

Rafael Fuentes Cataño, Félix Ponce-Nava Cortés, María Inés Provencio Lameiras

OFAC Sanctions Against Mexican Companies Linked to the Sinaloa Cartel

On April 23, 2026, OFAC sanctioned 23 individuals and entities forming part of an international synthetic opioid supply network linked to the Sinaloa Cartel, which has been designated as a Foreign Terrorist Organization.

The designations were issued pursuant to Executive Orders 14059 (illicit drugs) and 13224 (terrorism), together with Executive Order 14367, which designated fentanyl and its precursors as Weapons of Mass Destruction.

I. Designated Mexican companies

Among those designated are at least nine Mexican companies in sectors such as chemical trading, logistics and transportation, customs brokerage and cargo importation, and real estate development. Their roles in the network include:

- **Brokerage of chemical precursors:** Acquisition of precursor chemicals imported from Asia for fentanyl and methamphetamine producers.
- **Importation and customs clearance:** Importation of large volumes of chemicals intended for the production of synthetic drugs, with shipments originating from Asia.
- **Logistics and transportation:** Corporate networks designed to facilitate the importation and distribution of chemical precursors and obscure their traceability.
- **Front companies:** Entities engaged in ostensibly legitimate activities, used to conceal or channel funds linked to the procurement network.

II. Risks to your company

Sanctions are not limited to those designated. Any company with commercial or financial relationships—whether direct or indirect—with sanctioned individuals or entities faces significant risks.

Compliance:

- FIU investigations and freezing of bank accounts
- OFAC fines and investigations by the U.S. Department of Justice
- Requirement to file Reports of Significant or Unusual Transactions

Foreign trade:

- Detention and seizure of goods; with potential classification as a smuggling or contraband offense
- Loss of VAT, IEPS, IMMEX certifications, and AEO status
- Retroactive collection of duties and restrictions on exports to the U.S.

III. Recommendations

Immediate actions:

- Identify any commercial or financial relationships with designated individuals and entities.
- Assess the level of exposure and implement mitigation measures.
- Determine reporting obligations to Mexican and/or U.S. authorities.
- Consider temporarily suspending pending transactions with potentially linked entities.

Preventive actions:

- Strengthen due diligence mechanisms with suppliers and third parties.
- Implement automated screening against OFAC, FIU, and other authorities' lists.
- Establish a crisis protocol to enable a swift response to future designations.

IV. Our Services

We have specialized teams in Compliance and Foreign Trade that work in coordination to address these types of scenarios.

Compliance:

- Audits of exposure to international sanctions (OFAC, EU, UN)
- Anti-money laundering and counter-terrorist financing programs
- Due diligence on counterparties and suppliers
- Crisis protocols and sanctions response

Foreign Trade:

- Assessment of the customs and tariff impact of sanctions
- Protection of AEO, IMMEX, VAT, and IEPS certifications
- Supply chain restructuring
- Representation in the event of detention, seizure, and smuggling offense proceedings
- Advice on export controls and trade restrictions with the U.S.

We recommend that companies operating in the manufacturing, pharmaceutical, chemical, logistics, customs, and international trade sectors take a proactive approach. A swift response is critical to safeguarding operational continuity.

Contacts



Rafael Fuentes Cataño

Compliance Counsel

rafael.fuentes@perezllorca.com

T. +52 55 5202 7622



Félix Ponce-Nava Cortes

Foreign Trade Counsel

felix.poncenava@perezllorca.com

T. +52 55 5202 7622

Offices

Europe ↗

Barcelona
Lisbon
Madrid

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