

OFAC Issues GL 52, Further Loosening Sanctions Against PdVSA

March 23, 2026

On March 18, 2026, the U.S. Department of the Treasury, Office of Foreign Assets Control (OFAC) issued [General License \(GL\) 52](#), authorizing certain transactions involving Petróleos de Venezuela, S.A. (PdVSA), or any entity in which PdVSA owns, directly or indirectly, a 50 percent or greater interest (collectively, PdVSA Entities) by an established U.S. entity.¹ Concurrently with GL 52, OFAC issued two new Venezuela-related Frequently Asked Questions (FAQs) addressing key aspects of GL 52. Since January 2026, the U.S. government has issued a series of general licenses authorizing sector- or activity-specific dealings relating to Venezuela (including PdVSA Entities) under specified conditions. This latest general license represents a further step by the U.S. government to encourage investment in Venezuelan oil production, as part of a broader effort to expand Venezuela’s production and export capacity.²

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¹ “Established U.S. entity” is defined as any entity organized under the laws of the United States or any jurisdiction within the United States on or before January 29, 2025.

² See Timothy Gardner and Marianna Parraga, *U.S. Broadly Authorizes Transactions with Venezuela’s Oil Company PDVSA*, Reuters, March 18, 2026, available [here](#) (“This license will benefit both the United States and Venezuela, while supporting the global energy market by increasing the supply of available oil. It will also help incentivize new investment in Venezuela’s energy sector,” a Treasury spokesperson said.”).



GL 52 represents the broadest authorization issued by OFAC with respect to PdVSA Entities since January 2026. Pursuant to Executive Orders (E.O.s) 13850 and 13884, issued in January and August 2019 respectively, PdVSA Entities are, broadly speaking, subject to U.S. blocking sanctions that effectively prohibit U.S. persons from engaging in dealings or transactions with PdVSA Entities or their property.³ In practical terms, GL 52 lifts the restrictions relating to those blocking sanctions, provided that transactions are conducted in compliance with the terms and conditions set forth in the license, as well as other applicable sanctions restrictions, described in greater detail below.

[FAQ 1245](#) confirms that the authorization of GL 52 includes, subject to its terms and conditions, transactions with PdVSA Entities related to:

- the lifting, exportation, reexportation, sale, resale, supply, storage, marketing, purchase, delivery, or transportation of Venezuelan oil or petroleum products
- the provision to Venezuela of diluent, goods, services, and technologies necessary for exploration, development, or production activities in the oil, gas, or petrochemical products sectors
- entry into new investment contracts for exploration, development, or production activities in the oil, gas, or petroleum products sectors of Venezuela
- the formation of new joint ventures or other entities in Venezuela related to such activities, and
- all transactions ordinarily incident and necessary to such activities, including the performance of commercial, legal, technical, safety, and environmental due diligence and assessments related to the foregoing.

³ See E.O. 13884, *Blocking Property of the Government of Venezuela*, August 5, 2019, available [here](#). See also E.O. 13850, *Blocking Property of Additional Persons*

Activities That Remain Prohibited

Importantly, however, GL 52 does not authorize transactions prohibited more broadly by the Venezuela Sanctions Regulations (VSR), [31 CFR Part 591](#), and associated executive orders, including E.O.s 13808 and 13835, absent a separate applicable general or specific license. As set forth in GL 52 and FAQ 1245, these include:

- **Government of Venezuela (GoV) and PdVSA Debt Restrictions.** Transactions prohibited by [E.O. 13808](#) related to bonds and certain other debt of the GoV or PdVSA, including transactions to settle such bonds and debt, are not authorized.
- **Equity Transfer Prohibitions.** GL 52 does not authorize 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 Entities, or any other entity in which the GoV has a 50 percent or greater ownership interest, including PDV Holding, CITGO Holding, or CITGO Petroleum Corp.
- **Settlements and Proceeds from Judicial Processes.** GL 52 does not authorize entering into settlement agreements or the enforcement of any lien, judgment, arbitral award, decree, or other order — whether through execution, garnishment, or other judicial process — that purports to transfer, alter, or otherwise affect the property or interests in property of any person blocked pursuant to the VSR, including a PdVSA Entity.
- **SDN List.** GL 52 does not authorize any transactions involving any individual or entity identified on the Specially Designated Nationals and Blocked Persons (SDN) List, excluding PdVSA Entities.

[FAQ 1246](#) further confirms that GL 52 does not authorize the sale of CITGO shares that are the subject

Contributing to the Situation in Venezuela, November 1, 2018, available [here](#). Our analysis of E.O. 13884 and E.O. 13850 is available [here](#).

of the ongoing *Crystallex International Corporation v. Bolivarian Republic of Venezuela* litigation.

Terms and Conditions

The terms of GL 52 are substantially similar to those of recent GLs 46A through 51, consistent with the U.S. government’s general approach to the conditions under which it has authorized transactions related to Venezuela.

- **Choice of Law.** All contracts for transactions with PdVSA Entities entered into pursuant to GL 52 must be governed by U.S. law and require dispute resolution to occur in the United States.
- **Payments and Payment Terms.** Any payment to a blocked person (excluding payments for local taxes, permits, or fees) must be made into the Foreign Government Deposit Funds, as specified in [E.O. 14373](#), or any other account as instructed by the U.S. Department of the Treasury.⁴ Additionally, GL 52 does not authorize payment terms that are “not commercially reasonable,” debt swaps, gold payments, or payments in digital currency, coins, or tokens issued by, for, or on behalf of the GoV (including the petro).
- **Prohibited Counterparties.** GL 52 does not authorize any transaction involving a person located in or organized under the laws of Cuba, Iran, North Korea, Russia, or any entity that is owned or controlled by or in a joint venture with such persons. GL 52 also prohibits any transaction 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.
- **Transaction Reporting Requirements.** Parties engaging in the export, reexport, sale, resale, or supply of Venezuelan-origin oil or petrochemical products to countries other than the United States pursuant to GL 52 must submit reports to the U.S. government identifying: (i) the parties involved;

(ii) a description of the transactions, including the products, quantities, values, dates of the transactions, and countries of ultimate destination, and (iii) any taxes, fees, or other payments provided to the GoV. These reports must be submitted within ten days after the execution of the first of such transactions and every 90 days thereafter while such transactions are ongoing.

- **Other Restrictions.** GL 52 does not authorize the unblocking of any property blocked pursuant to the VSR, nor does it authorize any transaction involving a blocked vessel.

GL 52 does not contain an expiration date, but remains subject to revocation by OFAC at any time, and does not relieve parties from compliance with requirements of other federal agencies, including the Bureau of Industry and Security.

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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⁴ See our analysis of E.O. 14373 [here](#).