IMPACT OF SANCTIONS ON THE RODRIGUEZ OREJUELA BUSINESS EMPIRE

MARCH 1996 JULY 1996 OCTOBER 21 1995 • The President name Miguel and Gilberto • DROGAS LA REBAJA's 4,000 employees • OFAC designates companies associated with RODRIGUEZ OREJUELA in the Annex to the RODRIGUEZ OREJUELA brothers, including ostensibly purchase the company and Executive Order 12978. RIONAP COMERCIO Y REPRESENTACIONES transform it into a worker's cooperative named • OFAC designates companies associated in Quito, Ecuador. COPSERVIR. with the RODRIGUEZ OREJUELA brothers, including the Colombian drugstore chain DROGAS LA REBAJA. **APRIL 1997 APRIL 1998 MARCH 1999** • OFAC names COPSERVIR along with six related • COPSERVIR files a lawsuit in U.S. District Court • U.S. District Court dismisses COPSERVIR's companies as SDNTs. against the U.S. Government regarding its lawsuit against the U.S. Government. designation as an SDNT. **JUNE 1999 MARCH 2000** FEBRUARY 2000 • U.S. Courts uphold U.S. District Court's decision • OFAC designates six companies associated · OFAC designates four companies associated with COPSERVIR, including the pharmaceutical to dismiss COPSERVIR's complaint. with COPSERVIR including DROMARCA. cooperative ADMACOOP. **MARCH 2001 FEBRUARY - MARCH 2003 DECEMBER 2000** • OFAC designates three companies associated · COPSERVIR files a lawsuit in Colombian court • OFAC designates a financial network of with COPSERVIR, including the drugstore against six Colombian banks for refusing 46 new front companies associated with chain's credit card company, CREDIREBAJA. banking services because of their OFAC the RODRIGUEZ OREJUELA brothers and COPSERVIR designation. **MAY 2003 DECEMBER 2003** OCTOBER 2003 • Colombian Constitutional Court rules in favor • OFAC designates a widespread network • The United States Attorney's Office for the of the six Colombian banks, allowing them to Southern District of Florida unseals Sept, 2000 of 23 companies from Colombia and five continue to deny services to COPSERVIR. neighboring Latin American countries that are indictment charging Gilberto and Miguel directly involved in the DROGAS LA REBAJA RODRIGUEZ OREJUELA with drug trafficking, pharmaceutical empire. money laundering, and obstruction of justice. **MARCH 2004 SEPTEMBER 2004 NOVEMBER 2004** • The United States Attorney's Office for the • OFAC designated 23 front companies in • OFAC issues a specific licensing policy Southern District of New York indicts Gilberto Colombia associated with COPSERVIR. allowing U.S. suppliers to engage in certain and Miguel RODRIGUEZ OREJUELA for money transactions with COPSERVIR, FARMACOOP, • Colombian Government seizes drugstore chain laundering and violation of OFAC sanctions. DROGAS LA REBAJA following asset forfeiture and COSMEPOP. investigation. **MARCH 2005 MAY 2006 DECEMBER 2004** • The Colombian Government extradites • The Colombian Government extradites Miguel • Colombian Government seizes five companies Gilberto RODRIGUEZ OREJUELA to the United RODRIGUEZ OREJUELA to the United States. following asset forfeiture investigation, including CREDIREBAJA. States SEPTEMBER – NOVEMBER 2006 **SEPTEMBER 2006 JANUARY 2009** • The RODRIGUEZ OREJUELAS pled guilty to • In conjunction with the RODRIGUEZ • OFAC designates two Colombian companies that RODRIGUEZ OREJUELA family members federal drug trafficking and money laundering OREJUELA brothers' plea agreements, 28 of their designated family members of the charges and agreed to forfeiture in the amount were using in an attempt to conceal assets in of \$2.1 billion in assets. RODRIGUEZ OREJUELA brothers agreed to violation of the agreement. forfeit any property that was financed in whole or in part with narcotics proceeds. **NOVEMBER 2009** · OFAC takes its last designation action against the RODRIGUEZ OREJUELA business empire,

designating 14 individuals and 25 entities in Colombia and elsewhere that were also assisting in the concealment of assets.