



## Information Regarding the Interpretation of Name Entries in Annex 7 to the **Ordinance on Measures against Syria**<sup>1</sup>

*This notice contains important information for the interpretation of the name entries in Annex 7 and recommendations for the screening of the individuals and entities listed therein. It is not legally binding. Compliance with the provisions of the Ordinance is the sole responsibility of the natural and legal persons concerned.*

Annex 7<sup>2</sup> to the Ordinance contains entries of physical persons who are subject to financial as well as travel sanctions and legal persons which are subject to financial sanctions.

### **Name entries**

The majority of physical persons listed in annex 7 have Arabic names. As a consequence of the translation from Arabic into Latin script, names or name parts can be spelt differently. Additionally and regardless of the spelling, persons can be known under different names. Therefore Annex 7 applies a system of aliases (or *a.k.a.*'s) in order to list all names and name parts. Hence, in annex 7 *a.k.a.*'s are defined as spelling variants of names or name parts in Latin script by which listed persons are also known.

Generally, there are alternative Latin spelling variants for all name-parts. They are divided into their type of name-part. The enumeration following letters (*a.k.a. a*), *a.k.a. b*), etc.) is making reference to one type of name-part (given / family name and other name).

When applicable, additional spelling variants for each *a.k.a.* of the name part are added in brackets.

*Example: Amer al-Achi*

PDF-Listing:

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<sup>1</sup> SR 946.231.172.7; thereafter „Ordinance“

<sup>2</sup> The consolidated PDF-Version of annex 7 is available [here](#).

**SSID:** 200-12694 **Name:** Amer al-Achi  
**Sex:** M **Title:** Major General **Good quality a.k.a.:** **a)** Amis (Ammar) **b)** Ibrahim **c)** al Ashi (Aachi, Ashi)  
**Justification:** Appointed Governor of the Sweida Governorate by President Bashar al- Assad on Jul 2016. Former Head of the intelligence branch of the Syrian Air Force Intelligence Service (2012- 2016). Through his role in the Air Force Intelligence Service, Amer al-Achi is implicated in the repression of the Syrian opposition. **Modifications:** Amended on 6 Nov 2013, 19 Jan 2016, 12 Jun 2018, 26 Jun 2020

“Good quality *a.k.a.* a)” refers to an alternative spelling of the given name; “Good quality *a.k.a.* b)” refers to a further given name; “Good quality *a.k.a.* c)” is making reference to the family name.

## XML List

The [XML List](#) can only be read with specifically coded software. For reading the list, one needs the relevant [XML specifications](#). The XML list contains all relevant information concerning listed persons in chronological order.

In the XML list, the names of physical persons are provided in both Latin and, whenever applicable, Arabic spelling. For technical reasons, the Arabic spelling is not available in the PDF version of the list.

```
- <name-part name-part-type="family-name" order="2">  
  <value>Al-Assad</value>  
  <spelling-variant lang="ARA" spelling-variant-type="not-defined" script="ARAB">الأ Assad</spelling-variant>  
</name-part>
```

Only the XML list provides an unambiguous reference to the type of name-parts composing the *a.k.a.* and its spelling variants, such as the given name (<given-name> in the XML file), the family name (<family-name> in the XML file) or any other kind of name (e.g. <whole-name>). In the PDF list, however, it is in most cases obvious to which name-part an *a.k.a.* is making reference to.

## Combinations

The different name-parts (given and family name, in some cases also titles or further given names) and their *a.k.a.* 's as well as their spelling variants should be combined, sometimes generating an important number of full names, as seen in the example below. Any combination should at least contain one given name (<given-name> or <further given-name> in the

XML file) and one family name (<family-name> in the XML file). Lone given- or family-names do not require to be screened against individually. Combination with titles remains possible.

△ In some cases, the list provides whole name *a.k.a.*'s (any name part that is labelled as <whole-name> *a.k.a.* in the XML list). They do not have to be combined with any other name part to be considered and stand as a name for themselves. Nevertheless, they can be combined with titles.

There are no combinations of Arabic (in the XML list provided as spelling variant of the main name) and Latin name parts.

*Example: Amer al-Achi*

Given name: Amer.

Family name: al-Achi.

Title: Major General.

A.k.a. given name: Amis, spelling variant Ammar in brackets.

A.k.a. further given name: Ibrahim.

A.k.a. family name: al Ashi, spelling variants Aachi and Ashi in brackets.

As a consequence, there exist 56 possible combinations:

Major General Amer al-Achi	Major General Amer al Ashi	Major General Amer Aachi
Major General Amis al-Achi	Major General Amis al Ashi	Major General Amis Aachi
Major General Ammar al-Achi	Major General Ammar al Ashi	Major General Ammar Aachi
Major General Amer Ibrahim al-Achi	Major General Amer Ibrahim al Ashi	Major General Amer Ibrahim Aachi
Major General Amis Ibrahim al-Achi	Major General Amis Ibrahim al Ashi	Major General Amis Ibrahim Aachi
Major General Ammar Ibrahim al-Achi	Major General Ammar Ibrahim al Ashi	Major General Ammar Ibrahim Aachi
Major General Ibrahim al-Achi	Major General Ibrahim al Ashi	Major General Ibrahim Aachi
Major General Amer Ashi		
Major General Amis Ashi		
Major General Ammar Ashi		
Major General Amer Ibrahim Ashi		
Major General Amis Ibrahim Ashi		
Major General Ammar Ibrahim Ashi		
Major General Ibrahim Ashi		
Amer al-Achi	Amer al Ashi	Amer Aachi
Amis al-Achi	Amis al Ashi	Amis Aachi
Ammar al-Achi	Ammar al Ashi	Ammar Aachi
Amer Ibrahim al-Achi	Amer Ibrahim al Ashi	Amer Ibrahim Aachi
Amis Ibrahim al-Achi	Amis Ibrahim al Ashi	Amis Ibrahim Aachi
Ammar Ibrahim al-Achi	Ammar Ibrahim al Ashi	Ammar Ibrahim Aachi
Ibrahim al-Achi	Ibrahim al Ashi	Ibrahim Aachi
Amer Ashi		
Amis Ashi		
Ammar Ashi		
Amer Ibrahim Ashi		
Amis Ibrahim Ashi		

### **Interpretation of name entries**

Please note that the above interpretation of the name entries in annex 7 to the *Ordinance on Measures against Syria* cannot be transferred to other Ordinances.

If you have any additional queries, please contact:

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