



## The UN Sanctions Regime on DPRK Panel of Experts

- Designated Entities and Sanctions Evasion Techniques -

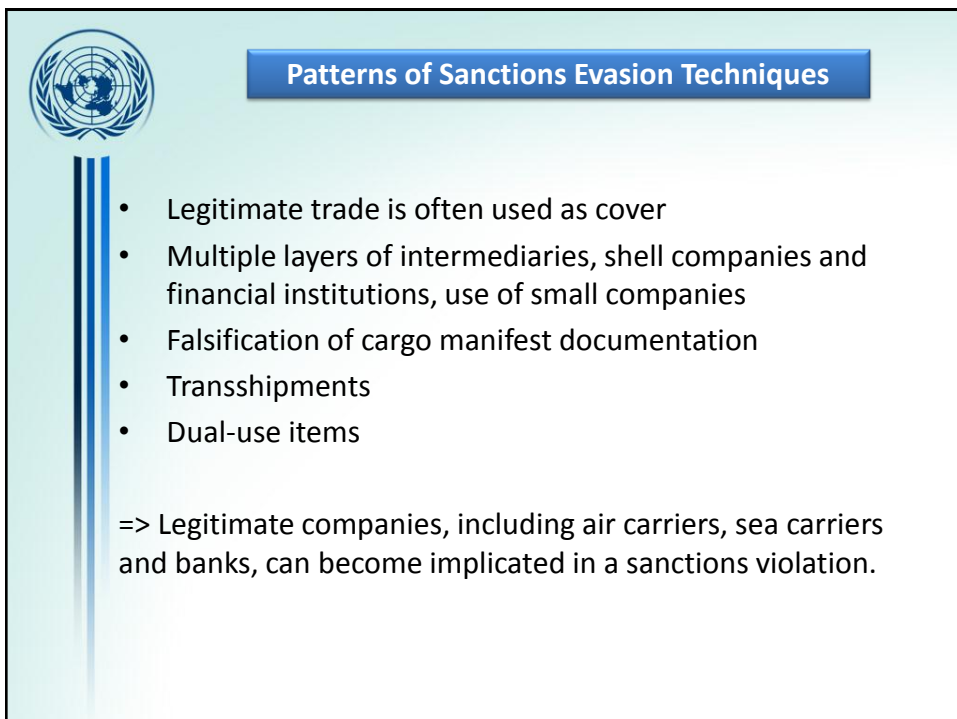
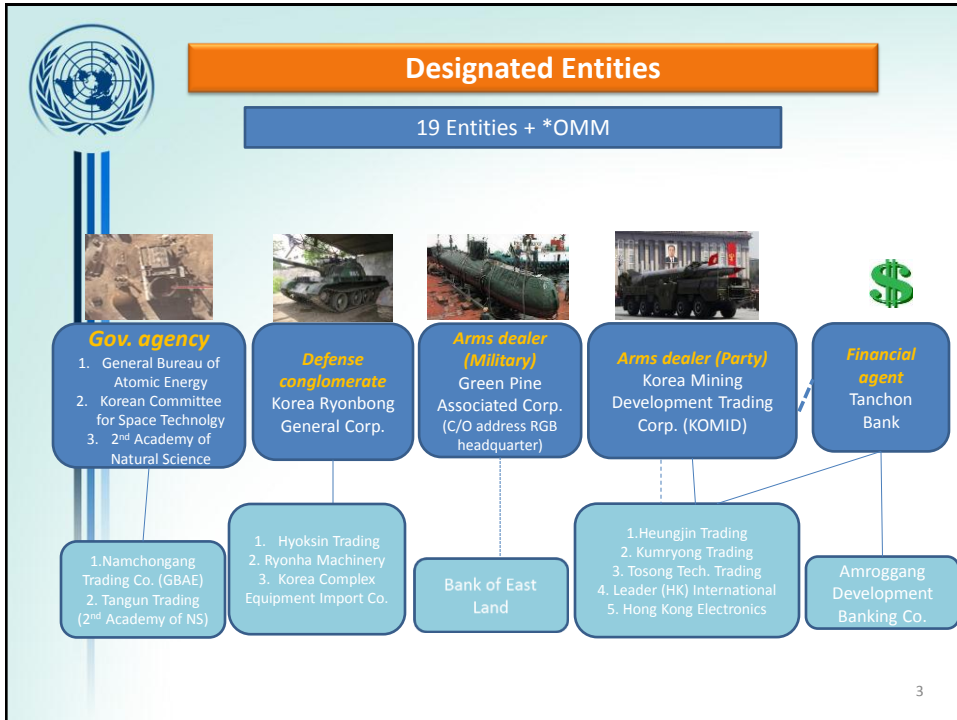
Youngwan Kim  
Member, Panel of Experts  
established pursuant to resolution 1874 (2009)  
United Nations Security Council

February 2016, CISTEC seminar



### Overview

1. Designated Entities
2. Sanctions Evasion Techniques
3. Cases of Sanctions Evasion
4. Lessons Learned





## Patterns of Sanctions Evasion Techniques

- Hybrid Entities - Integration of Foreign Partner's Business Network (sharing addresses and sometimes office space)
  - Shift their foreign bases and/or use multiple location abroad with banking connectivity and loose administrative control
  - A Few Trusted Key Nodes
  - Alternative ways to translate Korean names into other languages
- ⇒ Lists of Aliases not exhaustive



## Case Study : Arms and related materiel seized by France

In 2010, French authorities inspected a shipment originating from the DPRK and destined for Syria. The shipment was declared to contain copper bars and plates.

20 ft: 2	40 ft: 0	45 ft: 0
Description		
COPPER BARS & PLATES		

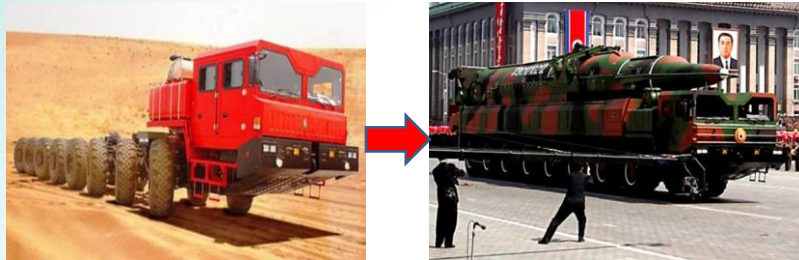


However, according to an analysis by a specialized laboratory, these items can be used to manufacture case tubes for artillery projectiles.



## Case Study : Commercial Truck converted to Military Vehicle

False End User Certificate by the DPRK buyer (DPRK Forestry Ministry, RIM Mok General Trading Company, Limited) only for transporting timbers in the DPRK



UNOSAT concluded that features of the two trucks are identical.  
→ DPRK deliberately breached the end user guarantee and converted into TEL.



## Lessons learned: all Member States or Entities can be implicated

- Any Member States could be implicated in sanctions evasions of the DPRK, regardless of 1) geographic location, 2) size of economy, 3) lack of industrial structure supportive of WMD-related manufacturing, and 4) any other national characteristic.
- Only complete implementation and enforcement of the relevant UNSC resolutions equips a country to prevent, detect, and deny proliferators the use of business, concealment, transport, communication and financing facilities.