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HSI New York Joins Department of Treasury in Announcing Sanctions Against Corruption Network in Guyana

NEW YORK — Homeland Security Investigations (HSI) New York joined the U.S. Department of Treasury's Office of Foreign Assets Control (OFAC), in coordination with law enforcement partners, in announcing sanctions against members of one of Guyana's wealthiest families, Nazar Mohamed and his son, Azruddin Mohamed; their company, Mohamed's Enterprise; and Mae Thomas, a Guyanese government official, for their roles in public corruption in Guyana.

OFAC also designated two other entities, Hadi's World and Team Mohamed's Racing Team, for being owned or controlled by Mohamed's Enterprise and Azruddin, respectively. These people and entities are sanctioned pursuant to Executive Order 13818, which builds upon and implements the Global Magnitsky Human Rights Accountability Act and targets perpetrators of serious human rights abuses and corruption around the world.

"Today's announcement is the result of an extensive multiagency investigation that uncovered the Mohameds' alleged unencumbered abuse of power to the tune of at least tens of millions of dollars. One of the wealthiest families in Guyana, history has shown the Mohameds wielded their money and influence with impunity and sheer disregard for the greater global impacts, and further recruited others to do their bidding," said HSI New York Special Agent in Charge Ivan J. Arvelo. "These sanctions are a significant first step in bringing the Mohameds' alleged corrupt practices to bear and holding them accountable for their yearslong abuse of power. I commend the U.S. Department of Treasury and HSI's law enforcement partners for their unwavering commitment to the public's wellbeing."

These actions were conducted in coordination with the HSI New York Organized Crime Drug Enforcement Task Force Strike Force, the Diplomatic Security Service, U.S. Customs and Border Protection's New York Operations Office of Intelligence, and the FBI's Miami field office with assistance from HSI Miami, CBP Miami and New York, the New York City Police Department's Intelligence Bureau, and the Drug Enforcement Administration.

"Today's action underscores our commitment to holding accountable those who seek to exploit Guyana's gold sector for personal gain," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "Treasury, in close coordination with our partners in U.S. law enforcement, will continue to take action to safeguard the U.S. financial system from abuse by corrupt actors."

Gold is one of Guyana's main exports, but it remains a highly fractured industry with small-scale gold mining operations in Guyana occupying a majority share of the country's gold production. These small, family-owned businesses have informal relationships with larger purchasers and traders like Mohamed's Enterprise. Once mined, Guyanese gold is sold and traded throughout international markets, including the United States, Canada, the United Arab Emirates and the European Union.

Nazar founded Mohamed's Enterprise in Guyana before expanding to the United States as a money changer and transitioned into gold trading, growing Mohamed's Enterprise into one of Guyana's largest gold exporters. In time, Azruddin ultimately took over Mohamed's Enterprise, which also now does business as "Confidential Cambio."

Azruddin and Mohamed's Enterprise evaded Guyana's tax on gold exports and defrauded the Guyanese government of tax revenues by under-declaring their gold exports to Guyanese authorities. Between 2019 and 2023, Mohamed's Enterprise omitted more than 10,000 kilograms of gold from import and export declarations and avoided paying more than \$50 million in duty taxes to the government of Guyana.

Mohamed's Enterprise has bribed customs officials to falsify import and export documents and facilitate illicit gold shipments. Mohamed's Enterprise paid bribes to Guyanese government officials to ensure the undisrupted flow of inbound and outbound personnel that move currency and other items on behalf of Azruddin and Mohamed's Enterprise.

In addition, Azruddin is the principal and owner of Team Mohamed's Racing Team, a drag racing organization in Guyana. Hadi's World is a Guyana-based subsidiary of Mohamed's Enterprise.

To conceal their illegal activity and operate with impunity, Azruddin and Mohamed's Enterprise have engaged in extensive bribery schemes involving government officials in Guyana, including providing direct and recurring bribery payments to Guyanese government officials to ensure favorable treatment in criminal or civil matters that would otherwise suggest their involvement in illegal criminal activity. In return, corrupt officials receive cash and gifts for incidents that are overlooked. Additionally, Mohamed's Enterprise has paid bribes to corrupt Guyanese government officials to facilitate the award of government contracts.

One such official, Thomas, was the permanent secretary to Guyana's Ministry of Home Affairs from October 2020 through August 2023 and is the current permanent secretary of the Ministry of Labour. A corrupt permanent secretary could manipulate procurement processes to suit their preferred bidder by providing inside information at the early stages of evaluation. Access to a permanent secretary of any ministry could afford contractors insight into upcoming projects and bid values. Permanent secretaries can act as the legal authority to sign contracts on behalf of their ministry.

While permanent secretary to Guyana's Ministry of Home Affairs, Thomas used her position to offer benefits to Mohamed's Enterprise and Azruddin, among others, in exchange for cash payments and high-value gifts. Thomas misused her position to influence the award of official contract bids and the approval processes for weapons permits and passports on behalf of Mohamed's Enterprise.

OFAC is designating Azruddin and Mohamed's Enterprise for being persons who have materially assisted, sponsored or provided financial, material or technological support for, or goods or services to or in support of, corruption. That includes the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery conducted by a foreign person.

OFAC is designating Nazar for being a foreign person who is or has been a leader or official of Mohamed's Enterprise, an entity whose property and interests in property are blocked pursuant to Executive Order 13818 as a result of activities related to Nazar's tenure.

OFAC is designating Team Mohamed's Racing Team for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Azruddin. It is also designating Hadi's World for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Mohamed's Enterprise.

OFAC is designating Thomas as a foreign person who is a current or former government official, or a person acting for or on behalf of such an official, who is responsible for or complicit in, or has directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

As a result of the action, all property and interests in property of the designated persons described above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, individually or in the aggregate, 50% or more by one or more blocked persons are also blocked. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons.

In addition, financial institutions and other persons that engage in certain transactions or activities with the sanctioned entities and individuals may expose themselves to sanctions or be subject to an enforcement action. The prohibitions include the making of any contribution or provision of funds, goods or services by, to, or for the benefit of any designated person, or the receipt of any contribution or provision of funds, goods or services from any such person.

Building upon the *Global Magnitsky Human Rights Accountability Act*, Executive Order 13818 was issued Dec. 20, 2017, in recognition that the prevalence of human rights abuse and corruption that have their source, in whole or in substantial part, outside the United States, had reached such scope and gravity as to threaten the stability of international political and economic systems. Human rights abuse and corruption undermine the values that form an essential foundation of stable, secure and functioning societies; have devastating impacts on individuals; weaken democratic institutions; degrade the rule of law; perpetuate violent conflicts; facilitate the activities of dangerous persons; and undermine economic markets. The United States seeks to impose tangible and significant consequences on those who commit serious human rights abuse or engage in corruption, as well as to protect the financial system of the United States from abuse by these same persons.

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