



2025/2443

1.12.2025

COUNCIL IMPLEMENTING REGULATION (EU) 2025/2443
of 1 December 2025
implementing Regulation (EU) 2022/2309 concerning restrictive measures in view of the situation in
Haiti

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EU) 2022/2309 of 25 November 2022 concerning restrictive measures in view of the situation in Haiti ⁽¹⁾, and in particular Article 16(1) thereof,

Having regard to the proposal from the High Representative of the Union for Foreign Affairs and Security Policy.

Whereas:

- (1) On 25 November 2022, the Council adopted Regulation (EU) 2022/2309.
- (2) On 17 October 2025, the United Nations Security Council ("UNSC") adopted Resolution 2794 (2025). In that Resolution, the UNSC added two individuals to the list of persons and entities subject to restrictive measures.
- (3) Regulation (EU) 2022/2309 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

Article 1

Annex I to Regulation (EU) 2022/2309 is amended in accordance with the Annex to this Regulation.

Article 2

This Regulation shall enter into force on the date of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, 1 December 2025.

For the Council

The President

K. KALLAS

⁽¹⁾ OJ L 307, 28.11.2022, p. 17, ELI: <http://data.europa.eu/eli/reg/2022/2309/oj>.

ANNEX

In Annex I to Regulation (EU) 2022/2309, in the 'List of natural and legal persons, entities and bodies referred to in Article 2, 3 and 9', under the heading 'PERSONS', the following entries are added:

8. **Dimitri HERARD.** Listed pursuant to paragraph 19 of United Nations Security Council Resolution 2794 (2025) for the measures listed in paragraphs 3 and 6 of UNSC Resolution 2653 (2022).

Function: former head of the National Palace General Security Unit (USGPN) under President Jovenel Moïse

DOB: –

POB: –

Nationality: –

Date of UN designation: 17 October 2025

Gender: male

Additional information from the narrative summary of reasons for listing provided by the Sanctions Committee:

Dimitri Herard has engaged in acts that threaten the peace, security, and stability of Haiti and has supported criminal activities that undermine the country's institutions and exacerbate its humanitarian crisis. Herard is the former head of the National Palace General Security Unit (USGPN) under President Jovenel Moïse. He has played a key role in enabling the activities of criminal networks and gangs in Haiti, including supporting the Ti Bwa gang in creating a special combat unit named "Back up 100 plak", which has increased its fighting capacity. Herard has been implicated in facilitating the trafficking of arms and ammunition, which have fueled gang violence and destabilized the country. His actions have contributed to the expansion of gang control over key areas, further undermining Haiti's security and governance.

9. **Kempes SANON.** Listed pursuant to paragraph 19 of United Nations Security Council Resolution 2794 (2025) for the measures listed in paragraphs 3 and 6 of UNSC Resolution 2653 (2022).

Function: leader of the Les Argentins gang, also known as the Bel Air gang

DOB: –

POB: –

Nationality: –

Date of UN designation: 17 October 2025

Gender: male

Additional information from the narrative summary of reasons for listing provided by the Sanctions Committee:

Kempes Sanon has engaged in actions that threaten the peace, security, and stability of Haiti through his leadership of the Les Argentins gang, also known as the Bel Air gang, which operates from its stronghold in the Haut Bel-Air area of Port-au-Prince. With approximately 150 members, the gang has been involved in systematic human rights violations, including extortion, kidnappings, and illicit taxation. Sanon has played a significant role in consolidating gang power in Port-au-Prince, particularly through his involvement in the Viv Ansanm alliance, which has launched coordinated attacks to expand gang-controlled territories. Under his leadership, Les Argentins has conducted repeated assaults on neighborhoods like Solino, resulting in numerous casualties and the displacement of thousands of residents. Sanon also maintains a network of individuals within governmental institutions, including security agencies, which enables him to evade arrest and facilitate his criminal activities. He escaped from prison in 2021, where he was incarcerated for kidnapping, theft, and assassination, and has since continued to destabilize Haiti through his actions.