

# FEOC Compliance Certificate

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Verification ID: FEOC-4EA87CF11561

Source: live federal-list snapshot

## ZUPPA HOLDINGS LIMITED

Virgin Islands, British · Entity · ID: 23271

### FEOC FLAGGED

**Why this matters:** ZUPPA HOLDINGS LIMITED appears on a critical federal screening list. Equipment, services, or transactions involving this entity likely fail FEOC requirements for IRA tax credits (45X, 48E, 30D). Confirm identity against the cited authority before procurement or compliance decisions.

### FEDERAL-LIST SCREENING MATRIX

LIST	AUTHORITY	STATUS	LISTED AS	SEVERITY
OFAC SDN	Treasury OFAC	İListed	ZUPPA HOLDINGS LIMITED	CRITICAL
BIS Entity List	Commerce / BIS	İListed	CLC Holdings Limited	CRITICAL
DOD 1260H (Chinese Military Companies)	DOD	İListed	SMIC Holdings Limited	CRITICAL
UFLPA Entity List	DHS / FLETF	İListed	Changhong Meiling Co. Ltd.	CRITICAL
CBP Withhold Release Orders	DHS / CBP	Not listed	—	CRITICAL
BIS Denied Persons	Commerce / BIS	Not listed	—	HIGH
BIS Military End User	Commerce / BIS	Not listed	—	HIGH
BIS Unverified List	Commerce / BIS	Not listed	—	MEDIUM
State ITAR Debarred	State Department	Not listed	—	HIGH
State Nonproliferation	State Department	Not listed	—	HIGH

### KNOWN ADDRESSES

- Virgin Islands, British

### SANCTIONS PROGRAMS / AUTHORITIES

GLOMAG

### SANCTIONING AUTHORITY NOTES

Linked To: GERTLER, Dan; Linked To: FLEURETTE PROPERTIES LIMITED.

### DATA SOURCES

OFAC SDN	<a href="https://ofac.treasury.gov/specially-designated-nationals-list-data-formats-data-schemas">https://ofac.treasury.gov/specially-designated-nationals-list-data-formats-data-schemas</a>
BIS Entity List	<a href="https://www.bis.gov/entity-list">https://www.bis.gov/entity-list</a>
DOD 1260H (Chinese Military Companies)	<a href="https://www.war.gov/Portals/1/Documents/Section%201260H%20List.pdf">https://www.war.gov/Portals/1/Documents/Section%201260H%20List.pdf</a>
UFLPA Entity List	<a href="https://www.dhs.gov/uflpa-entity-list">https://www.dhs.gov/uflpa-entity-list</a>

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**Informational only.** Not legal advice. Cross-list matching is name-based — verify identity with the cited source authority before procurement, financing, or compliance decisions.

This document is a point-in-time snapshot. The Verification ID can be reproduced from the entity ID + the date of issue.

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