

GLOBAL MAGNITSKY SANCTIONS SUBMISSION

Recommendation for Designation under Executive Order 13818

In re: Senior Officials of the Federal Government of Mexico Engaged in Significant Corruption Shielding Officials Indicted in S9 23 Cr. 180 (KPF) in Aid of a Designated Foreign Terrorist Organization

Submitted to:

Office of Foreign Assets Control

U.S. Department of the Treasury

Attn: Director, OFAC

Freedman's Bank Building, 1500 Pennsylvania Avenue NW

Washington, DC 20220

With copies to:

U.S. Department of State, Office of Sanctions Coordination

U.S. Department of State, Bureau of Democracy, Human Rights, and Labor

National Security Council, Office of the Coordinator for Sanctions

U.S. Senate Foreign Relations Committee, Western Hemisphere Subcommittee

U.S. House Foreign Affairs Committee, Western Hemisphere Subcommittee

Submitted by:

Simón Levy

Washington, D.C.

Washington, D.C., May 6, 2026

EXECUTIVE SUMMARY

This submission recommends, under Executive Order 13818 of December 20, 2017, implementing the Global Magnitsky Human Rights Accountability Act, the designation of senior officials of the Federal Government of Mexico, including but not limited to Claudia Sheinbaum Pardo and Ernestina Godoy Ramos, in connection with significant acts of corruption committed to shield officials indicted by the United States Department of Justice in aid of a designated Foreign Terrorist Organization.

On April 29, 2026, the United States District Court for the Southern District of New York unsealed a Ninth Superseding Indictment in *United States v. Ruben Rocha Moya, et al.*, S9 23 Cr. 180 (KPF), assigned to the Honorable Katherine Polk Failla. The instrument charges the sitting Governor of the Mexican State of Sinaloa, Ruben Rocha Moya, and nine additional current and former Mexican officials with narcotics importation conspiracy and related offenses, in aid of the Sinaloa Cartel and its Chapitos faction. The Sinaloa Cartel is a designated Foreign Terrorist Organization. The indictment is the latest instrument in a continuous federal investigation pending in the Southern District of New York since 2023 and resulting in charges against more than thirty Cartel members and associates.

Within thirty-six hours of the unsealing, the President of Mexico publicly characterized the indictment as potentially political and conditioned cooperation with the United States extradition request on an extra-treaty evidentiary standard. The Mexican Attorney General opened a parallel review of the United States packets and announced an internal investigation. The Mexican Secretariat of Foreign Affairs issued a public statement asserting evidentiary insufficiency before any judicial review.

This conduct, taken together, constitutes significant corruption within the meaning of E.O. 13818, particularly given the Foreign Terrorist Organization nexus and the proximate causal relationship between the trafficking alleged in the SDNY indictment and the mass civilian deaths in the United States attributable to fentanyl, heroin, cocaine and methamphetamine importation.

I. PROPOSED DESIGNATION TARGETS

The undersigned recommends that the Office of Foreign Assets Control evaluate, for designation under E.O. 13818, the following individuals.

Subject	Position	Conduct Basis
Claudia Sheinbaum Pardo	President of the United Mexican States	Public characterization of pending US indictment as political; construction of extra-treaty evidentiary standard.
Ernestina Godoy Ramos	Attorney General of Mexico (FGR)	Institutional gatekeeper using parallel review to delay or defeat extradition request.

Roberto Velasco Álvarez	Secretary of Foreign Affairs (SRE)	Public communique asserting evidentiary insufficiency within hours of unsealing, prior to judicial review.
Senior Morena legislative leadership	Federal Congress (Senate and Chamber of Deputies)	Coordinated public defense of indicted defendants framing the case as attack on political project.

The undersigned reserves the right to supplement this list as additional conduct is documented, and notes that designations should be considered for any subordinate official who, with knowledge of the SDNY proceeding, executed acts in furtherance of the obstruction described herein.

II. CONDUCT WARRANTING DESIGNATION

A. Threshold under E.O. 13818

Section 1(a)(ii) of E.O. 13818 authorizes designation of any foreign person determined to be responsible for or complicit in, or to have directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery. Section 1(a)(iii) extends designation to current or former government officials responsible for or complicit in, or who have directly or indirectly engaged in, the foregoing.

The undersigned submits that conduct by senior Mexican officials to shield, from a pending United States federal proceeding, officials charged with partnering with a designated Foreign Terrorist Organization to import deadly narcotics into the United States constitutes corruption within the meaning of E.O. 13818. The Foreign Terrorist Organization nexus, combined with the head-of-state level of the conduct and the demonstrable intent to defeat the lawful operation of a treaty obligation, places the case at the apex of designations the Order was designed to reach.

B. Specific Acts

The conduct documented in the parallel criminal referral filed concurrently with this submission, summarized here, constitutes the following acts within the reach of E.O. 13818:

1. Public characterization, by the President of Mexico on April 30, 2026, of the SDNY indictment in S9 23 Cr. 180 (KPF) as potentially political, while extradition was pending, with the foreseeable effect of building a public-opinion record on which refusal of extradition could be politically defended.
2. Issuance, by the Mexican Secretariat of Foreign Affairs on April 29, 2026, within hours of the unsealing and prior to any judicial review, of a public communique asserting evidentiary insufficiency of the United States packets and the construction of an extra-treaty evidentiary standard not contemplated by the 1978 Treaty.

3. Opening, by the Mexican Attorney General Ernestina Godoy Ramos, of a parallel review and an internal investigation that has the foreseeable effect of delaying or defeating the United States extradition request.
4. Coordinated public defense by senior Morena legislators, the President's political party, framing the indictment as an attack on the political project of the Fourth Transformation rather than as a federal criminal matter to be addressed on the legal merits.
5. The use, or threatened use, of administrative leave (licencia) and fuero-related procedural mechanisms to insulate sitting officials from extradition proceedings, in furtherance of the foregoing.

C. The Foreign Terrorist Organization Nexus

The Sinaloa Cartel is a designated Foreign Terrorist Organization and a Specially Designated Global Terrorist. The conduct described above is conduct intended to shield individuals charged with operating in aid of that designated FTO. The shielding of FTO-aligned officials by senior officials of a foreign state is conduct of the most serious order, and the United States has, through repeated executive and legislative action, signaled that such conduct will not be tolerated.

III. EVIDENCE TENDERED

The undersigned tenders, and stands ready to supplement on request, the following materials:

- DOJ press release of April 29, 2026, Press Release 26-115 (SDNY).
- DEA press release of April 29, 2026.
- United States v. Ruben Rocha Moya, et al., S9 23 Cr. 180 (KPF), Indictment, EN and ES versions (justice.gov).
- Transcript and video of Mexican President's morning press conference of April 30, 2026.
- Mexican SRE communique of April 29, 2026.
- Public statements of Mexican Attorney General Godoy Ramos and FGR.
- Open-source reporting on Morena legislative response.
- Cross-reference timeline (Simón Lo Dijo Primero) correlating prior published findings with subsequent United States enforcement actions.

IV. REQUESTED ACTION

The undersigned respectfully requests that the Office of Foreign Assets Control:

6. Evaluate the proposed targets identified in Section I for designation under E.O. 13818, including blocking of all property and interests in property within United States jurisdiction or in the possession or control of any United States person.
7. Coordinate with the Department of State on parallel public designation under Section 7031(c) of the State Department appropriations act.

8. Coordinate with the Financial Crimes Enforcement Network on review of correspondent banking, money services business and remittance flows tied to the proposed targets.
9. Afford the undersigned the opportunity to supplement this submission as the evaluation proceeds.

V. SOURCE PROTECTION

The undersigned acknowledges the heightened risk of retaliation associated with this submission and respectfully requests that any contact information be safeguarded under the Privacy Act and applicable Treasury procedures, and that, where appropriate, this submission be treated consistently with applicable source-protection protocols of the Office of Foreign Assets Control.

Respectfully submitted,

Simón Levy

Washington, D.C., May 6, 2026

Certification under 28 U.S.C. § 1746. The undersigned certifies, under penalty of perjury under the laws of the United States of America, that the foregoing statements are true and correct to the best of his knowledge and belief, and that this submission is made in good faith and not for any improper purpose.