

OFAC Authorizes Commercial Negotiations With the Government of Venezuela and Certain Financial Services

April 20, 2026

On April 14, 2026, the U.S. Department of the Treasury, Office of Foreign Assets Control (OFAC) issued two new General Licenses (GL), GLs [56](#) and [57](#), authorizing commercial negotiations with the Government of Venezuela (GoV) and the provision of a broad range of ordinary-course financial services involving the Venezuelan central bank and three state-controlled banks or GoV individual employees and affiliates.

These additional GLs follow a series of GLs issued since January 2026, authorizing sector- and activity-specific dealings with Venezuela under specified conditions¹. Some of these GLs authorized negotiations of contingent contracts relating to such sectors and activities, and associated financial and banking activities generally also were authorized to the extent they were ordinarily incident and necessary to those sector- and activity-specific dealings. As a result of the latest action, however, U.S. persons now are authorized to negotiate commercial contracts with the GoV, and U.S. banks are authorized to resume normal banking activity essential for commercial activities with the four Venezuelan financial institutions identified in the GL. These new GLs represent another step in re-integrating Venezuela with the global economy to support previously authorized activities in the oil and gas, mining, and electricity sectors, while keeping certain such activities subject to approval by OFAC.

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¹ Our analysis of (i) GL 46/46A is available [here](#), (ii) GL 47 is available [here](#), (iii) GL 48 is available [here](#), (iv) GLs 49/50A is available [here](#), (v) GL 52 is available [here](#), and (vi) GLs 51A/54/55 is available [here](#).



GL 56: Authorizing Commercial-Related Negotiations of Contingent Contracts With the Government of Venezuela

GL 56 authorizes all transactions prohibited by [E.O. 13884](#) that are ordinarily incident and necessary to engaging in commercial-related negotiations of contingent contracts with the GoV, provided that the entry into and performance of any such contracts is made expressly contingent upon separate authorization from OFAC. For purposes of GL 56, the term “Government of Venezuela” has the same meaning as provided in E.O. 13884 and includes the state and Government of Venezuela, any political subdivision, agency, or instrumentality thereof, any person owned or controlled, directly or indirectly, by such entities and any person who has acted or purported to act, directly or indirectly, for or on behalf of such entities.

Contingent contracts include executory contracts, executory pro forma invoices, agreements in principle, executory offers capable of acceptance such as bids or proposals in response to public tenders, binding memoranda of understanding, or any other similar agreement.²

Limitations and Conditions

GL 56 includes limitations and conditions similar to [GL 49A](#), which authorizes contingent contracts for new investment in the oil, gas, petrochemical, and electricity sectors, and to [GL 55](#), which authorizes contingent contracts for new investment in the mining (including gold) sector:

- **Prohibited Transactions.** GL 56 does not authorize transactions otherwise prohibited by the Venezuela Sanctions Regulations, [31 C.F.R. Part 591](#) (VSR), such as transactions prohibited by [E.O. 13808](#) related to bonds and certain other debt of the GoV or Petróleos de Venezuela, S.A. (PdVSA), including transactions to settle such bonds and debt, as well as transactions prohibited by [E.O. 13835](#),

including transactions related to the sale, transfer, assignment, or pledging as collateral by the GoV of any equity interest in PdVSA or any other entity in which the GoV has a 50 percent or greater ownership interest.

- **Settlement Agreements or Judicial Decrees.** GL 56 does not authorize the entry into a settlement agreement or the enforcement of any lien, judgment, arbitral award, decree, or other order through execution, garnishment, or other judicial process purporting to transfer or otherwise alter or affect property or interests in property blocked pursuant to the VSR.
- **Payment Terms.** GL 56 does not authorize payment terms that are not “commercially reasonable,” involve debt swaps or payments in gold, or are denominated in digital currency, digital coin, or digital tokens issued by, for, or on behalf of the GoV, including the petro. “Commercially reasonable” is not further defined in GL 56.
- **Prohibited Counterparties.** GL 56 prohibits transactions with persons located in or organized under the laws of Russia, Iran, North Korea, Cuba, or any entity that is owned or controlled, directly or indirectly, by or in a joint venture with such persons. GL 56 further prohibits transactions involving an entity located in or organized under the laws of Venezuela or the United States that is owned or controlled, directly or indirectly, by or in a joint venture with a person located in or organized under the laws of China.
- **Designated Individuals or Entities.** GL 56 prohibits any transaction involving any individual or entity identified on the Specially Designated Nationals and Blocked Persons List (SDN List), as well as any entity in which one or more of such persons identified on the SDN List own, directly or indirectly,

² This definition parallels the definition of “contingent contracts” included in [GL 49A](#) and [GL 55](#).

individually or in the aggregate, a 50 percent or greater interest.

- **Blocked Property.** GL 56 does not unblock any property previously blocked pursuant to the VSR.

Notably, whereas prior GLs 49 and 55 authorized both negotiations and entry into contingent contracts relating to new investment or operations in specified sectors (with performance of the contract remaining subject to further specific authorization by OFAC), GL 56 applies broadly to commercial activities and only authorizes negotiations, requiring separate OFAC authorization for both entering into and performance of the contract.

GL 57: Authorizing Financial Services Transactions Involving Certain Venezuelan Banks and Government of Venezuela Individuals

GL 57 authorizes all transactions prohibited by the VSR that are ordinarily incident and necessary to the provision, exportation, or reexportation, directly or indirectly, of financial services to, from, or for the benefit of (i) Banco Central de Venezuela, (ii) Banco de Venezuela, S.A. Banco Universal (Banco de Venezuela), (iii) Banco Digital de los Trabajadores Banco Universal C.A., (iv) Banco del Tesoro, C.A. Banco Universal (Banco del Tesoro), (v) any entity in which one or more of the aforementioned entities own, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest, or (vi) any individual subject to blocking sanctions pursuant to E.O. 13884 as a result of being controlled by, or having acted or purported to act, directly or indirectly, for or on behalf of the GoV, including current employees of the GoV, but excluding any individual separately identified on the SDN List.

For the purposes of GL 57, the term “financial services” is defined broadly to include a wide range of ordinary-course banking and payment activities. Key

categories include (i) core banking services such as maintaining accounts and providing loans, including U.S. dollar-denominated correspondent account services; (ii) payment and funds transfer services, including wire transfers and the issuance of payment cards and digital wallets; (iii) insurance and employment-related payments or benefits; (iv) services related to fraud-prevention and security; and (v) services related to investments, securities, and commodity futures or options.³ By authorizing not only traditional personal banking services but also U.S. dollar-denominated correspondent account services, digital payment channels, and other interbank activities, GL 57 restores certain key elements of the financial infrastructure needed to support oil, gas, mining, and other commercial activities.

U.S. financial institutions processing transactions authorized by GL 57 may rely on the originator or beneficiary of a funds transfer with regard to compliance with GL 57, provided that the processing financial institution does not know or have reason to know that the transaction is not in compliance with GL 57.

Cleary Gottlieb’s international trade team continues to monitor developments regarding ongoing sanctions and trade developments with respect to Venezuela and is available to offer guidance on managing the changing regulatory landscape.

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³ The full list of covered financial services is set forth in Note 1 to [GL 57](#).