Bates Nos. 2018-08-116: 008245 – 008246 Submitter Notice Process Initiated

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FW: Re:Executive Order 13662

From: (b)(6)

To: (b)(6)

Date: Tue, 02 Aug 2016 14:42:56 -0400

(b)(6)

Would you mind handling this inquiry? The only reason I ask is because I remember during a few of our Ukraine meetings we talked about the suspicion of Kalashnikov using a company (or companies) in order to funnel its weapons into the United States.

Thanks. (b)(6)

-----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,

- Nega

- > 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

Bates Nos. 2018-08-116:
008248 - 008249
Pending Consultation
Responses from Department of
State and Other Components of
Treasury

Bates Nos. 2018-08-116: 008250 - 008256 Submitter Notice Process Initiated

Bates No. 2018-08-116: 008257 Pending Consultation Response from a Component of Treasury

Bates Nos. 2018-08-116: 008258 – 008261
Pending Consultation
Responses from Other
Components of Treasury

Bates No. 2018-08-116: 008262 Submitter Notice Process Initiated

OGT Response for UKRAINE-EO13685-2016-326746-1 (Kerch Port)

Attachments: Kerch Port Fee.pdf (976.47 kB); SUE RK Pilot Crimea.pdf (80.01 kB)

From: (b)(6)

To: (b)(6)

Ce: (b)(6)

Date: Thu, 17 Nov 2016 10:27:36 -0500

Good morning all,

This email is a follow-up to the request for OGT confirmation on two items involving Kerch Port. To the best of my ability and the information that I have round, there is a fee that ships passing through KEC must pay. Please see page 8 of the attached file "Kerch Port Fee" for evidence behind this determination. This information is from 2014, however, it was the most up-to-date information I was able to locate. Additionally, I am unable to confirm that Pilot Crimea is a subsidiary of SDN Kerch Port. However, I have included a PDF highlighting the origins of Pilot Crimea. Neither of these entities came up when I conducted a search on the Dun and Bradstreet website.

I hope this information provides clarity in your decision, but please let me know if there is anything else I can do to help. I will be out of the office starting early this afternoon through all of next week, but will be back on Monday November 28 to help with anything further.

Best regards,

(b)(6)





P & I REVIEW – UKRAINE Presented by Adv. Pavel Svertilov Manager of CIS PandI Services Ltd, Ukraine

Ukraine, 2014

CONTENT

- **1.** Situation at Ukrainian ports and status of Crimean ports, specifically at the port of Kerch. Recommendations of P&I Correspondent.
- 2. International sanctions due to political situation in Ukraine: Legal aspects and P&I Correspondent recommendations.
- **3.** Handling of personal injury claims in Ukraine: Beware of fraudulent PEME certificate. P&I Correspondent recommendations.
- **4.** Changes to the order of port inward clearance cancellation of ecological declaration: problem remains.
- 5. Grain cargo operations at Ukrainian ports: Beware of un-welcomed guests.



1. Situation at Ukrainian ports and status of Crimean ports, specifically at the port of Kerch. P&I Correspondent recommendations.

Despite political turmoil, which took place in Ukraine during spring-summer 2014, the situation in Ukrainian ports is stable and calm. Ukrainian ports, such as: Odessa, Ilychevsk, Yuzhny, Kherson, Dneprobugsky, Nikolayev, Berdyansk, Izmail, and Octoyabrsk are trouble-free and working in the usual regime. Ukrainian port administrations and private terminals located at the port areas have increased the security measures at the ports, therefore in order to get an access to the port terminals appropriate passes for surveyors should be arranged by means of sending 2 days advance notice to the port and immigration authorities.

The situation in the East of Ukraine is more severe. The anti-terrorist operation of the Ukrainian army is still in progress but to a lesser extent since October 2014, when active military actions have been stopped and now the situation is a "frozen conflict". Parts of the Donetsk and Lugansk regions are under control of the anti-government forces, resulting in disturbances.

There are no limitations for transport entering Ukraine except on the territories under control of the separatists. There is a high risk of confiscation of cars, property and cargo as well as threats for life and health of drivers and other involved personnel. Due to these reasons forwarders refuse to arrange cargo and container deliveries in the territories under control of armed separatists. Thus, serious problems with cargo logistic take place in the East part of Ukraine.



Situation in the East of Ukraine - Map of territory of the anti-terrorists operation: Brown color – territory under control of separatists. Blue and Yellow color – territory of Donetsk and Lugansk regions under control of Ukraine.



Map of Ukraine:

White color – annexed territory of Crimea, Red color – territory under control of separatists, Blue color – territory under demonstrations. Yellow under control of Ukrainian government.



The closest port to the so-called "neutral interim zone", which divided Ukrainian army and anti-government forces, is the port of Mariupol at Azov Sea (Donetsk region). The Port is safe and working in the usual manner. There are no restrictions or limitations for the crew of any nationality and shore passes are issued in the normal way. However on the outskirts of the city sometimes shooting takes place, mostly at night time. Therefore due to potential threats of violence and attacks of uncontrolled armed groups on the East of Ukraine, we recommend that the crew do not leave the vessels during berthing at Mariupol.

Port of Mariupol: Port is working in the usual manner and in full capacity.









SITUATION IN CRIMEAN PORTS

Since 18, March 2014 the self-proclaimed Republic of Crimea is annexed to the Russian Federation under the name Republic of Crimea and Sevastopol. The Annexation of Crimea and Sevastopol city as an integral part of the territory of Ukraine was not acknowledged by the international community; The EU and USA have imposed a significant range of economic and political sanctions on Russian officials and legal entities.

All Crimean marine ports (Kerch, Sevastopol, Yalta, Evpatoria, Theodosia (or Feodosia), are considered as ports located on the temporarily occupied territories with a disputable and unclear legal status.

Needless to say that the disputable status of the ports, entails negative consequences for the commercial activity and a significant reduction of ship calls. There is also a decrease of main cargoes operated by the Crimean ports, such as steel products, grain and mineral oil exports. About 90% of cargoes to the Crimean ports were supplied or were delivered in transit by railway from the mainland of Ukraine. Crimean ports handled about 7,5% of the entire Ukraine ports activity in 2013 overall results. As Crimean crisis continued to be in progress the ports of Crimean peninsula lost connection with their main continental suppliers. Ukraine also closed its checkpoints in Crimean ports making it impossible to import cargoes via Crimea.

It is foreseen that that current trend of Crimean ports will be reorientated on Russian cargoes. Sevastopol port does not operate in full capacity due to lack of cargo from Ukraine. Port Kerch is working mainly with Russian cargoes.

The situation is stable in the port and port administration works under Russian jurisdiction even at the anchorage. The port of Sevastopol will become a Russian military base. Ports of Yalta and Kerch will be reoriented also for receiving cargoes needed for maintenance of vital activity in Crimea. As declared by Crimean self-proclaimed government ports of Evpatoria and Theodosia will be closed.

After the annexation of Crimea, Ukrainian export cargo was reoriented on the Ukrainian ports and mainly distributed between Mariupol, Ilyichevsk, Nikolayev, Odessa, Yuzhny, etc.

Ukraine has signed the range of international documents (UNO Convention on the Law of the Sea, SOLAS Convention etc.) which obligate the country to provide safety of navigation within its borders. Thus, due to the fact of annexing of Crimea and the confiscation of Ukrainian state property in Crimean ports, pilot stations, hydrographic marine equipment, Harbour Masters' offices, the Ukrainian government officially announced to the IMO Secretariat that Ukraine, is unable to fulfill international obligations for safety of navigation in Crimean ports and cannot guarantee the safety of life of crewmembers and safety of vessels calling at the Crimean ports. The Ministry of Infrastructure of Ukraine declared that Ukraine, is not responsible anymore for observance of international liability in Crimean ports. Relevant notification of Ministry of Infrastructure of Ukraine via the Ministry of Foreign Affairs of Ukraine has been passed to IMO Secretariat on 20, May 2014.



Port of Kerch

In Kerch, loading of cargo (oil, grain) is carried out at the anchorage, far from the shore. Ships at this anchorage do not obtain "free practique", so they are not cleared by the Immigration, Customs and Sanitary authorities. Thus, formally it is considered that they do not call Kerch port and do not enter the Crimean annexing territory.

At least neither port's registries nor ships' logs bear any official information/notes about any ships' calls at the port. Such practice had developed long before the annexation of Crimea. Therefore at present ships under loading operation at the anchorage of the Kerch port were not entered in the special list of the Ukrainian authorities as vessel contradicting the status of temporarily occupied territory established by Ukrainian Law.

It should be noted however that since Russian federation considers 12 mile as territorial waters, ship's calling Kerch anchorage (about 4 miles from shore), may still be considered by Ukraine as black listed.



Chart of Kerch-Yenikkale channel with yellow line is a limitation on a waterway (ex-state border) between Russian and Ukrainian (Crimean) parts

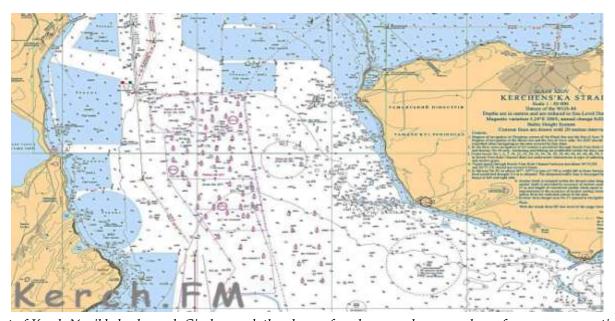


Chart of Kerch-Yenikkale channel: Circles mark the places of anchorage where vessels perform cargo operations.



Legal aspects of sanctions that may impact cargo transport

The EU has implemented EU Council Decision 2014/386/CFSP and Council Regulation 692/2014 dated 23 June 2014 to impose the following sanctions:

- 1. A ban taking effect from 25 June 2014 against the import into the EU of goods originating from Crimea or Sevastopol;
- 2. A ban on the direct or indirect provision of financing or financial assistance, as well as insurance and reinsurance services relating to the import of goods originating from Crimea or Sevastopol.

There is an exemption for goods which the Ukrainian authorities have confirmed that they originate from Ukraine and there is a provision allowing for execution (until 26 September 2014) of trade contracts concluded before 25 June 2014 and ancillary contracts necessary for their execution is permitted. Those seeking to perform obligations under such contracts will need to comply with the relevant notification requirements i.e. 10 days advance notice to the competent authority of the Member State.

For the insurance sector it is prohibited to provide the insurance and reinsurance services for the following persons and companies.

Current list of sanctions include 3 levels (against persons and against companies):

The 1st level is introduced in March entered into legal force 17/03/2104 and extended on 18/04/2104, (2nd level);

After official annexing of Crimea and the escalation of military conflict the second level of sanctions have been applied.

Sanctions shared on sanctions imposed against persons and entities connected with the occupation of Crimea includes (lists of EU and

USA are almost identical): Plus 17 entities have been added as designated parties. These include, but are not limited to, banks, construction companies, transportation companies and holding companies.

Main aims of the sanctions:

To block assets, estates located in EU countries as well as the USA, Canada, Australia and Japan. These sanctions include a ban for providing insurance and reinsurance services.

For airlines: to close EU/USA airports and sky space for the airlines which make flights to the occupied Crimea (Dobrolet airlines, etc.) and provide the insurance and reinsurance services;

To put a restriction on the cooperation in high-tech sectors of Russian economy which import a significant part of their equipment for military, oil and gas sectors abroad.

Key individuals – Russian officials under the sanctions: Mr. Belavencev Oleg Evgenyevich, Mr. Chemezov Sergei Viktorovich, Mr. Kozak Dmitry, Mr. Murov Evgeniy Alekseyevich, Mr. Pushkov Aleksei Konstantinovich, Mr. Sechin Igor, Volodin Vyacheslav, Mr. Fradkov Michail, Mr. Kadyrov Ramzan, Mr. Patryshev Nikolai, Mr. Bortnikov Aleksandr, Mr. Nurgaliev Rashid, Mr. Gryzlov Boris, Mr. Beseda Sergei, Mr. Degtyarov Mikhail, Mr. Tkachyov Aleksandr, Mr. Gubarev Pavel, Mrs. Gubareva Ekaterina, Mr. Fedor Berezin, Mr. Kaurov Valeriy, Mr. Zdriliuk Sergei, Mr. Antyfeyev Vladimir.

Moreover sanctions imposed on Crimean officials (President of Crimea Mr. Sergey Aksenov, Head of Crimean Parliament - Mr. Konstantinov, Ex-Major of Sevastopol, Mr. Chalyy, and Prosecutor of Crimea - Ms Natalia Poclonskaya) and also Ukrainian ex-officials commenced with ex-President Viktor Yanukovich.



Entities' List under the sanctions

AQUANIKA (a.k.a. AQUANIKA LLC; a.k.a. LLC RUSSKOYE VREMYA; a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU RUSSKOE VREMYA; a.k.a. RUSSKOE VREMYA OOO; a.k.a. RUSSKOYE VREMYA LLC), 47A, Sevastopolskiy Ave., of. 304, Moscow 117186, Russia; 1/2 Rodnikovaya ul., Savasleika s., Kulebakski raion, Nizhegorodskaya oblast 607007, Russia, Registration ID 1075247000036; AVIA GROUP LLC (a.k.a. AVIA GROUP LTD), Terminal Aeroport Sheremetyevo Khimki, 141400 Moskovskaya obl., Russia; AVIA GROUP NORD LLC, 17 A, Stratoyava St., Saint Petersburg, Russia; CJSC ZEST (a.k.a. ZEST LEASING), pr. Medikov 5, of. 301, St. Petersburg, Russia; 2 Liter a Pl. Rastrelli, St. Petersburg 191124, Russia; Registration ID 1027809190507; INVESTCAPITALBANK a.k.a .INVESTKAPITALBANK; a.k.a. OJSC INVESTCAPITALBANK; a.k.a. OPEN JOINT STOCK COMPANY INVESTCAPITALBANK), 100/1, Dostoevskogo Street, Ufa, Bashkortostan Republic 450077, Russia; SWIFT/BIC INAKRU41; JSB SOBINBANK (a.k.a. SOBINBANK), 15 Korp. 56 D. 4 Etazh ul. Rochdelskaya, Moscow 123022, Russia; 15/56 Rochdelskaya Street, Moscow 123022, Russia; SWIFT/BIC SBBARUMM; Registration ID 1027739051009; SAKHATRANS LLC (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU SAKHA (YAKUTSKAYA) TRANSPORTNAYA KOMPANIYA; a.k.a. SAKHATRANS OOO), 14 ul. Molodezhnaya Rabochi Pos. Vanino, 682860 Vaninski, Raion Khabarovski Krai, Russia; (a.k.a. **SEVERNY** SMP **BANK BANK** MORSKOY PUT; a.k.a. SMP BANK OPEN JOINT-STOCK COMPANY), 71/11 Sadovnicheskaya Street, Moscow 115035, Russia; SWIFT/BIC SMBKRUMM;

STROYGAZMONTAZH (a.k.a. LIMITED LIABILITY COMPANY STROYGAZMONTAZH; a.k.a. STROYGAZMONTAZH CORPORATION; a.k.a. "SGM"), 53 prospekt Vernadskogo, Moscow 119415, Russia; STROYTRANSGAZ GROUP (a.k.a. STROYTRANSGAZ; a.k.a. "STG GROUP"), 3 Begovaya Street, Building #1, Moscow 125284, Russia; STROYTRANSGAZ HOLDING (a.k.a. STG HOLDING LIMITED; a.k.a. STG HOLDINGS LIMITED; a.k.a. STROYTRANSGAZ HOLDING LIMITED; a.k.a. "STGH"), 33 Stasinou Street, Office 2 2003, Nicosia Strovolos, Cyprus; **STROYTRANSGAZ** LLC 000 (a.k.a. STROYTRANSGAZ), House 65, Novocheremushkinskaya, Moscow 117418, Russia; STROYTRANSGAZ OJSC (a.k.a. OAO STROYTRANSGAZ), House 58, Novocheremushkinskaya St., Moscow 117418, Russia; STROYTRANSGAZ-M LLC, 26th Meeting of the Communist Party Street, House 2V, Novy Urengoy, Tyumenskaya Oblast, Yamalo-Nenetsky Autonomous Region 629305, Russia; LIMITED LIABILITY **COMPANY** INVESTMENT COMPANY ABROS (a.k.a. LLC IC ABROS), 2 Liter a Pl. Rastrelli, St. Petersburg 191124, Russia; TRANSOIL (a.k.a. LIMITED **COMPANY** LIABILITY TRANSOIL; a.k.a. **OBSHCHESTVO** S **ORGANICHERNNOI** OTVETSTVENNOSTYU TRANSOIL, a.k.a. TRANSOIL LLC; a.k.a. TRANSOYL SNG LTD.), 18A Petrogradskaya nab., St. Petersburg 197046, Russia; Registration ID 1037835069986; VOLGA GROUP (a.k.a. VOLGA GROUP INVESTMENTS; f.k.a. VOLGA RESOURCES; f.k.a. VOLGA RESOURCES GROUP), 3, rue de la Reine L-2418, Luxembourg; Russia.



<u>Sanctions of Level No 3 - most severe</u> <u>level</u>. Introduced on 12/09/2104 by EU Representatives Committee against the Russian companies working in the following sectors of

a) In the oil sector: Rosneft, Transneft, Gaspromneft, Luckoil, Gazprom, Surgutneftegas;

economy, briefly:

- b) In banking sector: Sberbank, VTB, Gazprombank, Vnesheconombank, Rosselkhozbank. It is prohibited to give them credits, financial support, and operation with shares and bonds issued by these banks on the period
- more than 30 days (it is actually most kind of financial bonds).
- c) In military sector: Oboronprom, Uralwagonzavod, United Avia Corporation, Rosstech, Kalashnikov Corp. Sirius, Stankoinstruments, Chemcomposite, Factory of Tula, High-Precise Complexes, Air defense company Almaz-Antey Corp., NPO Bazalt, Technologies of the machine construction.

Their assets abroad are blocked. It is prohibiting supplying the military with technologies and concluding contracts with these Russian military companies, especially it is painful for electronic equipment because all electronic equipment on Russian military products is imported from EU and USA.

On 25 July the EU published Regulation 810/2014. This expanded the list of individuals and entities for whom visa bans and asset blocks have been introduced. Thus, any commercial activity with individuals and legal entities included in the list of sanctions is prohibited: Moreover ports of Crimea also included into the list, such as: State ferry enterprise "Kerch ferry", State company "Sevastopol commercial seaport", State enterprise "Kerch commercial seaport".

We have to point out that in May-June 2014 "Kerch commercial sea port" exerts control over both the Kerch Strait and Kerch Canal, which vessels must use when sailing in transit to and from the Azov Sea. Canal duties for such transits must be paid to the port authority and any party doing so who is subject to EU jurisdiction may therefore technically be in breach of sanctions by paying funds to a legal entity under the sanctions. The EU has confirmed that this issue and the International Group is now seeking urgent clarification from them. For the avoidance of doubt, the Regulation applies:

- within the territory of the Union, including its airspace;
- on board any aircraft or any vessel under the jurisdiction of a Member State;
- to any person inside or outside the territory of the Union who is a national of a Member State;
- to any legal person, entity or body, inside or outside the territory of the Union, which is incorporated or constituted under the law of a Member State;
- * to any legal person, entity or body in respect of any business done in whole or in part within the Union.

Thus, EU and USA banning the import into the EU of goods originating from Crimea.



P&I Correspondents' recommendation

- 1.Owners are advised to check the implications on their insurance arrangements when calling Crimea ports. They should also be aware of the complexity of two rival legal systems (Ukraine holding to its territorial rights, and Russia) affecting the territory of Crimea.
- 2. Vessels calling both Crimea and Ukraine ports should take into consideration probable conflicts with Ukraine laws.
- 3. Shipowners involved in trading activity with Crimea, Ukraine or Russia should take care to comply with the above list of sanctions and undertake the due diligence practice in order to check the status of any individuals and legal entities of the commercial activity in order to prevent involvement into any unlawful trading activity and in case of any doubts/questions immediately to notify P&I Club/P&I Correspondents with the request to assist for avoiding negative consequences of unlawful transactions and possibility further of sanctions in the future.

Handling of personal injury claims in Ukraine

Beware of fraudulent PEME certificate. P&I Correspondents' recommendations.

Handling of personal injury claims are significant part in claims activity of Ukrainian P&I Correspondents due to a significant number of Ukrainian seafarers who are working in the world fleet. Thus, last developments in handling of personal injury claims may affect Shipowners legal position and entail increasing death payments and disability benefits to the claimants due to collision between terms and conditions of applicable CBA and Ukrainian Law.

Ukrainian Law and jurisdiction is quite favorable for claimants of personal injury and death claims. In case of legal dispute, claimants usually approach the local court with request also to issue a resolution to impose the ship's arrest as a security measure.

Local lawyers lodge a claim related to general illness which took place during sea service. Despite of the launching of Clubs' PEME programs in order to reduce the potential unnecessary claims, in the last year we had a growth of claims related with seafarers' general diseases, like cancer, leukemia, stroke, diabetes, heart attacks, and hepatitis. We have to stress that some deceases (cancer, some kinds of hepatitis) cannot be diagnosed during ordinary PEME at the medical clinics and special tests/analysis would be required. Meanwhile local lawyers try to prove that general disease occurred onboard due to hard working conditions, hot or cold weather, not proper medical aid or delay in providing an urgent medical aid to a seafarer, etc. Thus, in such cases Ukrainian Law actually make such deceases equal to an accident, by means of special definition "professional illness/decease", i.e. illness received due to work onboard. Thus, claimant get a right for compensation under Ukrainian Law and local courts are quite favorable to such kind of claims which is settled under Ukrainian Law in the Ukrainian jurisdiction.



We are handling the claim where during our investigation we find that PEME certificate with fit for duty conclusion was fraud (false doctors' signature and clinic's stamp) and seafarer died within first two weeks onboard due to heart Despite of the fact of fraud under attack. Ukrainian Law criminal cases cannot commenced due to the fact of thye death of the suspect person – i.e. seafarer. Thus, in this case the crewing agent did not even check the PEME certificate and did not approach the PEME accredited clinic to discuss the issuance of the PEME certificate. Therefore the deceased's next of kin blamed the crewing agent for issuing a fraud PEME certificate. Thus, all medical documents of the claimants should be checked thoroughly before employment.

We are handling a case where the widow lodged a statement of claim to the local court after signing the Receipt&Release at the manning agent office. However such R&R was signed without involvement of local P&I Correspondent and has been signed at manning agent's office without notarization. All above-mentioned steps entailed lengthy and complicated court litigation with involvement of lawyers from all parties concerned. However if Receipt&Release was signed by the claimant in the presence of the Notary, duly notarized and formally translated into local language, the court will accept the notarized R&Rs as a true and valid evidence of claim settlement and Shipowner was not involved into the proceedings at the court.

P&I Correspondents' recommendations:

- 1. To instruct local P&I Correspondents to keep a permanent contact with the next of kin or injured seafarer, to discuss seafarer's health conditions and prospects of recovery with the attending doctor or in case of any doubts to get an alternative medical advice from an independent medical consultants.
- 2. To monitor constantly the medical costs as per supporting vouchers and obtain medical updates regularly, to require and check the seafarer's PEME certificate, to liaise with PEME accredited clinic and discus the seafarer's heath condition with PEME accredited clinic/doctors and check seafarer's medical history and medical records and analysis results and send outcome of perusal to the Club/Shipowner;
- 3. Clearly explain to the claimants the Owners/Club's legal position regarding to the claim settlement. Do not lose the proper contact with the claimants/their lawyers because losing of contact entail to a negative effect as sudden ship's arrest. To propose claimants to mitigate the amount of claim if there are legal grounds for reducing the claim amount and explain it to the claimant in due course. It is clear that for such steps Shipowners/Club approval must be given in advance.
- 4. In case of settlement the significant death claims to request and arrange the signing/certifying of The Statement of Receipt & Release by a Notary Office in order to avoid any claims in tort, and/or third parties claims due to validity and binding notarization form of The Statement of Receipt&Release for Ukrainian courts.



Changes in the order of port inward clearance – cancellation of ecological declaration: problem remains.

As owners and P&I clubs are well aware, Strict Ukrainian ballast regulations, obligatory state ecologists' permission for de-ballasting operation before commencement the loading and obligatory completion of the ecological declaration by ship's administration with quantity of ballast onboard caused problems for Shipowners and entail negative consequences, such as delay in commencement the loading, administrative fine on Master and Chief Engineer for incorrect or incomplete records in ecological declaration and even delay in ship's sailing and off hire disputes.

Under the Ukrainian Law The State Ecological Inspection has the right to demand from captains of ecological declaration's presentation, taking a ballast water samples or forbidding its deballasting until the receiving of lab. analysis's results. All these powers of ecological inspectors led to ships' detention for quite significant time. It, in turn, caused unreasonable financial losses.

On 08, October 2014 Ukrainian government adopted changes and amendments to the Order No 204 dated 08/09/1999 "On approval of the regulations of ecological control at check-points through state borders and in areas of activity of regional custom houses and customs".

The regulation Enclosure 5 – "ship's ecological declaration" was postponed. We remind that as per ship's ecological declaration the quantity of ballast onboard, bilge waters, quantity of water to be de-ballasted, tanks' capacity should be indicated.

Thus, to submit the ecological declaration to the state ecological inspectors with exact quantity of ballast onboard and quantity of water to be deballasted is not obligatory. Despite of the situation that state ecologists continue to impose the fine for de-ballasting or try to make some unofficial deals "in spec" with the masters via the agents, adopting the above-mentioned Laws means that there is a chance that the situation with the ballast water in Ukrainian ports will be improved.

It is expected that in the very near future the ship's ecological declaration as obligatory documents for port inward clearance will be cancelled finally and simplify the procedure of settlement port inward formalities for vessels and ecologists' permission for de-ballasting would not be required..



Grain cargo operations at Ukrainian ports: Beware of un-welcomed guests.

Ukrainian ports operating with a significant grain cargo turnover, mostly stored at port silos or grain terminals designated for grain storage and transshipment onboard the vessels. The grain cargo is stored inside closed warehouse equipped with inlet/outlet grids (of small cells) on belt conveyor. During the loading the cargo goes though the closed belt conveyor and load by means of loading pipe. The terminal and port silo has the protective covers in order to protect cargo from elements and foreign matters. Nevertheless we investigated incidents where dead pigeons were found at the cargo compartment inside a parcel of grain loaded onboard and found dead at the discharge port. It entailed a claim from the receivers and problem with sanitary authorities at the port of discharge.

During investigation our surveyor revealed that flat storage port warehouse had two main entrances with doors located at both ends of the w/h compartment. When filling the compartment with grain additional wooden bars are installed in the doors which enable corps of dead pigeons pass through the protecting metal grids of loading pipe and contaminate the cargo.

In order to overcome the above-mentioned problems we recommend the following steps for the proper defense of the Shipowners.



Cargo of grain on the storage site at the grain terminal.



Size check of flap's grid at the grain terminal



Dead pigeons found at grain cargo at cargo compartment of the vessel at discharge port.



P&I Correspondents' recommendations:

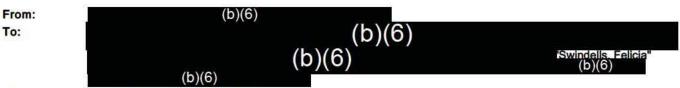
- Instruct P&I Correspondents to appoint a surveyor to supervise the loading of grain.
- Make visual inspection of the cargo in a storage site and during the process of loading immediately stop the loading if during the operation any foreign matters inside of the cargo are be found;
- Collect evidences relating to the cargo contamination, photographic record, photo-report will be necessary to assist in the evaluation of the situation and verification of the actual cargo condition which should be forwarded to the Shipowners/Club by P&I Correspondents without any delay.
- If it is suspected that cargo has foreign matters or threats of cargo contamination the P&I surveyor should recommend to the Master to keep Owners/Managers duly informed, stop loading and arrange screening of the cargo by sifter or other available means. The P&I surveyor should be onboard constantly in order to monitor the loading operations and assist the Master until the loading is completed.

This newsletter is based on our practical experience in the recent year. We hope that you will find it useful. The content of this newsletter is not a legal advice and should not be constructed as such because every case has its own features and ways of solution. You could contact CIS PANDI Services (Ukraine) Ltd for any assistance if necessary.

Odessa 10/2014

Bates Nos. 2018-08-116: 008277 – 008278 Pending Consultation Response from Department of State

FW: Records search request for FOIA case 2017-01-114 from Michael Elsner, Motley Rice LLC



Date: Tue, 09 May 2017 12:11:54 -0400

Attachments: 2017-01-114 initial request.pdf (416.17 kB); 2017-01-114 Modified request_041217.pdf (96.02 kB); Consolidated

language of modified request_041217.docx (17.09 kB)

Policy team, this request was sent out earlier from the OFAC/FOIA team and the Policy POC was unfortunately not included, therefore, a new due date has been established.

FOIA # 2017-01-114

DUE DATE: 05-16-17

OFAC has received a FOIA request concerning the following: (See email below)

Please provide your negative or positive response including the following required information:

NAME

EMPLOYEE GRADE LEVEL

OF HOURS SEARCHED

SYSTEMS SEARCHED (OASIS, ABBARS, TSDN, TFIN OR OTHERS)

FILES SEARCHED

SEARCH TERMS USED

EMAILS LOCATED (YES OR NO)

OF PAGES OR DISC FOUND

OF PAGES PENDING SEARCH

(In the event extensive records have been located)

RESULTS



Subject: Records search request for FOIA case 2017-01-114 from Michael Elsner, Motley Rice LLC

Good morning!

OFAC received a FOIA request from Michael Elsner of Motley Rice LLC, assigned FOIA No. 2017-01-114. Mr. Elsner has modified his request to seek the following:

All Department of Treasury (DOT) documents concerning the basis and reasons for Executive Order 13662 and the Treasury
Department's decision to include Sberbank of Russia along with the various Sberbank entities listed below in Directive 1 of the
Sectoral Sanctions Identification List. The requester does not seek any of the documents obtained by Treasury as a result of any
person or entity seeking to engage in banking services prohibited by Executive Order 13662 concerning Sberbank or its related
companies.

BPS Sberbank, JSC Sberbank of Russia, JSC Sberbank-Automated System for Trading, Non-State Pension Fund of Sberbank, SB Sberbank JSC, Sberbank Switzerland, Sberbank Capital LLC, Sberbank Europe AG, Sberbank Finance Company Limited Liability Company, Sberbank Insurance Broker Limited Liability Company, Sberbank Insurance Company Ltd, Sberbank Investments LLC, Sberbank Leasing CJSC, Sberbank Technologies Closed Joint Stock Company.

NOTE: We have interpreted the scope of item 1 in line with the initial request, where Sberbank and the Sberbank

entities identified by the requester are the subjects of this portion of the request.

- 2. Any information OFAC possesses regarding financial transactions involving a subset of individuals/entities identified by the requester which were added to the SDN List on July 16, 2014 or December 19, 2014. See modified request for list.
- 3. All DOT documents related to those entities and individuals who were involved in the financing of those who brought down Malaysian Airlines Flight 17 on July 17, 2014.
- 4. The evidentiary packages for the subset of individuals and entities, identified by the requester, and sanctioned by the DOT on July 16, 2014 and December 19, 2014 pursuant to Executive Order (E.O.) 13660 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. See modified request for list.

The OFAC FOIA Office has tasked the **Deputy Director**, **Eastern Hemisphere (EHM)**, **Sanctions Compliance and Evaluation (SCE)**, **Enforcement**, and **Policy** with search, seeking a search response by COB on **May 23, 2017**. (We will task Director John Smith with search at a later date.)

If any of the following are true, please let us know by email with details ASAP:

- If you believe that another component of OFAC has records responsive to this request.
- If there are issues with the subject of the request.
- If there are sensitive issues (national security, investigative or business sensitive) that everyone tasked with the search needs to discuss.
- If there are ways to narrow the scope of the request (by time, by program, by wording).

If you have any questions, please feel free to give me a call or send me an email.

Thank you,

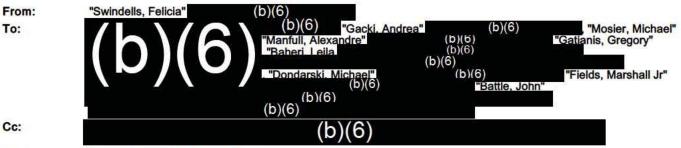
(b)(6)

FOIA Admin
Information Disclosure and Records Management Division
Office of Resource Management
Office of Foreign Assets Control
U.S. Department of the Treasury

(b)(6)

2018-08-116: 008280

RE: Records search request for FOIA case 2017-01-114 from Michael Elsner, Motley Rice LLC



Date: Tue, 09 May 2017 13:05:48 -0400

Attachments: 2017-01-114 initial request.pdf (416.17 kB); 2017-01-114 Modified request_041217.pdf (96.02 kB); Consolidated

language of modified request_041217.docx (17.09 kB)

who covered Russia for OFAC Policy in 2014. Also, someone will need to search Sean Kane's records since he is gone but started covering Russia issues when (b)(6) moved to the Front Office.

From: (b)(6)
Sent: Tuesday, May 09, 2017 11:36 AM
To: Gacki, Andrea; Mosier, Michael; Manfull, Alexandre; Gatjanis, Gregory: Baheri, Leila; (b)(6)
Dondarski, Michael; Swindells, Felicia; Fields, Marshall Jr; (b)(6)

Cc; (b)(6)

Subject: Records search request for FOIA case 2017-01-114 from Michael Elsner, Motley Rice LLC

Good morning!

OFAC received a FOIA request from Michael Elsner of Motley Rice LLC, assigned FOIA No. 2017-01-114. Mr. Elsner has modified his request to seek the following:

All Department of Treasury (DOT) documents concerning the basis and reasons for Executive Order 13662 and the Treasury
Department's decision to include Sberbank of Russia along with the various Sberbank entities listed below in Directive 1 of the
Sectoral Sanctions Identification List. The requester does not seek any of the documents obtained by Treasury as a result of any
person or entity seeking to engage in banking services prohibited by Executive Order 13662 concerning Sberbank or its related
companies.

BPS Sberbank, JSC Sberbank of Russia, JSC Sberbank-Automated System for Trading, Non-State Pension Fund of Sberbank, SB Sberbank JSC, Sberbank Switzerland, Sberbank Capital LLC, Sberbank Europe AG, Sberbank Finance Company Limited Liability Company, Sberbank Insurance Broker Limited Liability Company, Sberbank Insurance Company Ltd, Sberbank Investments LLC, Sberbank Leasing CJSC, Sberbank Technologies Closed Joint Stock Company.

NOTE: We have interpreted the scope of item 1 in line with the initial request, where Sberbank and the Sberbank entities identified by the requester are the subjects of this portion of the request.

- 2. Any information OFAC possesses regarding financial transactions involving a subset of individuals/entities identified by the requester which were added to the SDN List on July 16, 2014 or December 19, 2014. See modified request for list.
- All DOT documents related to those entities and individuals who were involved in the financing of those who brought down Malaysian Airlines Flight 17 on July 17, 2014.
- 4. The evidentiary packages for the subset of individuals and entities, identified by the requester, and sanctioned by the DOT on July 16, 2014 and December 19, 2014 pursuant to Executive Order (E.O.) 13660 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. See modified request for list.

The OFAC FOIA Office has tasked the Deputy Director, Eastern Hemisphere (EHM), Sanctions Compliance and Evaluation (SCE), Enforcement, and Policy with search, seeking a search response by COB on May 23, 2017. (We will task Director John Smith with search at a later date.)

If any of the following are true, please let us know by email with details ASAP:

- If you believe that another component of OFAC has records responsive to this request.
- If there are issues with the subject of the request.

- If there are sensitive issues (national security, investigative or business sensitive) that everyone tasked with the search needs to discuss.
- If there are ways to narrow the scope of the request (by time, by program, by wording).

If you have any questions, please feel free to give me a call or send me an email.

Thank you,

(b)(6)

FOIA Admin
Information Disclosure and Records Management Division
Office of Resource Management
Office of Foreign Assets Control
U.S. Department of the Treasury
(b)(6)

2018-08-116: 008282



www.motleyrice.com

"I will stand for my allent's rights. I am a trial lawyer," -Ron Motley (1944-2013) 28 Bridgeside Blvd. .Mt. Pleasant, SC 29464 o. 843.216.9000 f. 843.216.9450

> Michael E. Elsner Licensed in NY, SC, VA direct; 843,216,9250 melsner@motleyrice.com

December 14, 2016

Via U.S. Mail

Ryan Law Director, FOIA and Transparency 1500 Pennsylvania Avenue, NW Washington, D.C. 20220

Dear Mr. Law:

I represent victims of the Malaysia Airlines Flight 17 that was downed by Russian separatist groups on July 17, 2014. Pursuant to the Freedom of Information Act, 5 USC § 552, I hereby urgently request the following:

- All Department of Treasury (DOT) documents concerning Sberbank of Russia, which was sanctioned by the DOT September 12, 2014, and entities linked to Sberbank of Russia, which were later sanctioned by DOT on December 19, 2014; Copies of the sanctions are attached hereto as Exhibit 1.
- Any information DOT possesses regarding Sberbank debit cards or other financial transactions occurring through the bank which are associated with individuals or entities sanctioned on July 14, 2014, September 12, 2014 and December 19, 2014 for violating the sovereignty and territorial integrity of the Ukraine or Crimea;
- 3. All DOT documents related to the downing Malaysian Airlines Flight 17 on July 17, 2014; and
- 4. All DOT documents concerning the individuals and entities sanctioned by the DOT on July 16, 2014 and December 19, 2014 pursuant to Executive Order (E.O.) 13660 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."

I attached hereto copies of the sanctions referred to above for your quick and easy reference.

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Department of Treasury FOIA Request December 14, 2016 Re: FOIA Request Page 2

If you deny all or part of this request, please cite the specific exemptions you believe justify your refusal to release the information and notify me of your appeal procedures available under law. In excising material, please "black out" rather than "white out" or "cut out." Please respond to this request within 20 working days as provided for by law.

I agree to pay whatever fees are incurred to complete this request. However, I request that prior to your incurring any fees in excess of \$1,000.00 that I be advised of the total estimate. Should you have any questions regarding this request, please contact me.

Thank you for your consideration in this matter.



U.S. DEPARTMENT OF THE TREASURY

Resource Center



Ukraine-related Sanctions; Publication of Executive Order 13662 Sectoral Sanctions Identifications List

7/16/201

Amendment to the 7/16/2014 announcement (made on 7/21/2014):

On 7/16/2014 OFAC also released Ukraine General License Number 1 | ½: - Authorizing Certain Transactions Related to Derivatives under Directive 1 and 2 of Executive Order 13662.

Today, OFAC is introducing the Sectoral Sanctions Identifications Ust to Identify persons operating in sectors of the Russian economy Identified by the Secretary of the Treasury pursuant to Executive Order 13662. Directives found within the first describe prohibitions on dealings with the persons identified.

Please see the following frequently asked questions for more information on sectoral sanctions.

Specially Designated Nationals List Update

In addition, the following individuals have been added to OFAC's SDN List:

BESEDA, Sergey (a.k.a. BESEDA, Sergel; a.k.a. BESEDA, Sergel Orestovoch); DOB 1954; Commander of the Fifth Service of the FSB; Commander of the Service for Operational Information and International Communications of the FSB; FSB Colonel General; Colonel-General (Individual) (UKRAINEZ).

BORODAI, Aleksandr (a.k.a. BORODAI, Alexander); DOB 25 Jul 1972; nationality Russia (individual) [UKRAINE].

NEVEROV, Sergel Ivanovich (a.k.a. NEVEROV, Sergel; a.k.a. NEVEROV, Sergey); DOB 21 Dec 1961; POB Tashtagol, Russla; Deputy Chairman of the State Duma of the Russlan Federation; Member of the State Duma Committee on Housing Poëcy and Housing and Communal Services (individual) [UKRAINE2].

SAVELYEV, Oleg Gearkhovich; DOB 27 Oct 1965; POB St. Petersburg, Russia; Minister for Crimean Affairs (individual) [UKRAINE2].

SHCHEGOLEV, Igor (a.k.a. SHCHYOGOLEV, Igor Olegovich): DOB 10 Nov 1955; POB Vinnitsa, Ukraine; alt. POB Vinnytsia, Ukraine; Aide to the President of the Russian Federation (individual) (UKRAINE2).

The following entities have been added to OFAC's SDN List;

DONETSK PEOPLE'S REPUBLIC, Oonetsk Region, Ukraine [UKRAINE].

FEDERAL STATE UNITARY ENTERPRISE STATE RESEARCH AND PRODUCTION ENTERPRISE BAZALT (a.k.a. FEDERAL STATE UNITARY ENTERPRISE, STATE RESEARCH AND PRODUCTION ENTERPRISE BAZALT; a.k.a. FIATE RESEARCH AND PRODUCTION ENTERPRISE BAZALT), 32 k.k.a. FSUE SRPE BAZALT), 32 K.A. STATE RESEARCH AND PRODUCTION ENTERPRISE BAZALT), 32 Velyaminovskaya, Moscow 105318, Russle; Websia www.bazalt.ur; Email Address moscow@bazalt.ur [URRAINE2].

FEODOSIYA ENTERPRISE (a.k.a. FEODOSIA OIL PRODUCTS SUPPLY CO.; a.k.a. FEODOSIYA ENTERPRISE ON PROVIDING OIL PRODUCTS; a.k.a. FEODOSIYSKE COMPANY FOR THE OIL; a.k.a. THEODOSIYA OIL TERMINAL), Feodosiya, Geologicheskaya str. 2, Crimea 98107, Ukra/ne; Feodosia, Str. Geological 2, Crimea 98107, Ukra/ne; Ukra/ne; Directoria (UKRA/INE).

JOINT STOCK COMPANY CONCERN RADIO-ELECTRONIC TECHNOLOGIES (a.k.a. CONCERN RADIO-ELECTRONIC TECHNOLOGIES; a.k.a. "KRET"), 20/1 Korp. 1 ul. Gorichamaya, Moscow 109240, Russia; Websita http://www.kret.com; Registration ID 1097746084666 [UKRAINE2].

JOINT STOCK COMPANY CONCERN SOZVEZDIE (a.k.a. JSC CONCERN SOZVEZDIE), 14 Ptekhanovskaya Street, Voronezh, Russia; 14 ul. Ptekhanovskaya, Voronezh, Votonezhskaya obl. 394018, Russia; Registration (D 1053600445337 (UKRAINEZ).

JOINT STOCK COMPANY MILITARY INDUSTRIAL CORPORATION NPO MASHINOSTROYENIA (a.k.a. JOINT STOCK COMPANY MILITARY INDUSTRIAL CORSORTIUM NPO MASHINOSTROYENIA; a.k.a. JSC MIC MPO MASHINOSTROYENIA; a.k.a. JSC MIC MPO MASHINOSTROYENIA; a.k.a. MILITARY INDUSTRIAL CORPORATION NPO MASHINOSTROYENIA OAO; a.k.a. OPEN JOINT STOCK COMPANY MILITARY INDUSTRIAL CORPORATION SCIENTIFIC AND PRODUCTION MACHINE BUILDING ASSOCIATION; a.k.a. VOENNO-PROMYSHLENNAYA KORPORATSIYA NAUCHNO-PROIZVODSTVENNOE-OBEDINENIE MASHINOSTROENIYA OAO; a.k.a. VPK NPO MASHINOSTROENIYA), 33, Gagarina St., Reutovtown, Moscow Region 143966, Russia; 33 Gagarin Street, Reutov, Moscow Region 143966, Russia; 33 Gagarina vi., Routov, Moskovskaya obi 143966, Russia; Websile www.npomash.ru; Emial Address export@npomash.ru; alt. Email Address vpk@npomash.ru; Registration ID 4075012001492 (Russia), Tax ID No. 5012039795 (Russia); Government Gazette Number 07501739 (Russia) [UKRAINE2].

JOINT-STOCK COMPANY CONCERN ALMAZ-ANTEY (a.k.a. ALMAZ-ANTEY CORP; a.k.a. ALMAZ-ANTEY DEFENSE CORPORATION; a.k.a. ALMAZ-ANTEY JSC; f.k.a. OTKRYTGE AKTSIONERNOE OBSHCHESTVO KONTSERN PVO ALMAZ ANTEI), 41 ul.Vereiskaya, Moscow 121471, Russia; Website a'maz-antey.ru; Email Address antey@almaz-antey.ru (UKRAINEZ).

KALASHNIKOV CONCERN (a.k.a. CONCERN KALASHNIKOV; a.k.a. IZHEVSKIY MASHINOSTROITEL'NYI ZAVOD OAO; f.k.a. IZHMASH RAD CENTER; f.k.a. JSC NPO IZHMASH; f.k.a. NPO IZHMASH OAO; a.k.a. OJSC CONCERN KALASHNIKOV; f.k.a. OJSC IZHMASH; f.k.a. SCIENTIFIC PRODUCTION ASSOCIATION IZHMASH JOINT STOCK COMPANY), 3, Derjabin Pr., Izhevsk, Udmurt Republic 426008, Russia; Registration ID 1111832003018 (UKRAINEZ).

https://www.treasurv.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20140716... 12/14/2016

KONSTRUKTORSKOE BYURO PRIBOROSTROENIYA OTKRYTOE AKTSIONERNOE OBSHCHESTVO (a.k.a. INSTRUMENT DESIGN BUREAU; a.k.a. JSC KBP INSTRUMENT OESIGN BUREAU; a.k.a. KBP INSTRUMENT DESIGN BUREAU; a.k.a. KBP INSTRUMENT DESIGN BUREAU JOINT STOCK COMPANY; a.k.a. "KBP OAO"), 59 Shcheglowskaya Zaseka ul., Tula 300001, Russia; Websita www.kbptula.ru; Email Address kökedr@fula.net; Registration ID 1117154036911 (Russia); Government Gazette Number 07515747 (Russia) (UKRAINEZ).

ŁUHANSK PEOPLE'S REPUBLIC (a.k.a. LUGANSK PEOPLE'S REPUBLIC; a.k.a. PEOPLE'S REPUBLIC OF LUHANSK), Lubansk Region, Ukraine ĮUKRAINEJ.

URALVAGONZAVOD (a.k.a. NAUCHNO-PROIZVODSTVENNAYA KORPORATSIYA URALVAGONZAVOD OAO; a.k.a. NPK URALVAGONZAVOD; a.k.a. NPK URALVAGONZAVOD; a.k.a. RESEARCH AND PRODUCTION CORPORATION URALVAGONZAVOD; a.k.a. RESEARCH AND PRODUCTION CORPORATION URALVAGONZAVOD; a.k.a. RESEARCH AND PRODUCTION CORPORATION URALVAGONZAVOD (a.k.a. URALVAGONZAVOD); a.k.a. "UVZ"), 28, Vostochnoye shosse, Nizhni Tagil, Sverdlovsk region 622007, Russia; 28 Vostochnoye shosse, Nizhni Tagil, Sverdlovsk yay objast 622007, Russia; 40, Boʻshaya Yakimanka Street, Moscow 119049, Russia; Vistochnoye Shosse, 28, Nizhny Tagil 622007, Russia; Website http://www.uvz.ru; alt. Website bitp://uravagonzavod.com/. Email Address web@uvz.ru (URRAINES).

Sectoral Sanctions Identifications List Update

The following entitles have been added to OFAC's Sectoral Sanctions Identifications List:

GAZPROMBANK OAO (a.k.a. GAZPROMBANK GAS INDUSTRY OJSC; a.k.a. GAZPROMBANK OJSC; a.k.a. GAZPROMBANK OPEN JOINT STOCK COMPANY; a.k.a. GAZPROMBANK OTKRYTOE AKTSIONERNOE OBSHCHESTVO; a.k.a. GPB, OAO; a.k.a. GPB, OJSC), 16, Building 1, Namelliana St., Moscow 117420, Russia; 63, Novocheremushkinskaya St., Moscow 117418, Russia; SWIFT/BIC GAZPRUMM; Website www.gazprombank.ru; Email Address mailbox@gazprombank.ru; Registration 10 1027700187110; Tax IO No. 7744001497; Government Gazette Number 09807884 FUKRAINE-EO13882).

OAO NOVATEK (a.k.a. FINANSOVO-INVESTITSIONNAYA KOMPANIYA NOVAFININVEST OAO; a.k.a. NOVATEK), 2, Udalisova Street, Moscow 119416, Russla; 22 A, Pobedy Street, Tarko-Sale, Yamalo-Nenets Autonomous District 629580, Russla; 22a Pobedy ul., Tarko-Sale, Purovski raion, Tyumenskaya Oblast 629650, Russla; Email Address novatek@novatek.ru; Registration ID 1026303117642 (Russla); Government Gazette Number 33558474 (Russla) [UKRAINE-EO13662].

OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY (a.k.a. OAO ROSNEFT OIL COMPANY; a.k.a. OIL COMPANY ROSNEFT; a.k.a. OJSC ROSNEFT OIL COMPANY; a.k.a. ROSNEFT; a.k.a. ROSNEFT OIL COMPANY), 28/1 Sofiyskaya Embankmani, Moscow 116035, Russia; Wabsite www.rosneft.com; alt. Wabsite www.rosneft.com; Email Address postman@rosneft.co; Registration 10 1027700043502 (Russia); Trax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); IURRAINE-E0136627.

VNESHECONOMBANK (a.k.a. BANK FOR DEVELOPMENT AND FOREIGN ECONOMIC AFFAIRS (VNESHECONOMBANK) STATE CORPORATION; a.k.a. BANK RAZVITIYA I VNESHNEEKONOMICHESKOI DEYATELNOSTI (VNESHEKONOMBANK) GOSUDARSTVENNAYA KORPORATSIYA; a.k.a. "VEB"), 9 Axademika Sakharova prospeki, Moscow 107986, Russia; SWIFT/BIC BFEA RU MM; Websile http://www.veb.ru; Email Address info@veb.ru; BIK (RU) 044525080 (UKRAINE-EO13882).

treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20140716... 12/14/2016

2018-08-116: 008286

U.S. DEPARTMENT OF THE TREASURY

Resource Center

Ukraine-related Sanctions

8/12/2014

OFAC has implemented the following Ukralne-related Sanctions.

Please see the following frequently asked questions for more information on today's sectoral sanctions release.

In addition, OFAC has also issued Ukraine-related General License 1a $-f_{\rm el}$. Authorizing Certain Transactions Related to Derivatives Prohibited by Directives 1, 2, and 3 under Executive Order 13662 and Ukraine-related General License 2 $-f_{\rm el}$. Authorizing Certain Activities Prohibited by Directive 4 under Executive Order 13662 Necessary to Wind Down Operations.

Sectoral Sanctions Identifications (SSI) List Updates

The following entities have been added to OFAC's Sectoral Sanctions Identifications List pursuant to the directives that can be found here.

Please note: In order to preserve space in the SSI lists remarks field, OFAC is no longer publishing the full text of the directives associated with each SSI record, Instead, OFAC has created a parasible feature that indicates what directive number or numbers apply to the SSI record. Users of the SSI list can find the full text of each applicable directive by visiting the link that now appears in the remarks field of each SSI record.

AK TRANSNEFT OAD (a.k.a. AKTSIONERNAYA KOMPANIYA PO TRANSPORTUNEFTI TRANSNEFT OAD; a.k.a. OAD AK TRANSNEFT; a.k.a. UL TRANSPORTING JOINT-STOCK COMPANY TRANSNEFT; a.k.a. TRANSNEFT; a.k.a. TRANSNEFT; a.k.a. TRANSNEFT; a.k.a. TRANSNEFT, JSC), 57 B. Polyanka ul., Moscow 119180, Russia; 57 Bolshaya. Polyanka, Moscow 119180, Russia; Website www.transneft.m; Email Address transneft@ak.transneft.m; Executive Order 13662 Directive Determination - Subject to Directive 2; Registration iD 1027700049486; Tax ID No. 7706061801; Government Gazette Number 00044463; For more information on directives, please visit the following link: http://www.treasury.gov/resource-center/senctions/Programs/Pages/ukraine.aspx/fdirectives. (UKRAINE-EO 13662).

LUKOIL OAO (a.k.a. LUKOIL; a.k.a. LUKOIL OIL COMPANY; a.k.a. NEFTYANAYA KOMPANIYA LUKOIL OOO; a.k.a. NK LUKOIL OAO), 11 Srelenski boulevard, Moscow 101000, Russie; Website www.lukoil.ru; Email Address infogglukoil.ru; Executive Order 13882 Directive Determination - Subject to Directive 4; Registration 10 1027700035769; Tax ID No. 7708004767; Government Gazette Number 00044434; For more information on directives, please visit the following link: http://www.treasury.gov/resource-center/sanctions/programs/Pages/ukratine,aspx/directives. [U KRAINE-EO 13682].

OJSC GAZPROM NEFT (a.k.a. GAZPROM NEFT OAO; a.k.a. JSC GAZPROM NEFT; a.k.a. OPEN JOINT-STOCK COMPANY GAZPROM NEFT; f.k.a. SIBIRSKAYA NEFTYANAYA KOMPANIYA OAO), Let A. Galernaya, f, ul, St. Petersburg 190000, Russia; 1.5 Pochtamtskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamtskaya St., St. Petersburg 190000, Russia; 3-5 Pochtamtskaya St., St. Petersburg 190000, Russia; Website http://www.gazprom-neft.com/; Email Address info@gazprom-neft.ru; alt. Email Address g@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address info@gazprom-neft.ru; alt. Email Address info@gazpro

OPEN JOINT STOCK COMPANY GAZPROM (a.k.a. GAZPROM OAC; a.k.a. OAO GAZPROM), 16 Nametkina St., Moscow, Russia GSP-7, 117997, Russia; 16 Nametkina dt., Moscow 117991, Russia; Website www.gazprom.ru; Email Address gazprom@gazprom.ru; Executive Order 13882 Directive Datomination - Subject to Directive 4; Registration ID 1027700070518 (Russia); Tax ID No. 773605003 (Russia); Government Gazetta Number 00040778 (Russia); For more information on directives, please visit the following First: http://www.treasury.gov/resource-center/sanctions/Programs/Pages/vixalne.aspx#dfrectives. (UKRAINE: EO13662).

ROSTEC (a.k.e. ROSTEC STATE CORPORATION; a.k.a. RUSSIAN TECHNOLOGIES; a.k.a. RUSSIAN TECHNOLOGIES STATE CORPORATION FOR ASSISTANCE TO DEVELOPMENT, PRODUCTION AND EXPORT OF ADVANCED TECHNOLOGY INDUSTRIAL PRODUCT; a.k.a. STATE CORPORATION FOR ASSISTANCE TO DEVELOPMENT, PRODUCTION AND EXPORT OF ADVANCED TECHNOLOGY INDUSTRIAL PRODUCT ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTECHNOLOGII; a.k.a. STATE CORPORATION ROSTECHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII), 24 Usscheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13562 Directive Determination - Subject to Directive 3, Registration ID 1077799030847 (Russia); Txx ID No. 770427402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: http://www.treasury.gov/resource-center/sanctions/Programs/Pagas/ukraine.asox/#cfrectivas. (UXRAINE-EO13662).

SBERBANK OF RUSSIA (f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO SBERBANK ROSSII; a.k.a. SBERBANK ROSSII; f.k.a. SBERBANK ROSSII OAO), 19 ul. Vavilova, Moscow 117997, Russia; SWIFT/BIC SABRRUMM; Websita www.sberbank.ru; Email Address staf@staf.ru; Executiva Order 13802 Ofrectiva



Determination - Subject to Directive 1; For more information on directives, please visit the following link: http://www.treasury.gowhesource-center/sanctions/Programs/Pages/ukraine.aspx#directives. [UKRAINE-E013662].

SURGUTNEFTEGAS (a.k.a. OPEN JOINT STOCK COMPANY SURGUTNEFTEGAS; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO SURGUTNEFTEGAZ; a.k.a. SURGUTNEFTEGAS OAO; a.k.a. SURGUTNEFTEGAS OAD; a.k.a. SURGUTNEFTEGAS; a.k.a. OTKRYTOE AKTAINS-EDISONERY OAD; a.k.a. SURGUTNEFTEGAS; a.k.a. OTKRYTOE AKTAINS-EDISONERY OAD; a.k.a. SURGUTNEFTEGAS; a.k

The following changes have been made to OFAC's Sectoral Sanctions Identifications List:

BANK OF MOSCOW (f.k.a. AKTSIONERNY KOMMERCHESKI BANK BANK MOSKVY, OTKRYTOE AKTSIONERNOE OBSCHCHESTVO: a k a. JOINT STOCK COMMERCIAL BANK - BANK OF MOSCOW OPEN JOINT STOCK COMPANY), 8/15 Korp, 3 ul. Rozhdestvenka, Moscow 107996, Russia; Bld 3 8/15, Rozhdestvenka St., Moscow 107996, Russia; SWIFT/BIC MOSW RU MM; Website www.bm.ru; Email Address holmogorov_ss@mmbank.ru; alt. Email Address info@mmbank.ru; BIK (RU) 044525219; Registration ID 1027700159497; Government Gazette Number 29292940; The following transactions by U.S. persons or within the United States are hereby prohibited: transacting in, providing financing for, or otherwise dealing in new debt of longer than 90 days maturity or new equity for these persons (listed here), their property, or their interests in property. All other transactions with these persons or involving any property in which one or more of these persons has an interest are permitted, provided such transactions do not otherwise involve property or interests in property of a person blocked pursuant to Executive Orders 13660, 13661, or 13662, or any other sanctions programs implemented by the Office of Foreign Assets Control. [UKRAINE-E013662]. -to-BANK OF MOSCOW (f.k.a. AKTSIONERNY KOMMERCHESKI BANK BANK MOSKVY, OTKRYTOE AKTSIONERNOE OBSCHCHESTVO; a.k.a. JOINT STOCK COMMERCIAL BANK - BANK OF MOSCOW, OPEN JOINT STOCK COMPANY), 8/15 Korp. 3 ul. Rozhdestvenka Moscow 107996, Russia; Bld 3 8/15, Rozhdestvenka St., Moscow 107996, Russia; SWIFT/BIC MOSW RU MM; Website www.bm.ru; Email Address holmogorov_ss@mmbank.ru; alt. Email Address info@mmbank.ru; BIK (RU) 044525219; Executive Order 13662 Directive Determination - Subject to Directive 1; Registration ID 1027700159497; Government Gazette Number 29292940; For more information on directives, please visit the following link: http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives.| [UKRAINE-EO13662].

GAZPROMBANK OAO (a.k.a, GAZPROMBANK GAS INDUSTRY OJSC; a.k.a. GAZPROMBANK OJSC; a.k.a. GAZPROMBANK OPEN JOINT STOCK COMPANY; a.k.a. GAZPROMBANK OTKRYTOE AKTSIONERNOE OBSHCHESTVO; a.k.a. GPB, OAO; a.k.a. GPB, OJSC), 16, Building 1, Nametkina St., Moscow 117420, Russia; 63, Novocheremushkinskaya St., Moscow 117418, Russia; SWIFT/BIC GAZPRUMM; Website www.gazprombank.ru; Email Address mailbox@gazprombank.ru; Registration ID 1027700167110; Tax ID No. 7744001497; Government Gazette Number 09807684: The following transactions by U.S. persons or within the United States are hereby prohibited: transacting in, providing financing for, or otherwise dealing in new debt of longer than 90 days maturity or new equity for these persons (listed here), their property, or their interests in property. All other transactions with these persons or involving any property in which one or more of these persons has an interest are permitted, provided such transactions do not otherwise involve property or interests in property of a person blocked pursuant to Executive Orders 13660, 13661, or 13662, or any other sanctions programs implemented by the Office of Foreign Assets Control, [UKRAINE-EO13662], 4o- GAZPROMBANK OAO (a.k.a. GAZPROMBANK GAS INDUSTRY OJSC; a.k.a. GAZPROMBANK OJSC; a.k.a. GAZPROMBANK OPEN JOINT STOCK COMPANY; a.k.a. GAZPROMBANK OTKRYTOE AKTSIONERNOE OBSHCHESTVO; a.k.a. GPB, OAO; a.k.a. GPB, OJSC)), 16, Bu?ding 1, Nametkina St., Moscow 117420, Russia; 63, Novocheremushkinskaya St., Moscow 117418, Russia; SWIFT/BIC GAZPRUMM; Website www.gazprombank.ru; Email Address mailbox@gazprombank.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Registration 1D 1027700167110; Tax ID No. 7744001497; Government Gazette Number 09807684: For more information on directives, clease visit the following link http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives.] [UKRAINE-EO13662].

OAO NOVATEK (a.k.a. FINANSOVO-INVESTITSIONNAYA KOMPANIYA NOVAFININVEST OAO; a.k.a NOVATEK), 2, Udaltsova Street, Moscow 119415, Russia; 22 A, Pobedy Street, Tarko-Sale, Yamalo-Nenets Autonomous District 629580, Russla; 22a Pobedy Ul., Tarko-Sate, Purovski raton, Tyumenskaya Oblast 629850, Russia; Email Address novatek@novatek.ru; Registration ID 1026303117642 (Russia); Government Gazette Number 33558474 (Russia); The following transactions by U.S. persons or within the United States are hereby prohibited: transacting in, providing financing for, or otherwise dealing in new debt of longer than 90 days maturity for these persons (listed here), their property, or their interests in property. All other transactions with these persons or involving any property in which one or more of these persons has an interest are permitted, provided such transactions do not otherwise involve property or interests in property of a person blocked pursuant to Executive Orders 13660, 13661, or 13662, or any other sanctions programs implemented by the Office of Foreign Assets Control, [UKRAINE-E013662], 40- OAO NOVATEK (a.k.a. FINANSOVO-INVESTITSIONNAYA KOMPANIYA NOVAFININVEST OAO; a.k.a. NOVATEK)], 2, Udaltsova Street, Moscow 119415, Russia; 22 A, Pobedy Street, Tarko-Sale, Yamalo-Nenets Autonomous District 629580, Russia; 22a Pobedy ul., Tarko-Sale, Purovski raion, Tyumenskaya Obłast 629850, Russia; Email Address novatek@novatek.ru; Executive Order 13662 Directive Determination - Subject to Directive 2: Registration ID 1026303117642 (Russia): Government Gazette Number 33556474 (Russia): For more information on directives, please visit the following link: http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukra'ne.aspx#directives.[[UKRAINE-EO13662].

OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY (a.k.a. OAO ROSNEFT OIL COMPANY; a.k.a. OIL COMPANY ROSNEFT; a.k.a. OJSC ROSNEFT OIL COMPANY; a.k.a. ROSNEFT; a.k.a. ROSNEFT OIL COMPANY), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; ail. Website www.rosneft.com; ail. Website www.rosneft.com; bothan@rosneft.ru; Registration ID 1027700043502 (Russla); Tax ID No. 7706107510 (Russla); Government Gazette Number 00044428 (Russla); The fotowing transactions by U.S. persons or within the United States are hereby prohibited: transacting in, providing financing for, or otherwise deafing in new debt of longer than 90 days maturity for these persons (listed here), their property, or their interests in property. All

2018-08-116: 008288

Ukraine-related Sanctions Page 3 of 4

other transactions with these persons or involving any property in which one or more of these persons has an interest are permitted, provided such transactions do not otherwise involve property or interests in property of a person blocked pursuant to Executive Orders 13660, 13661, or 13662, or any other sanctions programs implemented by the Office of Foreign Assets Control. [UKRAINE-E013662]. -to-OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY, a.k.a. OIL COMPANY ROSNEFT, a.k.a. OJSC ROSNEFT OIL COMPANY; a.k.a. ROSNEFT OIL COMPANY; a.k.a. OIL COMPANY ROSNEFT; a.k.a. OJSC ROSNEFT OIL COMPANY; a.K.a. POSNEFT OIL COMPANY; a.K.a. Post postpart of the substance of the substan

RUSSIAN AGRICULTURAL BANK (f.k.a. OTKRYTOE AKTSIONERNOE ROSSISKI SELSKOKHOZYAISTVENNY BANK; a.k.a. ROSSELKHOZBANK; a.k.a. ROSSIYSKI SELSKOKHOZYAISTVENNY BANK OAO; a.k.a. RUSSIAN AGRICULTURAL BANK OAO), 3, Gagarinsky Pereulok, Moscow 119034, Russia; 3 Gagarinsky per., Moscow 119034, Russia; SWIFT/BIC RUAG RU MM; Website http://www.rshb.ru; Email Address office@rshb.ru; Registration ID 1027700342890; Government Gazette Number 52750822; The following transactions by U.S. persons or within the United States are hereby prohibited: transacting in, providing financing for, or otherwise dealing in new debt of longer than 90 days maturity or new equity for these persons (listed here), their property, or their interests in property. All other transactions with these persons or involving any property in which one or more of these persons has an interest are permitted, provided such transactions do not otherwise involve property or interests in property of a person blocked pursuant to Executive Orders 13660, 13661, or 13662, or any other sanctions programs implemented by the Office of Foreign Assets Control. [UKRAINE-E013662]. -to- RUSSIAN AGRICULTURAL BANK (f.k.a. OTKRYTOE AKTSIONERNOE ROSSISKI SELSKOKHOZYAISTVENNY BANK; a.k.a. ROSSELKHOZBANK; a.k.a. ROSSIYSKI SELSKOKHOZYAISTVENNY BANK OAO; a.k.a. RUSSIAN AGRICULTURAL BANK OAO), 3, Gagarinsky Pereulok, Moscow 119034, Russia; 3 Gagarinsky per., Moscow 119034, Russia; SWIFT/BIC RUAG RU MM; Website http://www.rshb.ru; Email Address office@rshb.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Registration ID 1027700342890; Government Gazette Number 52750822; For more information on directives, please visit the following link: http://www.treasury.gov/resourcecenter/sanctions/Programs/Pages/ukraine.aspx#directives.] [UKRAINE-EO13662].

VNESHECONOMBANK (a.k.a. BANK FOR DEVELOPMENT AND FOREIGN ECONOMIC AFFAIRS (VNESHECONOMBANK) STATE CORPORATION; a.k.a. BANK RAZVITIYA I VNESHNEEKONOMICHESKOI DEYATELNOSTI (VNESHEKONOMBANK) GOSUDARSTVENNAYA KORPORATSIYA; a.k.a. "VEB"), 9 Akademika Sakharova prospekt, Moscow 107996, Russia; SWIFT/BIC BFEA RU MM; Website http://www.veb.ru; Email Address info@veb.ru; BIK (RU) 044525060; The following transactions by U.S. persons or within the United States are hereby prohibited: transacting in, providing financing for, or otherwise dealing in new debt of longer than 90 days maturity or new equity for these persons (listed here), their property, or their interests in property. All other transactions with these persons or involving any property in which one or more of these persons has an interest are permitted, provided such transactions do not otherwise involve property or interests in property of a person blocked pursuant to Executive Orders 13660, 13661, or 13662, or any other sanctions programs implemented by the Office of Foreign Asse Control [UKRAINE-E013662]. -to- VNESHECONOMBANK (a.k.a. BANK FOR DEVELOPMENT AND FOREIGN ECONOMIC AFFAIRS (VNESHECONOMBANK) STATE CORPORATION; a.k.a. BANK RAZVITIYA I VNESHNEEKONOMICHESKOI DEYATELNOSTI (VNESHEKONOMBANK) GOSUDARSTVENNAYA KORPORATSIYA; a.k.a. "VEB")], 9 Akademika Sakharova prospekt, Moscow 107996, Russia; SWIFT/BIC BFEA RU MM; Website http://www.veb.ru; Email Address info@veb.ru; BIK (RU) 044525060; Executive Order 13662 Directive Determination - Subject to Directive 1; For more information on directives, please visit the following link: http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives.] [UKRAINE-EO13662].

VTB BANK OAO (f.k.a. BANK VNESHNEY TORGOVLI ROSSIYSKOY FEDERATSII, CLOSED JOINT-STOCK COMPANY; f.k.a. BANK VNESHNEY TORGOVLI RSFSR; f.k.a. BANK VNESHNEY TORGOVLI, JOINT-STOCK COMPANY; f.k.a. BANK VNESHNEY TORGOVLI, OPEN JOINT-STOCK COMPANY; a.k.a. BANK VTB OAO; a.k.a. BANK VTB, OPEN JOINT-STOCK COMPANY; a.k.a. JSC VTB BANK; f.k.a. VNESHTORGBANK; f.k.a. VNESHTORGBANK ROSSII, CLOSED JOINT-STOCK COMPANY; a.k.a. VTB BANK, OPEN JOINT-STOCK COMPANY), 29, Bolshaya Morskaya str., St. Petersburg 190000, Russia; 37 Phyushchikha ul., Moscow 119121, Russia; 43, Vorontsovskaya str., Moscow 109044, Russia; SWIFT/BIC VTBRRUMM; Website www.vtb.com; Registration ID 1027739609391 (Russia); Tax ID No. 7702070139 (Russia); Government Gazette Number 00032520 (Russia); License 1000 (Russia); The following transactions by U.S. persons or within the United States are hereby prohibited: transacting in, providing financing for, or otherwise dealing in new debt of longer than 90 days maturity or new equity for these persons (listed here), their property, or their interests in property. All other transactions with these persons or involving any property in which one or more of these persons has an interest are permitted, provided such transactions do not otherwise involve property or interests in property of a person blocked pursuant to Executive Orders 13660, 13661, or 13662, or any other sanctions programs implemented by the Office of Foreign Assets Control, [UKRAINE-E013662], 4o- VTB BANK OAO (f.k.a. BANK VNESHNEY TORGOVLI ROSSIYSKOY FEDERATSII, CLOSED JOINT-STOCK COMPANY; f.k.a. BANK VNESHNEY TORGOVLI RSFSR; f.k.a. BANK VNESHNEY TORGOVLI, JOINT-STOCK COMPANY; f.k.a. BANK VNESHNEY TORGOVLI, OPEN JOINT-STOCK COMPANY; a.k.a. BANK VTB OAO; a.k.a. BANK VTB, OPEN JOINT-STOCK COMPANY; a.k.a. JSC VTB BANK, f.k.a. VNESHTORGBANK; f.k.a. VNESHTORGBANK ROSSII, CLOSED JOINT-STOCK COMPANY; a.k.a. VTB BANK, OPEN JOINT-STOCK COMPANY), 29, Bolshaya Morskaya str., St. Petersburg 190000, Russia; 37 Plyusischikha ul., Moscow 119121, Russia; 43, Vorontsovskaya str., Moscow 109044, Russia; SWiFT/BIC VTBRRUMM; Website www.vtb.com; Executive Order 13662 Directive Determination - Subject to Directive 1 Registration ID 1027739609391 (Russia); Tax ID No. 7702070139 (Russia); Government Gazette Number 00032520 (Russia); License 1000 (Russia); For more information on directives, please visit the following link: http://www.treasury.gov/rescurce-center/sanctions/Programs/Pages/ukraine.aspx#directives.| [UKRAINE-E013662].

OFFICE OF FOREIGN ASSETS CONTROL Specially Designated Nationals List Update:

The following entities have been added to OFAC's SDN List:

Ukraine-related Sanctions Page 4 of 4

JOINT STOCK COMPANY ALMAZ-ANTEY AIR DEFENSE CONCERN MAIN SYSTEM DESIGN BUREAU NAMED BY ACADEMICIAN A.A. RASPLETIN (a.k.a. A.A. RASPLETIN MAIN SYSTEM DESIGN BUREAU; a.k.a. ALMAZ-ANTEY GSKB; a.k.a. ALMAZ-ANTEY GSKB IMENI ACADEMICIAN A.A. RASPLETIN; a.k.a. ALMAZ-ANTEY MSDB; a.k.a. ALMAZ-ANTEY PVO 'AIR DEFENSE' CONCERN LEAD SYSTEMS DESIGN BUREAU DAO 'OPEN JOINT-STOCK COMPANY IMENI ACADEMICIAN A.A. RASPLETIN; a.k.a. GOLOVNOYE SISTEMNOYE KONSTRUKTORSKOYE BYURO OPEN JOINT-STOCK COMPANY OF ALMAZ-ANTEY PVO CONCERN IMENI ACADEMICIAN A.A. RASPLETIN; a.k.a. JSC 'ALMAZ-ANTEY MSDB; (I.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO NAUCHNO PROIZVODSTVENNOE OBEDINENIE ALMAZ IMENI AKADEMIKA A.A. RASPLETIN; a.k.a. "GSKB"), 18-80, Len'ingradsky Prospect, Moscow 125190, Russ'a; Website http://www.raspletin.ru; email Address Info@raspletin.ru; att. Email Address a'maz_zakupxi@mail.ru [UKRAINE-EO13861].

JSC V. TIKHOMIROV SCIENTIFIC RESEARCH INSTITUTE OF INSTRUMENT DESIGN (a.k.a. JSC NIIP; f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO NAUCHNO ISSLEDOVATELSKI INSTITUT PRIBOROSTROENIYA IMENI V.V. TIKHOMIROVA), 3 UI. Gagarina, Zhukovski, Moskovskaya Obi 140180, Russia; Gagarin Str. 3, Zhukovsky 140180, Russia; Website http://www.niip.ru; Email Address niip@niip.ru; Registration ID 1025001627859; Government Gazette Number 13185231 (Russia) [UKïRAINE-EO13661].

KALININ MACHINE PLANT JSC (a.k.a. KALININ MACHINE-BUILDING PLANT OPEN JOINT-STOCK COMPANY; a.k.a. KALININ MACHINERY PLANT-BRD; a.k.a. MASHINOSTROITEL'NYI ZAVOD IM. M.I. KALININA, G, YEKATERINBURG OAO; a.k.a. MZIK OAO; a.k.a. OPEN-END JOINT-STOCK COMPANY KALININ MACHINERY PLANT. YEKATERINBURG; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO MASHINOSTROITELNY ZAVOD IM.M.I.KALININA, G.EKATERINBURG), 18 prospekt Kosmonavtov, Ekaterinburg, Sverdlovskaya obl. 620017, Russia; Emai Address Info@zik.ru [UKRANE-EO13661].

MYTISHCHINSKI MASHINOSTROITELNY ZAVOD, OAO (a.k.a. JSC MYTISHCHINSKI MACHINE-BUILDING PLANT; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO MYTISHCHINSKI MASHINOSTROITELNY ZAVOD), 4 ul. Kotontsova Mytishchi, Mytishchinski Ralon, Moskovskayaoth 141009, Russla; Ul. Kotoncova, d.4, Mytishi, Moscow region 141009, Russla; Website www.mmzavod.n; Email Address mmzavot@maik.n; Registration ID 195029003860 (Russla); Government Gazette Number 61540869 (Russla) [UKRAINE-E013661].

OAO 'DOLGOPRUDNY RESEARCH PRODUCTION ENTERPRISE' (a.k.a. DOLGOPRUDNENSKOYE NPP OAO; a.k.a. DOLGOPRUDNY; a.k.a. DOLGOPRUDNY RESEARCH PRODUCTION ENTERPRISE; a.k.a. OTKRYTOE AKT SIONERNOE OBSHCHESTVO DOIGOPRUDNENSKOE NAUCHNO PROIZVODSTVENNOE PREDPRIYATIE), 1 Pl. Sobina, Dolgoprudny, Moskovskaya obl. 141700, Russia; Proshchad Sobina 1, Dolgoprudny 141700, Russia; Email Address dripp@orc.ru; Registration ID 1025001202544; Tax ID No. 5008000322; Government Gazette Number 07504318 [UKRAINE-E013861].

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U.S. DEPARTMENT OF THE TREASURY

Resource Center



Issuance of a new Ukraine-related Executive Order and General License; Ukraine-related Designations

2/19/2014

Today, the President signed an Executive Order 2. Blocking Property of Certain Persons and Prohibiting Certain Transactions with Respect to the Crimea Region of Ukraine.

Also, Ukraine-related General License 4 $-\hat{\mathcal{N}}_1$ was Issued Authorizing the Exportation or Reexportation of Agricultural Commodities, Medicine, Medicine Supplies, and Replacement Parts.

Specially Designated Nationals List Update

The following Individuals have been added to OFAC's SON List:

ANTYUFEYEV, Vladimir (a.k.a. ALEXANDROV, Vladimir Gheorghlevid; a.k.a. ANTIUFEEV, Vladimir Juhevio; a.k.a. ANTIUFEYEV, Vladimir; a.k.a. ANTYUFEYEV, Vladimir Yuryevich; a.k.a. SHEVTSOV, Vladimir; a.k.a. SHEVTSOV, Vladimir); DOB 19 Feb 1951; POB Novosibirsk, Russła (individual) [UKRAINE-EO13660].

BEREZIN, Fedor (a.k.a. BEREZIN, Fyodor, a.k.a. BEREZIN, Fyodor Dmi(riavich); DOB 07 Feb 1960; POB Donalsk, Ukraine (individual) (UKRAINE-EO/3660).

BEZLER, Igor Nikolayevich (a.k.a. BEZLER, Igor, a.k.a. BEZLER, Igor Mykolalovych; a.k.a. BEZLER, Ihor); DOB 1985 (individual) [UKRAINE-EO13560].

GUBAREV, Pavel (a.k.a. HUBARYEV, Pavio); DOB 10 Feb 1983; POB Slavierodonatsk, Uzraine (individual) [UKRAINE-EO13860].

KARYAKIN, Alexei Vyacheslavovich (a.k.a. KARIAKIN, Alexey; a.k.a. KARYAKIN, Alexey; a.k.a. KARYAKIN, Alexey; DOB 07 Apr 1980; POB Stahanov, Luhansk Oblast, Ukraine (individual) [UKRAINE-E013660].

KHRYAKOV, Alexander (a.k.a. KHRYAKOV, Aleksandr Vitallyovych; a.k.a. KHRYAKOV, Alexander Vitallyovych; a.k.a. KHRYAKOV, Alexandr Vitallyovych), Donetsk, Ukraine; DOB 08 Nov 1958; POB Donetsk, Ukraine (ndovidual) [UKRAINE-E013680].

KOZITSYN, Nikołai (e.k.a. KOZITSYN, Mykoła; a.k.a. KOZITSYN, Mykoła Nanovych; a.k.a. KOZITSYN, Nikołay); DOB 20 Jun 1956; POB Donatsk Region; citizen Russia (Individual) [UKRAINE-EO13660].

MALOFEYEV, Konstantin (a.k.a. MALOFEEV, Konstantin Valerevich; a.k.a. MALOFEEV, Konstantin Valerievich); DOB 03 Jul 1974; POB Pushchino, Moscow, Russia; Managing Partner of Marshall Capital Partners (individual) [UKRAINE-EO13660] (Linked To: MARSHALL CAPITAL PARTNERS).

MOZGOVOY, Aleksey (a.k.e. MOZGOVO), Aleksei; a.k.e. MOZGOVOI, Aleksei; a.k.e. MOZGOVOI, Oleksiy; a.k.e. MOZGOVOY, Aleksei; a.k.e. MOZGOVOY, Aleksei; a.k.e. MOZGOVY, Aleksei; a.k.e. MOZGOVY, Aleksei; a.k.e. MOZGOVY, Oleksiy; a.k.e. MOZGOVY, Oleksiy; a.k.e. MOZHOVY, Oleksiy; a.k.e. MOZHOVY, Aleksei; a.k.e. MOZHOVY, Alekse

NEKLYUDOV, Dmitry Sergeyevich (a.k.a. NEKLYUDOV, Dmitriy Sergeyevich); DOB 17 Feb 1969; POB Simferopol, Ukraine findlydust) (UKRAINE-EO 13660).

PLOTNITSKY, Igor Venediktovich (a.k.a. PLOTNITSKY, Igor); DOB 24 Jun 1984; POB Kelmentsi, Ukraine (individual) [UKRAINÉ-EO13860].

POKLONSKAYA, Natafia Vladimirovna (a.k.a. POKLONSKA, Natalya; a.k.a. POKLONSKAYA, Natafia; a.k.a. Poklonskaya, a.k.

RUDENKO, Miroslav Vladimirovich (a.k.a. RUDENKO, Miroslav, a.k.a. RUDENKO, Myroslav), Donetsk, Ukraine; DCB 21 Jan 1983; at. DOB 1983; POB Debatsavo, Donetsk Region, Ukraine (individual) [UKRAINE-E013660].

SAVCHENKO, Petr (a.k.a. SAVCHENKO, Peter; a.k.a. SAVCHENKO, Peter A.; a.k.a. SAVCHENKO, Petro Oleksitovych), Makeyevka, Ukraine; DOB 23 Feb 1968 (Individual) [UKRAINE-EO13660] (Linked To: PROFAKTOR, TOV).

TSARYOV, Oleh Anatolisvich (a.k.a. TSAREV, Oleg; a.k.a. TSARIOV, Oleh; a.k.a. TSAROV, Oleg; a.k.a. TSARYOV, Oleh), Stari Kodaky, Dospropetrovsk Oblast, Ukraine; DOB 02 Jun 1970; POB Dospropetrovsk, Ukraine (individual) [UKRAINE-EO13660].

ZAKHARCHENKO, Alexander; DOB 1976; POB Donetsk, Ukraine (individual) [UKRAINE-EO13660].

https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20141219... 12/28/2015

Issuance of a new Ukraine-related Executive Order and General License; Ukraine-related ... Page 2 of 2

ZALDOSTANOV, Aleksandr (a.k.a. ZALDASTANOV, Aleksandr Sergeevich; a.k.a. ZALDOSTANOV, Alexander; a.k.a. ZALDOSTANOV, Alexander; a.k.a. "The Surgeon"); DOB 19 Jan 1963; POB Kirovograd, Ukraine (individual) [UKRAINE-EO13660].

The following entities have been added to OFAC's SDN List:

DONBASS PEOPLE'S MILITIA (a.k.a. PEOPLE'S MILITIA OF DONBASS), Prospect Zasyadko.13, Donetsk, Ukraine; Email Address voenkom.dnr@mail.ru; alt. Email Address mobilisation@novorossla.co; alt. Email Address novoross24@mail.ru [UKRAINE-E013660].

MARSHALL CAPITAL PARTNERS (a.k.a. MARSHALL CAPITAL), 6th Floor, Novinsky Passage Business Center, 31 Novinsky Boulevard, Moscow 123242, Russia; Website www.marcap.ru; Email Address info@marcap.ru [UKRAINE-F013660]

NIGHT WOLVES (a.k.a. MOLODEZHNAYA AVTONOMNAYA NEKOMMERCHESKAYA ORGANIZATSIYA NOCHNYE VOLKI; a.k.a. NOCHNYE WOLKI; a.k.a. NOCHNYE WOLKI; a.k.a. NOCHNYE WOLKI; nizarije Mnevniki, 110, "Bike Center", Moscow, Russia; 110 Nizhnije Mnevniki, Moscow, Russia; 110 Nizhnije Mnevniki UII, Moscow 123423, Russia; Registration ID 1037717009846; Government Gazette Number 14188237 (UKRAINE-EO13660).

NOVOROSSIYA PARTY (a.k.a. NEW RUSSIA PARTY), Ukraine [UKRAINE-EO13660].

OPLOT, Donetsk, Ukraine; Kharkiv, Ukraine [UKRAINE-EO13660].

PROFAKTOR, TOV (a.k.a. PROFAKTOR, LLC), Bud, 22/28, vul. Dzerzhynskogo, Makivika 86100, Ukraine; Makeevka str., Donetsk Region 86157, Ukraine; Government Gazette Number 32084605 [UKRAINE-EO13860].

SOUTH-EAST MOVEMENT (a.k.a. SOUTHEAST MOVEMENT; a.k.a. YUGO-VOSTOK MOVEMENT), Ukraine [UKRAINE-EO13660].

https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20141219... 12/28/2015

2018-08-116: 008292

Bates No. 2018-08-116: 008293 Pending Consultation Responses from Other Components of Treasury



From: (b)(6)

To: (b)(6)

Date: Fri, 02 Jun 2017 15:00:16 -0400

Here is the blurb for Almaz-Antey and other firms (8 total) from the press release.

Treasury today has also designated and blocked the assets of Almaz-Antey, Federal State Unitary Enterprise State Research and Production Enterprise Bazalt, JSC Concern Sozvezdie, JSC MIC NPO Mashinostroyenia, Kalashnikov Concern, KBP Instrument Design Bureau, Radio-Electronic Technologies, and Uralvagonzavod pursuant to E.O. 13661 for operating in the arms or related materiel sector in the Russian Federation. The designated firms are responsible for the production of a range of materiel, from small arms to mortar shells to tanks. As a result of today's action under E.O. 13661, any assets of the entities designated that are within U.S. jurisdiction must be frozen. In addition, transactions by U.S. persons or within the United States involving the entities designated today under E.O. 13661 are generally prohibited.

Almaz-Antey manufactures surface-to-air missile systems currently used by the Russian military.

https://www.treasury.gov/press-center/press-releases/Pages/j12572.aspx

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