syria. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+
335.	Taher AL-KAYALI الكياي طاهر	Date of birth: 13.12.1959; Nationality: Syrian; Gender: male	Taher Al-Kayali is a Syrian businessman who owns several companies including Neptunus LLC. Through his companies he is involved in the production and trafficking of Captagon, especially in terms of transportation from the port of Latakia. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
336.	Imad Abu ZUREIQ Emad Abu ZURAIQ Imad Abu ZREIK زريق أبو عماد	Date of birth: 1982; Place of birth: Nasib, Daraa (Syria); Nationality: Syrian; Suspected location: Daraa, Syria; Gender: male	Imad Abu Zureiq is a leading member of a regime-affiliated militia in Southwest Syria that reports directly to the Syrian regime's Military Security branch. Currently his militia profits from the war economy, including the trafficking in Captagon. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+
337.	Mustafa AL-MASALMAH a.k.a. Mustafa AL-KASAM / QASIM الكسم / المسالمة مصطفى	Nationality: Syrian; Suspected location: Daraa al-Balad, Syria; Gender: male	Mustafa al-Masalmah leads a regime-affiliated militia that reports directly to the Syrian regime's Military Security branch. Currently his militia profits from the war economy, including the trafficking in the synthetic drug Captagon. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime, and is associated with it.	+

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	Name	Identifying information	Reasons	Date of listing
338.	Hassan Muhammad DAQQOU دقو محمد حسن	Date of birth: 1.2.1985; Place of birth: Tfail, Lebanon; Nationality: Syrian/Lebanese; Gender: male	Hassan Muhammad Daqqou has close ties with the Fourth Division of the Syrian Army. Daqqou has established a wide drug trafficking network in Lebanon and Syria and built Captagon manufacturing plants close to the Syrian-Lebanese border. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+
339.	Jihad BARAKAT بركات جهاد	Date of birth: 1964; Place of birth: Qardahah/Syria; Nationality: Syrian; Gender: male	Jihad Barakat is, through marriage, associated with the Assad family. He is also leader of a regime-affiliated militia and continues to hold different military and intelligence functions for the regime.	+

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	Name	Identifying information	Reasons	Date of listing
340.	Raji FALHOUT فلحوط راجي	Date of birth: 3.10.1985; Place of birth: Atil, Syria; Position: Syrian regime-affiliated militia leader; Nationality: Syrian; Gender: male	Raji Falhout leads a militia that is associated with the Syrian Military Intelligence. Raji Falhout is also involved in drug trafficking linked to Captagon. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. He therefore benefits from and supports the regime.	+

	Name	Identifying information	Reasons	Date of listing
341.	Muhammad ABDO ASSAAD a.k.a. Asa'ad أسعد عبده محمد	Date of birth: 19.7.1975; Place of birth: Ain Tineh, Damascus Countryside, Syria; Nationality: Syrian; Address: Assaad Building, Main Street, Ain Tineh, Damascus Countryside; Other identifying information: Father: Abdo Assaad; Gender: male	Muhammad Abdo Assaad is the leader of the Hosn al-Watan militia, which fought on behalf of the Syrian regime. Most recently, he has founded the Aman for Protection and Security LLC, which offers private security services and operates as a shell company for the Hosn al-Watan militia. He therefore benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
342.	Samer AL-DIBIS الدبيس سامر (a.k.a. Samer AL-DIBS, Samir)	Date of birth: 30.3.1962; Place of birth: Damascus, Syria; Nationality: Syrian; Address: Naher Street, Rawda, Damascus, Syria; Gender: male	Samer al-Dibis is a leading businessperson operating in Syria, active in several sectors of the economy, especially in the chemical industry and in real estate. He is a member of the Board of Directors of the Syrian-Chinese Business Council and the chairman of the Damascus and Rural Damascus Chamber of Industry. He is also a member of Parliament and a close associate of Maher al-Assad. In these functions Samer al-Dibis benefits from and supports the regime.	+
343.	Ali Najib IBRAHIM علي نجيب إبراهيم (a.k.a. Ali NajeebIBRAHIM)	Date of birth: 1991; Position: businessperson; Nationality: Syrian; Address: Al-Malki, Damascus, Syria; Gender: male	Ali Najib Ibrahim is a leading businessperson operating in Syria, active also in the telecommunications sector. He owns several shell companies, which have been linked to the Syrian regime in attempts to circumvent sanctions. He therefore benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
344.	Jamal ISMAIL a.k.a. Ismael إسماعيل جمال	Nationality: Syrian; Associated entities: Military Intelligence Directorate; Gender: male	Jamal al-Ismail was the commander of Branch 227 of the Military Intelligence Directorate of the Syrian regime on 13 April 2013 when his unit killed at least 41 civilians in the town of Tadamon ('Tadamon massacre'). He is therefore responsible for the violent repression of the civilian population in Syria.	+
345.	Jamal AL-KHATIB الخطيب جمال	Associated entities: Military Intelligence Directorate	Jamal al-Khatib was a commanding officer in Branch 227 of the Military Intelligence Directorate of the Syrian regime on 13 April 2013 when he participated in the killing of at least 41 civilians in the town of Tadamon ('Tadamon massacre'). He is therefore responsible for the violent repression of the civilian population in Syria.	+

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	Name	Identifying information	Reasons	Date of listing
346.	Osama AL-MALIKI a.k.a. Usama المالكي أسامة	Date of birth: 1963; Place of birth: Damascus, Syria; Nationality: Syrian; Address: Villa 98, Sharqiyyat, Jazira al- Khamisa, Qura al-Assad, Damascus Coutryside, Syria; Other identifying information: Father: Mohammad al-Maliki – محمد المالكي Gender: male	Osama al-Maliki is majority owner of Al-Jabal Security and Protection LLC. Al-Jabal Security and Protection LLC acts as a shell company to allow for the continuation of activities of the Saraya al-Areen 313 militia, a regime-affiliated militia. Osama al-Maliki therefore benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
347.	Fadi SAQR أحمد فادي (a.k.a. Fady SAKR, Fadi SAQER, Fadi SAQIR)	Date of birth: 1975 Place of birth: Jablah, Syria; Nationality: Syrian; Gender: male	Fadi Saqr is a leader of the “National Defense Forces” (NDF) militia in Damascus that has fought on behalf of the regime since at least 2012. Fadi Saqr therefore is a member of a regime-affiliated militia. Fadi Saqr was part of the chain of command in the massacre of at least 41 civilians in the town of Tadamon on 13 April 2013 (‘Tadamon massacre’). He is therefore responsible for the violent repression of the civilian population in Syria.	+

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	Name	Identifying information	Reasons	Date of listing
348.	Ahmad Ali TAHER طاهر علي احمد	Date of birth: 1982; Nationality: Syrian; Address: Damascus, Mazze, Western Villas, Saraya 36 Building, 3rd Floor; Associated individuals: Brother: Khodr Taher; Associated entities: Castle Security and Protection LLC; Other identifying information: Father: Ali Taher; Gender: male	Ahmad Ali Taher owns shares in Castle Security and Protection LLC, which operates as a shell company for the Fourth Division of the Syrian Arab Army, led by Maher al-Assad. He therefore benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
349.	Amjad YOUSSEF a.k.a. Yusuf, Yousef يوسف أمجد	Nationality: Syrian; Gender: male	Amjad Youssef is a Warrant Officer in the Syrian Military Intelligence Directorate. He was a member of Branch 227 of the Military Intelligence Directorate of the Syrian regime on 13 April 2013, when he participated in the killing of at least 41 civilians in the town of Tadamon ('Tadamon massacre'). He is therefore responsible for the violent repression of the civilian population in Syria.	+

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	Name	Identifying information	Reasons	Date of listing
350.	Osama RAMADAN a.k.a. Usama رمضان أسامة	Date of birth: 1973; Nationality: Syrian; Address: Damascus, Mazze, Western Villas, Saraya 36 Building, 3rd Floor; Business Associate: Ahmad Ali Taher; Associated entities: Castle Security and Protection LLC; Other identifying information: Father: Hassan Ramadan; Gender: male	Osama Ramadan owns shares in Castle Security and Protection LLC, which operates as a shell company for the Fourth Division of the Syrian Arab Army, led by the Maher al-Assad. He therefore benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
351.	Ali Mhanna SULEIMAN سليمان مهنا علي	Date of birth: 1987; Place of birth: Al-Raml, Kherbet Maaza, Tartus, Syria; Nationality: Syrian; Address: Tartus, Khirbit Maaza, 36th Estate, Ghaya Estate Area; National ID Number: 10040018920; Father's Name: Mhanna; Mother's Name: Insaf; Gender: male	Ali Suleiman was the leader of the Sahab Regiment of a Syrian Arab Army division known as "Tiger Forces". He is a close associate of Suhayl Hassan. He has been involved in financing the regime, including through the smuggling of fuel. He also benefits from his association with the regime, such as from opportunities in real estate development. He therefore benefits from and supports the regime.	+

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(2) the following entries are added to the list set out in Section B (entities):

	Name	Identifying information	Reasons	Date of listing
'83.	Fourth Armoured Division of the Syrian Army الفرقة الرابع	Place of registration: Damascus; Principal place of business: Syrian regime territory in Syria; Associated individuals: Maher al-Assad, Ghassan Belal	The Fourth Armoured Division is one of the most prominent military units of the Syrian army led by Maher al-Assad and commanded by Ghassan Bilal. The Fourth Armoured Division is responsible for the violent repression of the civilian population. The Fourth Armoured Division also profits from the war economy, especially the trafficking in Captagon. Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. Therefore, the Fourth Armoured Division benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
84.	Neptunus LLC / Neptune LLC company شركة نبتونوس المحدودة المسؤولة نبتونس أوفرسيز المحدودة	Place of registration: Latakia, Syria; Date of registration: 2017	Neptunus LLC is involved in drug operations in the port of Latakia. Neptunus LLC therefore benefits and supports the regime. Neptunus LLC was co-founded by Taher Al-Kayali.	+

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	Name	Identifying information	Reasons	Date of listing
85.	Areen foundation / مؤسسة العرين	Place of registration: Syria; Date of registration: 1999; Principal place of business: Syria; Associated individuals: Asma al-Assad (wife of Bashar al-Assad and Director)	The al-Areen foundation poses as a charitable foundation, but is closely affiliated with Syrian regime militias. The al-Areen foundation is directed by the president's wife, Asma Al-Assad. The foundation is channelling aid in line with the policies and priorities of the regime, and therefore benefits from and supports the regime.	+
86.	Stroytransgaz / Стройтрансгаз	Other information: Stroytransgaz Group, Stroytransgaz (STG) Logistic, Stroytransgaz (STG) Engineering, STG Engineering	Stroytransgaz is a Russian engineering and construction company operating in Syria, which amongst other things assumed control of Syria's largest phosphate mines. Stroytransgaz therefore benefits from and supports the Syrian regime.	+

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	Name	Identifying information	Reasons	Date of listing
87.	Gecopham, the General Company for Phosphate and Mines الشركة العامة للفوسفات و المناجم	Address: Palmyra Road, Homs, Syrian Arabic Republic; Phone: 00963312751122; Email: info@gecopham.sy; General Manager: Younes Ramadan	Gecopham is controlled by the Syrian Ministry of Petroleum and Mineral Resources and provides financial support to the regime. It therefore supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
88.	Al-Jabal Security and Protection LLC شركة الجبل لخدمات الحماية والحراسة	Address: F6XR+495, Malek Bin Rabeaa, Damascus, Syria; Type of entity: Limited Liability Company; Place of registration: Damascus; Date of registration: 19.10.2017; Principal place of business: Damascus, Syria; Associated individuals: Osama Mohammad al-Maliki	Al-Jabal Security and Protection LLC is owned and managed by Osama al-Maliki. Al-Jabal Security and Protection LLC acts as a shell company to allow for the continuation of activities of the Saraya al-Areen 313 militia, a regime-affiliated militia. Al-Jabal Security and Protection LLC therefore benefits from and supports the regime.	+

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	Name	Identifying information	Reasons	Date of listing
89.	<p>Castle for Security and Protection LLC</p> <p>شركة القلعة للحماية والحراسة والخدمات الأمني</p> <p>a.k.a. Castle Security and Protection LLC, Citadel for Security and Protection</p>	<p>Address: Saraya Roundabout, Western Villas, Mazze, Damascus, Syria;</p> <p>Type of entity: Limited Liability Company;</p> <p>Place of registration: Damascus, Syria;</p> <p>Date of registration: 18.10.2017;</p> <p>Registration number: /</p> <p>Principal place of business: Damascus, Syria;</p> <p>Other information: Sector: Militia turned Security Company;</p> <p>Phone Number: +963116119331; +963943800808</p>	<p>Castle for Security and Protection LLC is a private company, which acts as a shell company for the Fourth Division of the Syrian Arab Army, which is led by Maher al-Assad.</p> <p>Castle for Security is involved also in the trafficking of narcotics. The Captagon trade has become a regime-led business model, enriching the inner circle of the regime and forming its lifeline. It therefore benefits from and supports the regime.</p>	+

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	Name	Identifying information	Reasons	Date of listing
90.	Aman for Protection and Security LLC شركة أمان للحماية والحراسة الأمنية	Address: Damascus Countryside; Type of entity: Limited Liability Company; Place of registration: Damascus Countryside; Date of registration: 10.10.2018; Registration number: 2906; Principal place of business: Damascus Countryside, Syria; Associated individuals: Muhammad Abdo Assad	Aman for Protection and Security LLC is a private security company, which acts as a shell company for the Hoshn al-Watan militia, founded by Muhammad Abdo Assaad. It therefore benefits from and supports the regime.	+

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