

# FEOC Compliance Certificate

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Issued: 2026-06-21

Verification ID: FEOC-A2ACEB3C9ACA

Source: live federal-list snapshot

## LERMA TRADING S.A.

Panama · Entity · ID: 19044

### FEOC FLAGGED

**Why this matters:** LERMA TRADING S.A. 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	LERMA TRADING S.A.	CRITICAL
BIS Entity List	Commerce / BIS	İListed	Lerma Trading S.A.	CRITICAL
DOD 1260H (Chinese Military Companies)	DOD	Not listed	—	CRITICAL
UFLPA Entity List	DHS / FLETF	Not listed	—	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

- Calle 53a Este, Panama

### SANCTIONS PROGRAMS / AUTHORITIES

UKRAINE-E013661

### SANCTIONING AUTHORITY NOTES

Secondary sanctions risk: Ukraine-/Russia-Related Sanctions Regulations, 31 CFR 589.201 and/or 589.209.

### DATA SOURCES

OFAC SDN  
BIS Entity List

<https://ofac.treasury.gov/specially-designated-nationals-list-data-formats-data-schemas>  
<https://www.bis.gov/entity-list>

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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.

Verification ID: FEOC-A2ACEB3C9ACA · Entity ID: 3aabab20-e385-4c03-8c46-99d25590af6c · Issued 2026-06-21