Understanding the US and EU Sanctions Against Russia and Ukraine

Updates on Latest Developments

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US Response to the Unrest in Ukraine

- On March 6, 2014, President Obama declared a national emergency, stating that Russian actions in Crimea “undermine democratic processes and institutions in Ukraine; threaten its peace, security, stability, sovereignty, and territorial integrity”
- He issued three Executive Orders, authorizing sanctions against Russian and Ukrainian individuals and entities
- Blocking sanctions are implemented by the Treasury Department’s Office of Foreign Assets Control (“OFAC”), and export control restrictions by the Departments of State and Commerce
Executive Orders

• Executive Order 13660 (March 6, 2014)
  – Multiple Russian/Ukrainian persons have been blocked pursuant to this Executive Order
  – Sanctioned persons also banned from entering the United States

• Executive Order 13661 (March 17, 2014)
  – Authorized OFAC to block persons in the following categories:
    • Officials of the Government of the Russian Federation
    • Persons found to operate in arms or in a related materiel sector in the Russian Federation
    • Persons owned or controlled by, or acting on behalf of, sanctioned persons, or that have materially assisted, sponsored or provided financial, material or technological support for, or goods or services to, or in support of, such persons
  – Multiple top-level Russian Government officials, associates of President Vladimir Putin, and a number of Russian entities have been blocked under this Executive Order; visa restrictions were also imposed

• See Annex A of the Webinar materials for a complete list of persons/entities blocked to date
Executive Orders

• Executive Order 13662 (March 20, 2014)
  – Authorizes further sanctions against Russia, targeting certain sectors of the Russian economy
  – Lists sectors which could be affected:
    • Financial services
    • Energy
    • Metals and mining
    • Engineering
    • Defense and related material
  – Sectoral sanctions have not been implemented…yet
  – President Obama stated that sectoral sanctions will be inevitable if Russia disrupts Ukraine’s May 25 elections
OFAC Key Concepts

• Specially Designated Nationals (SDNs)
  – Comprehensive list maintained by OFAC of individuals, entities, vessels, and aircraft subject to trade, financial, and economic sanctions (blocking) programs administered by OFAC
  – Includes persons/entities owned by, or acting on behalf of certain embargoed countries, and terrorists, narcotics traffickers, WMD proliferators, and persons or entities targeted due to their role in sanctioned activity, such as Russian interference in Ukraine
  – US Persons are generally prohibited from engaging in transactions with SDNs and any property in which an SDN has an interest that comes into possession or control of a US Person must be blocked, and a blocking report must be filed with OFAC within 10 days

• US Persons
  – All US citizens and permanent resident aliens, regardless of where they are located and for whomever they are employed;
  – All persons and entities within the United States, including US branches of foreign companies; and
  – All US-organized entities and their foreign branches
OFAC Implementation

- March 17, 2014: OFAC adds former Ukrainian President Viktor Yanukovych and 10 others to its SDN List pursuant to Executive Orders 13660 and 13661
- March 20, 2014: OFAC sanctions 20 more individuals, including high-ranking Russian officials and associates of President Vladimir Putin, and Bank Rossiya, Russia’s 17th largest bank
- April 11, 2014: OFAC adds seven more individuals and another entity, Chernomorneftegaz, a gas company based in the Crimea region, to the SDN List
OFAC Implementation

• April 28, 2014: OFAC adds seven individuals and 17 entities to its SDN List, citing Russia's failure to comply with its commitment in Geneva on April 17, 2014 to deescalate the crisis in Ukraine.
• Newest sanctions target members of Putin’s inner circle, banks, investment firms, and several companies connected to the energy sector, including:
  – Igor Sechin, President and Chairman of the state-owned Rosneft oil company;
  – Sergei Chemezov, the Director General of Rostec, a state-owned corporation focusing on high-technology industries; and
  – Stroytransgaz Group (pipeline construction arm of Gazprom)
OFAC Issues New Regulations

• On May 8, 2014, OFAC published its Ukraine-Related Sanctions Regulations to implement Executive Orders 13660, 13661, and 13662

• A more comprehensive set of regulations is likely to be issued in the future that will contain more interpretive and definitional guidance, additional general licenses and statements of licensing policy
Commerce and State Department Actions

• In March, the Departments of Commerce and State placed a hold on the processing of export license applications for the (re)export of goods, technology, software, and defense services to Russia

• On April 28, 2014 Commerce added 11 Russian and two Russian-owned companies in Cyprus and Luxembourg to its Entities List
  – Any export, re-export, or other foreign transfer of US-origin items, foreign-origin items containing more than a de minimis amount of US content, and certain foreign-origin items made based on US technology to those companies requires a license
  – There is a general policy of denying any such license applications

• See Annex B of the Webinar materials for a complete list of the companies added to the Entities List
Commerce and State Department Actions

• On April 28, 2014 Commerce and State also announced a tightened policy to deny export licenses for any high-technology items destined for Russia or occupied Crimea that could enhance Russia's military capabilities. The Commerce Department is currently reviewing which items are affected.

• Any already issued export licenses that meet these conditions will be revoked.

• All other license applications to (re)export items to Russia or occupied Crimea will be subject to a case-by-case review.
  – Likely to result in even more license applications being denied.
  – Even those that are granted are likely to be subject to extended processing.
Specific Issues: Facilitation

• In addition to prohibiting direct transactions by US Persons with the sanctioned persons/entities, US Persons are prohibited from financing, guaranteeing, approving, or otherwise facilitating non-US Person transactions with SDNs.

• If you cannot do it yourself, you cannot help someone else do it!

• US Persons working for, or serving on the Boards of, foreign companies must affirmatively recuse themselves from any matter involving SDNs and cannot refer an SDN matter to a non-US Person in their companies for handling/processing.

• Records of foreign entity transactions with SDNs should not be maintained in the United States.
Specific Issues: Ownership/Control

• If a named SDN owns 50%, or more, of an entity, directly or indirectly, that entity is also blocked automatically, even if not specifically named as an SDN.

• US Persons need to check carefully to see if an entity with which they are dealing is 50%, or more, owned by an SDN.

• This can be tricky, as ownership interests are not always easily evident. The level of due diligence to be performed generally should be based on the particular risks in the transaction, and the nature of the relationship being reviewed, e.g., due diligence for direct customers should be higher than for indirect parties to a transaction.

• SDN “control” without 50%, or more, ownership does not result in automatic blocking, but could result in OFAC designating the controlled entity as an SDN.
Specific Issues: Ownership/Control

- Some of the most recent OFAC SDN designations specified a number of entities owned or controlled by named SDNs, including Bank Rossiya subsidiaries The Limited Liability Company Investment Company Abros, JSC ZEST, and JSB Sobinbank.
- OAO Sogaz Insurance Group (reportedly the largest or 2nd largest insurer in the Russian market), owned, in part, by Bank Rossiya, was not specifically named.
- SDN Arkady Rotenberg reportedly owns 50% of TPS Avia, a construction firm that won a tender for a new project at Sheremetyevo airport near Moscow.
- According to press reports, Stroygazmontazh, a named SDN controlled by Arkady Rotenberg, recently acquired Gazprom-Bureniye, a large drilling company in Russia.
Specific Issues: SDN Executives

- Rosneft is a major publicly-traded oil company in Russia
  - Substantial ties to ExxonMobil and BP
- Rostec is a leading Russian company
  - Ongoing joint venture with Boeing
- Even though Rosneft and Rostec are not listed as Specially Designated Nationals, the fact that their top-level executives appear on the SDN List can have an impact on US Person dealings with those entities
- The fact that a senior officer of a company is an SDN does not mean that the company itself is blocked. Thus, while US Persons can continue to deal with Rosneft and Rostec, they must be careful not to deal directly with their SDN executives. Heightened due diligence is warranted. Moreover, depending on the level of control an SDN executive exercises over a company, it could become designated by OFAC down the road.
Specific Issues: Potential Impact of Sanctions on Non-US Persons

• All the Executive Orders authorize sanctions to be imposed against persons who are determined to “have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of” sanctioned persons.

• Thus, while foreign persons are not covered under the Executive Orders, to the extent they provide such assistance, sponsorship, or support, they could be designated by OFAC separately and have their property blocked as sanctioned persons.

• Extraterritorial application of US export control restrictions.
Specific Issues: Preexisting Business Arrangements With SDNs

• Seek licenses from OFAC to engage in wind down activities
• The license application should include a plan to wind down the activity expeditiously
Specific Issues: Penalties

- Penalties for violating the Russia SDN sanctions and export control restrictions can be substantial.
- Criminal violations are punishable by a $1 million fine and/or 20 years imprisonment.
- Civil violations are generally punishable by the greater of $250,000, or twice the value of the transaction in question, per violation. Violations of the State Department export control restrictions are subject to a $500,000, per violation, civil penalty.
Possible Additional US Sanctions

• Additional SDN designations targeting other government and top Russian business officials and companies

• Sectoral sanctions prohibiting specific, or more general, exports to, imports from, providing services to, or financial transactions with, identified sectors of the Russian economy, or selected persons/entities therein
The EU / UK Russian Sanctions Regime

• How the sanctions regimes operate
• Who must comply and what the sanctions require
• Derogations
• Impact on businesses
• The importance of due diligence
• The next steps?
Who must comply with the EU regime?

- The EU sanctions regime in relation to Russia applies:
  - within the territory of the EU, including its airspace and on board any vessel/aircraft within jurisdiction of a member state
  - to any person who is a national of a Member State
  - to any legal person, entity or body which is incorporated or constituted under the law of a member state
Who must comply with the EU regime? (cont.)

– to any legal person, entity or body in respect of any business done in whole or in part within the EU

• Wide scope – covers all EU nationals and companies wherever in the world they do business, and any business done within the territory of the EU

• This means that, for example, a US company which only has US nationals as employees, but which does business in the EU, is subject to the EU sanctions regime
What do the sanctions require?

- EU sanctions regime is currently financial, with no trade/export sanctions yet
  - Freezing of funds - all funds and economic resources belonging to, owned, held or controlled by a listed natural persons or natural or legal persons, entities or bodies associated with them, or legal persons, entities or bodies whose ownership has been transferred contrary to Ukrainian law, or which have benefited from such a transfer, shall be frozen (Article 2(1))
  - Prohibition of making funds available - no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of listed natural persons or natural or legal persons, entities or bodies associated with them (Article 2(2))
What do the sanctions require? (cont.)

- UK legislation takes a slightly different approach aimed at the same result
  - Freezing of funds - prohibition on a person ("P") dealing in funds or economic resources belonging to, owned, held or controlled by a designated person if P knows or has reasonable cause to suspect that P is dealing in such funds or economic resources
  - Prohibition on making funds or economic resources available – P must not make funds available, directly or indirectly, to a designated person if P knows or has reasonable cause to suspect that P is making such funds available
  - Similar prohibitions on making funds or economic resources available for the benefit of a designated person
What do the sanctions require?

- Compliance with the asset freeze provisions
- Reporting / information provision obligations to national competent authority
- Financial institutions must check whether they hold funds or economic resources of listed individuals and notify national competent authority
What do the sanctions require? (cont.)

- Offence to intentionally participate in activities knowing that the object or effect of them is (whether directly or indirectly)
  - to circumvent any of the prohibitions; or
  - enable/facilitate the contravention of such prohibitions
- Officers of body corporate liability under UK law
- Penalties under UK law – imprisonment of up to 2 years and/or unlimited fine
EU sanctions - Listed individuals

• At present, the EU Russia sanctions regime is targeted at political and military figures in Russia and Crimea, and connected with the former Ukraine government.
• Mostly individuals – but 2 confiscated Crimea energy companies added on 12 May 2014.
• But - sanctions apply to companies / entities associated with / controlled by listed individuals.
• Currently limited commonality between the targets of the US and EU sanctions.
• May move to a more harmonised approach with US.
• But – different economic / political considerations.
Derogations

- All derogations require prior authorisation from the national competent authority in question
- Existing contracts – payment due under pre-existing contract; must not breach Article 2(2)
- Judgments / arbitral awards – frozen funds may be released to meet a judgment or arbitral award, unless that judgment/arbitral award is for the benefit of a listed person/entity
- Basic needs – release of funds for foodstuffs, rent, mortgage, medical treatment, taxes, insurance, legal advice, maintenance of frozen funds/economic resources
- Credits to frozen accounts are (subject to certain exceptions) permitted as long as the credited amount is also frozen
Impact of sanctions on investors and businesses

- Obligation to check if you hold accounts, funds or economic resources for listed persons, freeze such accounts and report to HM Treasury if accounts, funds or economic resources held
- Need for authorisation in relation to pre-existing contracts
- Risk-based approach when writing new business
- No liability under existing contracts if refusal to make funds / economic resources available is a good faith decision
- Likely expansion of lists – conduct analysis now of Russian business?
Due Diligence

• Risk of inadvertently breaching sanctions due to inadequate due diligence
• Sanctions can turn a potential transaction from lawful to unlawful overnight
• Importance of understanding who you are contracting with – who are the ultimate beneficial owners? What control is exercised over the business?
• Ownership / control will be assessed on a case by case basis
• Joint venture partners – what do you know about them?
Due Diligence (cont.)

- Stringent "know your customer" procedures will help guard against risks
- Processes for screening counterparts at point of take-on
- Enhanced due diligence for transactions involving Russian businesses / assets?
- Compliance questionnaires to counterparts?
- Checks against existing clients when new individuals / companies are added to sanctions lists
- Counterpart not wanting to disclose information about ownership is not an excuse
- Importance of being able to show that steps taken to minimise risk of breaching sanctions
The next steps?

• Angela Merkel has indicated that a further round of EU sanctions is under discussion
• Sensitivity in EU to scale of trade with Russia
• Reliance on Russia for gas supplies through Ukraine
• Reports that EU has drawn up a list of 120-130 Russians who could be subject to travel bans and asset freezes
• German newspaper Bild reported that CEOs of Gazprom and Rosneft may be on that list
The next steps? (cont.)

• Unclear whether EU sanctions will move to include substantial corporates as well as individuals
• Targeting sectors of the Russian economy?
• New additions late on 12 May 2014:
  – 13 new individuals
  – 2 Crimean power companies which have been appropriated
  – First time that companies have been added to the list
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Annex A

The following is a comprehensive list of individuals that have been placed on the Specially Designated Nationals List pursuant to the Ukraine-related sanctions:

**AKSYONOV, Sergey Valeryevich**

**BELAVENCEV, Oleg Evgenyevich**  - Russian Presidential Envoy to the Crimean District; Member of the Russian Security Council.

**BUSHMIN, Evgeni Viktorovich**  - Deputy Speaker of the Federation Council of the Russian Federation; Chairman of the Council of the Federation Budget and Financial Markets Committee.

**CHALIY, Aleksei Mikhailovich**  - Mayor of Sevastopol; Chairman of the Coordination Council for the Establishment of the Sevastopol Municipal Administration.

**CHEMEZOV, Sergei.**

**DZHABAROV, Vladimir Mikhailovich**  - First Deputy Chairman of the International Affairs Committee of the Federation Council of the Russian Federation.

**FURSENO, Andrei Alexandrovich**  - Aide to the President of the Russian Federation.

**GLAZYEV, Sergey**  - Presidential Advisor.

**GROMOV, Alexei**  - First Deputy Chief of Staff of the Presidential Executive Office; First Deputy Head of Presidential Administration; First Deputy Presidential Chief of Staff.

**IVANOV, Sergei**  - Chief of Staff of the Presidential Executive Office.

**IVANOV, Victor Petrovich.**

**KLISHAS, Andrei**  - Chairman of the Russian Federation Council Committee on Constitutional Law, Judicial and Legal Affairs and the Development of Civil Society.

**KONSTANTINOV, Vladimir Andreyevich.**

**KOVALCHUK, Yuri Valentinovich.**

**KOZAK, Dmitry**  - Deputy Prime Minister of the Russian Federation.

**KOZHIN, Vladimir Igorevich.**

**MALYSHEV, Mikhail Grigorevich**  - Chair of the Crimea Electoral Commission

**MATVIYENKO, Valentina Ivanovna**  - Federation Council Speaker; Chairman of the Russian Federation Council.

**MEDVEDCHUK, Viktor.**
MEDVEDEV, Valery Kirillovich - Chair of the Sevastopol Electoral Commission

MIRONOV, Sergei Mikhailovich - Member of the Council of the State Duma; Leader of A Just Russia Party; Member of the State Duma Committee on Housing Policy and Housing and Communal Services.

MIZULINA, Yelena - State Duma Deputy; Chairman of the State Duma Committee on Family, Women and Children.

MUROV, Evgeniy Alekseyevich - Director of the Federal Protective Service of the Russian Federation; Army General.

NARYSHKIN, Sergey Yevgenyevich.


PANTELEEV, Oleg Evgenievich - First Deputy Chairman of the Committee on Parliamentary Issues.

PUSHKOV, Aleksei Konstantinovich - Chairman of State Duma Committee on International Affairs.

ROGOZIN, Dmitry Olegovich - Deputy Prime Minister of the Russian Federation.

ROTHENBERG, Arkady.

ROTHENBERG, Boris.

RYZHKOV, Nikolai Ivanovich - Senator in the Russian Upper House of Parliament; Member of the Committee for Federal Issues, Regional Politics and the North of the Federation Council of the Russian Federation.

SECHIN, Igor.

SERGUN, Igor Dmitrievich - Lieutenant General; Chief of the Main Directorate of the General Staff (GRU); Deputy Chief of the General Staff.

SLUTSKY, Leonid - State Duma Deputy; Chairman of the Committee on Affairs of the Commonwealth of Independent States (CIS); First Deputy Chairman of the Committee on International Affairs; Chairman of the Russian World Fund.

SURKOV, Vladislav Yurievich - Presidential Aide.

TEMIRGALIEV, Rustam Ilmirovich - DOB 15 Aug 1976; POB Ulan-Ude, Russia; Deputy Chairman of the Council of Ministers of Crimea; Crimean Deputy Prime Minister

TOTOONOV, Aleksandr Borisovich - Member of the Committee on Culture, Science, and Information, Federation Council of the Russian Federation.
TIMCHENKO, Gennady

TSEKOV, Sergey Pavlovich.

VOLODIN, Vyacheslay - First Deputy Chief of Staff of the Presidential Executive Office.

YAKUNIN, Vladimir.

YANUKOVYCH, Viktor Fedorovych - Former President of Ukraine.

ZHEREBTSOV, Yuriy Gennadievych - Counselor to the Speaker of the Crimean Rada

ZHELEZNYAK, Sergei Vladimirovich - Deputy Speaker of the State Duma of the Russian Federation.

ZIMA, Pyotr Anatoliyovych - Head of the Crimean SBU (Security Service of Ukraine).
The following is a comprehensive list of entities that have been placed on the Specially Designated Nationals List pursuant to the Ukraine-related sanctions:  

**AQUANIK**  

Aliases: AQUANIK LLC; LLC RUSSKOYE VREMYA; OBSHCHESTVO S OGRANICHEENO OTVETSTVENOSTYU RUSSKOE VREMYA; RUSSKOE VREMYA OOO; RUSSKOYE VREMYA LLC  

Description: producer of bottled water; wholly-owned subsidiary of Volga Group (listed below); founded in 2007; has production facilities around Nizhny Novgorod with annual capacity of up to 500 million liters.  

**AVIA GROUP LLC**  

Alias: AVIA GROUP LTD  

**AVIA GROUP NORD LLC**  

Description: provides services for private jets at St. Petersburg’s Pulkovo airport, including ground handling, flight operations support and fuelling; 70% owned by Volga Group.  

**BANK ROSSIYA**  

**CHERNOFOREFTEGAZ**  

Aliases: CHORNOMORNAFTOGAZ; NJSC CHORNOMORNAFTOGAZ  

**CJSC ZEST**  

Alias: ZEST LEASING  

Description: leasing company based in St. Petersburg; provides a range of services including real estate, vehicle, equipment and business jet leasing; wholly-owned subsidiary of Bank Rossiya (above).  

**INVESTCAPITALBANK**  

Aliases: INVESTKAPITALBANK; OJSC INVESTCAPITALBANK; OPEN JOINT STOCK COMPANY INVESTCAPITALBANK  

Description: bank established in 1993, based in the Volga region; controlled by Arkady and Boris Rotenberg.  

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JSB SOBINBANK

Alias: SOBINBANK

Description: Moscow-based bank, founded in 1990 and controlled by Bank Rossiya. Major U.S. credit card companies stopped providing services for payment transactions for clients at Bank Rossiya and Sobinbank after the March sanctions. Mark

SAKHATRANS LLC

Alias: OBSHCHESTVO S OGRANICHENOI OTVETSTVENNOSTYU

Description: 89 percent-owned subsidiary of Volga Group (below); project to build a coal and iron ore terminal in Russia's Far East.

SAKHA (YAKUTSKAYA) TRANSPORTNAYA KOMPANIYA

Alias: SAKHATRANS OOO

SMP BANK

Aliases: BANK SEVERNY MORSKOY PUT; SMP BANK OPEN JOINT-STOCK COMPANY

Description: co-owned by the Rotenberg brothers, with each holding a 38.05 percent stake.

STROYGAZMONTAZH

Alias: LIMITED LIABILITY COMPANY STROYGAZMONTAZH; STROYGAZMONTAZH CORPORATION; "SGM")

Description: builder of oil and gas pipeline projects for Russian state and private energy companies; controlled by Arkady Rotenberg.

STROYTRANSGAZ GROUP

Aliases: STROYTRANSGAZ; "STG GROUP"

Description: construction holding company controlled by Timchenko. Stroytransgaz plans to build the European section of the South Stream gas pipeline intended to carry Russian gas to southern Europe via the Black Sea, avoiding Ukraine.

STROYTRANSGAZ HOLDING

Aliases: STG HOLDING LIMITED; STG HOLDINGS LIMITED; STROYTRANSGAZ HOLDING LIMITED; "STGH".

STROYTRANSGAZ LLC

Alias: OOO STROYTRANSGAZ
**STROYTRANSGAZ OJSC**

Alias: OAO STROYTRANSGAZa

**STROYTRANSGAZ-M LLC**

**THE LIMITED LIABILITY COMPANY INVESTMENT COMPANY ABROS**

Alias: LLC IC ABROS)

Description: investment company and subsidiary of Bank Rossiya.

**TRANSOIL**

Aliases: LIMITED LIABILITY COMPANY TRANSOIL; f.k.a. OBShCHESTVO S ORGANICHERNNOI OTVETSTVENNOSTYU TRANSOIL; TRANSOIL LLC; TRANSOYL SNG LTD

Description: Russia's biggest private railway carrier of oil and oil products; 80 percent owned by Volga Group (below); major relationships with Rosneft, Surgutneftegaz, Gazprom Neft and Novatek.

**VOLGA GROUP**

Aliases: VOLGA GROUP INVESTMENTS; f.k.a. VOLGA RESOURCES; f.k.a. VOLGA RESOURCES GROUP

Description: privately-held investment group controlled by Timchenko; owns assets in energy, mining, transportation, logistics, consumer goods, and real estate; has a 23 percent stake in Russia's second-largest gas producer, Novatek.
**Annex B**

The following is a complete list of the companies added to the Entities List by the Department of Commerce (located in Russia, unless otherwise indicated):

Aquanika

Avia Group LLC

Avia Group Nord LLC

CJSC Zest

Sakhatrans LLC

Stroygazmontazh

Stroytransgaz Group

Stroytransgaz Holding (located in Cyprus)

Stroytransgaz LLC

Stroytransgaz-M LLC

Stroytransgaz OJSC

Transoil

Volga Group (located in Luxembourg and Russia)
Annex C

The following is a comprehensive list as at 14 May 2014 of the individuals and entities that are the subject of Ukraine relating financial sanctions in Europe

**INDIVIDUALS**

- **AKSYONOV Sergey Valeryevich** - Prime Minister of Crimea
- **BELAVENTSEV Oleg Yevgenyvich**
- **BEREZOVSKIY Deniz Valentinovich** - Commander of the Ukrainian Navy
- **BEZLER Igor Mykolaiovych** - Militia leader.
- **BOLOTOV Valeriy** - One of the leaders of the separatist group 'Army of the South-East'
- **BUSHMIN Evgeni Viktorovich** - Deputy Speaker, Federation Council
- **CHALIY Aleksei Mikhailovich** - Mayor of Sevastopol
- **DZHABAROV Vladimir Michailovich** - First Deputy Chairman, International Affairs Committee, Federation Council
- **GALKIN Aleksandr** - Commander, Russia Southern Military District
- **TSYPLAKOV Sergey Gennadevich** - One of the leaders of the People's Militia of Dombas.
- **GERASIMOV Valery Vasilevich** - General of the Army, Chief of the General Staff of the Armed Forces of the Russian Federation, First Deputy minister of Defence of the Russian Federation
- **GLAZYEV Sergey** - Advisor to the President of the Russian Federation
- **JAROSH Petr Grigorievich** - Acting Head of the Federal Migration Service office for Crimea.
- **KAKIDZYANOV Igor** - One of the leaders of the armed forces of the self-proclaiomed 'Donetsk People's Republic'.
- **KISELYOV Dmitry Konstantinovich** - Head of the Russian Federal State News Agency 'Rossiya Segodnya'.
- **KLISHAS Andrei Aleksandrovich** - Chairman, Committee on Constitutional Law, Federation Council
- **Konstantinov Vladimir Andreevich** - Speaker, Supreme Council of the Autonomous Republic of Crimea
- **KOVATIDI Olga Fedorovna** - Member of the Russian Federation Council from the annexed Autonomous Republic of Crimea
- **KOZAK Dmitry Nikloayevich** - Deputy Prime Minister
- **KOZYURA Oleg Grigorievich** - Acting Head of the Federal Migration Service office for Sevastopol.
- **KULIKOV Valery Vladimirovich** - Rear Admiral, Deputy Commander of the Black Sea Fleet
- **LYAGIN Roman** - Head of the 'Lugansk People's Republic' Central Electoral Commission.
- **MALYKHIN Aleksandr** - Head of the 'Lugansk People's Republic' Central Electoral Commission.
- **MALYSHEV Mikhail** - Chair of the Crimea Electoral Commission
- **MATVIYENKO Valentina Ivanova** - Speaker of the Federation Council
- **MEDVEDEV Valery** - Chair of Sevastopol Electoral Commission
- **MENYAILO Sergei Ivanovich** - Acting governor of Sevastopol
ZHEREBTSOV Yuriy - Counsellor of the Speaker of the Verkhovna Rada of Crimea

ZIMA Pyotr Anatoliyovych - Head of the Crimean Security Service (SBU)

ARBUZOV, Serhiy - Former Prime Minister of the Ukraine

AZAROV, Mykola Yanovych - Former Prime Minister of Ukraine until January 2014

AZAROV, Oleksii Mykolayovych - Son of former Prime Minister Azarov

BOHATYRIOVA, Raisa Vasylivna - Former Minister of Health

IVANYUSHCHENKO, Yuriy - Party of Regions MP

KALININ, Ihor Oleksandrovych - Former Adviser to the President of Ukraine

KLIUIEV, Andrii Petrovych - Former Head of Administration of President of Ukraine

KLIUIEV, Serhii Petrovych - Businessman. Brother of Mr. Andrii Kliuiev

KLYMENKO, Oleksandr - Former Minister of Revenues and Charges

KURCHENKO, Serhiy Vitaliyovych – Businessman

LUKASH, Olena Leonidivna - Former Minister of Justice

PORTNOV, Andriy Volodymyrovych - Former Adviser to the President of Ukraine

PSHONKA, Artem Viktorovych - Son of former Prosecutor General, Deputy Head of the faction of Party of Regions in the Verkhovna Rada of Ukraine

PSHONKA, Viktor Pavlovych - Former Prosecutor General of Ukraine

RATUSHNIAK, Viktor Ivanovych - Former Deputy Minister of Internal Affairs

STAVYTSKYI, Edward - Former Minister of Fuel and Energy of Ukraine

TABACHNYK, Dmytro Volodymyrovych - Former Minister of Education and Science

YAKYMENKO, Oleksandr Hryhorovych - Former Head of Security Service of Ukraine

YANUKOVYCH, Oleksandr Viktorovych - Son of former President. Businessman

YANUKOVYCH, Viktor Fedorovych - Former President of Ukraine

YANUKOVYCH, Viktor Viktorovych - Member of the Verkhovna Rada of Ukraine

ZAKHARCHENKO, Vitalii Yuriyovych - Former Minister of Internal Affairs

ENTITIES:

Feodosia – Crimean energy company appropriated in breach of Ukrainian law

PJSC Chernomornftegaz – Crimean energy company appropriated in breach of Ukrainian law