

## McCain response letter

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**From:** "Kane, Sean" (b)(6)  
**To:** (b)(6)  
**Cc:** (b)(6) (b)(6)  
**Date:** Fri, 17 Jun 2016 11:38:19 -0400  
**Attachments:** 20160615 McCain response letter\_draft.docx (14.72 kB); mccain-letter-to-secretary-lew-re-sanctions\_060216.pdf (1.48 MB)

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Hi all – grateful for OGT/TFFC clearance on the attached draft response to Senator McCain's most recent letter on the Roscosmos issue. Welcome any input by **COB Monday**, then will move to counsel and up the chain.

Please and thank you.

Sean

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## FW: McCain response letter

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**From:** "Kane, Sean" (b)(6)  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Date:** Tue, 21 Jun 2016 10:52:02 -0400  
**Attachments:** 20160615 McCain response letter\_draft (b)(6) edits\_sck (to counsel).docx (17 kB); mccain-letter-to-secretary-lew-re-sanctions\_060216.pdf (1.48 MB)

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Counsel (b)(6) – requesting your review clearance on this by COB tomorrow (cleared by TFFC, Policy and OGT).

FWIW, a few days ago (b)(6) and I discussed whether we should address the specific ask here a bit more directly. However, re-reading McCain's incoming the only real ask is not to provide our determination but rather to *conduct the due diligence necessary* to conclusively determine.

(b)(5) (b)(5)  
But happy to discuss further or stand down if folks feel otherwise.

Also, + Cheryl because I'm dumb.

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**From:** (b)(6)  
**Sent:** Tuesday, June 21, 2016 10:28 AM  
**To:** Kane, Sean (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: McCain response letter

A couple minor comments attached. Take em or leave em!

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**From:** Kane, Sean  
**Sent:** Tuesday, June 21, 2016 10:11 AM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** FW: McCain response letter

OGT – any additional comments/edits to this before I move it to counsel?

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**From:** (b)(6)  
**Sent:** Monday, June 20, 2016 5:04 PM  
**To:** Kane, Sean (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: M

Hey Sean,

Attached are some suggested edits.

Thanks!

(b)(6)

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**From:** Kane, Sean  
**Sent:** Friday, June 17, 2016 11:38 AM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** McCain response letter

Hi all – grateful for OGT/TFFC clearance on the attached draft response to Senator McCain's most recent letter on the Roscosmos issue. Welcome any input by **COB Monday**, then will move to counsel and up the chain.

Please and thank you.

Sean

## FOR REVIEW: Sen. McCain response letter

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**From:** "Kane, Sean" (b)(6)  
**To:** "Smith, John" (b)(6) "Gacki, Andrea" (b)(6)  
**Cc:** "Mosier, Michael" (b)(6) "Carson, Cheryl"  
<cheryl.carson@treasury.gov>  
(b)(6) (b)(6) (b)(6)  
**Date:** Thu, 23 Jun 2016 14:35:30 -0400  
**Attachments:** 20160615 McCain response letter\_clean to J-A.docx (17.24 kB); mccain-letter-to-secretary-lew-re-sanctions\_060216.pdf (1.48 MB)

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Hi John and Andrea –

Please find attached a draft response to Senator McCain's latest letter regarding the Roscosmos issue. (b)(5)  
(b)(5) so

Front office is asking to have this by June 30<sup>th</sup> so grateful for your review/clearance by **OOB Monday**. I will also deliver a hard copy to the 2<sup>nd</sup> floor.

Thanks!  
Sean



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## United States Senate

COMMITTEE ON ARMED SERVICES

WASHINGTON, DC 20510-6050

CHRISTIAN D. BROSE, STAFF DIRECTOR  
ELIZABETH L. KING, MINORITY STAFF DIRECTOR

June 2, 2016

The Honorable Jacob J. Lew  
Secretary of the Treasury  
Washington, D.C. 20220

Dear Secretary Lew,

I write to express my concern with the appearance of selective enforcement of sanctions imposed in response to the invasion of Crimea by the Russian Federation. I am particularly troubled that, today, the Administration is allowing for the procurement of rocket engines for military space launches that result in the payment of money to a Russian state-owned corporation controlled by officers or directors who have been individually sanctioned in connection with that invasion.

In a March 2, 2016 letter, responding to a request from the Senate Armed Services Committee to review the sanctions' implications of Russian President Putin's recent reorganization of the Russian space enterprise, the Acting Director of the Office of Foreign Assets Control (OFAC) conceded that resulting control over Roscosmos or NPO Energomash by individuals sanctioned under Executive Order (E.O.) 13661 could be a "potential basis for OFAC to designate those entities and block their property and interests." In fact, there are numerous Roscosmos board members and executives who have either been targeted by sanctions under E.O. 13661 or that have ties to Russian corporations sanctioned under E.O. 13662.

For example, Sergei Chemezov, a prominent board member of Roscosmos, is currently subject to sanctions under E.O. 13661. Chemezov's state-owned corporation, a defense company called Rostec, is also sanctioned under E.O. 13662. In addition, Novikombank, a Rostec-owned bank that finances Roscosmos' operations, is sanctioned under E.O. 13662.

This is very troubling. When examining the organizational structure of Roscosmos after Putin's recent restructuring initiative, it becomes abundantly clear that we are funneling U.S. taxpayer dollars to a Russian space agency that is financed by a sanctioned Russian bank, which is owned by a sanctioned Russian defense company, and which is controlled by a sanctioned Russian CEO, who also happens to be a close personal friend of Vladimir Putin.

Moreover, other Russian companies owned by Rostec and controlled by Chemezov have already been targeted by U.S. sanctions under E.O. 13662. For example, Rosoboronexport, a state-owned arms exporter and subsidiary of Rostec, was first targeted by U.S. sanctions in September 2015. Kalashnikov, Russia's largest manufacturer of automatic and sniper weapons and guided artillery shells, was first targeted by sanctions in July 2014. Why, then, is Russia's space industry receiving such disparate treatment, especially in light of how it is financed and controlled?

Considering the relationship between Sergei Chemezov and Dmitry Rogozin, as well as numerous other Roscosmos board members and executives who have been targeted by U.S.

2018-08-116: 008003

sanctions or who have ties to sanctioned Russian corporations, OFAC's decision to date not to enforce current sanctions against Roscosmos and NPO Energomash appears disturbingly arbitrary and hypocritical.

I therefore request that OFAC (1) conduct the due diligence necessary to conclusively determine whether federal funding associated with the purchase of space launch activities under the Evolved Expendable Launch Vehicle (EELV) program is being used for a purchase from, or payment to, any entity owned or controlled by any person included on the list of specially-designated nationals and blocked persons maintained by the OFAC pursuant to Executive Order 13661 or any other executive order or provision of law imposing sanctions with respect to the Russian Federation in connection with the invasion of Crimea by the Russian Federation; and (2) report timely to the Committee on its findings.

Thank you for your attention to this important request. If your staff has any questions about this letter, your staff may contact Majority Professional Staff Member Daniel Lerner at 202-224-9349.

Sincerely,

A handwritten signature in blue ink that reads "John McCain". The signature is fluid and cursive, with the first name "John" and last name "McCain" clearly distinguishable.

John McCain  
Chairman

Bates Nos. 2018-08-116:  
008005 - 008006  
Pending Consultation  
Responses

## FW: Re:Executive Order 13662

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From: OFAC\_Feedback <ofac\_feedback@treasury.gov>  
To: (b)(6)  
Date: Tue, 02 Aug 2016 14:23:20 -0400

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-----Original Message-----

From: (b)(6)  
Sent: Tuesday, August 02, 2016 11:48 AM  
To: OFAC\_Feedback  
Subject: Re:Executive Order 13662

Thanks. I read all of that in the EO, but the question is whether the VEPR rifle, made by Molot (Vyatskie Polyany Machine-Building Plant MOLOT), which was rumored to be part of the Kalashnikov Concern through an acquisition. More recently there are US distributors who now state that Molot rifles were not banned and that there are new imports coming in from Russia. I want to ensure that any newly arrived VEPR rifles are indeed legal for purchase.

Thanks for your help

On 8/2/2016 10:58 AM, OFAC\_Feedback@treasury.gov wrote:

> (b)(6)

> If a U.S. person is in possession of a Kalashnikov Concern product that was bought and fully paid for prior to the date of designation (i.e., no payment remains due to Kalashnikov Concern), then that product is not blocked and OFAC sanctions would not prohibit the U.S. person from keeping or selling the product in the secondary market, so long as Kalashnikov Concern has no interest in the transaction. New transactions by U.S. persons with Kalashnikov Concern are prohibited, however, and any property in which Kalashnikov Concern has an interest is blocked pursuant to OFAC's designation of Kalashnikov Concern on July 16, 2014.

>  
> Regards,  
>  
> Sanctions Compliance & Evaluation  
> Office of Foreign Assets Control (OFAC) U.S. Department of the  
> Treasury  
> 1500 Pennsylvania Ave. NW  
> Washington, DC 20220  
> Toll Free: 1-800-540-6322  
> Local: 1-202-622-2490  
> Email: OFAC\_Feedback@treasury.gov  
> Website: www.treasury.gov/ofac

> (b)(6)

> -----Original Message-----

> From: (b)(6)  
> Sent: Monday, August 01, 2016 7:39 PM  
> To: OFAC\_Feedback  
> Subject: [SUSPECTED SPAM] Executive Order 13662  
>  
> Is the import of VEPR rifles banned under Executive Order 13662?  
>  
> Thanks



## R/U Separatists Brief

**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Tue, 30 Aug 2016 10:31:48 -0400  
**Attachments:** Copy of 2016-08-30 OFAC Actions Russia Ukraine.xlsx (13.95 kB); RiskAdvisory – Sanctioned Entities.pdf (261.75 kB); RiskAdvisory – Sanctioned Individuals.pdf (547.06 kB)

(b)(6).

Attached are two comprehensive spreadsheets that list all designated separatists, separatist entities and Crimean officials. In addition, I've included a matrix that lists all of our actions to date with a link to each "OFAC Recent Action". In total, we have designated approximately:

- I. 10 Crimean officials
- II. 31 Russian/Ukrainian Separatists
- III. 6 Separatist entities, including the Nightwolves

Of these Separatists/Crimean targets, the following have been noteworthy:

- I. On July 16, 2014, the Treasury Department has determined that the **Luhansk People's Republic** (LPR) has asserted governmental authority over a part or region of Ukraine without the authorization of the Government of Ukraine. The self-proclaimed LPR has asserted governmental authority through a number of actions, including issuing a declaration of martial law; banning the sale of corporate rights, production facilities, companies, and other assets; controlling the border guard checkpoints of Izvarino, Dolzhanskoye, and Krasnyi Partizansk on the Ukrainian-Russian border; and, shooting down a Ukrainian military transport jet as it attempted to land in Luhansk. The LPR also elected a leader and passed its own constitution on May 11, 2014.
- II. On July 16, 2014, the Treasury Department has also determined the **Donetsk People's Republic** to have asserted governmental authority over a part or region of Ukraine without the authorization of the Government of Ukraine. The militia in the self-proclaimed Donetsk People's Republic is defying the peaceful settlement regime, continues combat operations, and has seized and occupies regional government buildings, using them as its headquarters and firing positions. Igor Strelkov, the leader of the militia of the Donetsk People's Republic, rejected Ukrainian President Petro Poroshenko's peace plan.
- III. On July 16, 2014 OFAC designated **Aleksandr Borodai** who was the self-declared "prime minister" of the "Donetsk People's Republic" in Ukraine and has vowed to expel Ukraine's army from his new domain and resist any bid to recapture the city. Borodai was in Crimea as an advisor to Sergei Aksyonov, the separatist prime minister who oversaw the territory's purported annexation by Russia. Treasury designated Aksyonov pursuant to E.O. 13660 on March 17, 2014.
- IV. On December 19, 2014 OFAC designated **Natalia Poklonskaya** who was appointed as the de facto prosecutor of the so-called Republic of Crimea in May 2014 by Russian President Vladimir Putin. A Ukraine court in Kyiv ordered Poklonskaya's detention on suspicion of subverting Ukraine's constitutional system and seizing state power. She is accused of having accepted an illegal offer to head the Crimean prosecutor's office and has illegally taken office. Poklonskaya is being designated because she has asserted governmental authority over a part or region of Ukraine without the authorization of the Government of Ukraine.
- V. On December 19, 2014 OFAC designated **Konstantin Malofeyev** an individual who funds separatist activities in eastern Ukraine and is closely linked with Aleksandr Borodai, Igor Girkin (a.k.a. Igot Strelkov), and the so-called Donetsk People's Republic, which have all been previously sanctioned as Specially Designated Nationals (SDNs). Malofeyev is one of the main sources of financing for Russians promoting separatism in Crimea. Malofeyev is being designated because he is responsible for or complicit in, or has engaged in, actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine and has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of the so-called Donetsk People's Republic.
- VI. On December 19, 2014 OFAC designated the **Night Wolves** biker group which had its members serve in the Crimean self-defense forces as early as February 2014, which supported local Crimeans against the Government of Ukraine. In March 2014, the Night Wolves conducted intimidation and criminal activities within Ukraine and also abducted and subsequently assaulted a Ukrainian Border Guard official. This biker group also participated in the storming of the gas distribution station in Strikolkove and the storming of the Ukrainian Naval Forces Headquarters in Sevastopol. In early-April 2014, the Night Wolves helped smuggle a former senior Ukrainian official out of Ukraine and also helped obtain Russian passports for another larger group of senior Ukrainian officials that they helped get into Russia. The Night Wolves have been closely

connected to the Russian special services, have helped to recruit separatist fighters for Donetsk and Luhansk, Ukraine, and were deployed to the cities of Luhansk and Kharkiv. The Night Wolves group is being designated because it is an entity that is responsible for or complicit in, or has engaged in, directly or indirectly, actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine. Also designated was the leader of the Night Wolves, **Aleksandr Zaldostanov**, also known as “the Surgeon.” Zaldostanov chairs the overall Night Wolves organization, and some of his responsibilities include the punishing of chapter groups and members for disloyalty to the Night Wolves organization. During the late-March storming of the Ukrainian Naval Forces Headquarters in Sevastopol, he coordinated the confiscation of Ukrainian weapons with the Russian forces. Zaldostanov is being designated for being a leader of a group, the Night Wolves, that is engaging in, directly or indirectly, actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine.

#### **POLICY THAT DRIVES THE SANTIONING OF SEPARTISTS AND CRIMEAN OFFICIALS:**

In light of the continued conflict in eastern Ukraine and Russia’s continued disregard for its obligations under the Minsk agreements, which fuels the continued conflict, the U.S. Department of the Treasury continuously imposes sanctions pursuant to Executive Order (E.O.) 13660 on Ukrainian and Russian-backed separatists and the militias or entities they lead or support. The individuals and entities sanctioned are generally designated for being responsible for, or complicit in, actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine, or for being militias or entities, and/or asserting governmental authority over a part or region of Ukraine without the authorization of the Government of Ukraine. All of these actions encompass a U.S. commitment to seek a diplomatic resolution to the crisis in Ukraine by maintaining sanctions on Russia. Those sanctions will not begin to be rolled back until Russia fully implements its commitments under the Minsk Agreements, including the return to Ukraine of control of its side of the international border with Russia. These steps also demonstrate our sustained commitment to a policy of non-recognition with respect to Russia’s purported annexation of Crimea, and our intent to maintain Crimea-related sanctions until Russia ends its occupation of the peninsula.



RISK ADVISORY NEWS

## Consolidated list of Ukraine related sanctions

Risk Advisory offers a **compliance screening service** aimed to bring the checks of your counterparties against the Ukraine-related sanctions list to the next level. Our service screens not only your trading agents but also their shareholders and directors to ensure that they are not affiliated with sanctioned entities or individuals.

Please contact our Russia & Eastern Europe team for further information [russia@riskadvisory.net](mailto:russia@riskadvisory.net)

Name search					Apply	Reset								
Country of origin	All			Entity	US									
Name	Country	Role	Type	Position	US	EU	CA	CH	LI	AT	AU	JP	NO	
Airfix Aviation Oy	Finland	Company	Entity	Provider of aviation services, allegedly formerly controlled by Gennady Timchenko	✓									
Almaz-Antey (OAO)	Russia	Company	Entity	State-owned research and production enterprise engaged in manufacturing of weapons, ammunition and specialised electronics.	✓	✓	✓	✓	✓		✓		✓	
Angarsk Petrochemical Company (AO)	Russia	Company	Entity	A subsidiary of Rosneft	🛢️									
Aquanika (OOO)	Russia	Company	Entity	Manufacturer of non-alcoholic beverages and mineral waters. Owned by Gennady Timchenko.	✓		✓				✓			
Avia Group (OOO)	Russia	Company	Entity	Provider of business aviation services, majority-owned by Gennady Timchenko	✓		✓				✓			
Avia Group Nord (OOO)	Russia	Company	Entity	Provider of business aviation services, majority-owned by Gennady Timchenko	✓		✓				✓			
Avia Group Terminal (OOO)	Russia	Company	Entity	Provider of business aviation services, majority-owned by Gennady Timchenko	✓									
Azov Distillery Plant	Russia	Company	Entity	State enterprise confiscated by the new Crimean authorities	✓	✓	✓	✓	✓		✓		✓	
Bank Rossiya	Russia	Bank	Entity	Bank owned by several individuals from the sanctions list	✓						✓			
Chemomorneftegaz	Russia	Company	Entity	Crimean oil company, formerly owned by Naftogaz and confiscated by the new Crimean authorities	✓	✓	✓	✓	✓		✓	✓	✓	
Dolgoprudenskoye SPP (OAO)	Russia	Company	Entity	State scientific production plant specialising in manufacturing air defence systems and civil machinery	✓		✓							
Donbass People's Militia	Ukraine	Armed groups	Entity	An armed group in the Eastern Ukraine	✓	✓	✓	✓	✓		✓	✓	✓	

Name	Country	Role	Type	Position	US	EU	CA	CH	LI	AT	AU	JP	NO
Donetsk People's Republic	Ukraine	Political organisation	Entity	Self-proclaimed republic in Donetsk Oblast, Ukraine	✓	✓	✓	✓	✓		✓	✓	✓
Eurasian Youth Union	Russia	Political organisation	Entity	Far-right youth group formed by Alexander Dugin	✓		✓						
Evpatoria Sea Commercial Port	Russia	Company	Entity	Crimean state enterprise confiscated by the new authorities	✓								
Fentex Properties	British Virgin Islands	Company	Entity	A holding company controlled by Gennady Timchenko	✓								
Feodosia	Russia	Company	Entity	Crimean oil and oil products bulking company confiscated by the new Crimean authorities	✓	✓	✓	✓	✓		✓	✓	✓
Feodosia Sea Trading Port	Russia	Company	Entity	Crimean state enterprise confiscated by the new authorities	✓								
Genbank (AO)	Russia	Bank	Entity	A Russian bank, which operates in Crimea	✓								
IC Abros (OOO)	Russia	Company	Entity	Investment company wholly owned by Bank Rossiya	✓		✓						
Inresbank (OOO)	Russia	Bank	Entity	The bank is being merged into Mosoblbank	✓		✓						
Investcapitalbank (OAO)	Russia	Bank	Entity	Bank controlled by the Rotenberg brothers	✓		✓				✓		
PP Oil Products (Cyprus) Ltd	Cyprus	Company	Entity	Oil trading company allegedly formerly controlled by Gennady Timchenko	✓								
Izhevsky Mekhanichesky Zavod (OAO)	Russia	Company	Entity	State-owned concern engaged in production of weapons	✓		✓						
Izhmash Concern (OAO)	Russia	Company	Entity	State-owned concern engaged in production of weapons	✓		✓						
Kalashnikov (OAO)	Russia	Company	Entity	State-owned concern engaged in production of rifles and other weapons	✓		✓						
Kalinin Machinery Plant (OAO)	Russia	Company	Entity	State-owned plant specialising in manufacturing machinery for military and civil purposes	✓		✓						
KBP (OAO)	Russia	Company	Entity	State-owned research bureau, specialising in development of weapons	✓		✓						
Kerch Commercial Seaport	Russia	Company	Entity	Crimean state enterprise confiscated by the new authorities	✓	✓	✓	✓	✓		✓		✓
Kerch Ferry	Russia	Company	Entity	Crimean state ferry enterprise confiscated by the new Crimean authorities	✓	✓	✓	✓	✓		✓		✓
Krayinvestbank	Russia	Bank	Entity	A Russian bank, which operates in Crimea	✓								
KRET (OAO)	Russia	Company	Entity	State-owned concern engaged in production and development of specialised electronics	✓		✓						
Langvik Capital Limited Oy	Finland	Company	Entity	A hotel allegedly owned by the Rotenbergs	✓								
Lerma Trading S.A.	Panama	Company	Entity	A company allegedly previously involved in business with Gennady Timchenko	✓								



Name	Country	Role	Type	Position	US	EU	CA	CH	LI	AT	AU	JP	NO
LTS Holding Limited	British Virgin Islands	Company	Entity	A company formerly known as IPP, oil trading company allegedly formerly controlled by Gennady Timchenko	✓								
Lugansk People's Republic	Ukraine	Political organisation	Entity	Self-proclaimed republic in Lugansk Oblast, Ukraine	✓	✓	✓	✓	✓		✓	✓	✓
Magarach	Russia	Company	Entity	Crimean state enterprise of the National Institute of Grape and Vine confiscated by the new authorities	✓	✓	✓	✓	✓		✓		✓
Mako-Holding (ChAO)	Ukraine	Company	Entity	A holding company controlled by Oleksandr Yanukovich	✓								
Maples S A,	Luxembourg	Company	Entity	A company controlled by Gennady Timchenko	✓								
Marshall Capital Partners	Russia	Company	Entity	Investment fund allegedly controlled by Konstantin Malofeyev	✓		✓						
Massandra (NPAO)	Russia	Company	Entity	Crimean state agroproduction facility confiscated by the new authorities	✓	✓	✓	✓	✓		✓		✓
Mosoblbank PAO	Russia	Bank	Entity	Russia's 22d largest bank	✓		✓						
Mytischinskiy Mashinostroitelny Zavod (OAO)	Russia	Company	Entity	Factory in Moscow Oblast specialising in manufacturing military and civil machinery. Partially controlled by the state	✓		✓						
Night Wolves	Russia	Company	Entity	Bikers' union headed by Alexander Zaldostanov	✓		✓						
NI P (OAO)	Russia	Company	Entity	Tikhomirov Scientific Research Institute of Instrument Design. A state entity specialising in development and production of electronic systems for military and civil purposes	✓		✓						
Nizhnyaya Oreanda	Russia	Company	Entity	Crimean state resort facility confiscated by the new authorities	✓	✓	✓	✓	✓		✓		✓
Novikombank	Russia	Bank	Entity	A subsidiary of Rostec	✓								
Novorossiya (public organisation)	Ukraine	Political organisation	Entity	Political party in Donbass, one of the participant in the parliamentary elections in the self-proclaimed 'Donetsk People's Republic'	✓								
Novy Svet factory	Russia	Company	Entity	State Crimean sparkling wine factory confiscated by the new authorities	✓	✓	✓	✓	✓		✓		✓
NPK Uralvagonzavod (OAO)	Russia	Company	Entity	State-owned producer of railway wagons and military machinery	✓								
NPO Bazalt (OAO)	Russia	Company	Entity	State-owned research and production enterprise engaged in weapons and ammunition manufacturing	✓		✓						
NPO Mashinostroyeniya (OAO)	Russia	Company	Entity	State-owned research and production enterprise engaged in weapons and ammunition manufacturing	✓		✓						
Oplot Battalion	Ukraine	Political organisation	Entity	An armed group in Eastern Ukraine, subordinate to the Ministry of Internal Affairs of the	✓	✓	✓	✓					



Name	Country	Role	Type	Position	US	EU	CA	CH	LI	AT	AU	JP	NO
				self-proclaimed 'Donetsk People's Republic'									
Profaktor (TOV)	Ukraine	Company	Entity	A company in Makiivka, Donetsk Oblast, headed by Petr Savchenko (see above)	✓		✓						
RNKB (OAO)	Russia	Bank	Entity	Russian National Commercial Bank, operates in Crimea and allegedly controlled by the republic's authorities	✓	✓	✓	✓	✓		✓		✓
Sakhatrans (OOO)	Russia	Company	Entity	Transport company providing coal and iron ore bulking services. Owned by Gennady Timchenko.	✓		✓						
Set Petrochemicals Oy	Finland	Company	Entity	An oil trading company allegedly previously involved in business with Gennady Timchenko	✓								
Sevastopol Commercial Seaport	Russia	Company	Entity	Crimean enterprise confiscated by the new authorities	✓	✓	✓	✓	✓		✓		✓
Sevastopol Morskoy Bank	Russia	Company	Entity	A bank in Crimea	✓								
SMP Bank (OAO)	Russia	Bank	Entity	Bank controlled by the Rotenberg brothers	✓		✓				✓		
Sobinbank (OAO)	Russia	Bank	Entity	Russian bank wholly owned by Bank Rossiya	✓		✓						
Southeast Trading Oy	Finland	Company	Entity	A company affiliated with Set Petrochemicals	✓								
Southport Management Services Ltd	British Virgin Islands	Company	Entity	A company affiliated with Set Petrochemicals	✓								
Sozvezdiye (OAO)	Russia	Company	Entity	State-owned concern engaged in production and development of specialised electronics	✓		✓						
STG Holdings Limited	Russia	Company	Entity	Cypriot holding company controlled by Gennady Timchenko. Owns assets in Russia.	✓		✓						
Stroygazmontazh (OOO)	Russia	Company	Entity	Gas pipeline construction company controlled by Arcady Rotenberg	✓		✓				✓		
Stroytransgaz (OAO)	Russia	Company	Entity	Construction company controlled by Gennady Timchenko	✓		✓				✓		
Stroytransgaz Group	Russia	Company	Entity	Construction group controlled by Gennady Timchenko	✓		✓				✓		
Stroytransgaz-M (OOO)	Russia	Company	Entity	Construction company controlled by Gennady Timchenko	✓		✓				✓		
Tekhnopromexport (OAO)	Russia	Company	Entity	A construction company controlled by the Rostec state corporation	✓		✓						
Transoil (OOO)	Russia	Company	Entity	Rail freight operator controlled by Gennady Timchenko	✓		✓				✓		
Transservice (OOO)	Russia	Company	Entity	A subsidiary of Transoil, one of the biggest railway transporters of oil and oil products in Russia	✓								
United Shipbuilding Corporation (OAO)	Russia	Company	Entity	State-owned shipbuilding corporation	✓		✓						

Name	Country	Role	Type	Position	US	EU	CA	CH	LI	AT	AU	JP	NO
Volga Group	Russia	Company	Entity	Investment and management company owned by Gennady Timchenko	✓		✓				✓		
Yalta Sea Trading Port	Russia	Company	Entity	Crimean state enterprise confiscated by the new authorities	✓								
Yugo-Vostok	Ukraine	Political organisation	Entity	Movement in Kharkiv, headed by Oleg Tsaryov	✓		✓						
Zest (ZAO)	Russia	Company	Entity	Leasing company in St Petersburg, formerly owned by Bank Rossiya	✓		✓						



Sanctioned



Capital markets restrictions (EU restrictions and OFACs directives 1, 2 or 3)



Restrictions in the field of oil exploration and production (OFACs directive 4)



Restrictions on trading in dual-use goods and technologies



Repealed

Sources: **Australia**  
Australian Government Department of Foreign Affairs & Trade Consolidated Sanctions List

**Austria & Lichtenstein**  
Reuters  
Die Presse  
Liechtensteinisches Landesgesetzblatt

**Canada**  
Canadian Economic Sanctions - Russia  
Canadian Economic Sanctions - Ukraine

**EU**  
Council Regulation (EU) No 208/2014, 5 March 2014  
Council Regulation (EU) No 269/2014, 17 March 2014  
Council Implementing Regulation (EU) No 284/2014, 21 March 2014  
Council Implementing Regulation (EU) No 381/2014  
Council Implementing Regulation (EU) No 433/2014  
Council Implementing Regulation (EU) No 477/2014  
Council Implementing Regulation (EU) No 753/2014  
Council Decision 2014/499/CFSP  
Council Implementing Regulation (EU) No 826/2014  
Council Implementing Regulation (EU) No 960/2014  
Council Implementing Regulation (EU) No 961/2014  
Council Implementing Regulation (EU) No 1270/2014

**Japan**  
The list of designated entities re press release 24 September 2014  
Ministry of Foreign Affairs of Japan Press Release 24 September 2014  
Ministry of Foreign Affairs of Japan Press Release 9 December 2014

**Norway**  
Norway Ministry of Foreign Affairs

**Switzerland**  
The Federal Authorities of the Swiss Confederation  
State Secretariat for Economic Affairs (SECO)  
State Secretariat for Economic Affairs (SECO)  
State Secretariat for Economic Affairs (SECO)

**UK**  
Consolidated list of financial sanctions targets (UK)

**USA**  
US Department of Treasury - Executive orders 13660, 13661, 13662  
US Department of Treasury - Specially Designated Nationals List Updates  
Office of Foreign Assets Control, Changes to list of Specially Designated Nationals and Blocked Persons List

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