

Bates Nos. 2018-08-116:
000631 - 000638
Submitter Notice Process
Initiated

This document is made available through the declassification efforts
and research of John Greenewald, Jr., creator of:

The Black Vault



The Black Vault is the largest online Freedom of Information Act (FOIA) document clearinghouse in the world. The research efforts here are responsible for the declassification of hundreds of thousands of pages released by the U.S. Government & Military.

Discover the Truth at: <http://www.theblackvault.com>

(b)(6) Weekly Report Jan 15 2015

From: (b)(6)
To: (b)(6)
Date: Thu, 15 Jan 2015 10:56:40 -0500
Attachments: (b)(6)Week y Report Jan 15 2015.docx (23.19 kB)

Hi (b)(6),

Here is my weekly report. Please let me know if you have any questions.

Thanks
(b)(6)

(b)(6)

Weekly Report for January 9 to January 15, 2015

Upcoming Significant Matters

[None]

Activities for the Week Ending January 15, 2015 to be Reported to E&I

[None]

Other Activities for the Week Ending January 15, 2015

Through the OMB process, I reviewed and commented on a proposed Department of Commerce final rule regarding exports of U.S.-origin items to Crimea. We had also reviewed and commented on the rule before it was sent to OMB. (b)(6)

I participated in an OCC group discussion regarding the validity of (b)(5) Smith, (b)(6) (b)(5) (b)(6)

I followed up with (b)(5) (b)(5) from Kalashnikov Concern. (b)(6)

I edited and cleared on a Ukraine-related designation package (b)(5) (b)(6)

I edited and cleared on a Federal Register notice of Ukraine-related designations made in late December. (b)(6)

I met with (b)(6) and OGT regarding revisions to (b)(5) (b)(6)

I met with Licensing and Compliance regarding a question forwarded by John Smith on an urgent license request (b)(5) (b)(6)

I reviewed and assisted policy to respond to a question from DHS forwarded from policy regarding treatment of (b)(5) (b)(6)

I cleared on two urgent Burma licenses, one Ukraine-related urgent license, one Ukraine-related wire transfer denial, and one Sudan license authorization. (b)(6)

I fielded four phone calls on the main line regarding Ukraine-related and Sudanese sanctions issues. (b)(6)

I attended the OCC / Enforcement joint breakfast party.

Bates Nos. 2018-08-116:
000641 - 000643
Submitter Notice Process
Initiated

RE: Request from ATF

From: (b)(6)
To: (b)(6), "Baher, Le a" (b)(6)
Cc: (b)(6)
Date: Tue, 20 Jan 2015 13:26:20 -0500
Attachments: ATF Guidance on EO 13661 re sanctions on Russian entities - 8 August 2014....pdf (1.5 MB)

Sure thing. Here it is. Thanks very much for your help, (b)(6).

(b)(6)

From: (b)(6)
Sent: January 20, 2015 1:26 PM
To: (b)(6) Baher, Le a
Cc: (b)(6)
Subject: RE: Request from ATF

(b)(6),

Could you provide me with the original attachment that you reference in your email?

Thanks,

(b)(6)

From: Baher, Le a
Sent: Tuesday, January 20, 2015 1:20 PM
To: (b)(6)
Cc: (b)(6)
Subject: RE: Request from ATF

Adding (b)(6) who will be able to help you.
Thanks
Leila

From: (b)(6)
Sent: Tuesday, January 20, 2015 1:18 PM
To: Baher, Le a
Cc: (b)(6)
Subject: RE: Request from ATF

Thanks, Leila. If you could confirm or update the list of designees, I would appreciate it.

From: Baher, Le a
Sent: Tuesday, January 20, 2015 1:17 PM
To: (b)(6)
Cc: (b)(6)
Subject: RE: Request from ATF

(b)(6), Compliance is best positioned to help you with this question. We are happy to provide the list of designees, but how ATF should treat them is probably a compliance issue.
Thanks
Leila

From: (b)(6)
Sent: Friday, January 16, 2015 5:12 PM
To: Baher, Le a
Cc: (b)(6)
Subject: FW: Request from ATF

Leila,

I have a separate request for OGT from ATF. As part of its function to regulate arms imports, ATF received State Department guidance on August 8, 2014 (attached) that directs ATF to suspend active import permits for entities operating in the arms or related materiel sectors of Russia that have been sanctioned under EO 13661. ATF has requested an update from us and State on any entities that should be added to this list.

(b)(5)

(b)(5)

I am copying (b)(6) from Compliance, who will be serving as the ATF working group contact. Please let us know if you have questions, and thanks very much for your help.

Kind regards,

(b)(6)

From: Baher, Le a
Sent: Friday, January 16, 2015 2:56 PM
To: (b)(6)
Cc: (b)(6) Manfu, Alexandre; Feddo, Thomas
Subject: RE: Request from ATF

(b)(6)

I think this issue is more of a compliance/enforcement issue. I have cc'd Tom Feddo and Alex Manful who will be better positioned to address this request.

Thank you,
Leila

From: (b)(6)
Sent: Friday, January 16, 2015 2:44 PM
To: Baher, Le a; (b)(6)
Cc: (b)(6)
Subject: Request from ATF

Hi Leila and (b)(6),

We in OCC have been working with ATF and State on some (b)(5)

(b)(5)

(b)(5) My current understanding is that the working group would discuss issues on an as needed basis.

If OFAC wants to join this group, ATF has asked that we provide one or more primary point(s) of contact. After talking with Davin (who was working this issue previously), we thought that (b)(5) if we do decide to pursue this. But we would welcome you an appropriate contact.

Many thanks,

(b)(6)

(b)(6)
Attorney-Advisor
Office of the Chief Counsel (Foreign Assets Control)
United States Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220
Email: (b)(6)
Office Tele: (b)(6)

Bates Nos. 2018-08-116:
000646 - 000650
Pending Consultation Response

RE: Request from ATF

From: (b)(6)
To: (b)(6) "Baher, Le a" (b)(6)
Cc: "Manfu, Alexandre" (b)(6), "Feddo, Thomas" (b)(6)
Date: Tue, 20 Jan 2015 17:28:21 -0500

Sounds good to me, I know (b)(6) likes dealing with the weapons stuff ☺ .

From: (b)(6)
Sent: Monday, January 19, 2015 4:15 PM
To: (b)(6) Baher, Le a
Cc: (b)(6) Manfu, Alexandre; Feddo, Thomas
Subject: Re: Request from ATF

Thanks, (b)(6). (b)(6) from compliance already offered to be the contact for this group and has worked with ATF in the past, so I passed on his name to ATF on Friday. But I would be glad to give you background on the issues.

Thanks,
(b)(6)

From: (b)(6)
Sent: January 17, 2015 04:01 PM
To: (b)(6) Baher, Le a
Cc: (b)(6) Manfu, Alexandre; Feddo, Thomas
Subject: Re: Request from ATF

Happy to work on this with ATF; curious what issues they're still running into.

(b)(6)

From: (b)(6)
Sent: Friday, January 16, 2015 03:06 PM
To: Baher, Le a (b)(6)
Cc: (b)(6) Manfu, Alexandre; Feddo, Thomas
Subject: RE: Request from ATF

Thanks, Leila. Tom and Alex, thanks for your help. I would be glad to discuss the request further as needed.

From: Baher, Le a
Sent: Friday, January 16, 2015 2:56 PM
To: (b)(6)
Cc: (b)(6) Manfu, Alexandre; Feddo, Thomas
Subject: RE: Request from ATF

Duplicative of content on page marked Bates Nos. 2018-08-116: 000645

FW: Request from ATF - Livelink 1482 KB

From: (b)(6)
To: (b)(6)
Cc: (b)(6)
Date: Wed, 21 Jan 2015 13:45:49 -0500
Attachments: ATF Guidance on EO 13661 re sanctions on Russian entities - 8 August 2011....pdf - 1 MB (0 bytes)

(b)(6)

I'm finding this request a little confusing, but overall I think we need to provide a list of SDNs in the arms sector that are not the attached document. Can you confirm whether the following SDNs are energy companies or defense companies?

KONSTRUKTORSKOE BYURO PRIBOROSTROENIYA OTKRYTOE AKTSIONERNOE OBSHCHESTVO
UNITED SHIPBUILDING CORPORATION
OAO DOLGOPRUDNY RESEARCH PRODUCTION ENTERPRISE
KALININ MACHINE PLANT JSC

Thanks,

(b)(6)

From: (b)(6)
Sent: Tuesday, January 20, 2015 1:26 PM
To: (b)(6) Baher, Le a
Cc: (b)(6)
Subject: RE: Request from ATF

Duplicative of content in email marked with Bates Nos. 000644-000645



Duplicative of content in email marked with Bates Nos. 000644-000645

Bates Nos. 2018-08-116:
000656 - 000658
Submitter Notice Process
Initiated

RE: (b)(7)(A) lead, Ukraine

From: "Feddo, Thomas" (b)(6), (b)(7)(C)

To: (b)(6), (b)(7)(C)

Cc: "Gack, Andrea" (b)(6), (b)(7)(C)

Date: Wed, 21 Jan 2015 15:23:54 -0500

Dropping (b)(6), (b)(7) for a moment. I agree with her suggestion (b)(5)

Section Chiefs, if you agree, will defer to you all on deciding to whom we should assign this matter, if not to (b)(6), (b)(7)

(If it's not a problem, once we have a handle on the facts, perhaps the EO could circle back to this group with a brief note on what he or she learned. ...)

From: Gack, Andrea

Sent: Wednesday, January 21, 2015 3:19 PM

To: (b)(6), (b)(7)(C)

Cc: Feddo, Thomas

Subject: Re: (b)(7)(A) lead, Ukraine

Interesting. Fwiw, I'm very familiar with (b)(7)(A) from my LIC days and know how to reach their attorneys. Davin, (b)(6), (b)(7)(C), and (b)(6), (b)(7)(C) are very familiar as well (Davin from his OCC days).

From: (b)(6), (b)(7)(C)

Sent: Wednesday, January 21, 2015 03:10 PM Eastern Standard Time

To: (b)(6), (b)(7)(C)

Cc: Gack, Andrea; Feddo, Thomas

Subject: (b)(7)(A) lead, Ukraine

(b)(5) & (b)(7)(A)

If anyone has already seen this article today, please disregard, but it seems that

(b)(5) & (b)(7)(A)

Here is the link to the article and the ENF case.

(b)(7)(A)

Best,

(b)(6), (b)(7)(C)

(b)(6), (b)(7)(C)

Enforcement Officer
Office of Foreign Assets Control
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

(b)(6), (b)(7)(C)

(b)(6), (b)(7)(C)

<http://www.treas.gov/ofac>

RE: Request from ATF

From: (b)(6)
To: (b)(6)
Date: Wed, 21 Jan 2015 16:22:01 -0500

Could one of you get back to (b)(6) with an response? I think we just need to make him aware of these four entries, but perhaps you could read over the letter and let me know if I'm missing something.

Thanks,

(b)(6)

From: (b)(6)
Sent: Wednesday, January 21, 2015 2:14 PM
To: (b)(6)
Subject: RE: Request from ATF

Treasury also designated the United Shipbuilding Corporation (July 2014) and Kalinin Machine Plant (Sept 2014), pursuant to E.O. 13661, for operating in the arms or related materiel sector in Russia. So, all four entries are defense related.

From: (b)(6)
Sent: Wednesday, January 21, 2015 2:08 PM
To: (b)(6)
Subject: RE: Request from ATF

These two for sure are defense:

KONSTRUKTORSKOE BYURO PRIBOROSTROENIYA OTKRYTOE AKTSIONERNOE OBSHCHESTVO
OAO DOLGOPRUDNY RESEARCH PRODUCTION ENTERPRISE

From: (b)(6)
Sent: Wednesday, January 21, 2015 1:49 PM
To: (b)(6)
Cc: (b)(6)
Subject: RE: Request from ATF

I believe that three of these entries are defense companies. I will review the names and get back with you shortly with confirmation.

From: (b)(6)
Sent: Wednesday, January 21, 2015 1:46 PM
To: (b)(6)
Cc: (b)(6)
Subject: FW: Reque F

(b)(6),

I'm finding this request a little confusing, but overall I think we need to provide a list of SDNs in the arms sector that are not the attached document. Can you confirm whether the following SDNs are energy companies or defense companies?

KONSTRUKTORSKOE BYURO PRIBOROSTROENIYA OTKRYTOE AKTSIONERNOE OBSHCHESTVO
UNITED SHIPBUILDING CORPORATION
OAO DOLGOPRUDNY RESEARCH PRODUCTION ENTERPRISE
KALININ MACHINE PLANT JSC

Thanks,

(b)(6)

From: (b)(6)
Sent: Tuesday, January 20, 2015 1:26 PM
To: (b)(6) Baher, Le a
Cc: (b)(6)
Subject: RE: Request from ATF

Duplicative of content in email marked with Bates Nos. 000644-000645





FW: Request from ATF - Livelink 1480 KB

From:

(b)(6)

To:

Date: Wed, 21 Jan 2015 16:22:43 -0500

Attachments: ATF Guidance on EO 13661 re sanctions on Russian entities - 8 August 201....pdf - 1 MB (0 bytes)

[Here's the attachment; not sure if you have it.](#)

From: (b)(6)

Sent: January 20, 2015 1:26 PM

To: (b)(6) Baher, Le a

Cc: (b)(6)

Subject: RE: Request from ATF

Duplicative of content in email marked with Bates Nos. 000644-000645





RE: Request from ATF

From: (b)(6)
To: (b)(6)
Date: Wed, 21 Jan 2015 16:36:18 -0500

(b)(6) and I are working on it.

From: (b)(6)
Sent: Wednesday, January 21, 2015 4:23 PM
To: (b)(6)
Subject: FW: Request from ATF

Duplicative of content in email marked with Bates Nos. 000663-000664



Bates Nos. 2018-08-116:
000667 - 000669
Pending Consultation Response

U.S. DEPARTMENT OF THE TREASURY

Press Center

Announcement of Treasury Sanctions on Entities Within the Financial Services and Energy Sectors of Russia, Against Arms or Related Materiel Entities, and those Undermining Ukraine's Sovereignty

7/16/2014

*Actions Implement Executive Order 13662 against
Two Russian Financial Institutions and Two Energy Firms.*

*Actions also Target Eight Defense Technology Entities, Three Separatists, One Entity Complicit in the
Misappropriation of Ukrainian State Assets, and Four Russian Government Officials*

WASHINGTON – In response to Russia's continued attempts to destabilize eastern Ukraine and its ongoing occupation of Crimea, the U.S. Department of the Treasury today imposed a broad-based package of sanctions on entities in the financial services, energy, and arms or related materiel sectors of Russia, and on those undermining Ukraine's sovereignty or misappropriating Ukrainian property. More specifically:

- Treasury imposed sanctions that prohibit U.S. persons from providing new financing to two major Russian financial institutions (Gazprombank OAO and VEB) and two Russian energy firms (OAO Novatek and Rosneft), limiting their access to U.S. capital markets;
- Treasury designated eight Russian arms firms, which are responsible for the production of a range of materiel that includes small arms, mortar shells, and tanks;
- Treasury designated the "Luhansk People's Republic" and the "Donetsk People's Republic," which have asserted governmental authority over parts of Ukraine without the authorization of the Government of Ukraine; and Aleksandr Borodai, the self-declared "prime minister" of the Donetsk People's Republic, for threatening the peace, security, stability, sovereignty, and territorial integrity of Ukraine;
- Treasury designated Feodosiya Enterprises, a key shipping facility in the Crimean peninsula, because it is complicit in the misappropriation of state assets of Ukraine; and
- Treasury designated four Russian government officials, including Sergey Beseda, a senior Russian Federal Security Service official.

These actions do more than build upon previous steps to impose costs on separatists and the Russian government. By imposing sanctions on entities within the financial services and energy sectors, Treasury has increased the cost of economic isolation for key Russian firms that value their access to medium- and long-term U.S. sources of financing. By designating firms in the arms or related materiel sector, Treasury has cut these firms off from the U.S. financial system and the U.S. economy.

"Russia has continued to destabilize Ukraine and provide support for the separatists, despite its statements to the contrary," said Under Secretary for Terrorism and Financial Intelligence David S. Cohen. "Because Russia has failed to meet the basic standards of international conduct, we are acting today to open Russia's financial services and energy sectors to sanctions and limit the access of two key Russian banks and two key energy firms to U.S. sources of financing, and to impose blocking sanctions against eight arms firms and a set of senior Russian officials."

Identification of the Financial Services Sector of Russia and the Prohibition of Certain Types of Activities with Two Russian Banks Pursuant to E.O. 13662

Today, Treasury Secretary Jacob J. Lew determined that persons operating within Russia's financial services sector may now be subject to targeted sanctions. Following Secretary Lew's determination, Treasury imposed measures prohibiting U.S. persons and persons within the United States from transacting in, providing financing for, or otherwise dealing in new debt of longer than 90 days maturity or new equity for Gazprombank OAO and VEB, their property, or their interests in property. As a practical matter, this step will close the medium- and long-term U.S. dollar lending window to these banks, and will impose additional significant costs on the Russian Government for its continued activities in Ukraine.

We have not blocked the property or interests in property of these banks, nor have we prohibited transactions with them beyond these specific restrictions. However, the scope of the prohibited transaction types and the number of financial institutions may be expanded under E.O. 13662 if we decide to do so.

Gazprombank OAO is a Russian financial institution, which was originally established to provide financial services to companies in Russia's energy industry, but has expanded to provide services to more than 45,000 companies and 3 million private individuals. Gazprombank OAO has more than 40 branches across Russia, and a number of international subsidiaries. Gazprombank OAO specializes in the private banking and corporate financing services.

VEB is a Russian state-owned financial institution that acts as a development bank and payment agent for the Russian government. It was formed June 8, 2007, pursuant to Russian federal law and is the legal successor to Vnesheconombank of the USSR, which was a specialized Russian state bank. VEB's supervisory board is chaired by the Russian prime minister, and the chairman of the bank is appointed by the Russian president. VEB acts as an agent for the Russian Government for the

purposes of accounting, servicing, and repaying the sovereign debts of the former USSR and Russia; accounting, servicing, and repaying government loans issued by the former USSR and Russia to foreign borrowers; collecting debts from legal entities of Russia and municipal governments; providing and executing state guarantees of Russia and monitoring projects implemented by Russia with involvement of international financial institutions.

Identification of the Energy Sector of Russia and the Prohibition of Certain Types of Activities with Two Russian Energy Firms Pursuant to E.O. 13662

Today, Secretary Lew determined that persons operating within Russia's energy sector may now be subject to targeted sanctions. Following Secretary Lew's determination, Treasury imposed measures that prohibit U.S. persons and persons within the United States from transacting in, providing financing for, or otherwise dealing in new debt of longer than 90 days maturity for Russian energy firms OAO Novatek and Rosneft, their property, or their interests in property. As with the financial institutions, we have not blocked the property or interests in property of these companies, nor prohibited transactions with them beyond these specific restrictions. However, the scope of the prohibited transaction types and the number of energy companies may be expanded under the authorities of E.O. 13662, if the Russian government does not take steps to de-escalate the situation in Ukraine.

OAO Novatek is Russia's largest independent natural gas producer.

Rosneft is Russia's largest petroleum company and third largest gas producer. Treasury designated Rosneft's President and Chairman of the Board, Igor Sechin, on April 28, 2014, pursuant to E.O. 13661.

Imposition of Sanctions on Eight Firms Pursuant to E.O. 13661 for Operating in the Arms or Related Materiel Sector in the Russian Federation

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.

Federal State Unitary Enterprise State Research and Production Enterprise Bazalt ("Bazalt") is involved in the design and construction of air launched ordnance, rocket propelled grenades, and armored fighting vehicle ammunition. Bazalt's manufacturing interests include aerial bombs, mortar shells, grenades, anti-tank and anti-saboteur grenade launchers, and projectiles of all types and calibers.

JSC Concern Sozvezdie develops and produces high-tech control and communication systems, radio electronic warfare and special equipment for military forces. JSC Concern Sozvezdie focuses on three primary lines of production: military-oriented production, dual-purpose products, and dual-purpose products and professional communication and control systems. JSC Concern Sozvezdie's main activities include producing and developing materiel including automated control systems and communication systems for the tactical sector, automated control systems and communication systems for anti-missile defense and air defense systems, and automated communication systems and electronic warfare tools. The company produces systems and devices related to electronic warfare, such as small manpack and portable jammers. The products are designed to disrupt enemy army operations, to reduce staff and equipment loss, and to improve the operation of armed forces by radio jamming of enemy weapon control systems based on radio frequencies.

JSC MIC NPO Mashinostroyenia is a leading Russian rocketry company responsible for defense programs involving cruise missile complexes capable of surface, underwater, and ground platform-based launches. JSC MIC NPO Mashinostroyenia's involvement in Russia's strategic nuclear forces includes the manufacture of intercontinental ballistic rockets and the development of space systems, spacecraft, and automatic and manned orbital stations in support of Russia's Ministry of Defense.

Kalashnikov Concern produces a number of military weapons, including multiple grades and versions of assault rifles, grenade launchers, sniper rifles, military shotguns, and aircraft cannons. Kalashnikov Concern is the largest firearms producer in Russia and is a subsidiary of Russia's State Corporation of Russian Technologies (Rostec).

KBP Instrument Design Bureau is a research and production center that creates precision-guided weapons. KBP Instrument Design Bureau develops antitank missile systems and assault armaments, weapon systems for main battle tanks and lightly armored vehicles, guided artillery projectiles and guided missile systems, short-range air defense systems, gun armament and associated ammunition, combat small arms, and hunting/sporting guns.

Radio-Electronic Technologies designs and produces electronic warfare equipment including weapons-control systems, friend-or-foe identification (IFF) systems, avionics, operational and tactical systems, electronic warfare and intelligence equipment, special measuring instrumentation, and plugs, electric connectors, and cable products.

Uralvagonzavod is a Russian government-owned company that builds a variety of military equipment, including tanks.

Imposition of Sanctions on Two Entities and One Individual Pursuant to E.O. 13660

The following two entities and one individual are being designated and blocked today pursuant to E.O. 13660 for threatening the peace, security, stability, sovereignty, or territorial integrity of Ukraine.

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.

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.

Aleksandr Borodai is 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.

Imposition of Sanctions on Crimean Entity Pursuant to E.O. 13660

The following Crimea-based entity is **being designated** pursuant to E.O. 13660 for being complicit in the misappropriation of state assets of Ukraine.

Feodosiya Enterprise operates a key shipping facility in the Crimean peninsula for oil imports and exports. Prior to Russia's purported annexation of Crimea, **Feodosiya Enterprise** had been controlled by the Ukrainian state-controlled gas company Naftogaz. On March 25, 2014, the separatist self-styled "Crimean Parliament" nationalized **Feodosiya Enterprise** and decreed that the self-styled "Crimean Ministry of Fuel and Energy" would be the governing body of **Feodosiya Enterprise**. The separatist "Minister of Fuel and Energy" asserting authority in occupied Crimea has confirmed that, as of April 15, 2014, separatist authorities in Crimea were provided with fuel by Russian oil companies using the storage facility operated by **Feodosiya Enterprise**.

Imposition of Sanctions on Four Individuals Pursuant to E.O. 13661

The following four individuals are being designated today pursuant to E.O. 13661 for their status as Russian government officials.

Sergey Besesda heads Russia's Federal Security Service (FSB)'s Fifth Service, also known as the Service for Operational Information and International Communications.

Oleg Savelyev is Russia's Minister for Crimean Affairs. In this capacity, Savelyev is responsible for the integration of occupied Crimea into the Russian Federation following Russia's purported annexation of Crimea from Ukraine.

Sergei Neverov is the Deputy Chairman of the State Duma of the Russian Federation. Neverov is responsible for initiating legislation to integrate the purportedly annexed Ukrainian region of Crimea into the Russian Federation.

Igor Shchegolev is an Aide to the President of the Russian Federation.

As a result of today's actions under E.O. 13660 and E.O. 13661, any assets of the entities or individuals designated that are within U.S. jurisdiction must be frozen. Additionally, transactions by U.S. persons or within the United States involving the entities or individuals designated today under E.O. 13660 or E.O. 13661 are generally prohibited.

For identifying information on the individuals and entities named in this release, please click [here](#).

###



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

August 13, 2014

REVISED GUIDANCE ON ENTITIES OWNED BY PERSONS WHOSE PROPERTY
AND INTERESTS IN PROPERTY ARE BLOCKED

This guidance responds to inquiries received by the Department of the Treasury's Office of Foreign Assets Control (OFAC) relating to the status of entities owned by individuals or entities designated under Executive orders and regulations administered by OFAC. This document sets forth new guidance with respect to entities owned 50 percent or more in the aggregate by more than one blocked person.

Property blocked pursuant to an Executive order or regulations administered by OFAC is broadly defined to include any property or interest in property, tangible or intangible, including present, future or contingent interests. A property interest subject to blocking includes interests of any nature whatsoever, direct or indirect.

Persons whose property and interests in property are blocked pursuant to an Executive order or regulations administered by OFAC (blocked persons) are considered to have an interest in all property and interests in property of an entity in which such blocked persons own, whether individually or in the aggregate, directly or indirectly, a 50 percent or greater interest. Consequently, any entity owned in the aggregate, directly or indirectly, 50 percent or more by one or more blocked persons is itself considered to be a blocked person. The property and interests in property of such an entity are blocked regardless of whether the entity itself is listed in the annex to an Executive order or otherwise placed on OFAC's list of Specially Designated Nationals ("SDNs"). Accordingly, a U.S. person generally may not engage in any transactions with such an entity, unless authorized by OFAC. In certain OFAC sanctions programs (e.g., Cuba and Sudan), there is a broader category of entities whose property and interests in property are blocked based on, for example, ownership or control.

U.S. persons are advised to act with caution when considering a transaction with a non-blocked entity in which one or more blocked persons has a significant ownership interest that is less than 50 percent or which one or more blocked persons may control by means other than a majority ownership interest. Such entities may be the subject of future designation or enforcement action by OFAC. Furthermore, a U.S. person may not procure goods, services, or technology from, or engage in transactions with, a blocked person directly or indirectly (including through a third-party intermediary).

OFAC will incorporate this guidance as it issues regulations implementing new sanctions programs. In addition, OFAC expects to amend regulations implementing existing sanctions programs to reflect this guidance.

RE: Request from ATF

From: [REDACTED]
To: [REDACTED]
Date: Thu, 22 Jan 2015 10:00:16 -0500

Hi (b)(6)

This should wrap up #3 in ATF's list. I'll send it along to ATF a bit later. (b)(5) I think I sent you an email on Tuesday when you were out. (b)(5)
Let me know if you didn't get my Tuesday email, or if ATF's proposed approach does not make sense given the posture of the issue.

Thanks

(b)(6)

From: (b)(6)
Sent: Thursday, January 22, 2015 9:17 AM
To: (b)(6)
Subject: Request from ATF

Hi (b)(6)

Did this wrap up the (b)(5) issue, or do we still need to contact anyone else?

Best

(b)(6)

From: (b)(6)
Sent: Wednesday, January 21, 2015 5:06 PM
To: (b)(6)
Cc: (b)(6) Baher, Le a
Subject: RE: Request from ATF

Great, thanks very much everyone for your help.

From: (b)(6)
Sent: Wednesday, January 21, 2015 5:04 PM
To: (b)(6)
Cc: (b)(6) Baher, Le a
Subject: RE: Request from ATF

(b)(6),

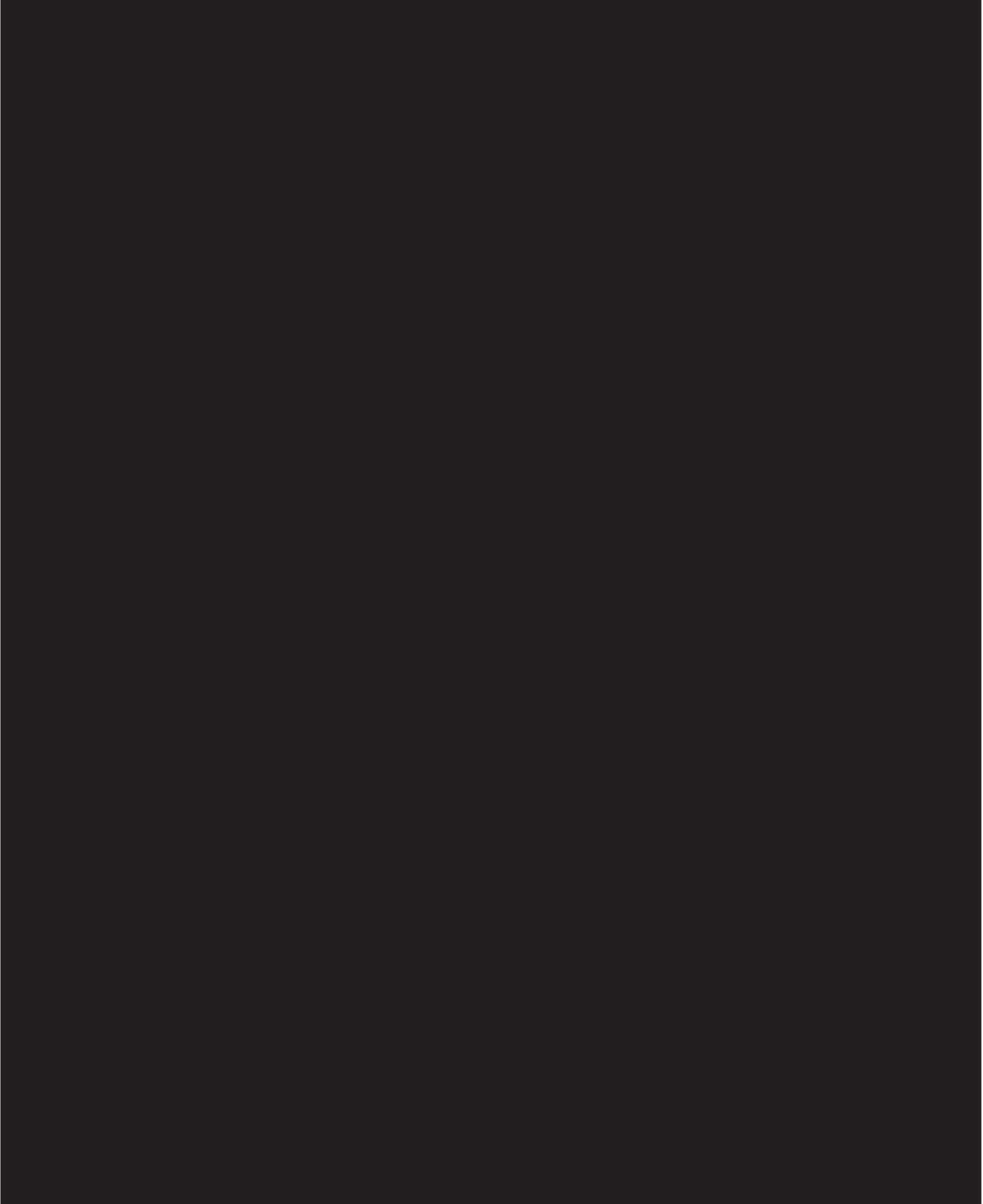
In addition to the entities identified by ATF, the following defense related entities were also designated by OFAC.

1. KONSTRUKTORSKOE BYURO PRIBOROSTROENIYA OTKRYTOE AKTSIONERNOE OBSHCHESTVO
 2. OAO 'DOLGOPRUDNY RESEARCH PRODUCTION ENTERPRISE'
 3. KALININ MACHINE PLANT JSC
 4. JSC NIIP
 5. MYTISHCHINSKI MASHINOSTROITELNY ZAVOD
 6. JOINT STOCK COMPANY ALMAZ-ANTEY AIR DEFENSE CONCERN MAIN SYSTEM DESIGN BUREAU NAMED BY ACADEMICIAN A.A. RASPLETIN
 7. ROSTEC – [On September 12, 2014, the Secretary of the Treasury determined that ROSTEC operated in the defense and materiel sector of the Russian economy and imposed restrictions pursuant to Directive 3]
-

From: (b)(6)
Sent: Wednesday, January 21, 2015 4:23 PM
To: (b)(6)
Subject: FW: Request from ATF

Duplicative of content in email marked with Bates Nos. 000663-000664







From: (b)(6), (b)(7)(C)
To: (b)(6), (b)(7)(C)
Subject: RE: (b)(7)(A) lead, Ukraine
Date: Thursday, January 22, 2015 10:25:00 AM

Hey (b)(6), (b)(7)(C)

I was just referring the lead. I don't think (b)(5)

(b)(6), (b)(7)(C)

Enforcement Officer
Office of Foreign Assets Control
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

(b)(6), (b)(7)(C)

(b)(6), (b)(7)(C)

<http://www.treas.gov/ofac>

From: (b)(6), (b)(7)(C)
Sent: Wednesday, January 21, 2015 5:55 PM
To: (b)(6), (b)(7)(C)
Subject: RE: (b)(7)(A) lead, Ukraine

Hi (b)(6), (b)(7)(C) thanks for bringing this to our attention. Are you interested in pursuing this case or did you just want to alert us to the lead?

From: (b)(6), (b)(7)(C)
Sent: Wednesday, January 21, 2015 3:11 PM
To: (b)(6), (b)(7)(C)
Cc: Gacki, Andrea; Feddo, Thomas
Subject: (b)(7)(A) lead, Ukraine

(b)(5) & (b)(7)(A)

If anyone has already seen this article today, please disregard, but it seems that

(b)(5) & (b)(7)(A)

Here is the link to the article and the ENF case.

(b)(7)(A)

(b)(7)(A)

Best,

(b)(6), (b)(7)(C)

(b)(6), (b)(7)(C)

Enforcement Officer
Office of Foreign Assets Control
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

(b)(6), (b)(7)(C)

(b)(6), (b)(7)(C)

<http://www.treas.gov/ofac>

RE: Weekly Report

From: (b)(6)
To: (b)(6)
Date: Thu, 22 Jan 2015 11:29:26 -0500
Attachments: (b)(6)Week y Report Jan 22 2015.docx (23.63 kB)

(b)(6),

Here is my weekly report.

Thanks,

(b)(6)

From: (b)(6)
Sent: Thursday, January 22, 2015 8:53 AM
To: (b)(6); Smith, Bradley; Tuchband, Matthew
Subject: Weekly Report

Good Morning

Please send your weekly reports to me by noon today. Also please make sure you validate your time by Friday at noon. If you came in late on Monday due to the weather please indicate that accordingly on your time card. You were allotted 2 hours of hazardous weather pay, if you only took 1 hour then only put 1 hour on your time card. If you didn't take any time then just log in your normal 8 hours. Please don't hesitate to ask me any questions. Thank you!

(b)(6)

Administrative Management Specialist
Office of Chief Counsel (Foreign Assets Control)
1500 Pennsylvania Ave, NW
Washington, DC 20220

(b)(6)

(b)(6)

Weekly Report for January 16 to January 22, 2015

Upcoming Significant Matters

[None]

Activities for the Week Ending January 22, 2015 to be Reported to E&I

Licensing:

Ukraine. On Friday, I participated in an interagency call with the (b)(5)

(b)(5)

(b)(5) ATF has proposed a working group on these issues, for which OFAC Compliance will serve as the primary point of contact going forward. (b)(6)

Other Activities for the Week Ending January 22, 2015

Through the OMB process, I finalized comments on a Department of Commerce final rule regarding exports of U.S.-origin items to Crimea. (b)(6)

I assisted Compliance with a question regarding the ability of (b)(5)

(b)(6)

I responded to State and OFAC Policy regarding a question on the ability of (b)(5)

(b)(6)

I responded to an OFAC question on how (b)(5)

(b)(6)

I discussed with (b)(6) and responded to an OFAC question about (b)(5)

(b)(5)

(b)(6)

I reviewed talking points on the implementation of the Ukraine Freedom Support Act of 2014. (b)(6)

I discussed with (b)(6) and responded to OFAC licensing about how (b)(5)

(b)(5)

(b)(6)

I responded to a question from OFAC licensing about the treatment of (b)(5) (b)(5) a Sudan issue. (b)(6)

I discussed issues with a Sudan legal services license with (b)(6) (b)(6)

I fielded three phone calls on the main line regarding Ukraine-related and Sudanese sanctions issues. (b)(6)

I reviewed our office's new employee materials to discuss suggestions for updates with (b)(6) (b)(6)

I reviewed about 30 summer intern applications. (b)(6)

Bates Nos. 2018-08-116:
000682 - 000689
Submitter Notice Process
Initiated and/or Pending
Consultation Responses

Bates Nos. 2018-08-116:

000690 – 000693

Withheld in full pursuant to
FOIA exemption (b)(7)(A)

Bates Nos. 2018-08-116:
000694 – 000700
Pending Consult Response

Bates Nos. 2018-08-116:
000701-000702

Duplicate pages marked
Bates No. 2018-08-116:
000696-000697

Bates Nos. 2018-08-116:
000703 - 000710
Submitter Notice Process
Initiated and/or Pending
Consultation Response

FW: (b)(7)(A) lead, Ukraine

From:

(b)(6), (b)(7)(C)

To:

Date: Tue, 27 Jan 2015 08:42:01 -0500

Hi (b)(6), (b)(7)(C)

(b)(5) & (b)(7)(A)

(b)(5) & (b)(7)(A)

I would sincerely appreciate your thoughts on this matter.

Many thanks,

(b)(6), (b)(7)(C)

Enforcement Officer
Office of Foreign Assets Control
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

(b)(6), (b)(7)(C)

From: (b)(6), (b)(7)(C)

Sent: Friday, January 23, 2015 10:01 AM

To: (b)(6), (b)(7)(C)

Subject: FW: (b)(7)(A) lead, Ukraine

As we discussed, please open an investigation on this issue using a new ENF number.

Sincerely,

(b)(6), (b)(7)(C)

From: (b)(6), (b)(7)(C)

Sent: Wednesday, January 21, 2015 3:11 PM

To: (b)(6), (b)(7)(C)

Cc: Gack, Thomas

Subject: (b)(7)(A) lead, Ukraine

(b)(5) & (b)(7)(A)

If anyone has already seen this article today, please disregard, but it seems that (b)(5) & (b)(7)(A)

(b)(5) & (b)(7)(A)

Here is the link to the article and the ENF case.

(b)(7)(A)

Best,

(b)(6), (b)(7)(C)

2018-08-116: 000711

(b)(6), (b)(7)(C)

Enforcement Officer
Office of Foreign Assets Control
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

(b)(6), (b)(7)(C)

(b)(6), (b)(7)(C)

<http://www.treas.gov/ofac>

Pending SN Process

Pending SN Process

Ukraine Binder Contents

From: (b)(6)
To: (b)(6)
Date: Wed, 28 Jan 2015 15:57:36 -0500
Attachments: Ukra ne B nder Contents (EOs, FAQs, etc).pdf (8.13 MB); The UFSA.pdf (164.7 kB)

(b)(6),

Attached is the .pdf document containing the Ukraine binder I put together. It even has the table of contents on there you just need to find some tabs to separate out the documents.

The one thing I haven't yet incorporated (but should) is the text of the UFSA. I added that here in case you want to put that into your binder also.

Have fun!

(b)(6)

TABLE OF CONTENTS

A	OFAC website - Ukraine Sanctions Page
B	E.O. 13660
C	Designations Pursuant to E.O. 13660 E.O. 13661 Designations Pursuant to E.O. 13661
F	E.O. 13662 Identifications Pursuant to E.O. 13662
H	Directives Under E.O. 13662
I	General Licenses Under E.O. 13662
J	Published FAQ Regarding E.O. 13662
K	E.O. 13685
L	General Licenses Under E.O. 13685
M	OFAC '50% Rule' Guidance
N	Published FAQ Regarding 50% Rule
O	31 C.F.R. part 589 - URSR (Regulations)
P	
S	
T	
U	
V	
W	
X	
Y	
Z	

TAB A



U.S. DEPARTMENT OF THE TREASURY

source Center

Ukraine-related Sanctions

Sign up for Ukraine-related Sanctions e-mail updates.

Frequently Asked Questions

OFAC has compiled hundreds of frequently asked questions (FAQs) about its sanctions programs and related policies. The link below sends the user to the entire list of OFAC's FAQs.

- OFAC Frequently Asked Questions
- Questions Regarding Sectoral Sanctions under Executive Order 13662
- Questions Related to Entities Owned by Persons Whose Property and Interests in Property are Blocked

Sectoral Sanctions Identifications (SSI) List

The Sectoral Sanctions Identifications List includes persons determined by OFAC to be operating in sectors of the Russian economy identified by the Secretary of the Treasury pursuant to Executive Order 13662.

- Sectoral Sanctions Identifications List Page
- Directive 1 as Amended Under Executive Order 13662 (September 12, 2014)
- Directive 2 as Amended Under Executive Order 13662 (September 12, 2014)
- Directive 3 Under Executive Order 13662 (September 12, 2014)
- Directive 4 Under Executive Order 13662 (September 12, 2014)

- Archived Directives
Directives 1 and 2 Pursuant to EO 13662 (Issued July 16, 2014)

Interpretive Guidance

OFAC issues interpretive guidance on specific issues related to the sanctions programs it administers. These interpretations of OFAC policy are sometimes issued in response to a public request for guidance or may be released proactively by OFAC in order to address a complex topic.

- Index of Interpretative Guidance

Applying for a Specific OFAC License

It may be in your and the U.S. government's interest to authorize particular economic activity related to the Ukraine-related Sanctions. Visit the link below to apply for an OFAC license.

- Apply for an OFAC License Online - Authorization from OFAC to engage in a transaction that otherwise would be prohibited.

Guidance on OFAC Licensing Policy

Certain activities related to the Ukraine-related Sanctions may be allowed if they are licensed by OFAC. Below OFAC has issued guidance and statements on specific licensing policies as they relate to the Ukraine-related Sanctions.

- Licenses for Legal Fees and Costs - Guidance on the Release of Limited Amounts of Blocked Funds for Payment of Legal Fees and Costs Incurred in Challenging the Blocking of U.S. Persons in Administrative or Civil Proceedings
- Entities Owned by Blocked Persons - Guidance On Entities Owned by Persons Whose Property And Interests In Property Are Blocked

General Licenses

OFAC issues general licenses in order to authorize activities that would otherwise be prohibited with regard to Ukraine. General licenses allow all US persons to engage in the activity described in the general license without needing to apply for a specific license.

- Ukraine General License Number 1A - Authorizing Certain Transactions Related to Derivatives Prohibited by Directives 1, 2 and 3 Under Executive Order 13662 (issued September 12, 2014)
- Ukraine General License Number 2 - Authorizing Certain Activities Prohibited by Directive 4 under Executive Order 13662 Necessary to Wind Down Operations (issued September 12, 2014)
- Ukraine General License Number 3 - Authorizing Transactions Involving Certain Entities Otherwise Prohibited by Directive 1 under Executive Order 13662 (October 6, 2014)
- Ukraine General License Number 4 - Authorizing the Exportation or Reexportation of Agricultural Commodities, Medicine, Medical Supplies, and Replacement Parts (December 19, 2014)
- List of Medical Supplies Authorized under Ukraine General License Number 4
- Ukraine General License Number 5 - Authorizing Certain Activities Prohibited by Executive Order 13685 of December 19, 2014 Necessary to Wind Down Operations Involving the Crimea Region of Ukraine (December 30, 2014)

Legal Framework for the Ukraine-related Sanctions

The Ukraine-related sanctions program represents the implementation of multiple legal authorities. Some of these authorities are in the form of an executive order issued by the President. Other authorities are public laws (statutes) passed by The Congress. These authorities are further codified by OFAC in its regulations which are published in the Code of Federal Regulations (CFR).

Executive Orders

2018-08-116: 000719

- 13660 - Blocking Property of Certain Persons Contributing to the Situation in Ukraine (March 6, 2014)
- 13661 - Blocking Property of Additional Persons Contributing to the Situation in Ukraine (March 17, 2014)
- 13662 - Blocking Property of Additional Persons Contributing to the Situation in Ukraine (March 20, 2014)
- 13685 - Blocking Property of Certain Persons and Prohibiting Certain Transactions with Respect to the Crimea Region of Ukraine (December 19, 2014)

Statutes

- International Emergency Economic Powers Act (IEEPA), 50 U.S.C. §§ 1701-1706
- National Emergencies Act (NEA), 50 U.S.C. §§ 1601-1651

Code of Federal Regulations

- 31 CFR Part 589 - Ukraine-Related Sanctions Regulations

Federal Register Notices

- 79 FR 26365-14 - Issuance of regulations to implement Executive Order 13660, Executive Order 13661, and Executive Order 13662

TAB B



Presidential Documents

Title 3—

Executive Order 13660 of March 6, 2014

The President

Blocking Property of Certain Persons Contributing to the Situation in Ukraine

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 *et seq.*) (NEA), section 212(f) of the Immigration and Nationality Act of 1952 (8 U.S.C. 1182(f)), and section 301 of title 3, United States Code,

I, BARACK OBAMA, President of the United States of America, find that the actions and policies of persons including persons who have asserted governmental authority in the Crimean region without the authorization of the Government of Ukraine that undermine democratic processes and institutions in Ukraine; threaten its peace, security, stability, sovereignty, and territorial integrity; and contribute to the misappropriation of its assets, constitute an unusual and extraordinary threat to the national security and foreign policy of the United States, and I hereby declare a national emergency to deal with that threat. I hereby order:

Section 1. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in: any person determined by the Secretary of the Treasury, in consultation with the Secretary of State:

(i) to be responsible for or complicit in, or to have engaged in, directly or indirectly, any of the following:

(A) actions or policies that undermine democratic processes or institutions in Ukraine;

(B) actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine; or

(C) misappropriation of state assets of Ukraine or of an economically significant entity in Ukraine;

(ii) to have asserted governmental authority over any part or region of Ukraine without the authorization of the Government of Ukraine;

(iii) to be a leader of an entity that has, or whose members have, engaged in any activity described in subsection (a)(i) or (a)(ii) of this section or of an entity whose property and interests in property are blocked pursuant to this order;

(iv) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, any activity described in subsection (a)(i) or (a)(ii) of this section or any person whose property and interests in property are blocked pursuant to this order; or

(v) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or

licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order.

Sec. 2. I hereby find that the unrestricted immigrant and nonimmigrant entry into the United States of aliens determined to meet one or more of the criteria in subsection 1(a) of this order would be detrimental to the interests of the United States, and I hereby suspend entry into the United States, as immigrants or nonimmigrants, of such persons. Such persons shall be treated as persons covered by section 1 of Proclamation 8693 of July 24, 2011 (Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions).

Sec. 3. I hereby determine that the making of donations of the type of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section 1 of this order would seriously impair my ability to deal with the national emergency declared in this order, and I hereby prohibit such donations as provided by section 1 of this order.

Sec. 4. The prohibitions in section 1 of this order include but are not limited to:

(a) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 5. (a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 6. For the purposes of this order:

(a) the term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization; and

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States.

Sec. 7. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in this order, there need be no prior notice of a listing or determination made pursuant to section 1 of this order.

Sec. 8. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including the promulgation of rules and regulations, and to employ all powers granted to the President by IEEPA, as may be necessary to carry out the purposes of this order. The Secretary of the Treasury may redelegate any of these functions to other officers and agencies of the United States Government consistent with applicable law. All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 9. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to submit the recurring and final reports

to the Congress on the national emergency declared in this order, consistent with section 401(c) of the NEA (50 U.S.C. 1641(c)) and section 204(c) of IEEPA (50 U.S.C. 1703(c)).

Sec. 10. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.



THE WHITE HOUSE,
March 6, 2014.

[FR Doc. 2014-05323
Filed 3-7-14; 11:15 am]
Billing code 3295-F4

TAB C



Sanctions List Search

E.O. 13660
as of: 14 Jan 2015

This Sanctions List Search application ("Sanctions List Search") is designed to facilitate the use of the Specially Designated Nationals and Blocked Persons list ("SDN List") and all other non-SDN lists, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Part 561 list, the Sectoral Sanctions Identifications List and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various non-SDN lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various non-SDN lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result

Name	Address	Type	Program(s)	List
YANUKOVYCH, Viktor Fedorovich		Individual	UKRAINE-EO13660	SDN
AKSYONOV, Sergey Valeryevich		Individual	UKRAINE-EO13660	SDN
KONSTANTINOV, Vladimir Andreyevich		Individual	UKRAINE-EO13660	SDN
MEDVEDCHUK, Viktor		Individual	UKRAINE-EO13660	SDN
CHALIY, Aleksei Mikhailovich		Individual	UKRAINE-EO13660	SDN
ZIMA, Pyotr Anatoliyovich	18 Ulitsa D. Ulyanova, Apartment 110	Individual	UKRAINE-EO13660	SDN
CHERNOMORNEFTEGAZ	Kirova / per. Sovnarkomovskaya, 52/1	Entity	UKRAINE-EO13660	SDN
TEMIRGALIEV, Rustam Ilmirovich		Individual	UKRAINE-EO13660	SDN
ZHEREBTSOV, Yuriy Gennadievych	23 Ulitsa Koltsevaya	Individual	UKRAINE-EO13660	SDN
MEDVEDEV, Valery Kirillovich	22 Ulitsa Oktyabrskoi Revolutsii, Building 9, Apt. 14	Individual	UKRAINE-EO13660	SDN
MALYSHEV, Mikhail Grigorevich	15/9 Ulitsa Turgeneva, Apt. 9	Individual	UKRAINE-EO13660	SDN
TSEKOV, Sergey Pavlovich		Individual	UKRAINE-EO13660	SDN
MENYAILO, Sergei Ivanovich		Individual	UKRAINE-EO13660	SDN
PONOMARYOV, Vyacheslav		Individual	UKRAINE-EO13660	SDN

KAUROV, Valery Vladimirovich		Individual	UKRAINE- EO13660	SDN
PURGIN, Andrey Yevgenyevich		Individual	UKRAINE- EO13660	SDN
FEODOSIYA ENTERPRISE	Feodosiya, Geologicheskaya str. 2	Entity	UKRAINE- EO13660	SDN
PUSHILIN, Denis		Individual	UKRAINE- EO13660	SDN
GIRKIN, Igor Vsevolodovich	Shenkurskiy Passage (Proyezd), House 8-6, Apartment 136	Individual	UKRAINE- EO13660	SDN
BOLOTOV, Valery		Individual	UKRAINE- EO13660	SDN
DONBASS PEOPLE'S MILITIA	Prospect Zasyadko.13	Entity	UKRAINE- EO13660	SDN
LUHANSK PEOPLE'S REPUBLIC		Entity	UKRAINE- EO13660	SDN
BORODAI, Aleksandr		Individual	UKRAINE- EO13660	SDN
DONETSK PEOPLE'S REPUBLIC		Entity	UKRAINE- EO13660	SDN
BEZLER, Igor Nikolayevich		Individual	UKRAINE- EO13660	SDN
RUDENKO, Miroslav Vladimirovich		Individual	UKRAINE- EO13660	SDN
TSARYOV, Oleh Anatolievich		Individual	UKRAINE- EO13660	SDN
NEKLYUDOV, Dmitry Sergeyevich		Individual	UKRAINE- EO13660	SDN
BEREZIN, Fedor		Individual	UKRAINE- EO13660	SDN
KHRYAKOV, Alexander		Individual	UKRAINE- EO13660	SDN
ZAKHARCHENKO, Alexander		Individual	UKRAINE- EO13660	SDN
KOZITSYN, Nikolai		Individual	UKRAINE- EO13660	SDN
SAVCHENKO, Petr		Individual	UKRAINE- EO13660	SDN
PROFAKTOR, TOV	Bud, 22/28, vul. Dzerzhynskogo	Entity	UKRAINE- EO13660	SDN
GUBAREV, Pavel		Individual	UKRAINE- EO13660	SDN

POKLONSKAYA, Natalia Vladimirovna		Individual	UKRAINE-EO13660	SDN
ANTYUFEYEV, Vladimir		Individual	UKRAINE-EO13660	SDN
NIGHT WOLVES	Nizhnije Mnevniki, 110, "Bike Center"	Entity	UKRAINE-EO13660	SDN
ZALDOSTANOV, Aleksandr		Individual	UKRAINE-EO13660	SDN
PLOTNITSKY, Igor Venediktovich		Individual	UKRAINE-EO13660	SDN
MOZGOVOY, Aleksey		Individual	UKRAINE-EO13660	SDN
MALOFEYEV, Konstantin		Individual	UKRAINE-EO13660	SDN
MARSHALL CAPITAL PARTNERS	5th Floor, Novinsky Passage Business Center, 31 Novinsky Boulevard	Entity	UKRAINE-EO13660	SDN
OLOT		Entity	UKRAINE-EO13660	SDN
KARYAKIN, Alexei Vyacheslavovich		Individual	UKRAINE-EO13660	SDN
SOUTH-EAST MOVEMENT		Entity	UKRAINE-EO13660	SDN
NOVOROSSIYA PARTY		Entity	UKRAINE-EO13660	SDN

TAB D



Presidential Documents

Title 3—

Executive Order 13661 of March 16, 2014

The President

Blocking Property of Additional Persons Contributing to the Situation in Ukraine

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 *et seq.*) (NEA), section 212(f) of the Immigration and Nationality Act of 1952 (8 U.S.C. 1182(f)), and section 301 of title 3, United States Code,

I, BARACK OBAMA, President of the United States of America, hereby expand the scope of the national emergency declared in Executive Order 13660 of March 6, 2014, finding that the actions and policies of the Government of the Russian Federation with respect to Ukraine—including the recent deployment of Russian Federation military forces in the Crimea region of Ukraine—undermine democratic processes and institutions in Ukraine; threaten its peace, security, stability, sovereignty, and territorial integrity; and contribute to the misappropriation of its assets, and thereby constitute an unusual and extraordinary threat to the national security and foreign policy of the United States. Accordingly, I hereby order:

Section 1. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in:

(i) the persons listed in the Annex to this order; and

(ii) persons determined by the Secretary of the Treasury, in consultation with the Secretary of State:

(A) to be an official of the Government of the Russian Federation;

(B) to operate in the arms or related materiel sector in the Russian Federation;

(C) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly:

(1) a senior official of the Government of the Russian Federation; or

(2) a person whose property and interests in property are blocked pursuant to this order; or

(D) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of:

(1) a senior official of the Government of the Russian Federation; or

(2) a person whose property and interests in property are blocked pursuant to this order.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order.

Sec. 2. I hereby find that the unrestricted immigrant and nonimmigrant entry into the United States of aliens determined to meet one or more of the criteria in section 1(a) of this order would be detrimental to the interests of the United States, and I hereby suspend entry into the United

States, as immigrants or nonimmigrants, of such persons. Such persons shall be treated as persons covered by section 1 of Proclamation 8693 of July 24, 2011 (Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions).

Sec. 3. I hereby determine that the making of donations of the type of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section 1 of this order would seriously impair my ability to deal with the national emergency declared in Executive Order 13660, and I hereby prohibit such donations as provided by section 1 of this order.

Sec. 4. The prohibitions in section 1 of this order include but are not limited to:

(a) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 5. (a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 6. For the purposes of this order:

(a) the term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization;

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States; and

(d) the term the "Government of the Russian Federation" means the Government of the Russian Federation, any political subdivision, agency, or instrumentality thereof, including the Central Bank of the Government of the Russian Federation, and any person owned or controlled by, or acting for or on behalf of, the Government of the Russian Federation.

Sec. 7. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in Executive Order 13660, there need be no prior notice of a listing or determination made pursuant to section 1 of this order.

Sec. 8. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including the promulgation of rules and regulations, and to employ all powers granted to the President by IEEPA, as may be necessary to carry out the purposes of this order. The Secretary of the Treasury may redelegate any of these functions to other officers and agencies of the United States Government consistent with applicable law. All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 9. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to determine that circumstances no longer warrant the blocking of the property and interests in property of a person

listed in the Annex to this order, and to take necessary action to give effect to that determination.

Sec. 10. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Sec. 11. This order is effective at 12:01 a.m. eastern daylight time on March 17, 2014.

A handwritten signature in black ink, appearing to be Barack Obama's signature, consisting of a large 'B' followed by a circle and a horizontal line.

THE WHITE HOUSE,
March 16, 2014.

Billing code 3295-F4-P

ANNEX

1. Yelena Mizulina [State Duma Deputy, born December 9, 1954]
2. Leonid Slutsky [State Duma Deputy, born January 4, 1968]
3. Andrei Klithas [Chairman of the Russian Federation Council Committee on Constitutional Law, Judicial and Legal Affairs and the Development of Civil Society, born November 9, 1972]
4. Valentina Ivanovna Matviyenko [Federation Council Speaker, born April 7, 1949]
5. Dmitry Olegovich Rogozin [Deputy Prime Minister of the Russian Federation, born December 21, 1963]
6. Vladislav Yurievich Surkov [Presidential Aide to the President of the Russian Federation, born September 21, 1964]
7. Sergey Glazyev [Presidential Advisor to the President of the Russian Federation, born January 1, 1961]

TAB E

E.O. 13661
as of: 14 Jan 2015

Sanctions List Search

This Sanctions List Search application ("Sanctions List Search") is designed to facilitate the use of the Specially Designated Nationals and Blocked Persons list ("SDN List") and all other non-SDN lists, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Part 561 list, the Sectoral Sanctions Identifications List and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various non-SDN lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various non-SDN lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal

Name	Address	Type	Program(s)	List
ROGOZIN, Dmitry Olegovich		Individual	UKRAINE-EO13661	SDN
SURKOV, Vladislav Yurievich		Individual	UKRAINE-EO13661	SDN
GLAZYEV, Sergey		Individual	UKRAINE-EO13661	SDN
KLISHAS, Andrei		Individual	UKRAINE-EO13661	SDN
MATVIYENKO, Valentina Ivanovna		Individual	UKRAINE-EO13661	SDN
MIZULINA, Yelena		Individual	UKRAINE-EO13661	SDN
SLUTSKY, Leonid		Individual	UKRAINE-EO13661	SDN
OZEROV, Viktor Alekseevich		Individual	UKRAINE-EO13661	SDN
DZHABAROV, Vladimir Michailovich		Individual	UKRAINE-EO13661	SDN
TIMCHENKO, Gennady		Individual	UKRAINE-EO13661	SDN
YAKUNIN, Vladimir Ivanovich		Individual	UKRAINE-EO13661	SDN
ZHELEZNYAK, Sergei Vladimirovich		Individual	UKRAINE-EO13661	SDN
ROTENBERG, Arkady		Individual	UKRAINE-EO13661	SDN
MIRONOV, Sergei Mikhailovich		Individual	UKRAINE-EO13661	SDN
ROTENBERG, Boris		Individual	UKRAINE-EO13661	SDN
BUSHMIN, Evgeni Viktorovich		Individual	UKRAINE-EO13661	SDN
RYZHKOV, Nikolai Ivanovich		Individual	UKRAINE-EO13661	SDN
TOTOONOV, Aleksandr Borisovich		Individual	UKRAINE-EO13661	SDN
PANTELEEV, Oleg Evgenevich		Individual	UKRAINE-EO13661	SDN
FURSENKO, Andrei Alexandrovich		Individual	UKRAINE-EO13661	SDN
KOZHIN, Vladimir Igorevich		Individual	UKRAINE-EO13661	SDN
KOVALCHUK, Yuri Valentinovich		Individual	UKRAINE-EO13661	SDN
BANK ROSSIYA	2 Liter A Pl. Rastrelli	Entity	UKRAINE-EO13661	SDN
SERGUN, Igor Dmitrievich		Individual	UKRAINE-EO13661	SDN
CHEMEZOV, Sergei		Individual	UKRAINE-EO13661	SDN
IVANOV, Sergei		Individual	UKRAINE-EO13661	SDN
GROMOV, Alexei		Individual	UKRAINE-EO13661	SDN
IVANOV, Victor Petrovich		Individual	UKRAINE-EO13661	SDN
NARYSHKIN, Sergey Yevgenyevich		Individual	UKRAINE-EO13661	SDN
SECHIN, Igor		Individual	UKRAINE-EO13661	SDN

KOZAK, Dmitry		Individual	UKRAINE-EO13661	SDN
PUSHKOV, Aleksei Konstantinovich		Individual	UKRAINE-EO13661	SDN
VOLODIN, Vyacheslav		Individual	UKRAINE-EO13661	SDN
MUROV, Evgeniy Alekseyevich		Individual	UKRAINE-EO13661	SDN
BELAVENCEV, Oleg Evgenyevich		Individual	UKRAINE-EO13661	SDN
VOLGA GROUP	3, rue de la Reine	Entity	UKRAINE-EO13661	SDN
TRANSOIL	18A Petrogradskaya nab.	Entity	UKRAINE-EO13661	SDN
AQUANIKA	47A, Sevastopolskiy Ave., of. 304	Entity	UKRAINE-EO13661	SDN
INVESTCAPITALBANK	100/1, Dostoevskogo Street	Entity	UKRAINE-EO13661	SDN
CJSC ZEST	pr. Medikov 5, of. 301	Entity	UKRAINE-EO13661	SDN
JSB SOBINBANK	15 Korp. 56 D. 4 Etazh ul. Rochdelskaya	Entity	UKRAINE-EO13661	SDN
SAKHATRANS LLC	14 ul. Molodezhnaya Rabochi Pos. Vanino, 682860 Vaninski	Entity	UKRAINE-EO13661	SDN
AVIA GROUP LLC	Terminal Aeroport Sheremetyevo Khimki, 141400 Moskovskaya obl.	Entity	UKRAINE-EO13661	SDN
AVIA GROUP NORD LLC	17 A, Stratoyava St.	Entity	UKRAINE-EO13661	SDN
STROYGAZMONTAZH	53 prospekt Vernadskogo	Entity	UKRAINE-EO13661	SDN
SMP BANK	71/11 Sadovnicheskaya Street	Entity	UKRAINE-EO13661	SDN
STROYTRANSGAZ HOLDING	33 Stasinou Street, Office 2 2003, Nicosia Strovolos	Entity	UKRAINE-EO13661	SDN
STROYTRANSGAZ GROUP	3 Begovaya Street, Building #1	Entity	UKRAINE-EO13661	SDN
STROYTRANSGAZ OJSC	House 58, Novocheremushkinskaya St.	Entity	UKRAINE-EO13661	SDN
STROYTRANSGAZ-M LLC	26th Meeting of the Communist Party Street, House 2V	Entity	UKRAINE-EO13661	SDN
STROYTRANSGAZ LLC	House 65, Novocheremushkinskaya	Entity	UKRAINE-EO13661	SDN
THE LIMITED LIABILITY COMPANY INVESTMENT COMPANY ABROS	2 Liter a Pl. Rastrelli	Entity	UKRAINE-EO13661	SDN

FEDERAL STATE UNITARY ENTERPRISE STATE RESEARCH AND PRODUCTION ENTERPRISE BAZALT	32 Velyaminovskaya	Entity	UKRAINE-EO13661	SDN
KONSTRUKTORSKOE BYURO PRIBOROSTROENIYA OTKRYTOE AKTIONERNOE OBSHCHESTVO	59 Shcheglovskaya Zaseka ul.	Entity	UKRAINE-EO13661	SDN
JOINT-STOCK COMPANY CONCERN ALMAZ- ANTEY	41 ul.Vereiskaya	Entity	UKRAINE-EO13661	SDN
JOINT STOCK COMPANY CONCERN RADIO- ELECTRONIC TECHNOLOGIES	20/1 Korp. 1 ul. Goncharnaya	Entity	UKRAINE-EO13661	SDN
JOINT STOCK COMPANY CONCERN SOZVEZDIE	14 Plekhanovskaya Street	Entity	UKRAINE-EO13661	SDN
JOINT STOCK COMPANY MILITARY- INDUSTRIAL CORPORATION NPO MASHINOSTROYENIA	33, Gagarina St.	Entity	UKRAINE-EO13661	SDN
URALVAGONZAVOD	28, Vostochnoye shosse	Entity	UKRAINE-EO13661	SDN
UNITED SHIPBUILDING CORPORATION	90, Marata ul.	Entity	UKRAINE-EO13661	SDN
KALASHNIKOV CONCERN	3, Derjabin Pr., Izhevsk	Entity	UKRAINE-EO13661	SDN
NEVEROV, Sergei Ivanovich		Individual	UKRAINE-EO13661	SDN
SAVELYEV, Oleg Genrikhovich		Individual	UKRAINE-EO13661	SDN
BESEDA, Sergey		Individual	UKRAINE-EO13661	SDN
SHCHEGOLEV, Igor		Individual	UKRAINE-EO13661	SDN
OAO 'DOLGOPRUDNY RESEARCH PRODUCTION ENTERPRISE'	1 Pl. Sobina	Entity	UKRAINE-EO13661	SDN
JSC V. TIKHOMIROV SCIENTIFIC RESEARCH INSTITUTE OF INSTRUMENT DESIGN	3 Ul. Gagarina	Entity	UKRAINE-EO13661	SDN
MYTISHCHINSKI MASHINOSTROITELNY ZAVOD, OAO	4 ul. Kolontsova Mytishchi	Entity	UKRAINE-EO13661	SDN
JOINT STOCK COMPANY ALMAZ-ANTEY AIR DEFENSE CONCERN MAIN SYSTEM DESIGN BUREAU NAMED BY ACADEMICIAN A.A. RASPLETIN	16-80, Leningradsky Prospect	Entity	UKRAINE-EO13661	SDN
KALININ MACHINE PLANT JSC	18 prospekt Kosmonavtov	Entity	UKRAINE-EO13661	SDN

TAB F

Presidential Documents

Title 3—

Executive Order 13662 of March 20, 2014

The President

Blocking Property of Additional Persons Contributing to the Situation in Ukraine

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 *et seq.*) (NEA), section 212(f) of the Immigration and Nationality Act of 1952 (8 U.S.C. 1182(f)), and section 301 of title 3, United States Code,

I, BARACK OBAMA, President of the United States of America, hereby expand the scope of the national emergency declared in Executive Order 13660 of March 6, 2014, and expanded by Executive Order 13661 of March 16, 2014, finding that the actions and policies of the Government of the Russian Federation, including its purported annexation of Crimea and its use of force in Ukraine, continue to undermine democratic processes and institutions in Ukraine; threaten its peace, security, stability, sovereignty, and territorial integrity; and contribute to the misappropriation of its assets, and thereby constitute an unusual and extraordinary threat to the national security and foreign policy of the United States. Accordingly, I hereby order:

Section 1. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in: any person determined by the Secretary of the Treasury, in consultation with the Secretary of State:

(i) to operate in such sectors of the Russian Federation economy as may be determined by the Secretary of the Treasury, in consultation with the Secretary of State, such as financial services, energy, metals and mining, engineering, and defense and related materiel;

(ii) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, any person whose property and interests in property are blocked pursuant to this order; or

(iii) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order.

Sec. 2. I hereby find that the unrestricted immigrant and nonimmigrant entry into the United States of aliens determined to meet one or more of the criteria in section 1(a) of this order would be detrimental to the interests of the United States, and I hereby suspend entry into the United States, as immigrants or nonimmigrants, of such persons. Such persons shall be treated as persons covered by section 1 of Proclamation 8693 of July 24, 2011 (Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions).

Sec. 3. I hereby determine that the making of donations of the type of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section 1 of this order would seriously impair my ability to deal with the national emergency declared in Executive Order 13660, and expanded in Executive Order 13661 and this order, and I hereby prohibit such donations as provided by section 1 of this order.

Sec. 4. The prohibitions in section 1 of this order include but are not limited to:

(a) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 5. (a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 6. For the purposes of this order:

(a) the term “person” means an individual or entity;

(b) the term “entity” means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization;

(c) the term “United States person” means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States; and

(d) the term the “Government of the Russian Federation” means the Government of the Russian Federation, any political subdivision, agency, or instrumentality thereof, including the Central Bank of the Russian Federation, and any person owned or controlled by, or acting for or on behalf of, the Government of the Russian Federation.

Sec. 7. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in Executive Order 13660, and expanded in Executive Order 13661 and this order, there need be no prior notice of a listing or determination made pursuant to section 1 of this order.

Sec. 8. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including the promulgation of rules and regulations, and to employ all powers granted to the President by IEEPA, as may be necessary to carry out the purposes of this order. The Secretary of the Treasury may redelegate any of these functions to other officers and agencies of the United States Government consistent with applicable law. All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 9. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

A handwritten signature in black ink, appearing to be Barack Obama's signature, written in a cursive style.

THE WHITE HOUSE,
March 20, 2014.

[FR Doc. 2014-06612
Filed 3-21-14; 11:15 am]
Billing code 3295-F4

TAB G



E.O. 13662
as of: 14 Jan 2015

Sanctions List Search

This Sanctions List Search application ("Sanctions List Search") is designed to facilitate the use of the Specially Designated Nationals and Blocked Persons list ("SDN List") and all other non-SDN lists, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Part 561 list, the Sectoral Sanctions Identifications List and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various non-SDN lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various non-SDN lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

Name	Address	Type	Program(s)	List
VTB BANK OAO	29, Bolshaya Morskaya str.	Entity	UKRAINE-EO13662	Non-SDN
RUSSIAN AGRICULTURAL BANK	3, Gagarinsky Pereulok	Entity	UKRAINE-EO13662	Non-SDN
VNESHECONOMBANK	9 Akademika Sakharova prospekt	Entity	UKRAINE-EO13662	Non-SDN
GAZPROMBANK OAO	16, Building 1, Nametkina St.	Entity	UKRAINE-EO13662	Non-SDN
BANK OF MOSCOW	8/15 Korp. 3 ul. Rozhdestvenka	Entity	UKRAINE-EO13662	Non-SDN
SBERBANK OF RUSSIA	19 ul. Vavilova	Entity	UKRAINE-EO13662	Non-SDN
OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY	26/1 Sofiyskaya Embankment	Entity	UKRAINE-EO13662	Non-SDN
OAO NOVATEK	2, Udaltsova Street	Entity	UKRAINE-EO13662	Non-SDN
OJSC GAZPROM NEFT	Let. A. Galernaya, 5, ul	Entity	UKRAINE-EO13662	Non-SDN
SURGUTNEFTEGAS	ul. Grigoriya Kukuyevitskogo, 1, bld. 1, Khanty-Mansiysky Autonomous Okrug - Yugra	Entity	UKRAINE-EO13662	Non-SDN
LUKOIL OAO	11 Sretenski boulevard	Entity	UKRAINE-EO13662	Non-SDN
OPEN JOINT STOCK COMPANY GAZPROM	16 Nametkina St.	Entity	UKRAINE-EO13662	Non-SDN
AK TRANSNEFT OAO	57 B. Polyanka ul.	Entity	UKRAINE-EO13662	Non-SDN
ROSTEC	24 Usacheva ul.	Entity	UKRAINE-EO13662	Non-SDN

2018-08-116: 000748



OFFICE OF FOREIGN ASSETS CONTROL

Sectoral Sanctions Identifications List

September 12, 2014

As of: 14 Jan 2015

The Sectoral Sanctions Identifications List (the "SSI List")

This publication of Treasury's Office of Foreign Assets Control ("OFAC") is a reference tool providing actual notice of actions by OFAC with respect to persons that are identified pursuant to Executive Order 13662. The latest changes may appear here prior to their publication in the Federal Register, and it is intended that users rely on changes indicated in this document. Such changes reflect official actions of OFAC, and will be reflected as soon as practicable in the Federal Register under the index heading "Foreign Assets Control." New Federal Register notices with regard to identifications made under Executive Order 13662 may be published at any time. Users are advised to check the Federal Register and this electronic publication routinely for additional names or other changes to the listings. Entities and individuals on the list are occasionally licensed by OFAC to transact business with U.S. persons in anticipation of removal from the list or because of foreign policy considerations in unique circumstances. Licensing in anticipation of official Federal Register publication of a notice of removal based on the unblocking of an entity's or individual's property is reflected in this publication by the removal of an identified name from the list.

Description of the SSI List:

This Sectoral Sanctions Identifications List includes persons determined by OFAC to be operating in sectors of the Russian economy identified by the Secretary of the Treasury pursuant to Executive Order 13662. The prohibitions on dealings related to the persons identified on this list are described in the directives below. Persons identified pursuant to each directive will appear under the corresponding directive on the SSI List.

The property and interests in property of persons identified on the SSI List are not blocked, but persons sanctioned under E.O. 13662 and on the SSI List may also be persons whose property and interests in property are blocked pursuant to E.O. 13662 or pursuant to other authorities administered by OFAC. Persons on the SSI List

whose property and interests in property are blocked under E.O. 13662 or other authorities will appear on OFAC's SDN list with program tags for relevant blocking authorities.

Directive 1 - The following activities by a U.S. person or within the United States are prohibited, except to the extent provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control: (1) all transactions in, provision of financing for, and other dealings in new debt of longer than 30 days maturity or new equity of persons determined to be subject to this Directive (listed below), their property, or their interests in property; and (2) all activities related to debt or equity issued before the date of this Directive 1 (as amended) that would have been prohibited by the prior version of this Directive 1. All other activities with these persons or involving their property or interests in property are permitted, provided such activities are not otherwise prohibited pursuant to Executive Orders 13660, 13661, or 13662 or any other sanctions program implemented by the Office of Foreign Assets Control. Except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are also prohibited: (1) any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions contained in this Directive; and (2) any conspiracy formed to violate any of the prohibitions in this Directive. For information on the original Directive 1, please visit the following URL: http://www.treasury.gov/resource-center/sanctions/Programs/Documents/EO_13662_directives.pdf

AKTSIONERNY KOMMERCHESKI BANK BANK MOSKVY, OTKRYTOE AKTSIONERNOE OBSHCHESTVO (a.k.a. BANK OF MOSCOW; 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].

BANK FOR DEVELOPMENT AND FOREIGN ECONOMIC AFFAIRS

(VNESHECONOMBANK) STATE CORPORATION (a.k.a. BANK RAZVITIYA I VNESHNEEKONOMICHESKOI DEYATELNOSTI (VNESHECONOMBANK) GOSUDARSTVENNAYA KORPORATSIYA; a.k.a. VNESHECONOMBANK; 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].

BANK OF MOSCOW (f.k.a. AKTSIONERNY KOMMERCHESKI BANK BANK MOSKVY, OTKRYTOE AKTSIONERNOE OBSHCHESTVO; 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].

BANK RAZVITIYA I VNESHNEEKONOMICHESKOI

2018-08-116: 000749

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].

JSC VTB BANK (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; f.k.a. VNESHTORGBANK; f.k.a. VNESHTORGBANK ROSSII, CLOSED JOINT-STOCK COMPANY; a.k.a. VTB BANK OAO; a.k.a. VTB BANK, OPEN JOINT-STOCK COMPANY), 29, Bolshaya Morskaya str., St. Petersburg 190000, Russia; 37 Plyushchikha 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/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OTKRYTOE AKTSIONERNOE OBSHCHESTVO SBERBANK ROSSII (a.k.a. SBERBANK OF RUSSIA; a.k.a. SBERBANK ROSSII; f.k.a. SBERBANK ROSSII OAO), 19 ul. Vavilova, Moscow 117997, Russia; SWIFT/BIC SABRRUMM; Website www.sberbank.ru; Email Address sbrf@sbrf.ru; 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].

OTKRYTOE AKTSIONERNOE ROSSISKI SELSKOKHOZYAISTVENNY BANK (a.k.a. ROSSELKHOZBANK; a.k.a. ROSSIYSKI SELSKOKHOZYAISTVENNY BANK OAO; a.k.a. RUSSIAN AGRICULTURAL BANK; 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/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

ROSSELKHOZBANK (f.k.a. OTKRYTOE AKTSIONERNOE ROSSISKI SELSKOKHOZYAISTVENNY BANK; a.k.a. ROSSIYSKI SELSKOKHOZYAISTVENNY BANK OAO; a.k.a. RUSSIAN AGRICULTURAL BANK; 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/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

ROSSIYSKI SELSKOKHOZYAISTVENNY BANK OAO (f.k.a. OTKRYTOE AKTSIONERNOE ROSSISKI SELSKOKHOZYAISTVENNY BANK; a.k.a. ROSSELKHOZBANK; a.k.a. RUSSIAN AGRICULTURAL BANK; 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/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

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/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

RUSSIAN AGRICULTURAL BANK OAO (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), 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/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-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; Website www.sberbank.ru; Email Address sbrf@sbrf.ru; 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].

SBERBANK ROSSII (f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO SBERBANK ROSSII; a.k.a. SBERBANK OF RUSSIA; f.k.a. SBERBANK ROSSII OAO), 19 ul. Vavilova, Moscow 117997, Russia; SWIFT/BIC SABRRUMM; Website www.sberbank.ru; Email Address sbrf@sbrf.ru; 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].

SBERBANK ROSSII OAO (f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO SBERBANK ROSSII; a.k.a. SBERBANK OF RUSSIA; a.k.a. SBERBANK ROSSII), 19 ul. Vavilova, Moscow 117997, Russia; SWIFT/BIC SABRRUMM; Website www.sberbank.ru; Email Address sbrf@sbrf.ru; 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].

VNESHECONOMBANK (a.k.a. BANK FOR DEVELOPMENT AND FOREIGN ECONOMIC AFFAIRS (VNESHECONOMBANK) STATE CORPORATION; a.k.a. BANK RAZVITIYA I VNESHNEEKONOMICHESKOI DEYATELNOSTI (VNESHECONOMBANK) 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].

VNESHTORGBANK (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 ROSSII, CLOSED JOINT-STOCK COMPANY; a.k.a. VTB BANK OAO; a.k.a. VTB BANK, OPEN JOINT-STOCK COMPANY), 29, Bolshaya Morskaya str., St. Petersburg 190000, Russia; 37 Plyushchikha 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/resource-](http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives)

[center/sanctions/Programs/Pages/ukraine.aspx#directives](http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives). [UKRAINE-EO13662].

VNESHTORGBANK ROSSII, CLOSED JOINT-STOCK COMPANY (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; a.k.a. VTB BANK OAO; a.k.a. VTB BANK, OPEN JOINT-STOCK COMPANY), 29, Bolshaya Morskaya str., St. Petersburg 190000, Russia; 37 Plyushchikha 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/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 Plyushchikha 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: [\[center/sanctions/Programs/Pages/ukraine.aspx#directives\]\(http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives\). \[UKRAINE-EO13662\].](http://www.treasury.gov/resource-</p>
</div>
<div data-bbox=)

VTB BANK, OPEN JOINT-STOCK COMPANY (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 OAO), 29, Bolshaya Morskaya str., St. Petersburg 190000, Russia; 37 Plyushchikha 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/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

"VEB" (a.k.a. BANK FOR DEVELOPMENT AND FOREIGN ECONOMIC AFFAIRS (VNESHECONOMBANK) STATE CORPORATION; a.k.a. BANK RAZVITIYA I VNESHNEEKONOMICHESKOI DEYATELNOSTI (VNESHECONOMBANK) GOSUDARSTVENNAYA KORPORATSIYA; a.k.a. VNESHECONOMBANK), 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].

Directive 2 - The following activities by a U.S. person or within the United States are prohibited, except to the extent provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control: (1) all transactions in, provision of financing for, and other dealings in new debt of longer than 90 days maturity of

persons determined to be subject to this Directive (listed below), their property, or their interests in property; and (2) all activities related to debt issued before the date of this Directive 2 (as amended) that would have been prohibited by the prior version of this Directive 2. All other activities with these persons or involving their property or interests in property are permitted, provided such activities are not otherwise prohibited pursuant to Executive Orders 13660, 13661, or 13662 or any other sanctions program implemented by the Office of Foreign Assets Control. Except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are also prohibited: (1) any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions contained in this Directive; and (2) any conspiracy formed to violate any of the prohibitions in this Directive.

AK TRANSNEFT OAO (a.k.a. AKTSIONERNAYA KOMPANIYA PO TRANSPORTUNEFTI TRANSNEFT OAO; a.k.a. OAO AK TRANSNEFT; a.k.a. OIL TRANSPORTING JOINT-STOCK COMPANY TRANSNEFT; a.k.a. TRANSNEFT; a.k.a. TRANSNEFT OJSC; a.k.a. TRANSNEFT, JSC), 57 B. Polyanka ul., Moscow 119180, Russia; 57 Bolshaya. Polyanka, Moscow 119180, Russia; Website www.transneft.ru; Email Address transneft@ak.transneft.ru; 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/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

AKTSIONERNAYA KOMPANIYA PO TRANSPORTUNEFTI TRANSNEFT OAO (a.k.a. AK TRANSNEFT OAO; a.k.a. OAO AK TRANSNEFT; a.k.a. OIL TRANSPORTING JOINT-STOCK COMPANY TRANSNEFT; a.k.a. TRANSNEFT; a.k.a. TRANSNEFT OJSC; a.k.a. TRANSNEFT, JSC), 57 B. Polyanka ul., Moscow 119180, Russia; 57 Bolshaya. Polyanka, Moscow 119180, Russia; Website www.transneft.ru; Email Address transneft@ak.transneft.ru; 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/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

FINANSOVO-INVESTITSIONNAYA KOMPANIYA NOVAFININVEST OAO (a.k.a. NOVATEK; a.k.a. OAO 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 Oblast 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/ukraine.aspx#directives>. [UKRAINE-EO13662].

GAZPROM NEFT OAO (a.k.a. JSC GAZPROM NEFT; a.k.a. OJSC GAZPROM NEFT; a.k.a. OPEN JOINT-STOCK COMPANY GAZPROM NEFT; f.k.a. SIBIRSKAYA NEFTYANAYA KOMPANIYA OAO), Let. A. Galernaya, 5, ul, St. Petersburg 190000, Russia; Ul. Pochtamtorskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamtorskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow 117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

JSC GAZPROM NEFT (a.k.a. GAZPROM NEFT OAO; a.k.a. OJSC GAZPROM NEFT; a.k.a. OPEN JOINT-STOCK COMPANY GAZPROM NEFT; f.k.a. SIBIRSKAYA NEFTYANAYA KOMPANIYA OAO), Let. A. Galernaya, 5, ul, St. Petersburg 190000, Russia; Ul. Pochtamtorskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamtorskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow

117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

NOVATEK (a.k.a. FINANSOVO-INVESTITSIONNAYA KOMPANIYA NOVAFININVEST OAO; a.k.a. OAO 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 Oblast 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/ukraine.aspx#directives>. [UKRAINE-EO13662].

OAO AK TRANSNEFT (a.k.a. AK TRANSNEFT OAO; a.k.a. AKTSIONERNAYA KOMPANIYA PO TRANSPORTUNEFTI TRANSNEFT OAO; a.k.a. OIL TRANSPORTING JOINT-STOCK COMPANY TRANSNEFT; a.k.a. TRANSNEFT; a.k.a. TRANSNEFT OJSC; a.k.a. TRANSNEFT, JSC), 57 B. Polyanka ul., Moscow 119180, Russia; 57 Bolshaya. Polyanka, Moscow 119180, Russia; Website www.transneft.ru; Email Address transneft@ak.transneft.ru; 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/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, Russia; 22a Pobedy ul., Tarko-Sale, Purovski raion, Tyumenskaya Oblast 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/ukraine.aspx#directives>. [UKRAINE-EO13662].

OAQ ROSNEFT OIL COMPANY (a.k.a. OIL COMPANY ROSNEFT; a.k.a. OJSC ROSNEFT OIL COMPANY; a.k.a. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT; a.k.a. ROSNEFT OIL COMPANY), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OIL COMPANY ROSNEFT (a.k.a. OAO ROSNEFT OIL COMPANY; a.k.a. OJSC ROSNEFT OIL COMPANY; a.k.a. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT; a.k.a. ROSNEFT OIL COMPANY), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OIL TRANSPORTING JOINT-STOCK COMPANY TRANSNEFT (a.k.a. AK TRANSNEFT OAO; a.k.a. AKTSIONERNAYA KOMPANIYA PO TRANSPORTUNEFTI TRANSNEFT OAO; a.k.a. OAO AK

TRANSNEFT; a.k.a. TRANSNEFT; a.k.a. TRANSNEFT OJSC; a.k.a. TRANSNEFT, JSC), 57 B. Polyanka ul., Moscow 119180, Russia; 57 Bolshaya. Polyanka, Moscow 119180, Russia; Website www.transneft.ru; Email Address transneft@ak.transneft.ru; 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/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

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, 5, ul, St. Petersburg 190000, Russia; Ul. Pochtamskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow 117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OJSC ROSNEFT OIL COMPANY (a.k.a. OAO ROSNEFT OIL COMPANY; a.k.a. OIL COMPANY ROSNEFT; a.k.a. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT; a.k.a. ROSNEFT OIL COMPANY), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the

following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OPEN JOINT-STOCK COMPANY GAZPROM NEFT (a.k.a. GAZPROM NEFT OAO; a.k.a. JSC GAZPROM NEFT; a.k.a. OJSC GAZPROM NEFT; f.k.a. SIBIRSKAYA NEFTYANAYA KOMPANIYA OAO), Let. A. Galernaya, 5, ul, St. Petersburg 190000, Russia; Ul. Pochtamskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow 117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.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; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

ROSNEFT (a.k.a. OAO ROSNEFT OIL COMPANY; a.k.a. OIL COMPANY ROSNEFT; a.k.a. OJSC ROSNEFT OIL COMPANY; a.k.a. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT OIL COMPANY), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; alt. Website www.rosneft.ru;

Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

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. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

SIBIRSKAYA NEFTYANAYA KOMPANIYA OAO (a.k.a. GAZPROM NEFT OAO; a.k.a. JSC GAZPROM NEFT; a.k.a. OJSC GAZPROM NEFT; a.k.a. OPEN JOINT-STOCK COMPANY GAZPROM NEFT), Let. A. Galeymaya, 5, ul, St. Petersburg 190000, Russia; Ul. Pochtamskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow 117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

TRANSNEFT (a.k.a. AK TRANSNEFT OAO; a.k.a. AKTSIONERNAYA KOMPANIYA PO TRANSPORTUNEFTI TRANSNEFT OAO; a.k.a. OAO AK TRANSNEFT; a.k.a. OIL TRANSPORTING JOINT-STOCK COMPANY TRANSNEFT; a.k.a. TRANSNEFT OJSC; a.k.a. TRANSNEFT, JSC), 57 B. Polyanka ul., Moscow 119180, Russia; 57 Bolshaya. Polyanka, Moscow 119180, Russia; Website www.transneft.ru; Email Address transneft@ak.transneft.ru; 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/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

TRANSNEFT OJSC (a.k.a. AK TRANSNEFT OAO; a.k.a. AKTSIONERNAYA KOMPANIYA PO TRANSPORTUNEFTI TRANSNEFT OAO; a.k.a. OAO AK TRANSNEFT; a.k.a. OIL TRANSPORTING JOINT-STOCK COMPANY 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.ru; Email Address transneft@ak.transneft.ru; 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/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

TRANSNEFT, JSC (a.k.a. AK TRANSNEFT OAO; a.k.a. AKTSIONERNAYA KOMPANIYA PO TRANSPORTUNEFTI TRANSNEFT OAO; a.k.a. OAO AK TRANSNEFT; a.k.a. OIL TRANSPORTING JOINT-STOCK COMPANY TRANSNEFT; a.k.a. TRANSNEFT; a.k.a. TRANSNEFT OJSC), 57 B. Polyanka ul., Moscow 119180, Russia; 57 Bolshaya. Polyanka, Moscow 119180, Russia; Website www.transneft.ru; Email Address transneft@ak.transneft.ru; 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/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

[center/sanctions/Programs/Pages/ukraine.aspx#directives](http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives). [UKRAINE-EO13662].

Directive 3 - The following activities by a U.S. person or within the United States are prohibited, except to the extent provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control: all transactions in, provision of financing for, and other dealings in new debt of longer than 30 days maturity of persons determined to be subject to this Directive (listed below), their property, or their interests in property. All other activities with these persons or involving their property or interests in property are permitted, provided such activities are not otherwise prohibited pursuant to Executive Orders 13660, 13661, or 13662 or any other sanctions program implemented by the Office of Foreign Assets Control. Except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are also prohibited: (1) any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions contained in this Directive; and (2) any conspiracy formed to violate any of the prohibitions in this Directive.

ROSTEC (a.k.a. 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 ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

ROSTEC STATE CORPORATION (a.k.a. ROSTEC; 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 ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

RUSSIAN TECHNOLOGIES (a.k.a. ROSTEC; a.k.a. ROSTEC STATE CORPORATION; 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 ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

RUSSIAN TECHNOLOGIES STATE CORPORATION FOR ASSISTANCE TO DEVELOPMENT, PRODUCTION AND EXPORT OF ADVANCED TECHNOLOGY INDUSTRIAL PRODUCT (a.k.a. ROSTEC; a.k.a. 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 ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

EXPORT OF ADVANCED TECHNOLOGY INDUSTRIAL PRODUCT (a.k.a. ROSTEC; a.k.a. ROSTEC STATE CORPORATION; a.k.a. RUSSIAN TECHNOLOGIES; a.k.a. STATE CORPORATION FOR ASSISTANCE TO DEVELOPMENT, PRODUCTION AND EXPORT OF ADVANCED TECHNOLOGY INDUSTRIAL PRODUCT ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

STATE CORPORATION FOR ASSISTANCE TO DEVELOPMENT, PRODUCTION AND EXPORT OF ADVANCED TECHNOLOGY INDUSTRIAL PRODUCT ROSTEKHNOLOGII (a.k.a. ROSTEC; a.k.a. 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 ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

STATE CORPORATION ROSTEKHNOLOGII (a.k.a. ROSTEC; a.k.a. 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 ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

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 ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

STATE CORPORATION ROSTEKHNOLOGII (a.k.a. ROSTEC; a.k.a. 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 ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

Directive 4 - The following activities by a U.S. person or within the United States are prohibited, except to the extent provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control: the provision, exportation, or reexportation, directly or indirectly, of goods, services (except for financial services), or technology in support of exploration or

production for deepwater, Arctic offshore, or shale projects that have the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory, and that involve any person determined to be subject to this Directive (listed below), its property, or its interests in property. Except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are also prohibited: (1) any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions contained in this Directive; and (2) any conspiracy formed to violate any of the prohibitions in this Directive.

GAZPROM NEFT OAO (a.k.a. JSC GAZPROM NEFT; a.k.a. OJSC GAZPROM NEFT; a.k.a. OPEN JOINT-STOCK COMPANY GAZPROM NEFT; f.k.a. SIBIRSKAYA NEFTYANAYA KOMPANIYA OAO), Let. A. Galernaya, 5, ul, St. Petersburg 190000, Russia; Ul. Pochtamtskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamtskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow 117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

GAZPROM OAO (a.k.a. OAO GAZPROM; a.k.a. OPEN JOINT STOCK COMPANY GAZPROM), 16 Nametkina St., Moscow, Russia GSP-7, 117997, Russia; 16 Nametkina ul., Moscow 117991, Russia; Website www.gazprom.ru; Email Address gazprom@gazprom.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700070518 (Russia); Tax ID No. 7736050003 (Russia); Government Gazette Number 00040778 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

JSC GAZPROM NEFT (a.k.a. GAZPROM NEFT OAO; a.k.a. OJSC GAZPROM NEFT; a.k.a. OPEN JOINT-STOCK COMPANY GAZPROM NEFT; f.k.a. SIBIRSKAYA NEFTYANAYA KOMPANIYA OAO), Let. A. Galernaya, 5, ul, St. Petersburg 190000, Russia; Ul. Pochtamtskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamtskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow 117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

LUKOIL (a.k.a. LUKOIL OAO; a.k.a. LUKOIL OIL COMPANY; a.k.a. NEFTYANAYA KOMPANIYA LUKOIL OOO; a.k.a. NK LUKOIL OAO), 11 Sretenski boulevard, Moscow 101000, Russia; Website www.lukoil.ru; Email Address info@lukoil.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 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/ukraine.aspx#directives>. [UKRAINE-EO13662].

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 Sretenski boulevard, Moscow 101000, Russia; Website www.lukoil.ru; Email Address info@lukoil.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 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/ukraine.aspx#directives>. [UKRAINE-EO13662].

LUKOIL OIL COMPANY (a.k.a. LUKOIL; a.k.a. LUKOIL OAO; a.k.a. NEFTYANAYA KOMPANIYA LUKOIL OOO; a.k.a. NK LUKOIL

OAO), 11 Sretenski boulevard, Moscow 101000, Russia; Website www.lukoil.ru; Email Address info@lukoil.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 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/ukraine.aspx#directives>. [UKRAINE-EO13662].

NEFTYANAYA KOMPANIYA LUKOIL OOO (a.k.a. LUKOIL; a.k.a. LUKOIL OAO; a.k.a. LUKOIL OIL COMPANY; a.k.a. NK LUKOIL OAO), 11 Sretenski boulevard, Moscow 101000, Russia; Website www.lukoil.ru; Email Address info@lukoil.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 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/ukraine.aspx#directives>. [UKRAINE-EO13662].

NK LUKOIL OAO (a.k.a. LUKOIL; a.k.a. LUKOIL OAO; a.k.a. LUKOIL OIL COMPANY; a.k.a. NEFTYANAYA KOMPANIYA LUKOIL OOO), 11 Sretenski boulevard, Moscow 101000, Russia; Website www.lukoil.ru; Email Address info@lukoil.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 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/ukraine.aspx#directives>. [UKRAINE-EO13662].

OAO GAZPROM (a.k.a. GAZPROM OAO; a.k.a. OPEN JOINT STOCK COMPANY GAZPROM), 16 Nametkina St., Moscow, Russia GSP-7, 117997, Russia; 16 Nametkina ul., Moscow 117991, Russia; Website www.gazprom.ru; Email Address gazprom@gazprom.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700070518 (Russia); Tax ID No. 7736050003 (Russia); Government Gazette Number 00040778 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OA O ROSNEFT OIL COMPANY (a.k.a. OIL COMPANY ROSNEFT; a.k.a. OJSC ROSNEFT OIL COMPANY; a.k.a. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT; a.k.a. ROSNEFT OIL COMPANY), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OIL COMPANY ROSNEFT (a.k.a. OA O ROSNEFT OIL COMPANY; a.k.a. OJSC ROSNEFT OIL COMPANY; a.k.a. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT; a.k.a. ROSNEFT OIL COMPANY), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

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, 5, ul. St. Petersburg 190000, Russia; Ul. Pochtamskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow 117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662

Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OJSC ROSNEFT OIL COMPANY (a.k.a. OA O ROSNEFT OIL COMPANY; a.k.a. OIL COMPANY ROSNEFT; a.k.a. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT; a.k.a. ROSNEFT OIL COMPANY), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OPEN JOINT STOCK COMPANY GAZPROM (a.k.a. GAZPROM OAO; a.k.a. OA O GAZPROM), 16 Nametkina St., Moscow, Russia GSP-7, 117997, Russia; 16 Nametkina ul., Moscow 117991, Russia; Website www.gazprom.ru; Email Address gazprom@gazprom.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700070518 (Russia); Tax ID No. 7736050003 (Russia); Government Gazette Number 00040778 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OPEN JOINT STOCK COMPANY SURGUTNEFTGAS (a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO SURGUTNEFTGAZ; a.k.a. SURGUTNEFTGAS; a.k.a. SURGUTNEFTGAS OAO; a.k.a. SURGUTNEFTGAS OJSC; a.k.a. SURGUTNEFTGAZ OAO), ul. Grigoriya Kukuyevitskogo, 1, bld. 1, Khanty-Mansiysky Autonomous Okrug - Yugra, the city of Surgut, Tyumenskaya Oblast 628415, Russia; korp. 1 1 Grigoriya Kukuevitskogo ul., Surgut, Tyumenskaya oblast 628404, Russia; Street

Kukuevitskogo 1, Surgut, Tyumen Region 628415, Russia; Website www.surgutneftegas.ru; Email Address secretary@surgutneftegas.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OPEN JOINT-STOCK COMPANY GAZPROM NEFT (a.k.a. GAZPROM NEFT OAO; a.k.a. JSC GAZPROM NEFT; a.k.a. OJSC GAZPROM NEFT; f.k.a. SIBIRSKAYA NEFTYANAYA KOMPANIYA OAO), Let. A. Galernaya, 5, ul. St. Petersburg 190000, Russia; Ul. Pochtamskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow 117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY (a.k.a. OA O 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; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

OTKRYTOE AKTSIONERNOE OBSHCHESTVO SURGUTNEFTEGAZ (a.k.a. OPEN JOINT STOCK COMPANY SURGUTNEFTEGAS; a.k.a. SURGUTNEFTEGAS; a.k.a. SURGUTNEFTEGAS OAO; a.k.a. SURGUTNEFTEGAS OJSC; a.k.a. SURGUTNEFTEGAZ OAO), ul. Grigoriya Kukuyevitskogo, 1, bld. 1, Khanty-Mansiysky Autonomous Okrug - Yugra, the city of Surgut, Tyumenskaya Oblast 628415, Russia; korp. 1 1 Grigoriya Kukuevitskogo ul., Surgut, Tyumenskaya oblast 628404, Russia; Street Kukuevitskogo 1, Surgut, Tyumen Region 628415, Russia; Website www.surgutneftegas.ru; Email Address secretary@surgutneftegas.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

ROSNEFT (a.k.a. OAO ROSNEFT OIL COMPANY; a.k.a. OIL COMPANY ROSNEFT; a.k.a. OJSC ROSNEFT OIL COMPANY; a.k.a. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT OIL COMPANY), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

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. OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY; a.k.a. ROSNEFT), 26/1 Sofiyskaya Embankment, Moscow 115035, Russia; Website www.rosneft.com; alt. Website www.rosneft.ru; Email Address postman@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1027700043502 (Russia); Tax ID No. 7706107510 (Russia); Government Gazette Number 00044428 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

SIBIRSKAYA NEFTYANAYA KOMPANIYA OAO (a.k.a. GAZPROM NEFT OAO; a.k.a. JSC GAZPROM NEFT; a.k.a. OJSC GAZPROM NEFT; a.k.a. OPEN JOINT-STOCK COMPANY GAZPROM NEFT), Let. A. Galeynaya, 5, ul. St. Petersburg 190000, Russia; Ul. Pochtamskaya, 3-5, St. Petersburg 190000, Russia; 3-5 Pochtamskaya St., St. Petersburg 190000, Russia; 125 A. Profsoyuznaya Street, Moscow 117647, Russia; Website <http://www.gazprom-neft.com/>; Email Address Info@gazprom-neft.ru; alt. Email Address pr@gazprom-neft.ru; alt. Email Address shareholders@gazprom-neft.ru; alt. Email Address ir@gazprom-neft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1025501701686; Tax ID No. 5504036333; Government Gazette Number 42045241; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

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 OJSC; a.k.a. SURGUTNEFTEGAZ OAO), ul. Grigoriya Kukuyevitskogo, 1, bld. 1, Khanty-Mansiysky Autonomous Okrug - Yugra, the city of Surgut, Tyumenskaya Oblast 628415, Russia; korp. 1 1 Grigoriya Kukuevitskogo ul., Surgut, Tyumenskaya oblast 628404, Russia; Street Kukuevitskogo 1, Surgut, Tyumen Region 628415, Russia; Website www.surgutneftegas.ru; Email Address secretary@surgutneftegas.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

SURGUTNEFTEGAS OAO (a.k.a. OPEN JOINT STOCK COMPANY SURGUTNEFTEGAS; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO SURGUTNEFTEGAZ; a.k.a. SURGUTNEFTEGAS; a.k.a. SURGUTNEFTEGAS OAO; a.k.a. SURGUTNEFTEGAZ OAO), ul. Grigoriya Kukuyevitskogo, 1, bld. 1, Khanty-Mansiysky Autonomous Okrug - Yugra, the city of Surgut, Tyumenskaya Oblast 628415, Russia; korp. 1 1 Grigoriya Kukuevitskogo ul., Surgut, Tyumenskaya oblast 628404, Russia; Street Kukuevitskogo 1, Surgut, Tyumen Region 628415, Russia; Website www.surgutneftegas.ru; Email Address secretary@surgutneftegas.ru; Executive Order 13662 Directive Determination - Subject to Directive 4; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

SURGUTNEFTEGAS OAO (a.k.a. OPEN JOINT STOCK COMPANY SURGUTNEFTEGAS; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO SURGUTNEFTEGAZ; a.k.a. SURGUTNEFTEGAS; a.k.a. SURGUTNEFTEGAS OAO; a.k.a. SURGUTNEFTEGAZ OJSC), ul. Grigoriya Kukuyevitskogo, 1, bld. 1, Khanty-Mansiysky Autonomous Okrug - Yugra, the city of Surgut, Tyumenskaya Oblast 628415, Russia; korp. 1 1 Grigoriya Kukuevitskogo ul., Surgut, Tyumenskaya oblast 628404, Russia; Street Kukuevitskogo 1, Surgut, Tyumen Region 628415, Russia; Website www.surgutneftegas.ru; Email Address

secretary@surgutneftegas.ru; Executive Order
13662 Directive Determination - Subject to
Directive 4; For more information on directives,
please visit the following link:
<http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

For further information on the "Sectoral Sanctions
Identifications List," contact the:

OFFICE OF FOREIGN ASSETS CONTROL
U.S. DEPARTMENT OF THE TREASURY
1500 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20220
<http://www.treasury.gov/ofac>

TAB H



OFFICE OF FOREIGN ASSETS CONTROL

DIRECTIVE 1 (AS AMENDED)¹
UNDER EXECUTIVE ORDER 13662

Pursuant to sections 1(a)(i), 1(b), and 8 of Executive Order 13662 of March 20, 2014 “Blocking Property of Additional Persons Contributing to the Situation in Ukraine” (the Order) and 31 C.F.R. § 589.802, and following the Secretary of the Treasury’s determination under section 1(a)(i) of the Order with respect to the financial services sector of the Russian Federation economy, the Director of the Office of Foreign Assets Control has determined, in consultation with the Department of State, that the following activities by a U.S. person or within the United States are prohibited, except to the extent provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control: (1) all transactions in, provision of financing for, and other dealings in new debt of longer than 30 days maturity or new equity of persons determined to be subject to this Directive, their property, or their interests in property; and (2) all activities related to debt or equity issued before the date of this Directive 1 (as amended) that would have been prohibited by the prior version of this Directive 1. All other activities with these persons or involving their property or interests in property are permitted, provided such activities are not otherwise prohibited pursuant to Executive Orders 13660, 13661, or 13662 or any other sanctions program implemented by the Office of Foreign Assets Control.

Except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are also prohibited: (1) any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions contained in this Directive; and (2) any conspiracy formed to violate any of the prohibitions in this Directive.

A complete listing of persons determined to be subject to one or more directives under Executive Order 13662 can be found in OFAC’s Sectoral Sanctions Identifications (SSI) List on OFAC’s Web site (<http://www.treasury.gov/ofac>) at http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/ssi_list.aspx.

September 12, 2014

¹ A prior version of this Directive, which was issued on July 16, 2014 and which is superseded by this version, prohibited these same activities but involving debt of longer than 90 days maturity or equity if that debt or equity was issued on or after the date a person was determined to be subject to the Directive. The updated version also reflects technical and other non-substantive changes.

OFFICE OF FOREIGN ASSETS CONTROL

DIRECTIVE 2 (AS AMENDED)¹
UNDER EXECUTIVE ORDER 13662

Pursuant to sections 1(a)(i), 1(b), and 8 of Executive Order 13662 of March 20, 2014 “Blocking Property of Additional Persons Contributing to the Situation in Ukraine” (the Order) and 31 C.F.R. § 589.802, and following the Secretary of the Treasury’s determination under section 1(a)(i) of the Order with respect to the energy sector of the Russian Federation economy, the Director of the Office of Foreign Assets Control has determined, in consultation with the Department of State, that the following activities by a U.S. person or within the United States are prohibited, except to the extent provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control: (1) all transactions in, provision of financing for, and other dealings in new debt of longer than 90 days maturity of persons determined to be subject to this Directive, their property, or their interests in property; and (2) all activities related to debt issued before the date of this Directive 2 (as amended) that would have been prohibited by the prior version of this Directive 2. All other activities with these persons or involving their property or interests in property are permitted, provided such activities are not otherwise prohibited pursuant to Executive Orders 13660, 13661, or 13662 or any other sanctions program implemented by the Office of Foreign Assets Control.

Except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are also prohibited: (1) any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions contained in this Directive; and (2) any conspiracy formed to violate any of the prohibitions in this Directive.

A complete listing of persons determined to be subject to one or more directives under Executive Order 13662 can be found in OFAC’s Sectoral Sanctions Identifications (SSI) List on OFAC’s Web site (<http://www.treasury.gov/ofac>) at http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/ssi_list.aspx.

September 12, 2014

¹ A prior version of this Directive, which was issued on July 16, 2014, prohibited these same activities for debt issued on or after July 16, 2014. The updated version reflects technical and other non-substantive edits and supersedes that version.

OFFICE OF FOREIGN ASSETS CONTROL

DIRECTIVE 3
UNDER EXECUTIVE ORDER 13662

Pursuant to sections 1(a)(i), 1(b), and 8 of Executive Order 13662 of March 20, 2014 “Blocking Property of Additional Persons Contributing to the Situation in Ukraine” (the Order) and 31 C.F.R. § 589.802, and following the Secretary of the Treasury’s determination under section 1(a)(i) of the Order with respect to the defense and related materiel sector of the Russian Federation economy, the Director of the Office of Foreign Assets Control has determined, in consultation with the Department of State, that the following activities by a U.S. person or within the United States are prohibited, except to the extent provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control: all transactions in, provision of financing for, and other dealings in new debt of longer than 30 days maturity of persons determined to be subject to this Directive, their property, or their interests in property. All other activities with these persons or involving their property or interests in property are permitted, provided such activities are not otherwise prohibited pursuant to Executive Orders 13660, 13661, or 13662 or any other sanctions program implemented by the Office of Foreign Assets Control.

Except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are also prohibited: (1) any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions contained in this Directive; and (2) any conspiracy formed to violate any of the prohibitions in this Directive.

A complete listing of persons determined to be subject to one or more directives under Executive Order 13662 can be found in OFAC’s Sectoral Sanctions Identifications (SSI) List on OFAC’s Web site (<http://www.treasury.gov/ofac>) at http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/ssi_list.aspx.

September 12, 2014

OFFICE OF FOREIGN ASSETS CONTROL

DIRECTIVE 4
UNDER EXECUTIVE ORDER 13662

Pursuant to sections 1(a)(i), 1(b), and 8 of Executive Order 13662 of March 20, 2014 “Blocking Property of Additional Persons Contributing to the Situation in Ukraine” (the Order) and 31 C.F.R. § 589.802, and following the Secretary of the Treasury’s determination under section 1(a)(i) of the Order with respect to the energy sector of the Russian Federation economy, the Director of the Office of Foreign Assets Control has determined, in consultation with the Department of State, that the following activities by a U.S. person or within the United States are prohibited, except to the extent provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control: the provision, exportation, or reexportation, directly or indirectly, of goods, services (except for financial services), or technology in support of exploration or production for deepwater, Arctic offshore, or shale projects that have the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory, and that involve any person determined to be subject to this Directive, its property, or its interests in property.

Except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are also prohibited: (1) any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions contained in this Directive; and (2) any conspiracy formed to violate any of the prohibitions in this Directive.

A complete listing of persons determined to be subject to one or more directives under Executive Order 13662 can be found in OFAC’s Sectoral Sanctions Identifications (SSI) List on OFAC’s Web site (<http://www.treasury.gov/ofac>) at http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/ssi_list.aspx.

September 12, 2014

TAB I



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF FOREIGN ASSETS CONTROL

Executive Order 13662 of March 20, 2014
Blocking Property of Additional Persons Contributing to the Situation in Ukraine


GENERAL LICENSE NO. 1A

Authorizing Certain Transactions Related to Derivatives
Prohibited by Directives 1, 2, and 3 under Executive Order 13662

(a) All transactions by U.S. persons, wherever located, and transactions within the United States involving derivative products whose value is linked to an underlying asset that constitutes (1) new debt with a maturity of longer than 30 days or new equity issued by a person subject to Directive 1 under Executive Order 13662, (2) new debt with a maturity of longer than 90 days issued by a person subject to Directive 2 under Executive Order 13662, or (3) new debt with a maturity of longer than 30 days issued by a person subject to Directive 3 under Executive Order 13662, are authorized.

(b) This general license does not authorize the holding, purchasing, or selling of underlying assets otherwise prohibited by Directives 1, 2, or 3 under Executive Order 13662 by U.S. persons, wherever they are located, or within the United States.

(c) Effective September 12, 2014, General License No. 1, dated July 16, 2014, is replaced and superseded in its entirety by this General License No. 1A.



John E. Smith
Acting Director
Office of Foreign Assets Control

Dated: September 12, 2014



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF FOREIGN ASSETS CONTROL

Executive Order 13662 of March 20, 2014
Blocking Property of Additional Persons Contributing to the Situation in Ukraine

GENERAL LICENSE NO. 2


Authorizing Certain Activities Prohibited by Directive 4 under
Executive Order 13662 Necessary to Wind Down Operations

(a) Except as provided in paragraph (b) of this general license, all activities prohibited by Directive 4 under Executive Order 13662 of March 20, 2014, that are ordinarily incident and necessary to the wind down of operations, contracts, or other agreements involving persons determined to be subject to Directive 4 under Executive Order 13662 and that were in effect prior to September 12, 2014, are authorized through 12:01 a.m. eastern daylight time, September 26, 2014.

(b) This general license does not authorize any new provision, exportation, or reexportation of goods, services (except for financial services), or technology except as needed to cease operations involving projects covered by Directive 4 under Executive Order 13662. This general license does not authorize any transactions or dealings otherwise prohibited by any other Directive under Executive Order 13662 or any part of 31 C.F.R. Chapter V.

(c) U.S. persons participating in transactions authorized by this general license are required, within 10 business days after the wind-down activities conclude, to file a

detailed report, including the parties involved, the type and scope of activities conducted, and the dates of the activities, with the Office of Foreign Assets Control, Licensing Division, U.S. Department of the Treasury, 1500 Pennsylvania Avenue N.W., Annex, Washington, DC 20220.



John E. Smith
Acting Director
Office of Foreign Assets Control

Dated: September 12, 2014



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF FOREIGN ASSETS CONTROL

Executive Order 13662 of March 20, 2014
Blocking Property of Additional Persons Contributing to the Situation in Ukraine


GENERAL LICENSE NO. 3

Authorizing Transactions Involving Certain Entities
Otherwise Prohibited by Directive 1 under Executive Order 13662

(a) Except as provided in paragraph (b), all transactions prohibited by Directive 1 under Executive Order 13662 for a financial institution named in paragraph (c), or any entity in which such a financial institution owns, directly or indirectly, a 50 percent or greater interest, are authorized.

(b) This general license does not authorize otherwise prohibited transactions with other persons subject to any Directive under Executive Order 13662, or any other transactions prohibited pursuant to any part of 31 C.F.R. chapter V.

(c) The financial institution(s) are: DenizBank A.Ş.


Adam J. Szubin
Director
Office of Foreign Assets Control

Dated: 10/6/2014

TAB J



Questions Related to Sectoral Sanctions under Executive Order 13662

[Print This entire FAQ topic](#)

370. What do the prohibitions in Directives 1 and 2 mean? Are they blocking actions?

The sectoral sanctions imposed on specified persons operating in sectors of the Russian economy identified by the Secretary of Treasury were done under Executive Order 13662 through Directives issued by OFAC pursuant to its delegated authorities. Directive 1, issued on July 16, 2014, prohibits transacting in, providing financing for, or otherwise dealing in debt with a maturity of longer than 90 days or equity if that debt or equity is issued on or after the sanctions effective date ("new debt" or "new equity") by, on behalf of, or for the benefit of the persons operating in Russia's financial sector named under Directive 1, their property, or their interests in property. On September 12, 2014, OFAC amended Directive 1, reducing the tenor of prohibited debt from longer than 90 days to longer than 30 days.

Directive 2 separately prohibits transacting in, providing financing for, or otherwise dealing in new debt of greater than 90 days maturity if that debt is issued on or after the sanctions effective date by, on behalf of, or for the benefit of the persons operating in Russia's energy sector named under the Directive 2, their property, or their interests in property.

These actions pursuant to Directives 1 and 2 prohibit transactions by U.S. persons as defined in E.O. 13662, wherever they are located, and transactions within the United States. This action does not require U.S. persons to block the property or interests in property of the entities identified in the Directives, nor will persons identified in Directives 1 and 2 be added to the Specially Designated Nationals (SDN) List. U.S. persons should reject transactions or dealings that are prohibited by Directives 1 or 2, and to the extent required by Section 501.604 of the Reporting, Procedures and Penalties Regulations (31 C.F.R. part 501), U.S. persons must report to OFAC any rejected transactions within 10 business days. [9-12-2014]

[Print This FAQ](#)

371. What does OFAC interpret to be debt and equity? Are there other prohibited activities under Directives 1, 2, and 3? Can U.S. financial institutions continue to maintain correspondent accounts and process U.S. dollar-clearing transactions for the entities subject to these Directives?

The term *debt* includes bonds, loans, extensions of credit, loan guarantees, letters of credit, drafts, bankers acceptances, discount notes or bills, or commercial paper. The term *equity* includes stocks, share issuances, depositary receipts, or any other evidence of title or ownership.

The prohibitions in Directive 1 apply to all transactions involving new debt with a maturity of longer than 30 days or new equity; all financing in support of such new debt or new equity; and any dealing in, including provision of services in support of, such new debt or new equity.

The prohibitions in Directive 2 apply to all transactions involving new debt with a maturity of longer than 90 days; all financing in support of such new debt; and any dealing in, including provision of services in support of, such new debt.

The prohibitions in Directive 3 apply to all transactions involving new debt with a maturity of longer than 30 days; all financing in support of such new debt; and any dealing in, including provision of services in support of, such new debt.

All the prohibitions in these Directives extend to rollover of existing debt, if such rollover results in the creation of new debt with a maturity of longer than 30 days (for persons subject to Directives 1 or 3) or longer than 90 days (for persons subject to Directive 2).

Transacting in, providing financing for, or otherwise dealing in any debt or equity issued by, on behalf of, or for the benefit of persons subject to Directives 1, 2, or 3 is permissible, if the debt or equity was issued prior to the date on which the person was determined to be subject to the relevant Directive. In addition, transacting in, providing financing for, or otherwise dealing in debt instruments with maturities of 30 days or less (issued by, on behalf of, or for the benefit of persons subject to Directives 1 or 3) or 90 days or less (issued by, on behalf of, or for the benefit of persons subject to Directive 2), even if they are issued after the sanctions effective date, is permissible. Transacting in, providing financing for, or otherwise dealing in new equity instruments of persons subject to Directives 2 and 3 is permissible. U.S. financial institutions may continue to maintain correspondent accounts and process U.S. dollar-clearing transactions for the persons subject to the Directives, so long as those activities do not involve transacting in, providing financing for, or otherwise dealing in transaction types prohibited by these Directives.

On September 12, 2014, OFAC amended and reissued Directive 1, changing the allowable maturity of debt instruments issued by, on behalf of, or for the benefit of persons subject to Directive 1 from 90 days to 30 days. Transacting in, providing financing for, or otherwise dealing in debt with maturity of 90 days or less issued by, on behalf of, or for the benefit of the persons identified under Directive 1 is not prohibited if such debt instruments were issued prior to September 12, 2014, and the terms of such instruments do not change subsequently (see FAQ 394 for additional detail on what constitutes the changing of terms). Rollovers of such instruments must comply with the 30-day maturity limit imposed on September 12, 2014.

[9-12-2014]

[Print This FAQ](#)

372. Do Directives 1, 2, and 3 prohibit U.S. persons from entering into derivatives contracts linked to new debt or new equity issued by the entities subject to the Directives?

On September 12, 2014, OFAC issued General License 1A, which authorizes certain transactions involving derivative products that would otherwise be prohibited pursuant to Directives 1, 2, or 3. This General License 1A replaced and superseded General License No. 1, dated July 16, 2014, which authorized certain transactions involving derivative products that would have been prohibited pursuant to Directives 1 or 2. [9-12-2014]

[Print This FAQ](#)

373. Do the prohibitions imposed pursuant to the Directives also extend to entities owned 50 percent or more by one or more entities identified by these Directives, as per revised guidance OFAC issued on August 13, 2014?

Yes, these prohibitions apply to the named persons, their property, and their interests in property, which includes entities owned 50 percent or more by one or more persons identified as subject to the Directives. [9-12-2014]

[Print This FAQ](#)

374. If I own a Kalashnikov product, is that product blocked by sanctions? Am I able to resell a Kalashnikov product at a gun show or other secondary market?

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. If a U.S. person has an inventory of Kalashnikov Concern products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment), we advise that U.S. person to contact OFAC for further guidance on handling of the inventory. [7-16-2014]

[Print This FAQ](#)

375. If I have Kalashnikov products in my inventory, can I sell them?

If a U.S. person has an inventory of Kalashnikov Concern products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment), we advise that U.S. person to contact OFAC for further guidance on handling of the inventory. [7-16-2014]

[Print This FAQ](#)

391. Can U.S. persons issue and deal in new depositary receipts that are based on the equity of an entity subject to the Sectoral Sanctions Identification List (an SSI entity)?

In certain circumstances, yes. U.S. persons, including U.S. financial institutions, may issue and deal in depositary receipts that are based on equity issued by a person determined to be subject to Directive 1 prior to the date the person was determined to be subject to Directive 1. U.S. persons may not, however, deal in or issue depositary receipts that are based on equity issued by a person subject to Directive 1 on or after the sanctions effective date. Such transactions would constitute prohibited transactions or dealings in new equity under Directive 1. There are no equity-related prohibitions contained within Directives 2, 3, or 4, and thus U.S. persons are not prohibited from issuing or dealing in depositary receipts that are based on equity issued by persons subject only to those Directives. [9-12-2014]

[Print This FAQ](#)

392. How are banks expected to distinguish between transactions involving new versus old equity under Directive 1 if entities subject to Directive 1 issue new equity that utilizes the same International Securities Identification Number (ISIN) or other identifier as equity issued prior to the sanctions effective date?

Directive 1 prohibits U.S. persons from transacting in, providing financing for, or otherwise dealing in new equity for named persons, their property, or their interests in property. Directive 1 also prohibits such transactions from occurring in the United States. If a U.S. person decides to transact or otherwise deal in equity issued by an SSI entity prior to the sanctions effective date, the U.S. person should ensure that it is not transacting in, providing financing for, or otherwise dealing in the newly issued equity. To the extent that a U.S. person does in fact transact in, provide financing for, or otherwise deal in newly issued equity, such activity would constitute a violation of the prohibition set forth in Directive 1. [7-28-2014]

[Print This FAQ](#)

393. Does OFAC consider counterparty credit risk associated with derivatives transactions that are authorized pursuant to General License 1A to Executive Order 13662 to constitute new debt?

OFAC does not consider normal counterparty credit exposure encountered by a U.S. person to be an extension of credit when the U.S. person enters into an otherwise permissible derivatives transaction. U.S. persons engaging in such transactions should ensure that they do not hold, purchase, or sell the underlying asset in such transactions as described in Paragraph (b) of General License 1A. [7-28-2014]

[Print This FAQ](#)

394. If a U.S. person entered into a revolving credit facility or long-term loan arrangement for a person determined to be subject to Directives 1, 2, or 3 prior to the sanctions effective date, what are the restrictions on drawdowns from that facility? Do all drawdowns and disbursements pursuant to the parent agreement need to carry repayment terms of 30 days or less (for persons subject to Directives 1 and 3) or 90 days or less (for persons subject to Directive 2)?

If a U.S. person entered into a long-term credit facility or loan agreement prior to the sanctions effective date, drawdowns and disbursements with repayment terms of 30 days or less (for persons subject to Directives 1 and 3) or 90 days or less (for persons subject to Directive 2) are permitted. Drawdowns and disbursements whose repayment terms exceed the applicable authorized tenor are not prohibited if the terms of such drawdowns and disbursements (including the length of the repayment period, the interest rate applied to the drawdown, and the maximum drawdown amount) were contractually agreed to prior to the sanctions effective date and are not modified on or after the sanctions effective date. U.S. persons may not deal in a drawdown or disbursement initiated after the sanctions effective date with a repayment term of longer than 30 days (for persons subject to Directives 1 and 3) or 90 days (for persons subject to Directive 2), if the terms of the drawdown or disbursement were negotiated on or after the sanctions effective date. Such a newly negotiated drawdown or disbursement would constitute a prohibited extension of credit. [9-12-2014]

[Print This FAQ](#)

395. Do Directives 1, 2, and 3 prohibit U.S. persons from advising or confirming a letter of credit that was issued on or after the sanctions effective date and that carries a term of longer than 30 days maturity (for Directives 1 and 3) or 90 days maturity (for Directive 2) when the beneficiary of that letter of credit is one of the entities identified as subject to the Directives?

U.S. persons may advise or confirm a letter of credit issued on behalf of a non-sanctioned entity in which an entity subject to Directive 1, 2, or 3 is the beneficiary (i.e., the exporter or seller of the underlying goods) because the subject letter of credit does not represent an extension of credit to the SSI entity.

U.S. persons may not advise or confirm a letter of credit if all of the following three conditions are met: (1) the letter of credit was issued on or after the sanctions effective date, (2) the letter of credit carries a term of longer than 30 days maturity (for persons subject to Directives 1 and 3) or 90 days maturity (for persons subject to Directive 2), and (3) an SSI entity is the applicant of the letter of credit (i.e., the importer or buyer of the underlying goods or services). This would constitute prohibited activity because the subject letter of credit would represent an extension of credit to the SSI entity. [9-12-2014]

[Print This FAQ](#)

396. How do I know when a name has been added, changed, or removed on the Sectoral Sanctions Identifications (SSI) List?

The SSI List available on OFAC's website is the latest version of the list and contains the most updated information on entities determined to be subject to one or more of the Directives. OFAC also maintains "changes files" that record all significant changes to the SSI List. Any addition, alteration, or removal of an SSI record is considered a

significant change and will appear in these files along with the date that such an action occurred. These files are offered in two formats and are called SSINew14.PDF and SSINew14.TXT. The changes files are produced by year, thus future file names will be SSINew15.PDF and SSINew15.TXT and so on. [9-12-2014]

[Print This FAQ](#)

404. Is the term "new equity" in Directive 1 limited to equity that is issued by an SSI entity after the sanctions effective date or would equity purchased or acquired by an SSI entity from a third party after the sanctions effective date be considered new equity?

The equity prohibitions in Directive 1 pertain to equity *issued*, directly or indirectly, by an SSI entity on or after the sanctions effective date. Directive 1 does not prohibit U.S. persons from dealing with an SSI entity as counterparty to transactions involving equity issued by a non-sanctioned party. [9-12-2014]

[Print This FAQ](#)

405. Does the prohibition on "otherwise dealing in new debt" of longer than 30 days maturity (for persons subject to Directives 1 and 3) or 90 days (for persons subject to Directive 2) of SSI entities, their property, or their interests in property prohibit dealing in debt with maturity that exceeds the applicable authorized tenor in which the SSI entity is not directly or indirectly the borrower?

Directives 1 and 3 prohibit U.S. persons from dealing in debt of longer than 30 days maturity and Directive 2 prohibits U.S. persons from dealing in debt of longer than 90 days maturity issued on or after the sanctions effective date in cases where the new debt is issued by an SSI entity subject to these Directives. Directives 1, 2, and 3 do not prohibit U.S. persons from dealing with an SSI entity as counterparty to transactions involving debt issued on or after the sanctions effective date by a non-sanctioned party. For example, U.S. persons are not prohibited from dealing in a loan exceeding the applicable authorized tenor that is issued after the sanctions effective date of sanctions provided by an SSI entity to a non-sanctioned third-party, dealing with an SSI entity who is the underwriter on new debt of a non-sanctioned third party exceeding the applicable authorized tenor, or accepting payment under a letter of credit with terms exceeding the applicable authorized tenor that is issued, advised, or confirmed by an SSI entity, so long as the SSI entity is not the borrower. [9-12-2014]

[Print This FAQ](#)

406. Does the prohibition on dealing in new equity of entities subject to Directive 1 apply to transactions in which those entities are not the issuer of the equity?

U.S. persons are not prohibited from dealing in new equity with an entity subject to Directive 1 if the entity is not the issuer of the equity. For instance, U.S. persons are not prohibited from transacting with an entity subject to Directive 1 in support of new equity where the entity subject to Directive 1 is the underwriter of the equity and not the issuer. [8-27-2014]

[Print This FAQ](#)

407. May a U.S. person consent to a replacement of its participation by a non-U.S. person in a long-term loan facility that was extended to a person subject to Directives 1, 2, or 3 prior to the sanctions effective date?

A U.S. person is not prohibited by Directives 1, 2, or 3 from engaging in transactions necessary to exit or replace its participation in a long-term loan facility that was extended to an SSI entity prior to the sanctions effective date. This would not constitute dealing in new debt. U.S. persons involved in such facilities should ensure that all newly

negotiated drawdowns or disbursements from the facility utilize repayment terms that are not prohibited by the applicable sanctions effective date. See FAQ 394? for additional information on what constitutes a permitted drawdown or disbursement from an existing long-term loan obligation. [9-12-2014]

[Print This FAQ](#)

408. Is a U.S. person permitted under Directives 1, 2, or 3 to extend credit for greater than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2) to a non-sanctioned party for the purpose of purchasing goods or services from a person subject to Directives 1, 2, or 3?

Directives 1, 2, and 3 do not prohibit U.S. persons from extending credit for longer than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2) to non-sanctioned parties for the purpose of purchasing goods or services from an SSI entity, so long as the SSI entity is not the indirect borrower. [9-12-2014]

[Print This FAQ](#)

409. If a person determined to be subject to Directives 1, 2, or 3 makes successive draws under a short-term facility created after the sanctions effective date (e.g., it borrows \$100 million with a 15-day maturity, then at the end of the 15 days, the debt “rolls over”), does the facility become prohibited if the SSI borrower makes successive short-term borrowings that cumulatively add up to more than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2)?

Two conditions must be met for short-term facilities created after the sanctions effective date to be permissible. As long as (1) each individual disbursement has a maturity of 30 or 90 days or less (depending on the applicable Directive) and the disbursement *is paid back in full* before the next disbursement and (2) the lender is not contractually required to roll over the balance for a cumulative period of longer than 30 or 90 days (depending on the applicable Directive) at the borrower's request (i.e., it has the option to refuse the request for a new short-term loan and terminate the facility), the loan is not prohibited, even though the same borrower may obtain a series of short-term loans from the same lender over a cumulative period exceeding 30 or 90 days (depending on the applicable Directive). U.S. persons may not deal in a drawdown or disbursement initiated after the sanctions effective date with a repayment term of longer than the applicable authorized tenor if the terms of the drawdown or disbursement are negotiated or re-negotiated on or after the sanctions effective date. Such a newly negotiated drawdown or disbursement would constitute a prohibited extension of credit. [9-12-2014]

[Print This FAQ](#)

410. Are U.S. persons prohibited from entering into new contracts after the sanctions effective date with persons subject to Directives 1, 2, or 3 that provide payment terms to the SSI entities of greater than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2)? For instance, if a U.S. person agrees to sell shares or assets to an SSI entity in a corporate transaction that becomes effective on or after the sanctions effective date, is the U.S. person prohibited from agreeing to deferred purchase payments, even if no interest is involved, that may be paid more than the permissible number of days later by the SSI entity?

Directives 1 and 3 prohibit new extensions of credit to SSI entities of greater than 30 days maturity and Directive 2 prohibits new extensions of credit to SSI entities of greater than 90 days maturity, and these prohibitions include deferred purchase agreements extending payment terms of longer than 30 days or 90 days (depending on the applicable Directive) to an SSI entity. Such agreements would constitute a prohibited extension of credit to an SSI entity if the terms were longer than the permissible number of days and the agreement was entered into on or after the sanctions effective date. OFAC does not consider the inclusion of an interest rate to be a necessary condition for establishing whether a transaction represents new debt. [9-12-2014]

Print This FAQ

411. What does the prohibition contained in Directive 3 under Executive Order 13662 mean? What is the scope of prohibited services?

OFAC issued Directive 3, introducing new prohibitions on all transactions in, provision of financing for, and other dealings in new debt of longer than 30 days maturity of persons determined to be subject to the Directive, their property, or their interests in property. Transactions by U.S. persons or within the United States involving derivative products whose value is linked to an underlying asset that constitutes new debt with maturity of longer than 30 days issued by a person subject to Directive 3 are authorized by General License 1A pursuant to Executive Order 13662.

[9-12-2014]

Print This FAQ

412. What does the prohibition contained in Directive 4 mean? What is the scope of prohibited services?

OFAC issued Directive 4, introducing new prohibitions on the provision of goods, services (except for financial services), and technology for certain activities involving certain persons operating in the energy sector of the Russian Federation. Directive 4 prohibits the direct or indirect provision, exportation, or reexportation of goods, services (except for financial services), or technology in support of exploration or production for deepwater, Arctic offshore, or shale projects that have the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory, and involve any person determined to be subject to Directive 4 or that person's property or interests in property. The prohibition on the exportation of services includes, for example, drilling services, geophysical services, geological services, logistical services, management services, modeling capabilities, and mapping technologies. The prohibition does not apply to the provision of financial services, e.g., clearing transactions or providing insurance related to such activities.

On September 12, 2014, OFAC issued General License 2, authorizing for 14 days all services and activities prohibited by Directive 4 that are ordinarily incident and necessary to the wind down of operations, contracts, or other agreements involving persons determined to be subject to Directive 4. In order to qualify under this General License, a transaction must (1) occur prior to 12:01 am E.D.T. September 26, 2014, and (2) relate to operations, contracts, or agreements that were in effect prior to September 12, 2014. General License 2 does not authorize any new provision, exportation, or re-exportation of goods, services, or technology except as needed to cease operations, contracts, or other agreements involving affected projects.

Please see this page for the Department of Commerce's related license requirement on exports of certain goods for deepwater, Arctic offshore, or shale projects that have the potential to produce oil or gas.

[9-12-2014]

Print This FAQ

413. For the purposes of Directive 4, how does OFAC define "deepwater" projects that have the potential to produce oil?

A project is considered to be a deepwater project if the project involves underwater activities at depths of more than 500 feet.

[9-12-2014]

Print This FAQ

414. Does Directive 4 apply to projects that have the potential to produce gas?

If a deepwater, Arctic offshore, or shale project in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory, and involving a person named under Directive 4 has the potential to produce oil, then the prohibition applies, irrespective of whether the project also has the potential to produce gas. If the project has the potential to produce gas only, then the prohibition does not apply.

[9-12-2014]

[Print This FAQ](#)

415. For persons determined to be subject to multiple Directives, how do the prohibitions and exemptions listed under one Directive affect prohibitions and exemptions under the other Directives?

Each Directive operates independently of the others. If a transaction involves a person subject to two Directives, for example, a U.S. person engaging in that transaction must comply with the requirements of both Directives. Exemptions in one Directive apply only to the prohibitions contained in that Directive and do not carry over to another Directive. For example, if a person is subject to both Directive 2 and Directive 4, the exemption for the provision of financial services by U.S. persons or in the United States under Directive 4 does not supersede the prohibition in Directive 2 on dealing in debt of longer than 90 days maturity of such a person. For these reasons, when OFAC references a prohibition involving an "SSI entity" in these FAQs or in other guidance, it is referring to an entity subject to the Directive(s) at issue in a particular FAQ or piece of guidance.

[9-12-2014]

[Print This FAQ](#)

416. What does the "sanctions effective date" mean in the context of sectoral sanctions pursuant to E.O. 13662?

For purposes of the sectoral sanctions, "sanctions effective date" means the date a person is determined to be subject to the prohibition(s) of the relevant Directive. When a person has been previously determined to be subject to a Directive and the prohibition in the Directive is subsequently amended, (1) the sanctions effective date for the prohibitions of the original Directive remains the date on which the person was identified as subject to the prohibitions of that Directive, and (2) the sanctions effective date for the amended Directive is the date of the amendment (or other date specified in the amended Directive).

[9-12-2014]

[Print This FAQ](#)

418. How does OFAC interpret the term "shale projects" with respect to the prohibitions in Directive 4 under Executive Order 13662?

The prohibitions in Directive 4 under Executive Order 13662 apply to deepwater, Arctic offshore, or shale projects with the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory. The term "shale projects" applies to projects that have the potential to produce oil from resources located in shale formations. Therefore, as long as the projects in question are neither deepwater nor Arctic offshore projects, the prohibitions in Directive 4 do not apply to exploration or production through shale to locate or extract crude oil (or gas) in reservoirs.

[11-18-2014]

Print This FAQ

419. How should U.S. persons account for the 30- and 90-day debt prohibitions under Directives 1, 2, and 3 as they relate to payment terms for the following types of transactions: (1) the sale of goods to an SSI entity, (2) the provision of services to and subscription arrangements involving SSI entities, and (3) progress payments for long-term projects?

U.S. persons may engage in commercial transactions with SSI entities provided that any such transactions do not represent a direct or indirect dealing in prohibited debt or equity. Because offering payment terms of longer than 30 or 90 days to an SSI entity may constitute a prohibited extension of credit to the SSI entity, U.S. persons should ensure that payment terms conform with the applicable debt prohibitions. For sales of goods to an SSI entity, U.S. persons may extend payment terms of up to 30 or 90 days from the point at which title or ownership of the goods transfers to the SSI entity. For the provision of services to, subscription arrangements involving, and progress payments for long-term projects involving SSI entities, U.S. persons may extend payment terms of up to 30 or 90 days from the point at which a final invoice (or each final invoice) is issued. In the event that a payment dispute arises causing a U.S. person to believe that it may not receive payment in full by the end of the 30- or 90-day period, the U.S. person should contact OFAC to determine whether a license or other authorization is required.

[12-11-2014]

Print This FAQ

420. Under Directive 4, does the term “production” encompass activities such as transportation, refining, or other dealings in oil extracted from deepwater, Arctic offshore, or shale projects?

For the purposes of Directive 4, the term “production” refers to the lifting of oil to the surface and the gathering, treating, field processing, and field storage of such oil. The production stage of a project ends when extracted oil is transported out of a field production storage tank or otherwise off of a field production site. Directive 4 does not prohibit the provision by U.S. persons or within the United States of goods, technology, or services to SSI entities when such transactions relate only to the transportation, refining, or other dealings involving oil that has already been extracted from a deepwater, Arctic offshore, or shale project and transported out of a field production storage tank or otherwise off of a field production site.

[12-11-2014]

Print This FAQ

421. How does OFAC interpret the term “Arctic offshore projects” with respect to the prohibitions in Directive 4 under Executive Order 13662?

The prohibitions in Directive 4 under Executive Order 13662 apply to deepwater, Arctic offshore, or shale projects with the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory. The term “Arctic offshore projects” applies to projects that have the potential to produce oil in areas that (1) involve drilling operations originating offshore, and (2) are located above the Arctic Circle. The prohibitions do not apply to horizontal drilling operations originating onshore where such drilling operations extend under the seabed to areas above the Arctic Circle.

[12-11-2014]

Print This FAQ

TAB K



Title 3—

Executive Order 13685 of December 19, 2014

The President

Blocking Property of Certain Persons and Prohibiting Certain Transactions With Respect to the Crimea Region of Ukraine

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 *et seq.*), section 212(f) of the Immigration and Nationality Act of 1952 (8 U.S.C. 1182(f)), and section 301 of title 3, United States Code,

I, BARACK OBAMA, President of the United States of America, in order to take additional steps to address the Russian occupation of the Crimea region of Ukraine, and with respect to the national emergency declared in Executive Order 13660 of March 6, 2014, and expanded by Executive Order 13661 of March 16, 2014, and Executive Order 13662 of March 20, 2014, hereby order:

Section 1. (a) The following are prohibited:

(i) new investment in the Crimea region of Ukraine by a United States person, wherever located;

(ii) the importation into the United States, directly or indirectly, of any goods, services, or technology from the Crimea region of Ukraine;

(iii) the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of any goods, services, or technology to the Crimea region of Ukraine; and

(iv) any approval, financing, facilitation, or guarantee by a United States person, wherever located, of a transaction by a foreign person where the transaction by that foreign person would be prohibited by this section if performed by a United States person or within the United States.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order.

Sec. 2. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in: any person determined by the Secretary of the Treasury, in consultation with the Secretary of State:

(i) to operate in the Crimea region of Ukraine;

(ii) to be a leader of an entity operating in the Crimea region of Ukraine;

(iii) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order; or

(iv) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, any person whose property and interests in property are blocked pursuant to this order.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order.

Sec. 3. I hereby find that the unrestricted immigrant and nonimmigrant entry into the United States of aliens determined to meet one or more of the criteria in subsection 2(a) of this order would be detrimental to the interests of the United States, and I hereby suspend entry into the United States, as immigrants or nonimmigrants, of such persons. Such persons shall be treated as persons covered by section 1 of Proclamation 8693 of July 24, 2011 (Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions).

Sec. 4. I hereby determine that the making of donations of the type of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section 2 of this order would seriously impair my ability to deal with the national emergency declared in Executive Order 13660, and expanded in Executive Orders 13661 and 13662, and I hereby prohibit such donations as provided by section 2 of this order.

Sec. 5. The prohibitions in section 2 of this order include but are not limited to:

(a) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 6. (a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 7. Nothing in this order shall prohibit transactions for the conduct of the official business of the United States Government by employees, grantees, or contractors thereof.

Sec. 8. For the purposes of this order:

(a) the term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization;

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States; and

(d) the term "Crimea region of Ukraine" includes the land territory in that region as well as any maritime area over which sovereignty, sovereign rights, or jurisdiction is claimed based on purported sovereignty over that land territory.

Sec. 9. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in Executive Order 13660 and expanded in Executive Orders 13661 and 13662, there need be no prior notice of a listing or determination made pursuant to section 2 of this order.

Sec. 10. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including the promulgation of rules and regulations, and to employ all powers granted to the President by IEEPA, as may be necessary to carry out the purposes of this order. The Secretary of the Treasury may redelegate any of these functions to other officers and agencies of the United States Government consistent with applicable law. All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 11. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Sec. 12. This order is effective at 3:30 p.m. eastern standard time on December 19, 2014.



THE WHITE HOUSE,
December 19, 2014.

[FR Doc. 2014-30323
Filed 12-23-14; 8:45 am]
Billing code 3295-F5

TAB L





DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF FOREIGN ASSETS CONTROL

Executive Order _____ of December 19, 2014
Blocking Property of Certain Persons and Prohibiting Certain
Transactions With Respect to the Crimea Region of Ukraine

GENERAL LICENSE NO. 4

Authorizing the Exportation or Reexportation of
Agricultural Commodities, Medicine, Medical Supplies, and Replacement Parts

(a) Exportation or reexportation of agricultural commodities, medicine, medical supplies, and replacement parts.

(1) Agricultural commodities, medicine, and medical supplies. Except as provided in paragraphs (a)(3) – (a)(5), the exportation or reexportation, from the United States or by a U.S. person, wherever located, of agricultural commodities, medicine, and medical supplies to Crimea, or to persons in third countries purchasing specifically for resale to Crimea, and the conduct of related transactions, including the making of shipping and cargo inspection arrangements, the obtaining of insurance, the arrangement of financing and payment, shipping of the goods, receipt of payment, and the entry into contracts (including executory contracts), are hereby authorized.

(2) Replacement parts. Except as provided in paragraph (a)(3), the exportation or reexportation, from the United States or by a U.S. person, wherever located, of replacement parts for medical supplies exported or reexported pursuant to paragraph (a)(1) of this general license to Crimea, or to persons in third countries purchasing specifically for resale to Crimea, and the conduct of related transactions, including the making of shipping and cargo inspection arrangements, the obtaining of insurance, the arrangement of financing and payment, shipping of the goods, receipt of payment, and the entry into contracts (including executory contracts), are hereby authorized, provided that such replacement parts are designated as EAR99, or, in the case of replacement parts that are not subject to the Export Administration Regulations, 15 CFR parts 730 *et seq.* (EAR), would be designated as EAR99 if they were located in the United States; and further provided that such replacement parts are limited to a one-for-one export or reexport basis (*i.e.*, only one replacement part can be exported or reexported to replace a broken or non-operational component).

(3) Excluded persons. Paragraphs (a)(1) and (a)(2) of this general license do not authorize the exportation or reexportation of agricultural commodities, medicine, medical supplies, or replacement parts to military or law enforcement purchasers or importers.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

(4) Excluded agricultural commodities. Paragraph (a)(1) of this general license does not authorize the exportation or reexportation of the following items: castor beans, castor bean seeds, certified pathogen-free eggs (unfertilized or fertilized), dried egg albumin, live animals (excluding live cattle), embryos (excluding cattle embryos), Rosary/Jequirity peas, non-food-grade gelatin powder, peptones and their derivatives, super absorbent polymers, western red cedar, or all fertilizers.

(5) Excluded medicines. Paragraph (a)(1) of this general license does not authorize the exportation or reexportation of the following medicines: non-NSAID analgesics, cholinergics, anticholinergics, opioids, narcotics, benzodiazapenes, and bioactive peptides.

(b) Other excluded items.

(1) Agricultural commodities. For the purposes of this general license, agricultural commodities do not include furniture made from wood; clothing manufactured from plant or animal materials; agricultural equipment (whether hand tools or motorized equipment); pesticides, insecticides, or herbicides; or cosmetics (unless derived entirely from plant materials).

(2) Medicine. For the purposes of this general license, medicine does not include cosmetics.

(c) Limitations.

(1) Nothing in this general license relieves the exporter from compliance with the export license application requirements of another Federal agency.

(2) Nothing in this general license authorizes the exportation or reexportation of any agricultural commodity, medicine, or medical device controlled on the United States Munitions List established under section 38 of the Arms Export Control Act (22 U.S.C. 2778); controlled on any control list established under the Export Administration Act of 1979 or any successor statute (50 U.S.C. App. 2401 et seq.); or used to facilitate the development or production of a chemical or biological weapon or weapon of mass destruction.

(3) Nothing in this general license affects prohibitions on the sale or supply of U.S. technology or software used to manufacture agricultural commodities, medicine, or medical devices, such as technology to design or produce biotechnological items or medical devices.

(4) Nothing in this general license affects U.S. nonproliferation export controls, including the end-user and end-use controls maintained under Part 744 of the Export Administration Regulations, 15 CFR part 744.

(5) Nothing in this general license authorizes any transaction or dealing with a person whose property and interests in property are blocked under, or who is designated or otherwise



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

subject to any sanctions under, the terrorism, proliferation of weapons of mass destruction, or narcotics trafficking programs administered by OFAC, 31 CFR parts 536, 544, 594, 595, 597, and 598, or with any foreign organization, group, or person subject to any restriction for its involvement in weapons of mass destruction or missile proliferation, or involving property blocked pursuant to 31 C.F.R. chapter V or any other activity prohibited by that chapter not otherwise authorized in or pursuant to 31 C.F.R. part 589.

(6) Nothing in this general license authorizes the exportation or reexportation of any agricultural commodity, medicine, or medical device that is not designated as EAR99 or, in the case of any agricultural commodity, medicine, or medical device not subject to the EAR, would not be designated as EAR99 if it were located in the United States.

(d) Covered items. For the purposes of this general license, agricultural commodities, medicine, medical devices, and medical supplies are defined below.

(1) Agricultural commodities. For the purposes of this general license, agricultural commodities are:

(i) In the case of products subject to the EAR, 15 CFR part 774, products that are designated as EAR99, and, in the case of products not subject to the EAR, products that would be designated as EAR99 under the EAR if they were located in the United States, in each case that fall within the term "agricultural commodity" as defined in section 102 of the Agricultural Trade Act of 1978 (7 U.S.C. 5602); and

(ii) In the case of products subject to the EAR, products that are designated as EAR99, and in the case of products not subject to the EAR, products that would be designated as EAR99 if they were located in the United States, in each case that are intended for ultimate use in Crimea as:

(A) Food for humans (including raw, processed, and packaged foods; live animal; vitamins and minerals; food additives or supplements; and bottled drinking water) or animals (including animal feeds);

(B) Seeds for food crops;

(C) Fertilizers or organic fertilizers; or

(D) Reproductive materials (such as live animals, fertilized eggs, embryos, and semen) for the production of food animals.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

(2) Medicine. For the purposes of this general license, medicine is an item that falls within the definition of the term “drug” in section 201 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 321) and that, in the case of an item subject to the EAR, is designated as EAR99 or, in the case of an item not subject to the EAR, that would be designated as EAR99, if it were located in the United States.

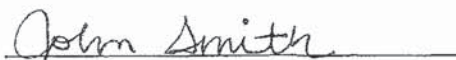
Note to paragraph (d)(2): The Department of Commerce’s Bureau of Industry and Security provides a list on its website of medicines that are not designated as EAR99 and therefore not eligible for this general license.

(3) Medical devices. For the purposes of this general license, a medical device is an item that falls within the definition of “device” in section 201 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 321) and that, in the case of an item subject to the EAR, is designated as EAR99, or in the case of an item not subject to the EAR, that would be designated as EAR99 if it were located in the United States.

(4) Medical supplies. For purposes of this general license, the term medical supplies means those medical devices, as defined in paragraph (d)(3) of this general license, that are included on the List of Medical Supplies on OFAC’s website (www.treasury.gov/ofac) on the Ukraine-related Sanctions page.

Note to paragraph (d)(4): The List of Medical Supplies is maintained on OFAC’s website (www.treasury.gov/ofac) on the Ukraine-related Sanctions page. The list also will be published in the Federal Register, as will any changes to the list.

Note to General License 4: Specific licenses may be issued on a case-by-case basis to authorize the export or reexport of medical devices that are not medical supplies (and therefore not authorized pursuant to section (a)(1) of this general license) to Crimea, or to persons in third countries purchasing specifically for resale to Crimea.


John E. Smith
Acting Director
Office of Foreign Assets Control

Dated: December 19, 2014

OFFICE OF FOREIGN ASSETS CONTROL

The Ukraine-related Sanctions Regulations, 31 C.F.R. Part 589

LIST OF MEDICAL SUPPLIES (December 19, 2014)

The list below comprises the medical supplies defined in Ukraine General License 4

General Medical Equipment and Supplies

- Syringes, cannulas, and needles – all sizes and types; including kits
- Catheters – all sizes and types; including kits
- Coils, guidewire
- Guidewires, all
- Medical tubing or hoses less than 2” diameter; including associated adaptors, connectors, caps, clamps, retainers, brackets, valves, washers, vents, stopcocks, or flow sensors; and peristaltic pumps with flowrates of less than 600 liters/hr for such tubing (note: does not include tubing made of butyl rubber or greater than 35% fluoropolymers)
- Endoscopic devices including laryngoscopes, laparoscopes, anascopes, proctoscopes, arthroscopes, sinusscopes, dematoscopes, ophthalmoscopes, sigmoidoscopes, otoscopes, retinoscopes, or colposcopes
- Blood pressure monitors, gauges, cuffs, aneroids, or infusors
- Monitor for glucose management
- Medical defibrillators
- Medical lavage systems
- IV sets, bags, and armboards
- Medical penlights
- Stethoscopes
- Speculums
- Medical scissors
- Forceps
- Single-use medical procedure trays and kits
- Medical diagnostic kits, point-of-care; including EAR99 reagents
- Reflex hammers
- Blood lancets
- Ear plugs and muffs
- Otology sponges
- Ear syringes
- Ear wax removers
- Clinical swabs, applicators, specimen collectors, sponges, pads, tongue depressors, wooden spoons, cotton balls, or cotton rolls
- Antiseptic wipes for human use (including alcohol, antimicrobial, benzalkonium, betadine, iodine, and witch hazel)
- Splints
- Canes, crutches, walkers, rollators

- Patient wheelchairs, chairs, gurneys, stretchers, mats, and cots
- Patient transfer chairs, lifts, benches, boards, slides, discs, slings, and sheets
- Safety poles, rails, handles, benches, grab bars, commode aids, and shower aids
- Patient vital-sign monitoring devices
- Limb prosthesis devices
- Orthopedic supports, braces, wraps, shoes, boots, or pads
- Medical casts, padding; and casting and removal equipment
- Orthopedic traction devices and tables
- Human body positioners including pads, wedges, cradles, pillows, rests, straps, supports, and holders
- Human specimen collectors and containers (e.g., urine, blood, tissue)
- Medical bandages, gauze, dressings, tape, swabs, sponges, and burn dressings
- Surgical sutures and staples; and removal kits
- Tourniquets
- Thermometers for measuring human body temperature
- Clinical basins, bowls, baths, pans, urinals, bags, and buckets; and holding devices for such items
- Medical carafes, cups, containers and tumblers
- Medicine cups
- Syringe aspirators
- Medical bags for medical supplies and equipment; including pre-packed bags
- Condoms
- Medical labels, labellers, stickers, forms, charts, signage, tags, cards, tape, wrist bands, documents, brochures, and graphics
- Non-electronic patient medical record file systems and organizers
- Beds: hospital beds, cribs, or bassinets; including mattresses, overlays, pillows, and bumpers
- Medical linens (e.g., blankets, sheets, pillow cases, towels, washcloths, drapes, covers)
- Chairs: exam, treatment, surgical, dental, or phlebotomy
- Stools: designed for clinical use
- Stands: IV, instrument, solution, or hamper
- Carts: medical, medical utility, medical supply, food service, or hospital laundry carts
- Tables: operating, exam, therapy, overbed, treatment, medical utility, or medical instrument
- Jars and containers designed for medical supplies and instruments less than 5 L internal volume
- Privacy screens and curtains
- Cabinets: medical supply or pharmaceutical
- Floor mats: safety, anti-fatigue or special-purpose medical floor mats
- Hydrocollator heating units
- Warmers: bottle, gel, lotion, or blanket
- Patient heating and cooling devices: pads, packs, bottles, bags, warmers, blankets, patches, lamps, bags
- Paraffin baths

- Lights and lamps: surgical, or medical exam, magnifying
- Scales, stadiometers, rulers, sticks, tapes, protractors, volumeters, gauges, or calipers designed for human measurement
- Patient safety devices including vests, aprons, finger mitts, limb or body holders, jackets, belts, restraints, cuffs, straps, or protectors
- Human body or cadaver bags and shrouds
- Adhesive designed for human use
- Adhesive remover designed for human use
- Telemetry pouches designed for human use

Anaesthesiology

- Air bags and tidal volume bags
- Air bellows
- Anaesthesia circuits
- Anaesthesia machines, vaporizers, nebulizers, and inhalers designed for individual human use
- Anaesthesia masks (including laryngeal)
- Anti-siphon equipment
- Block and epidural trays packaged for individual use
- Endotrach tubes
- Head straps and harnesses
- Hyperinflation systems
- In-line filters and cartridges, thermometers, CO₂ detectors, sodalime canisters, and temperature and moisture exchangers (note: gas mask canisters, other than sodalime canisters designed for anaesthesia systems, require a specific license)
- Intubation sets, probes and related equipment
- Anaesthesiometers
- Oral airways
- Peripheral nerve stimulators
- Anaesthesia pressure tubes and controllers
- Cardiopulmonary resuscitation (CPR) training manikins and lung bags
- Vibration dampening mounts

Apparel

- Medical gowns, scrubs, aprons, uniforms, lab coats, and coveralls; only those without integrated hoods
- Patient clothing including gowns, slippers, underpads, or undergarments
- Head or beard covers and nets
- Medical shoe and boot covers
- Surgical sleeve protectors
- Ventilated Safety eyeshields and goggles (does not include full face shield or indirectly-vented goggles)

- Disposable latex, nitrile, polyethylene, vinyl gloves/finger cots or other medical gloves
- Surgicalface or dust masks (does not include masks with respirators)

Cardiology

- Electrocardiography machines

Dental equipment and supplies

- Dental instruments – all types and sizes
- Dental instrument cases, trays, mats or tray liners, racks, covers, wraps, stands, holders, stringers, or protectors
- Dental and oral implants or devices
- Tooth and denture brushes
- Denture and temporary oral device containers
- Yankauers

Gynecology & Urology

- Bladder scanners
- Pouches, urostomy
- Bladder control pads, briefs, liners, underwear, pants and diapers
- Feminine hygiene products
- Fecal/stool management devices, kits, and catheters
- Enema sets

Laboratory

- Laboratory balances and scales not to exceed 10 Kg
- Patient blood gas analyzers
- Medical specimen centrifuges
- Automated clinical chemistry analyzers for patient care
- Coagulation analyzers
- Co-oximeters for haemoglobin analysis
- Medical bone densitometers
- Medical differential counters
- Bench-top dry bath incubators
- Electrolyte analyzers
- Hematology analyzers
- Histology and cytology strainers and tissue baths
- Laboratory hot plates with less than 1.0 sq. ft. heating surface
- Clinical immunoassay analyzers
- Luminometers
- Laboratory pH meter (with or without temperature probe)

- Automated blood culture systems
- Microplate readers/washers
- Light microscopes
- Osmometers
- Pipettes
- Medical refrigerators and freezers with less than 5.0 cu. ft. internal volume
- Spectrophotometers, photometers, and colorimeters designed for clinical use
- Urinalysis analyzers
- Clinical laboratory water baths less than 10 liter

Nephrology

- Hemodialysis machines; and dialysis filters designed for such machines (Note: Other dialysis equipment, filters, and parts not used for hemodialysis require a specific license and may be controlled under 15 CFR, part. 774, supp. 1, ECCN 2B352.d)
- Hemodialysis connection or tubing kits

Neurology

- Electroencephalography machines

Obstetrics and Maternity Care

- Umbilical cord clamps

Ophthalmology and Optometry

- Contact Lenses, corrective
- Contact Lens cleaning solutions
- Glasses, corrective
- Eyecharts

Physical and Occupational Therapy

- Parallel bars
- Exercise bars
- Hand bars
- Mat Platforms
- Exercise table
- Medical Whirlpools
- Mobility platforms, parallel bars, ladders, stairs
- Balance pads, platforms, and beams
- Cognitive measuring devices and equipment
- Manipulation boards
- Dining aids

- Hydraulic dynamometer
- Scoliometer
- Goniometers
- Pedometers
- Ergometers
- Rulonmeters
- Fine motor assessment equipment designed for human use
- Tactile sensation, sensitization, and desensitization equipment
- Rehabilitation exercise, weights, band, balls, boards, and mobility equipment
- Therapeutic putty
- Aquatic floats and training devices
- Protective headgear
- Electrotherapy, muscle stimulators, and tens units
- Ultrasound stimulators
- Massaging equipment

Radiology

- Medical ultrasound machines

Sterilization

- Aseptic, germicidal, or disinfectant wipes or clothes for medical equipment, devices or furniture
- Ready-to-use disinfectant in 32 oz. containers or less
- Aseptic, germicidal, or medical-grade soap, detergent, pre-soak, or rinse in 1 gallon containers or less
- Hand sanitizer, lotion, soap, scrub, wash, gel, or foam; including dispensing devices
- Medical cleaning brushes for equipment, patients, and furniture
- Sterilization or disinfection indicator strips, tape, or test packs
- Medical instrument sterilization pouches, mats, protector guards, or tubing
- Sterilization containers or cases less than 0.3 cu. ft.
- Autoclaves with chamber sizes less than 0.3 cu. ft.; including trays, containers, cassettes, cases, and filters for such systems.

Surgery

- Surgical clips
- Surgical instruments – all types and sizes
- Surgical instrument cases, trays, mats or tray liners, racks, covers, wraps, stands, holders, stringers, or protectors
- Stents – all types and sizes
- Surgical linens, drapes, or covers
- Chest drains

- Surgical case carts
- Blood transfusion equipment
- Surgical clean-up kits
- Wound drainage equipment
- Stockinettes
- Surgical mesh
- Surgical smoke evacuators and specialized supporting equipment
- Electrosurgery devices and supporting equipment
- Lubricant specially-formulated for surgical equipment in 1 gallon containers or less

EAR99-classified components, accessories, and optional equipment that are designed for and are for use with an EAR99-classified medical device included elsewhere on the list.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF FOREIGN ASSETS CONTROL

Executive Order 13685 of December 19, 2014
Blocking Property of Certain Persons and Prohibiting Certain Transactions With
Respect to the Crimea Region of Ukraine


GENERAL LICENSE NO. 5

Authorizing Certain Activities Prohibited by
Executive Order 13685 of December 19, 2014 Necessary to Wind Down Operations
Involving the Crimea Region of Ukraine

(a) Except as provided in paragraph (b) of this general license, all transactions and activities prohibited by Section 1 of Executive Order 13685 of December 19, 2014, “Blocking Property of Certain Persons and Prohibiting Certain Transactions With Respect to the Crimea Region of Ukraine” (the “Crimea E.O.”), that are ordinarily incident and necessary (1) to the winding down or divestiture or transfer to a foreign person of a U.S. person’s share of ownership, including an equity interest, in pre-December 20, 2014 investments located in the Crimea region of Ukraine; (2) to the winding down of operations, contracts, or other agreements that were in effect prior to December 20, 2014, involving the exportation, reexportation, sale, or supply of goods, services, or technology to the Crimea region of Ukraine; or (3) to the winding down of operations, contracts, or other agreements that were in effect prior to December 20, 2014, involving the importation of any goods, services, or technology from the Crimea region of Ukraine into the United States, are authorized through 12:01 a.m. eastern daylight time, February 1, 2015.

(b) This general license does not authorize (1) any new exportation, reexportation, sale, or supply of goods, services, or technology from the United States, or by a U.S. person, wherever located, to the Crimea region of Ukraine, or (2) any new importation into the United States of goods, services or technology from the Crimea region of Ukraine, except as needed to wind down operations, contracts, or other agreements otherwise prohibited by the Crimea E.O. This general license does not authorize any transactions or dealings otherwise prohibited by any other Executive order or any other part of 31 C.F.R. Chapter V, or any transactions or dealings with any specially designated national (SDN) listed pursuant to any Ukraine-related Executive order.

(c) U.S. persons participating in transactions authorized by this general license are required, within 10 business days after the wind-down activities conclude, to file a detailed report, including the parties involved, the type and scope of activities conducted, and the dates of the activities, with the Office of Foreign Assets Control, Licensing Division, U.S. Department of the Treasury, 1500 Pennsylvania Avenue N.W., Annex, Washington, DC 20220.


Adam J. Szubin
Director
Office of Foreign Assets Control

Dated: December 30, 2014

TAB M





DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

August 13, 2014

REVISED GUIDANCE ON ENTITIES OWNED BY PERSONS WHOSE PROPERTY
AND INTERESTS IN PROPERTY ARE BLOCKED

This guidance responds to inquiries received by the Department of the Treasury's Office of Foreign Assets Control (OFAC) relating to the status of entities owned by individuals or entities designated under Executive orders and regulations administered by OFAC. This document sets forth new guidance with respect to entities owned 50 percent or more in the aggregate by more than one blocked person.

Property blocked pursuant to an Executive order or regulations administered by OFAC is broadly defined to include any property or interest in property, tangible or intangible, including present, future or contingent interests. A property interest subject to blocking includes interests of any nature whatsoever, direct or indirect.

Persons whose property and interests in property are blocked pursuant to an Executive order or regulations administered by OFAC (blocked persons) are considered to have an interest in all property and interests in property of an entity in which such blocked persons own, whether individually or in the aggregate, directly or indirectly, a 50 percent or greater interest. Consequently, any entity owned in the aggregate, directly or indirectly, 50 percent or more by one or more blocked persons is itself considered to be a blocked person. The property and interests in property of such an entity are blocked regardless of whether the entity itself is listed in the annex to an Executive order or otherwise placed on OFAC's list of Specially Designated Nationals ("SDNs"). Accordingly, a U.S. person generally may not engage in any transactions with such an entity, unless authorized by OFAC. In certain OFAC sanctions programs (e.g., Cuba and Sudan), there is a broader category of entities whose property and interests in property are blocked based on, for example, ownership or control.

U.S. persons are advised to act with caution when considering a transaction with a non-blocked entity in which one or more blocked persons has a significant ownership interest that is less than 50 percent or which one or more blocked persons may control by means other than a majority ownership interest. Such entities may be the subject of future designation or enforcement action by OFAC. Furthermore, a U.S. person may not procure goods, services, or technology from, or engage in transactions with, a blocked person directly or indirectly (including through a third-party intermediary).

OFAC will incorporate this guidance as it issues regulations implementing new sanctions programs. In addition, OFAC expects to amend regulations implementing existing sanctions programs to reflect this guidance.

TAB N



Questions Related to Entities Owned by Persons Whose Property and Interests in Property are Blocked

TOP

These Frequently Asked Questions (FAQs) respond to inquiries received by the Department of the Treasury's Office of Foreign Assets Control (OFAC) relating to the status of entities owned by individuals or entities whose property and interests in property are blocked under Executive orders and regulations administered by OFAC (blocked persons). These FAQs provide additional clarity regarding revised guidance that OFAC issued today, which can be found on OFAC's website here, amending earlier guidance that had been issued on February 14, 2008 (OFAC's 50 Percent Rule). The revised guidance states that the property and interests in property of entities directly or indirectly owned 50 percent or more in the aggregate by one or more blocked persons are considered blocked regardless of whether such entities appear on OFAC's Specially Designated Nationals and Blocked Persons List (SDN List) or the annex to an Executive order. The revised guidance expands upon the earlier guidance by setting forth a new interpretation addressing entities owned 50 percent or more in the aggregate by more than one blocked person.*

For the purposes of clarification, please see specific FAQs below that OFAC is adding to its website. If you require additional guidance with respect to the application of OFAC's 50 Percent Rule, please contact OFAC and submit information pertaining to the specific facts and circumstances.

**OFAC also applies a 50 percent rule to entities on the Sectoral Sanctions Identification List (SSI List) created in July 2014 in the Ukraine-related sanctions context. The property and interests in property of persons on the SSI List (and entities owned 50% or more in the aggregate by one or more persons subject to the SSI List restrictions) are not required to be blocked; instead a more limited set of transaction restrictions applies to them. In the context of the SSI List restrictions, therefore, these FAQs can be used to identify which subordinate entities are subject to the SSI List restrictions only and are not meant to suggest that any additional actions (such as blocking) apply to those entities.*

http://www.treasury.gov/resource-center/faqs/Sanctions/Pages/ques_index.aspx#50_percent

398. Does OFAC consider entities over which one or more blocked persons exercise control, but do not own 50 percent or more of, to be blocked pursuant to OFAC's 50 Percent Rule?

No. OFAC's 50 Percent Rule speaks only to ownership and not to control. An entity that is controlled (but not owned 50 percent or more) by one or more blocked persons is *not* considered automatically blocked pursuant to OFAC's 50 Percent Rule. OFAC may, however, designate the entity and add it to the SDN List pursuant to a statute or Executive order that provides the authority for OFAC to designate entities over which a blocked person exercises control. OFAC urges caution when considering a transaction with an entity that is not a blocked person (a non-blocked entity) in which one or more blocked persons have a significant ownership interest that is less than 50 percent or which one or more blocked persons may control by means other than a majority ownership interest. Such non-blocked entities may become the subject of future designations or enforcement actions by OFAC. In addition, persons should be cautious in dealings with such a non-blocked entity to ensure that they are not, for example, dealing with a blocked person representing the non-blocked entity, such as entering into a contract that is signed by a blocked person. Please also note that some sanctions programs (such as Cuba and Sudan) block persons without an OFAC designation; these blockings are based on criteria separate from OFAC's 50 Percent Rule. [08-13-2014]

Print This FAQ

399. Does OFAC aggregate ownership stakes of all blocked persons when determining whether an entity is blocked pursuant to OFAC's 50 Percent Rule?

Yes. On August 13, 2014, OFAC indicated in its revised 50 Percent Rule guidance that OFAC's 50 Percent Rule applies to entities owned 50 percent or more in the aggregate by one or more blocked persons. Accordingly, if Blocked Person X owns 25 percent of Entity A, and Blocked Person Y owns another 25 percent of Entity A, Entity A is considered to be blocked. This is so because Entity A is owned 50 percent or more in the aggregate by one or more blocked persons. For the purpose of calculating aggregate ownership, the ownership interests of persons blocked under different OFAC sanctions programs are aggregated. [08-13-2014]

[Print This FAQ](#)

400. As explained in FAQ 398, OFAC's 50 Percent Rule does not apply if one or more individuals who are blocked persons (blocked individuals) control, but do not own 50 percent or more of, an entity. Can persons engage in negotiations, enter into contracts, or process transactions involving a blocked individual when that blocked individual is acting on behalf of the non-blocked entity that he or she controls (e.g., a blocked individual is an executive of a non-blocked entity and is signing a contract on behalf of the non-blocked entity)?

No. OFAC sanctions generally prohibit transactions involving, directly or indirectly, a blocked person, absent authorization from OFAC, even if the blocked person is acting on behalf of a non-blocked entity. Therefore, U.S. persons should be careful when conducting business with non-blocked entities in which blocked individuals are involved; U.S. persons may not, for example, enter into contracts that are signed by a blocked individual. [08-13-2014]

[Print This FAQ](#)

401. OFAC's 50 Percent Rule states that the property and interests in property of entities *directly or indirectly* owned 50 percent or more in the aggregate by one or more blocked persons are considered blocked. How does OFAC interpret indirect ownership as it relates to certain complex ownership structures?

"Indirectly," as used in OFAC's 50 Percent Rule, refers to one or more blocked persons' ownership of shares of an entity through another entity or entities that are 50 percent or more owned in the aggregate by the blocked person(s). OFAC urges persons considering a potential transaction to conduct appropriate due diligence on entities that are party to or involved with the transaction or with which account relationships are maintained in order to determine relevant ownership stakes. Please see FAQ 116 for additional guidance on due diligence standards for intermediary parties to wire transfers. Please refer to the examples below for further guidance on determining whether an entity is blocked pursuant to OFAC's 50 Percent Rule.

Example 1: Blocked Person X owns 50 percent of Entity A, and Entity A owns 50 percent of Entity B. Entity B is considered to be blocked. This is so because Blocked Person X owns, indirectly, 50% of Entity B. In addition, Blocked Person X's 50 percent ownership of Entity A makes Entity A a blocked person. Entity A's 50 percent ownership of Entity B in turn makes Entity B a blocked person.

Example 2: Blocked Person X owns 50 percent of Entity A and 50 percent of Entity B. Entities A and B each own 25 percent of Entity C. Entity C is considered to be blocked. This is so because, through its 50 percent ownership of Entity A, Blocked Person X is considered to indirectly own 25 percent of Entity C; and through its 50 percent ownership of Entity B, Blocked Person X is considered to indirectly own another 25 percent of Entity C. When Blocked Person X's indirect ownership of Entity C through Entity A and Entity B is totaled, it equals 50 percent. Entity C is also considered to be blocked due to the 50 percent aggregate ownership by Entities A and B, which are themselves blocked entities due to Blocked Person X's 50 percent ownership of each.

Example 3: Blocked Person X owns 50 percent of Entity A and 10 percent of Entity B. Entity A also owns 40 percent of Entity B. Entity B is considered to be blocked. This is so because, through its 50 percent ownership of Entity A, Blocked Person X is considered to indirectly own 40 percent of Entity B. When added to Blocked Person X's direct 10 percent ownership of Entity B, Blocked Person X's total ownership (direct and indirect) of Entity B is 50 percent. Entity B is also blocked due to the 50 percent aggregate ownership by Blocked Person X and Entity A, which are themselves both blocked persons.

Example 4: Blocked Person X owns 50 percent of Entity A and 25 percent of Entity B. Entities A and B each own 25 percent of Entity C. Entity C is *not* considered to be blocked. This is so because, even though Blocked Person X is considered to indirectly own 25 percent of Entity C through its 50 percent ownership of Entity A, Entity B is not 50 percent or more owned by Blocked Person X, and therefore Blocked Person X is not considered to indirectly own any of Entity C through its part ownership of Entity B. Blocked Person X's total ownership (direct and indirect) of Entity C therefore does not equal or exceed 50 percent. Entity A is itself a blocked person, but its ownership of Entity C also does not equal or exceed 50 percent.

Example 5: Blocked Person X owns 25 percent of Entity A and 25 percent of Entity B. Entities A and B each own 50 percent of Entity C. Entity C is *not* considered to be blocked. This is so because Blocked Person X's 25 percent ownership of each of Entity A and Entity B falls short of 50 percent. Accordingly, neither Entity A nor Entity B is blocked and Blocked Person X is not considered to indirectly own any of Entity C through its part ownership of Entities A or B. [08-13-2014]

Print This FAQ

402. How does OFAC's 50 Percent Rule apply to situations in which one or more blocked persons owned 50 percent or more of an entity, but subsequent to their designations one or more blocked persons divest their ownership stakes in the entity in a transaction that occurs entirely outside of U.S. jurisdiction such that the resulting combined ownership of the entity by blocked persons is less than 50 percent? How should a person treat property or interests in property of such an entity (1) in future transactions (post-divestment) and (2) that was properly blocked while the entity was owned 50 percent or more by one or more blocked persons?

According to OFAC's 50 Percent Rule, entities are considered blocked if they are owned 50 percent or more (directly or indirectly) in the aggregate by one or more blocked persons. If one or more blocked persons divest their ownership stake such that the resulting combined ownership by blocked persons is less than 50 percent, the entity is no longer considered automatically to be a blocked entity. Any such divestment transactions must occur entirely outside of U.S. jurisdiction and must not involve U.S. persons, as any blocked property or interests in property that come into the possession or control of a U.S. person must be blocked and reported to OFAC, and OFAC does not recognize any subsequent unlicensed transfers, through changes in ownership or otherwise, of such property.

Entities in which the aggregate of one or more blocked persons' ownership stakes has fallen below 50 percent are not considered blocked pursuant to OFAC's 50 Percent Rule, and therefore property of such entities that comes into the United States or the possession or control of a U.S. person while the aggregate of one or more blocked persons' ownership stakes is below 50 percent is not considered blocked by OFAC's 50 Percent Rule. OFAC urges caution when dealing with or processing transactions involving such entities, as those entities may become the subject of future designations or enforcement actions by OFAC. Sufficient due diligence should be conducted to determine that any purported divestment in fact occurred and that the transfer of ownership interests was not merely a sham transaction.

When the property of an entity owned 50 percent or more by a single blocked person comes within the United States or within the possession or control of a U.S. person and is blocked, the property remains blocked unless and until (1) OFAC authorizes the unblocking of or other dealings in the property or (2) OFAC removes the blocked person from the SDN List. The property remains blocked even if the blocked person's ownership of the entity subsequently falls below 50 percent. This is so because the blocked person is considered to have an interest in the blocked property,

and OFAC does not recognize the unlicensed transfer of the blocked person's interest after the property becomes blocked in the United States or in the possession or control of a U.S. person. Persons holding such property may request authorization from OFAC's Licensing Division to transfer or otherwise deal in that property (the electronic application can be found on OFAC's website [here](#)), and OFAC will evaluate such requests on a case-by-case basis.

Similarly, when the property of an entity owned 50 percent or more in the aggregate by more than one blocked person comes within the United States or in the possession or control of a U.S. person and is blocked, the property remains blocked unless and until (1) OFAC authorizes the unblocking of or other dealings in the property or (2) OFAC removes from the SDN List one or more of the blocked persons such that the aggregate ownership by blocked persons falls below 50 percent. If the aggregate ownership of the entity by blocked persons falls below 50 percent not due to SDN List removal actions by OFAC but instead due to actions by one or more of the blocked persons, including the entity itself, the property remains blocked. This is so because the group of blocked persons is considered to have an interest in the blocked property, and OFAC does not recognize the unlicensed transfer of any of the blocked persons' interests after the property becomes blocked in the United States or in the possession or control of a U.S. person. Persons holding such property may request authorization from OFAC's Licensing Division to transfer or otherwise deal in that property (the electronic application can be found on OFAC's website [here](#)), and OFAC will evaluate such requests on a case-by-case basis. [08-13-2014]

TAB 0



ELECTRONIC CODE OF FEDERAL REGULATIONS

e-CFR Data is current as of January 12, 2015

* as of 14 Jan 2015,
the URSR only
incorporate E.O.'s
13660, 13661, & 13662
NOT 13685

Title 31 → Subtitle B → Chapter V → Part 589

Title 31: Money and Finance: Treasury

PART 589—UKRAINE RELATED SANCTIONS REGULATIONS

Contents

Subpart A—Relation of This Part to Other Laws and Regulations

§589.101 Relation of this part to other laws and regulations.

Subpart B—Prohibitions

§589.201 Prohibited transactions.

§589.202 Effect of transfers violating the provisions of this part.

§589.203 Holding of funds in interest-bearing accounts; investment and reinvestment.

§589.204 Expenses of maintaining blocked property; liquidation of blocked property.

Subpart C—General Definitions

§589.300 Applicability of definitions.

§589.301 Blocked account; blocked property.

§589.302 Effective date.

§589.303 Entity.

§589.304 Interest.

§589.305 Licenses; general and specific.

§589.306 OFAC.

§589.307 Person.

§589.308 Property; property interest.

§589.309 Transfer.

§589.310 Ukraine-Related Executive Orders.

§589.311 United States.

§589.312 United States person; U.S. person.

§589.313 U.S. financial institution.

Subpart D—Interpretations

§589.401 [Reserved]

§589.402 Effect of amendment.

§589.403 Termination and acquisition of an interest in blocked property.

§589.404 Transactions ordinarily incident to a licensed transaction.

§589.405 Setoffs prohibited.

§589.406 Entities owned by a person whose property and interests in property are blocked.

Subpart E—Licenses, Authorizations, and Statements of Licensing Policy

§589.501 General and specific licensing procedures.

§589.502 [Reserved]

§589.503 Exclusion from licenses.

§589.504 Payments and transfers to blocked accounts in U.S. financial institutions.

§589.505 Entries in certain accounts for normal service charges authorized.

§589.506 Provision of certain legal services authorized.

§589.507 Payments from funds originating outside the United States authorized.

§589.508 Authorization of emergency medical services.

Subparts F-G [Reserved]

Subpart H—Procedures

§589.801 [Reserved]

§589.802 Delegation by the Secretary of the Treasury.

Subpart I—Paperwork Reduction Act

§589.901 Paperwork Reduction Act notice.

Appendix A to Part 589—Executive Order 13660

Appendix B to Part 589—Executive Order 13661

Appendix C to Part 589—Executive Order 13662

AUTHORITY: 3 U.S.C. 301; 31 U.S.C. 321(b); 50 U.S.C. 1601-1651, 1701-1706; Pub. L. 101-410, 104 Stat. 890 (28 U.S.C. 2461 note); Pub. L. 110-96, 121 Stat. 1011 (50 U.S.C. 1705 note); E.O. 13660, 79 FR 13493, March 10, 2014; E.O. 13661, 79 FR 15535 March 19, 2014, E.O. 13662, 79 FR 16169, March 24, 2014.

SOURCE: 79 FR 26366, May 8, 2014, unless otherwise noted.

[↑ Back to Top](#)

Subpart A—Relation of This Part to Other Laws and Regulations

[↑ Back to Top](#)

§589.101 Relation of this part to other laws and regulations.

This part is separate from, and independent of, the other parts of this chapter, with the exception of part 501 of this chapter, the recordkeeping and reporting requirements and license application and other procedures of which apply to this part. Actions taken pursuant to part 501 of this chapter with respect to the prohibitions contained in this part are considered actions taken pursuant to this part. Differing foreign policy and national security circumstances may result in differing interpretations of similar language among the parts of this chapter. No license or authorization contained in or issued pursuant to those other parts authorizes any transaction prohibited by this part. No license or authorization contained in or issued pursuant to any other provision of law or regulation authorizes any transaction prohibited by this part. No license or authorization contained in or issued pursuant to this part relieves the involved parties from complying with any other applicable laws or regulations.

NOTE TO §589.101: This part has been published in abbreviated form for the purpose of providing immediate guidance to the public. OFAC intends to supplement this part with a more comprehensive set of regulations, which may include additional interpretive and definitional guidance and additional general licenses and statements of licensing policy.

[↑ Back to Top](#)

Subpart B—Prohibitions

[↑ Back to Top](#)

§589.201 Prohibited transactions.

All transactions prohibited pursuant to Executive Order 13660 of March 6, 2014, Executive Order 13661 of March 16, 2014, and Executive Order 13662 of March 20, 2014 ("Ukraine-Related Executive Orders"), are also prohibited pursuant to this part.

NOTE 1 TO §589.201: The names of persons designated pursuant to the Ukraine-Related Executive Orders, whose property and interests in property therefore are blocked pursuant to this section, are published in the FEDERAL REGISTER and incorporated into OFAC's Specially Designated Nationals and Blocked Persons List ("SDN List") and appear with the prefix "UKRAINE" in the program tag associated with each listing. The SDN List is accessible through the following page on OFAC's Web site: www.treasury.gov/sdn. Additional information pertaining to the SDN List can be found in Appendix A to this chapter. See §589.406 concerning entities that may not be listed on the SDN List but whose property and interests in property are nevertheless blocked pursuant to this section.

NOTE 2 TO §589.201: The International Emergency Economic Powers Act (50 U.S.C. 1701-1706), in Section 203 (50 U.S.C. 1702), authorizes the blocking of property and interests in property of a person during the pendency of an investigation. The names of persons whose property and interests in property are blocked pending investigation pursuant to this section also are published in the FEDERAL REGISTER and incorporated into the SDN List with the prefix "BPI—UKRAINE."

NOTE 3 TO §589.201: Sections 501.806 and 501.807 of this chapter describe the procedures to be followed by persons seeking, respectively, the unblocking of funds that they believe were blocked due to mistaken identity, or administrative reconsideration of their status as persons whose property and interests in property are blocked pursuant to this section.

[↑ Back to Top](#)

§589.202 Effect of transfers violating the provisions of this part.

(a) Any transfer after the effective date that is in violation of any provision of this part or of any regulation, order, directive, ruling, instruction, or license issued pursuant to this part, and that involves any property or interest in property blocked pursuant to §589.201, is null and void and shall not be the basis for the assertion or recognition of any interest in or right, remedy, power, or privilege with respect to such property or property interests.

(b) No transfer before the effective date shall be the basis for the assertion or recognition of any right, remedy, power, or privilege with respect to, or any interest in, any property or interest in property blocked pursuant to §589.201, unless the person who holds or maintains such property, prior to that date, had written notice of the transfer or by any written evidence had recognized such transfer.

(c) Unless otherwise provided, a license or other authorization issued by OFAC before, during, or after a transfer shall validate such transfer or make it enforceable to the same extent that it would be valid or enforceable but for the provisions of this part and any regulation, order, directive, ruling, instruction, or license issued pursuant to this part.

(d) Transfers of property that otherwise would be null and void or unenforceable by virtue of the provisions of this section shall not be deemed to be null and void or unenforceable as to any person with whom such property is or was held or maintained (and as to such person only) in cases in which such person is able to establish to the satisfaction of OFAC each of the following:

(1) Such transfer did not represent a willful violation of the provisions of this part by the person with whom such property is or was held or maintained (and as to such person only);

(2) The person with whom such property is or was held or maintained did not have reasonable cause to know or suspect, in view of all the facts and circumstances known or available to such person, that such transfer required a license or authorization issued pursuant to this part and was not so licensed or authorized, or, if a license or authorization did purport to cover the transfer, that such license or authorization had been obtained by misrepresentation of a third party or withholding of material facts or was otherwise fraudulently obtained; and

(3) The person with whom such property is or was held or maintained filed with OFAC a report setting forth in full the circumstances relating to such transfer promptly upon discovery that:

(i) Such transfer was in violation of the provisions of this part or any regulation, ruling, instruction, license, or other directive or authorization issued pursuant to this part;

(ii) Such transfer was not licensed or authorized by OFAC; or

(iii) If a license did purport to cover the transfer, such license had been obtained by misrepresentation of a third party or withholding of material facts or was otherwise fraudulently obtained.

NOTE TO PARAGRAPH (d) OF §589.202: The filing of a report in accordance with the provisions of paragraph (d)(3) of this section shall not be deemed evidence that the terms of paragraphs (d)(1) and (d)(2) of this section have been satisfied.

(e) Unless licensed pursuant to this part, any attachment, judgment, decree, lien, execution, garnishment, or other judicial process is null and void with respect to any property in which, on or since the effective date, there existed an interest of a person whose property and interests in property are blocked pursuant to §589.201.

[↑ Back to Top](#)

§589.203 Holding of funds in interest-bearing accounts; investment and reinvestment.

(a) Except as provided in paragraphs (e) or (f) of this section, or as otherwise directed by OFAC, any U.S. person holding funds, such as currency, bank deposits, or liquidated financial obligations, subject to §589.201 shall hold or place such funds in a blocked interest-bearing account located in the United States.

(b)(1) For purposes of this section, the term *blocked interest-bearing account* means a blocked account:

(i) In a federally-insured U.S. bank, thrift institution, or credit union, provided the funds are earning interest at rates that are commercially reasonable; or

(ii) With a broker or dealer registered with the Securities and Exchange Commission under the Securities Exchange Act of 1934 (15 U.S.C. 78a *et seq.*), provided the funds are invested in a money market fund or in U.S. Treasury bills.

(2) Funds held or placed in a blocked account pursuant to paragraph (a) of this section may not be invested in instruments the maturity of which exceeds 180 days.

(c) For purposes of this section, a rate is commercially reasonable if it is the rate currently offered to other depositors on deposits or instruments of comparable size and maturity.

(d) For purposes of this section, if interest is credited to a separate blocked account or subaccount, the name of the account party on each account must be the same.

(e) Blocked funds held in instruments the maturity of which exceeds 180 days at the time the funds become subject to §589.201 may continue to be held until maturity in the original instrument, provided any interest, earnings, or other proceeds derived therefrom are paid into a blocked interest-bearing account in accordance with paragraphs (a) or (f) of this section.

(f) Blocked funds held in accounts or instruments outside the United States at the time the funds become subject to §589.201 may continue to be held in the same type of accounts or instruments, provided the funds earn interest at rates that are commercially reasonable.

(g) This section does not create an affirmative obligation for the holder of blocked tangible property, such as chattels or real estate, or of other blocked property, such as debt or equity securities, to sell or liquidate such property. However, OFAC may issue licenses permitting or directing such sales or liquidation in appropriate cases.

(h) Funds subject to this section may not be held, invested, or reinvested in a manner that provides immediate financial or economic benefit or access to any person whose property and interests in property are blocked pursuant to §589.201, nor may their holder cooperate in or facilitate the pledging or other attempted use as collateral of blocked funds or other assets.

[↑ Back to Top](#)

§589.204 Expenses of maintaining blocked property; liquidation of blocked property.

(a) Except as otherwise authorized, and notwithstanding the existence of any rights or obligations conferred or imposed by any international agreement or contract entered into or any license or permit granted prior to the effective date, all expenses incident to the maintenance of physical property blocked pursuant to §589.201 shall be the responsibility of the owners or operators of such property, which expenses shall not be met from blocked funds.

(b) Property blocked pursuant to §589.201 may, in the discretion of OFAC, be sold or liquidated and the net proceeds placed in a blocked interest-bearing account in the name of the owner of the property.

[↑ Back to Top](#)

Subpart C—General Definitions

[↑ Back to Top](#)

§589.300 Applicability of definitions.

The definitions in this subpart apply throughout the entire part.

↑ Back to Top

§589.301 Blocked account; blocked property.

The terms *blocked account* and *blocked property* shall mean any account or property subject to the prohibitions in §589.201 held in the name of a person whose property and interests in property are blocked pursuant to §589.201, or in which such person has an interest, and with respect to which payments, transfers, exportations, withdrawals, or other dealings may not be made or effected except pursuant to an authorization or license from OFAC expressly authorizing such action.

NOTE TO §589.301: See §589.406 concerning the blocked status of property and interests in property of an entity that is 50 percent or more owned by a person whose property and interests in property are blocked pursuant to §589.201.

↑ Back to Top

§589.302 Effective date.

The term *effective date* refers to the effective date of the applicable prohibitions and directives contained in this part as follows:

(a) With respect to a person listed in the Annex to E.O. 13661 of March 16, 2014, 12:01 a.m. eastern daylight time, March 17, 2014; and

(b) With respect to a person whose property and interests in property are blocked pursuant to §589.201, is the earlier of the date of actual or constructive notice that such person's property and interests in property are blocked.

↑ Back to Top

§589.303 Entity.

The term *entity* means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization.

↑ Back to Top

§589.304 Interest.

Except as otherwise provided in this part, the term *interest*, when used with respect to property (e.g., "an interest in property"), means an interest of any nature whatsoever, direct or indirect.

↑ Back to Top

§589.305 Licenses; general and specific.

(a) Except as otherwise specified, the term *license* means any license or authorization contained in or issued pursuant to this part.

(b) The term *general license* means any license or authorization the terms of which are set forth in subpart E of this part or made available on OFAC's Web site: www.treasury.gov/ofac.

(c) The term *specific license* means any license or authorization issued pursuant to this part but not set forth in subpart E of this part or made available on OFAC's Web site: www.treasury.gov/ofac.

NOTE TO §589.305: See §501.801 of this chapter on licensing procedures.

↑ Back to Top

§589.306 OFAC.

The term *OFAC* means the Department of the Treasury's Office of Foreign Assets Control.

↑ Back to Top

§589.307 Person.

The term *person* means an individual or entity.

[↑ Back to Top](#)

§589.308 Property; property interest.

The terms *property* and *property interest* include, but are not limited to, money, checks, drafts, bullion, bank deposits, savings accounts, debts, indebtedness, obligations, notes, guarantees, debentures, stocks, bonds, coupons, any other financial instruments, bankers acceptances, mortgages, pledges, liens or other rights in the nature of security, warehouse receipts, bills of lading, trust receipts, bills of sale, any other evidences of title, ownership or indebtedness, letters of credit and any documents relating to any rights or obligations thereunder, powers of attorney, goods, wares, merchandise, chattels, stocks on hand, ships, goods on ships, real estate mortgages, deeds of trust, vendors' sales agreements, land contracts, leaseholds, ground rents, real estate and any other interest therein, options, negotiable instruments, trade acceptances, royalties, book accounts, accounts payable, judgments, patents, trademarks or copyrights, insurance policies, safe deposit boxes and their contents, annuities, pooling agreements, services of any nature whatsoever, contracts of any nature whatsoever, and any other property, real, personal, or mixed, tangible or intangible, or interest or interests therein, present, future, or contingent.

[↑ Back to Top](#)

§589.309 Transfer.

The term *transfer* means any actual or purported act or transaction, whether or not evidenced by writing, and whether or not done or performed within the United States, the purpose, intent, or effect of which is to create, surrender, release, convey, transfer, or alter, directly or indirectly, any right, remedy, power, privilege, or interest with respect to any property. Without limitation on the foregoing, it shall include the making, execution, or delivery of any assignment, power, conveyance, check, declaration, deed, deed of trust, power of attorney, power of appointment, bill of sale, mortgage, receipt, agreement, contract, certificate, gift, sale, affidavit, or statement; the making of any payment; the setting off of any obligation or credit; the appointment of any agent, trustee, or fiduciary; the creation or transfer of any lien; the issuance, docketing, or filing of, or levy of or under, any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment; the acquisition of any interest of any nature whatsoever by reason of a judgment or decree of any foreign country; the fulfillment of any condition; the exercise of any power of appointment, power of attorney, or other power; or the acquisition, disposition, transportation, importation, exportation, or withdrawal of any security.

[↑ Back to Top](#)

§589.310 Ukraine-Related Executive Orders.

The term "Ukraine-Related Executive Orders" means Executive Order 13660 of March 6, 2014, Executive Order 13661 of March 16, 2014, and Executive Order 13662 of March 20, 2014.

[↑ Back to Top](#)

§589.311 United States.

The term *United States* means the United States, its territories and possessions, and all areas under the jurisdiction or authority thereof.

[↑ Back to Top](#)

§589.312 United States person; U.S. person.

The term *United States person* or *U.S. person* means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States.

[↑ Back to Top](#)

§589.313 U.S. financial institution.

The term *U.S. financial institution* means any U.S. entity (including its foreign branches) that is engaged in the business of accepting deposits, making, granting, transferring, holding, or brokering loans or credits, or purchasing or selling foreign exchange, securities, or commodity futures or options, or procuring purchasers and sellers thereof, as principal or agent. It includes but is not limited to depository institutions, banks, savings banks, trust companies, securities brokers and dealers, commodity futures and options brokers and dealers, forward contract and foreign exchange merchants, securities and commodities exchanges, clearing corporations, investment companies, employee benefit plans, and U.S. holding companies, U.S. affiliates, or U.S. subsidiaries of any of the foregoing. This term includes those branches, offices, and agencies of foreign financial institutions that are located in the United States, but not such institutions' foreign branches, offices, or agencies.

[↑ Back to Top](#)

Subpart D—Interpretations

[↑ Back to Top](#)

§589.401 [Reserved]

[↑ Back to Top](#)

§589.402 Effect of amendment.

Unless otherwise specifically provided, any amendment, modification, or revocation of any provision in or appendix to this part or chapter or of any order, regulation, ruling, instruction, or license issued by OFAC does not affect any act done or omitted, or any civil or criminal proceeding commenced or pending, prior to such amendment, modification, or revocation. All penalties, forfeitures, and liabilities under any such order, regulation, ruling, instruction, or license continue and may be enforced as if such amendment, modification, or revocation had not been made.

[↑ Back to Top](#)

§589.403 Termination and acquisition of an interest in blocked property.

(a) Whenever a transaction licensed or authorized by or pursuant to this part results in the transfer of property (including any property interest) away from a person whose property and interests in property are blocked pursuant to §589.201, such property shall no longer be deemed to be property blocked pursuant to §589.201, unless there exists in the property another interest that is blocked pursuant to §589.201, the transfer of which has not been effected pursuant to license or other authorization.

(b) Unless otherwise specifically provided in a license or authorization issued pursuant to this part, if property (including any property interest) is transferred or attempted to be transferred to a person whose property and interests in property are blocked pursuant to §589.201, such property shall be deemed to be property in which that person has an interest and therefore blocked.

[↑ Back to Top](#)

§589.404 Transactions ordinarily incident to a licensed transaction.

Any transaction ordinarily incident to a licensed transaction and necessary to give effect thereto is also authorized, except:

(a) An ordinarily incident transaction, not explicitly authorized within the terms of the license, by or with a person whose property and interests in property are blocked pursuant to §589.201; or

(b) An ordinarily incident transaction, not explicitly authorized within the terms of the license, involving a debit to a blocked account or a transfer of blocked property.

[↑ Back to Top](#)

§589.405 Setoffs prohibited.

A setoff against blocked property (including a blocked account), whether by a U.S. bank or other U.S. person, is a prohibited transfer under §589.201 if effected after the effective date.

[↑ Back to Top](#)

§589.406 Entities owned by a person whose property and interests in property are blocked.

A person whose property and interests in property are blocked pursuant to §589.201 has an interest in all property and interests in property of an entity in which it owns, directly or indirectly, a 50 percent or greater interest. The property and interests in property of such an entity, therefore, are blocked, and such an entity is a person whose property and interests in property are blocked pursuant to §589.201, regardless of whether the name of the entity is incorporated into OFAC's Specially Designated Nationals and Blocked Persons List ("SDN List").

[↑ Back to Top](#)

Subpart E—Licenses, Authorizations, and Statements of Licensing Policy

[↑ Back to Top](#)

§589.501 General and specific licensing procedures.

For provisions relating to licensing procedures, see part 501, subpart E, of this chapter. Licensing actions taken pursuant to part 501 of this chapter with respect to the prohibitions contained in this part are considered actions taken pursuant to this part. General licenses and statements of licensing policy relating to this part also may be available through the Ukraine-related sanctions page on OFAC's Web site: www.treasury.gov/ofac.

[↑ Back to Top](#)

§589.502 [Reserved]

[↑ Back to Top](#)

§589.503 Exclusion from licenses.

OFAC reserves the right to exclude any person, property, transaction, or class thereof from the operation of any license or from the privileges conferred by any license. OFAC also reserves the right to restrict the applicability of any license to particular persons, property, transactions, or classes thereof. Such actions are binding upon actual or constructive notice of the exclusions or restrictions.

[↑ Back to Top](#)

§589.504 Payments and transfers to blocked accounts in U.S. financial institutions.

Any payment of funds or transfer of credit in which a person whose property and interests in property are blocked pursuant to §589.201 has any interest that comes within the possession or control of a U.S. financial institution must be blocked in an account on the books of that financial institution. A transfer of funds or credit by a U.S. financial institution between blocked accounts in its branches or offices is authorized, provided that no transfer is made from an account within the United States to an account held outside the United States, and further provided that a transfer from a blocked account may be made only to another blocked account held in the same name.

NOTE TO §589.504: See §501.603 of this chapter for mandatory reporting requirements regarding financial transfers. See also §589.203 concerning the obligation to hold blocked funds in interest-bearing accounts.

[↑ Back to Top](#)

§589.505 Entries in certain accounts for normal service charges authorized.

(a) A U.S. financial institution is authorized to debit any blocked account held at that financial institution in payment or reimbursement for normal service charges owed it by the owner of that blocked account.

(b) As used in this section, the term *normal service charges* shall include charges in payment or reimbursement for interest due; cable, telegraph, Internet, or telephone charges; postage costs; custody fees; small adjustment charges to correct bookkeeping errors; and, but not by way of limitation, minimum balance charges, notary and protest fees, and charges for reference books, photocopies, credit reports,

transcripts of statements, registered mail, insurance, stationery and supplies, and other similar items.

⬆ Back to Top

§589.506 Provision of certain legal services authorized.

(a) The provision of the following legal services to or on behalf of persons whose property and interests in property are blocked pursuant to §589.201 or any further Executive orders relating to the national emergency declared in Executive Order 13660 of March 6, 2014, is authorized, provided that receipt of payment of professional fees and reimbursement of incurred expenses must be specifically licensed or otherwise authorized pursuant to §589.507:

(1) Provision of legal advice and counseling on the requirements of and compliance with the laws of the United States or any jurisdiction within the United States, provided that such advice and counseling are not provided to facilitate transactions in violation of this part;

(2) Representation of persons named as defendants in or otherwise made parties to legal, arbitration, or administrative proceedings before any U.S. federal, state, or local court or agency;

(3) Initiation and conduct of legal, arbitration, or administrative proceedings before any U.S. federal, state, or local court or agency;

(4) Representation of persons before any U.S. federal, state, or local court or agency with respect to the imposition, administration, or enforcement of U.S. sanctions against such persons; and

(5) Provision of legal services in any other context in which prevailing U.S. law requires access to legal counsel at public expense.

(b) The provision of any other legal services to persons whose property and interests in property are blocked pursuant to §589.201 or any further Executive orders relating to the national emergency declared in Executive Order 13660 of March 6, 2014, not otherwise authorized in this part, requires the issuance of a specific license.

(c) Entry into a settlement agreement or the enforcement of any lien, judgment, arbitral award, decree, or other order through execution, garnishment, or other judicial process purporting to transfer or otherwise alter or affect property or interests in property blocked pursuant to §589.201 or any further Executive orders relating to the national emergency declared in Executive Order 13660 of March 6, 2014, is prohibited unless licensed pursuant to this part.

NOTE TO §589.506: U.S. persons seeking administrative reconsideration or judicial review of their designation or the blocking of their property and interests in property may apply for a specific license from OFAC to authorize the release of a limited amount of blocked funds for the payment of legal fees where alternative funding sources are not available. For more information, see OFAC's *Guidance on the Release of Limited Amounts of Blocked Funds for Payment of Legal Fees and Costs Incurred in Challenging the Blocking of U.S. Persons in Administrative or Civil Proceedings*, which is available on OFAC's Web site: www.treasury.gov/ofac.

⬆ Back to Top

§589.507 Payments from funds originating outside the United States authorized.

Payments from funds originating outside the United States. Receipts of payment of professional fees and reimbursement of incurred expenses for the provision of legal services authorized pursuant to §589.506(a) to or on behalf of any person whose property and interests in property are blocked pursuant to §589.201 or any further Executive orders relating to the national emergency declared in Executive Order 13660 of March 6, 2014, are authorized from funds originating outside the United States, provided that:

(a) Prior to receiving payment for legal services authorized pursuant to §589.506(a) rendered to persons whose property and interests in property are blocked pursuant to §589.201 or any further Executive orders relating to the national emergency declared in Executive Order 13660 of March 6, 2014, the U.S. person that is an attorney, law firm, or legal services organization provides to OFAC a copy of a letter of engagement or a letter of intent to engage specifying the services to be performed and signed by the individual to whom such services are to be provided or, where services are to be provided to an entity, by a legal representative of the entity. The copy of a letter of engagement or a letter of intent to engage, accompanied by correspondence referencing this paragraph (a), is to be mailed to: Licensing Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue

NW., Annex, Washington, DC 20220;

(b) The funds received by U.S. persons as payment of professional fees and reimbursement of incurred expenses for the provision of legal services authorized pursuant to §589.506(a) must not originate from:

(1) A source within the United States;

(2) Any source, wherever located, within the possession or control of a U.S. person; or

(3) Any individual or entity, other than the person on whose behalf the legal services authorized pursuant to §589.506(a) are to be provided, whose property and interests in property are blocked pursuant to any part of this chapter or any Executive order;

NOTE TO PARAGRAPH (b) OF §589.507: This paragraph authorizes the blocked person on whose behalf the legal services authorized pursuant to §589.506(a) are to be provided to make payments for authorized legal services using funds originating outside the United States that were not previously blocked. Nothing in this paragraph authorizes payments for legal services using funds in which any other person whose property and interests in property are blocked pursuant to §589.201 or any further Executive orders relating to the national emergency declared in Executive Order 13660 of March 6, 2014, any other part of this chapter, or any Executive order holds an interest.

(c) *Reports.* (1) U.S. persons who receive payments in connection with legal services authorized pursuant to §589.506(a) must submit quarterly reports no later than 30 days following the end of the calendar quarter during which the payments were received providing information on the funds received. Such reports shall specify:

(i) The individual or entity from whom the funds originated and the amount of funds received; and

(ii) If applicable:

(A) The names of any individuals or entities providing related services to the U.S. person receiving payment in connection with authorized legal services, such as private investigators or expert witnesses;

(B) A general description of the services provided; and

(C) The amount of funds paid in connection with such services.

(2) In the event that no transactions occur or no funds are received during the reporting period, a statement is to be filed to that effect; and

(3) The reports, which must reference this section, are to be mailed to: Licensing Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue NW., Annex, Washington, DC 20220.

NOTE 1 TO §589.507: U.S. persons who receive payments in connection with legal services authorized pursuant to §589.506(a) do not need to obtain specific authorization to contract for related services that are ordinarily incident to the provision of those legal services, such as those provided by private investigators or expert witnesses, or to pay for such services. Additionally, U.S. persons do not need to obtain specific authorization to provide related services that are ordinarily incident to the provision of legal services authorized pursuant to §589.506(a).

NOTE 2 TO §589.507: Any payment authorized in or pursuant to this paragraph that is routed through the U.S. financial system should reference §589.507 to avoid the blocking of the transfer.

NOTE 3 TO §589.507: Nothing in this section authorizes the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any part of this chapter or any Executive order.

[↑ Back to Top](#)

§589.508 Authorization of emergency medical services.

The provision of nonscheduled emergency medical services in the United States to persons whose property and interests in property are blocked pursuant to §589.201(a) or any further Executive orders relating to the national emergency declared in Executive Order 13660 of March 6, 2014, is authorized, provided that all receipt of payment for such services must be specifically licensed.

[↑ Back to Top](#)

Subparts F-G [Reserved]

[↑ Back to Top](#)

Subpart H—Procedures

[↑ Back to Top](#)

§589.801 [Reserved]

[↑ Back to Top](#)

§589.802 Delegation by the Secretary of the Treasury.

Any action that the Secretary of the Treasury is authorized to take pursuant to the Ukraine-Related Executive Orders—with the exception of the determination of sectors of the Russian Federation economy under Section 1(a)(i) of Executive Order 13662 of March 20, 2014—and any further Executive orders relating to the national emergency declared in Executive Order 13660 of March 6, 2014, may be taken by the Director of OFAC or by any other person to whom the Secretary of the Treasury has delegated authority so to act.

[↑ Back to Top](#)

Subpart I—Paperwork Reduction Act

[↑ Back to Top](#)

§589.901 Paperwork Reduction Act notice.

For approval by the Office of Management and Budget (“OMB”) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3507) of information collections relating to recordkeeping and reporting requirements, licensing procedures (including those pursuant to statements of licensing policy), and other procedures, see §501.901 of this chapter. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid control number assigned by OMB.

[↑ Back to Top](#)

Appendix A to Part 589—Executive Order 13660

Executive Order 13660 of March 6, 2014

Blocking Property of Certain Persons Contributing to the Situation in Ukraine

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 *et seq.*) (NEA), section 212(f) of the Immigration and Nationality Act of 1952 (8 U.S.C. 1182(f)), and section 301 of title 3, United States Code,

I, BARACK OBAMA, President of the United States of America, find that the actions and policies of persons including persons who have asserted governmental authority in the Crimean region without the authorization of the Government of Ukraine that undermine democratic processes and institutions in Ukraine; threaten its peace, security, stability, sovereignty, and territorial integrity; and contribute to the misappropriation of its assets, constitute an unusual and extraordinary threat to the national security and foreign policy of the United States, and I hereby declare a national emergency to deal with that threat. I hereby order:

Section 1. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in: any person determined by the Secretary of the Treasury, in consultation with the Secretary of State:

2018-08-116: 000827

(i) To be responsible for or complicit in, or to have engaged in, directly or indirectly, any of the following:

(A) Actions or policies that undermine democratic processes or institutions in Ukraine;

(B) actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine; or

(C) misappropriation of state assets of Ukraine or of an economically significant entity in Ukraine;

(ii) to have asserted governmental authority over any part or region of Ukraine without the authorization of the Government of Ukraine;

(iii) to be a leader of an entity that has, or whose members have, engaged in any activity described in subsection (a)(i) or (a)(ii) of this section or of an entity whose property and interests in property are blocked pursuant to this order;

(iv) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, any activity described in subsection (a)(i) or (a)(ii) of this section or any person whose property and interests in property are blocked pursuant to this order; or

(v) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order.

Sec. 2. I hereby find that the unrestricted immigrant and nonimmigrant entry into the United States of aliens determined to meet one or more of the criteria in subsection 1(a) of this order would be detrimental to the interests of the United States, and I hereby suspend entry into the United States, as immigrants or nonimmigrants, of such persons. Such persons shall be treated as persons covered by section 1 of Proclamation 8693 of July 24, 2011 (Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions).

Sec. 3. I hereby determine that the making of donations of the type of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section 1 of this order would seriously impair my ability to deal with the national emergency declared in this order, and I hereby prohibit such donations as provided by section 1 of this order.

Sec. 4. The prohibitions in section 1 of this order include but are not limited to:

(a) The making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 5. (a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 6. For the purposes of this order:

(a) the term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization; and

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States.

Sec. 7. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to

2018-08-116: 000828

transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in this order, there need be no prior notice of a listing or determination made pursuant to section 1 of this order.

Sec. 8. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including the promulgation of rules and regulations, and to employ all powers granted to the President by IEEPA, as may be necessary to carry out the purposes of this order. The Secretary of the Treasury may redelegate any of these functions to other officers and agencies of the United States Government consistent with applicable law. All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 9. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to submit the recurring and final reports to the Congress on the national emergency declared in this order, consistent with section 401(c) of the NEA (50 U.S.C. 1641(c)) and section 204(c) of IEEPA (50 U.S.C. 1703(c)).

Sec. 10. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Barack Obama

THE WHITE HOUSE,

March 6, 2014

[↑ Back to Top](#)

Appendix B to Part 589—Executive Order 13661

Executive Order 13661 of March 16, 2014

Blocking Property of Additional Persons Contributing to the Situation in Ukraine

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 et seq.) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 et seq.) (NEA), section 212(f) of the Immigration and Nationality Act of 1952 (8 U.S.C. 1182(f)), and section 301 of title 3, United States Code,

I, BARACK OBAMA, President of the United States of America, hereby expand the scope of the national emergency declared in Executive Order 13660 of March 6, 2014, finding that the actions and policies of the Government of the Russian Federation with respect to Ukraine—including the recent deployment of Russian Federation military forces in the Crimea region of Ukraine—undermine democratic processes and institutions in Ukraine; threaten its peace, security, stability, sovereignty, and territorial integrity; and contribute to the misappropriation of its assets, and thereby constitute an unusual and extraordinary threat to the national security and foreign policy of the United States. Accordingly, I hereby order:

Section 1. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in:

(i) The persons listed in the Annex to this order; and

(ii) persons determined by the Secretary of the Treasury, in consultation with the Secretary of State:

(A) To be an official of the Government of the Russian Federation;

(B) to operate in the arms or related materiel sector in the Russian Federation;

(C) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly:

2018-08-116: 000829

(1) A senior official of the Government of the Russian Federation; or

(2) a person whose property and interests in property are blocked pursuant to this order; or

(D) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of:

(1) A senior official of the Government of the Russian Federation; or

(2) a person whose property and interests in property are blocked pursuant to this order.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order.

Sec. 2. I hereby find that the unrestricted immigrant and nonimmigrant entry into the United States of aliens determined to meet one or more of the criteria in section 1(a) of this order would be detrimental to the interests of the United States, and I hereby suspend entry into the United States, as immigrants or nonimmigrants, of such persons. Such persons shall be treated as persons covered by section 1 of Proclamation 8693 of July 24, 2011 (Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions).

Sec. 3. I hereby determine that the making of donations of the type of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section 1 of this order would seriously impair my ability to deal with the national emergency declared in Executive Order 13660, and I hereby prohibit such donations as provided by section 1 of this order.

Sec. 4. The prohibitions in section 1 of this order include but are not limited to:

(a) The making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 5. (a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 6. For the purposes of this order:

(a) The term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization;

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States; and

(d) the term the "Government of the Russian Federation" means the Government of the Russian Federation, any political subdivision, agency, or instrumentality thereof, including the Central Bank of the Government of the Russian Federation, and any person owned or controlled by, or acting for or on behalf of, the Government of the Russian Federation.

Sec. 7. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in Executive Order 13660, there need be no prior notice of a listing or determination made pursuant to section 1 of this order.

Sec. 8. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including the promulgation of rules and regulations, and to employ all powers granted to the President by IEEPA, as may be necessary to carry out the purposes of this order.

2018-08-116: 000830

The Secretary of the Treasury may redelegate any of these functions to other officers and agencies of the United States Government consistent with applicable law. All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 9. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to determine that circumstances no longer warrant the blocking of the property and interests in property of a person listed in the Annex to this order, and to take necessary action to give effect to that determination.

Sec. 10. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Sec. 11. This order is effective at 12:01 a.m. eastern daylight time on March 17, 2014.

Barack Obama

THE WHITE HOUSE,

March 17, 2014

[↑ Back to Top](#)

Appendix C to Part 589—Executive Order 13662

Executive Order 13662 of March 20, 2014

Blocking Property of Additional Persons Contributing to the Situation in Ukraine

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 et seq.) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 et seq.) (NEA), section 212(f) of the Immigration and Nationality Act of 1952 (8 U.S.C. 1182(f)), and section 301 of title 3, United States Code,

I, BARACK OBAMA, President of the United States of America, hereby expand the scope of the national emergency declared in Executive Order 13660 of March 6, 2014, and expanded by Executive Order 13661 of March 16, 2014, finding that the actions and policies of the Government of the Russian Federation, including its purported annexation of Crimea and its use of force in Ukraine, continue to undermine democratic processes and institutions in Ukraine; threaten its peace, security, stability, sovereignty, and territorial integrity; and contribute to the misappropriation of its assets, and thereby constitute an unusual and extraordinary threat to the national security and foreign policy of the United States. Accordingly, I hereby order:

Section 1. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in: Any person determined by the Secretary of the Treasury, in consultation with the Secretary of State:

(i) To operate in such sectors of the Russian Federation economy as may be determined by the Secretary of the Treasury, in consultation with the Secretary of State, such as financial services, energy, metals and mining, engineering, and defense and related materiel;

(ii) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, any person whose property and interests in property are blocked pursuant to this order; or

(iii) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order.

Sec. 2. I hereby find that the unrestricted immigrant and nonimmigrant entry into the United States of aliens determined to meet one or more of the criteria in section 1(a) of this order would be detrimental to the interests of the United States, and I hereby suspend entry into the United States, as immigrants or nonimmigrants, of such persons. Such persons shall be treated as persons covered by section 1 of Proclamation 8693 of July 24, 2011 (Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions).

Sec. 3. I hereby determine that the making of donations of the type of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section 1 of this order would seriously impair my ability to deal with the national emergency declared in Executive Order 13660, and expanded in Executive Order 13661 and this order, and I hereby prohibit such donations as provided by section 1 of this order.

Sec. 4. The prohibitions in section 1 of this order include but are not limited to:

(a) The making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 5. (a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 6. For the purposes of this order:

(a) The term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization;

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States; and

(d) the term the "Government of the Russian Federation" means the Government of the Russian Federation, any political subdivision, agency, or instrumentality thereof, including the Central Bank of the Russian Federation, and any person owned or controlled by, or acting for or on behalf of, the Government of the Russian Federation.

Sec. 7. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in Executive Order 13660, and expanded in Executive Order 13661 and this order, there need be no prior notice of a listing or determination made pursuant to section 1 of this order.

Sec. 8. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including the promulgation of rules and regulations, and to employ all powers granted to the President by IEEPA, as may be necessary to carry out the purposes of this order. The Secretary of the Treasury may redelegate any of these functions to other officers and agencies of the United States Government consistent with applicable law. All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 9. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Barack Obama

THE WHITE HOUSE,

March 20, 2014

2018-08-116: 000832

Bates Nos. 2018-08-116:
000833 - 000846
Submitter Notice Process
Initiated and/or Pending
Consultation Responses

DESIGNATIONS UNDER E.O. 13661

July 16, 2014

Almaz-Antey

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

Bazalt

Federal State Unitary Enterprise State Research and Production Enterprise Bazalt (“Bazalt”) is involved in the design and construction of air launched ordnance, rocket propelled grenades, and armored fighting vehicle ammunition. Bazalt’s manufacturing interests include aerial bombs, mortar shells, grenades, anti-tank and anti-saboteur grenade launchers, and projectiles of all types and calibers.

JSC Concern Sozvezdie

JSC Concern Sozvezdie develops and produces high-tech control and communication systems, radio electronic warfare and special equipment for military forces. JSC Concern Sozvezdie focuses on three primary lines of production: military-oriented production, dual-purpose products, and dual-purpose products and professional communication and control systems. JSC Concern Sozvezdie’s main activities include producing and developing materiel including automated control systems and communication systems for the tactical sector, automated control systems and communication systems for anti-missile defense and air defense systems, and automated communication systems and electronic warfare tools. The company produces systems and devices related to electronic warfare, such as small manpack and portable jammers. The products are designed to disrupt enemy army operations, to reduce staff and equipment loss, and to improve the operation of armed forces by radio jamming of enemy weapon control systems based on radio frequencies.

JSC MIC NPO Mashinostroyenia

JSC MIC NPO Mashinostroyenia is a leading Russian rocketry company responsible for defense programs involving cruise missile complexes capable of surface, underwater, and ground platform-based launches. JSC MIC NPO Mashinostroyenia’s involvement in Russia’s strategic nuclear forces includes the manufacture of intercontinental ballistic rockets and the development of space systems, spacecraft, and automatic and manned orbital stations in support of Russia’s Ministry of Defense.

Kalashnikov Concern

Kalashnikov Concern produces a number of military weapons, including multiple grades and versions of assault rifles, grenade launchers, sniper rifles, military shotguns, and aircraft cannons. Kalashnikov Concern is the largest firearms producer in Russia and is a subsidiary of Russia’s State Corporation of Russian Technologies (Rostec).

KBP Instrument Design Bureau

KBP Instrument Design Bureau is a research and production center that creates precision-guided weapons. KBP Instrument Design Bureau develops antitank missile systems and assault armaments, weapon systems for main battle tanks and lightly armored vehicles, guided artillery projectiles and guided missile systems, short-range air defense systems, gun armament and associated ammunition, combat small arms, and hunting/sporting guns.

Radio-Electronic Technologies

Radio-Electronic Technologies designs and produces electronic warfare equipment including weapons-control systems, friend-or-foe identification (IFF) systems, avionics, operational and tactical systems,

electronic warfare and intelligence equipment, special measuring instrumentation, and plugs, electric connectors, and cable products.

Uralvagonzavod

Uralvagonzavod is a Russian government-owned company that builds a variety of military equipment, including tanks.

July 29, 2014

United Shipbuilding

United Shipbuilding Corporation, which was established pursuant to a March 21, 2007 presidential order, is a Russian state-owned company that manufactures, among other things, ordnance and accessories, and is engaged in shipbuilding, repair, and maintenance. United Shipbuilding Corporation designs and constructs ships for the Russian Navy and is the largest shipbuilding company in Russia. This addition expands upon the list of eight defense technology firms designated on July 16.

September 12, 2014

AO 'Dolgoprudny Research Production Enterprise' is a Russia-based company, which is primarily engaged in the production of weapons and ammunition, including the Buk missile system, known in the West as "Gadfly" or SA-11 or SA-17.

Mytishchinski Mashinostroitelny Zavod, OAO is a Moscow-based company that has produced weaponry and equipment focusing primarily on anti-aircraft missile systems and chassis for tracked military vehicles.

Kalinin Machine Plant JSC is a Russia-based, state-run company involved in the production of special purpose products such as weapons, ammunition, and combat anti-air missile system facilities for the Ministry of Defense of the Russian Federation. Kalinin Machine Plant JSC produces artillery guns for infantry and anti-air defense and specializes in the production of launchers and anti-air missiles.

Almaz-Antey GSKB is a Moscow-based subsidiary of the Almaz-Antey Concern, which was designated under E.O. 13661 on July 16, 2014. Almaz-Antey GSKB designs and manufactures air defense systems for the Russian Ministry of Defense.

JSC NIIP is a Zhukovski-based Russian defense industrial firm owned by the Almaz-Antey Concern. JSC NIIP develops anti-aircraft defense systems, including on-board radar systems for MiG and Sukhoi fighters, and anti-aircraft missile systems for land forces, including the KUB and BUK systems.

Bates Nos. 2018-08-116:
000849 - 000870
Submitter Notice Process
Initiated and/or Pending
Consultation Responses

Bates Nos. 2018-08-116:
000871 - 000880

Duplicate pages marked
Bates Nos. 2018-08-116:
000515 - 000524

Bates Nos. 2018-08-116:
000881 - 000896
Submitter Notice Process
Initiated and/or Pending
Consultation Responses

RE: Request from ATF - Livelink 52 KB

From: (b)(6)
To: (b)(6)
Cc: (b)(6) "Baher, Le a" (b)(6)
Date: Wed, 11 Feb 2015 17:51:23 -0500
Attachments: February 2015 State Dept Sanct ons Gu dance v.1.docx - 27 KB (0 bytes)

(b)(6)

ATF has come back to us and asked for additional identifier information on the entities identified below that they will be using in a State Department guidance letter. They are requesting that information by this Friday. Is that something that we would be able to provide in that timeframe? If not, please let me know and I can let them know in turn.

Also, as you can see in the letter, ATF has asked about any defense related entities designated under E.O. 13685, but my understanding is that there have not been any thus far. If you could confirm that would be great.

Thanks for your help, and please let me know if you have questions.

Many thanks,

(b)(6)

From: (b)(6)
Sent: Wednesday, January 21, 2015 5:04 PM
To: (b)(6)
Cc: (b)(6) Baher, Le a
Subject: RE: Request from ATF

Duplicates content of pages marked with Bates Nos. 000674-000676



Duplicates content of pages marked with Bates Nos. 000674-000676



Duplicates content of pages marked with Bates Nos. 000674-000676



Bates Nos. 2018-08-116:
000900 - 000902
Submitter Notice Process
Initiated and/or Pending
Consultation Responses

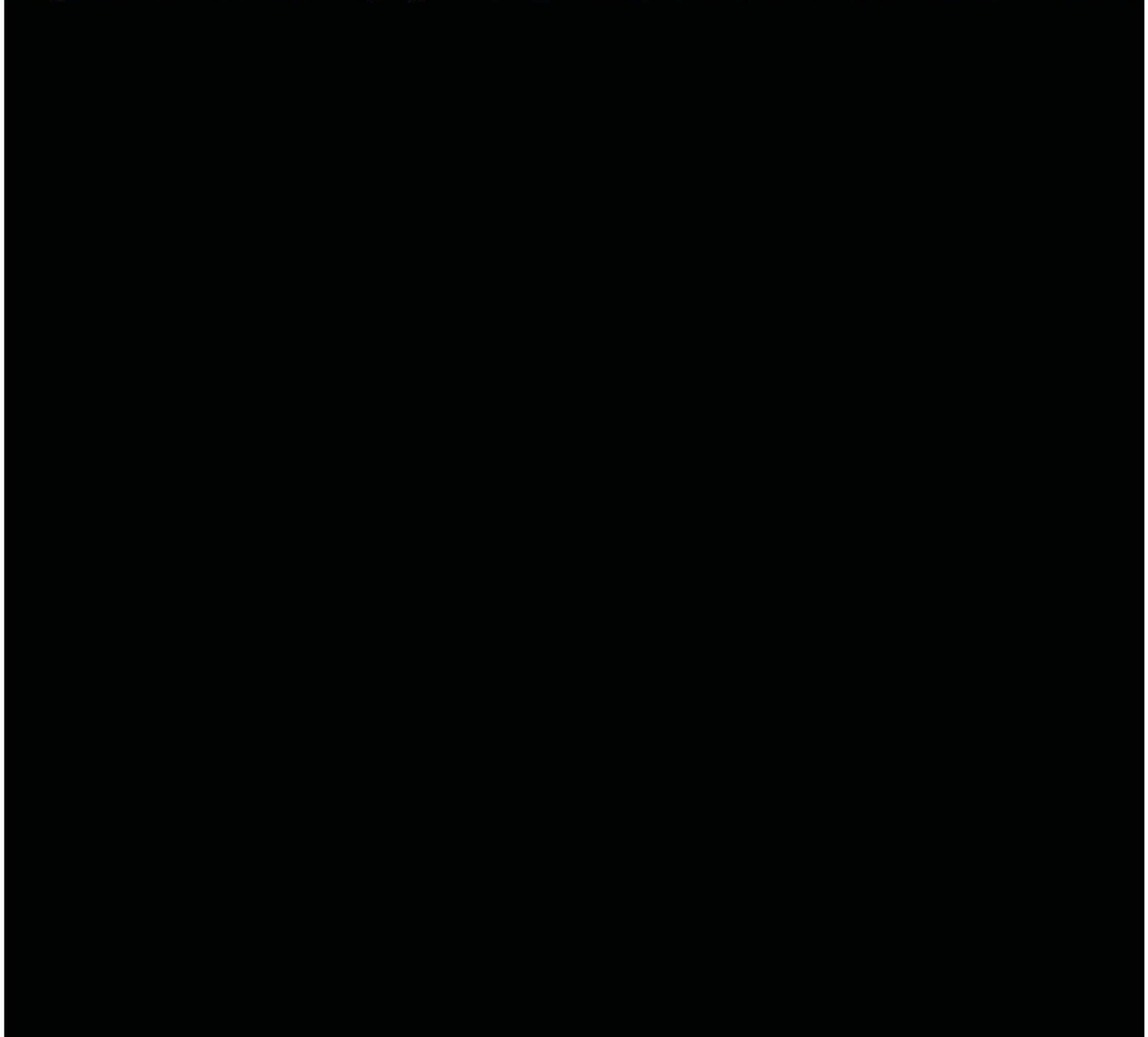
RE: Request from ATF

From: (b)(6)
To: (b)(6)
Cc: (b)(6) "Baher, Le a" (b)(6)
Date: Thu, 12 Feb 2015 09:54:33 -0500

(b)(6)

From: (b)(6)
Sent: Wednesday, February 11, 2015
To: (b)(6)
Cc: (b)(6) Baher, Le a;
Subject: RE: Request from ATF

Duplicates content of pages marked with Bates Nos. 000897-000899



Duplicates content of pages marked with Bates Nos. 000897-000899

Duplicates content of pages marked with Bates Nos. 000897-000899



RE: Request from ATF

From: (b)(6)
To: (b)(6)
Cc: (b)(6) "Baher, Le a" (b)(6)
Date: Thu, 12 Feb 2015 10:42:04 -0500

Hi (b)(6),

Just to confirm, there have been no defense related entities designated under E.O. 13685.

Also, here are the additional identifiers for the defense related entities you are requesting:

KONSTRUKTORSKOE BYURO PRIBOROSTROENIYA OTKRYTOE AKTSIONERNOE OBSHCHESTVO (a.k.a. INSTRUMENT DESIGN BUREAU; a.k.a. JSC KBP INSTRUMENT DESIGN BUREAU; a.k.a. KBP INSTRUMENT DESIGN BUREAU; a.k.a. KBP INSTRUMENT DESIGN BUREAU JOINT STOCK COMPANY; a.k.a. "KBP OAO"), 59 Shcheglovskaya Zaseka ul., Tula 300001, Russia; Website www.kbptula.ru; Email Address kbkedr@tula.net; Registration ID 1117154036911 (Russia); Government Gazette Number 07515747 (Russia) [UKRAINE-EO13661].

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 AKTSIONERNOE OBSHCHESTVO DOIGOPRUDNENSKOE NAUCHNO PROIZVODSTVENNOE PREDPRIYATIE), 1 Pl. Sobina, Dolgoprudny, Moskovskaya obl. 141700, Russia; Proshchad Sobina 1, Dolgoprudny 141700, Russia; Email Address dnpp@orc.ru; Registration ID 1025001202544; Tax ID No. 5008000322; Government Gazette Number 07504318 [UKRAINE-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 MASHINOSTROITEL'NYI ZAVOD IM.M.I.KALININA, G.EKATERINBURG), 18 prospekt Kosmonavtov, Ekaterinburg, Sverdlovskaya obl. 620017, Russia; Email Address info@zik.ru [UKRAINE-EO13661].

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 Ul. Gagarina, Zhukovski, Moskovskaya Obl 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) [UKRAINE-EO13661].

MYTISHCHINSKI MASHINOSTROITEL'NYI ZAVOD, OAO (a.k.a. JSC MYTISHCHINSKI MACHINE-BUILDING PLANT; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'MYTISHCHINSKI MASHINOSTROITEL'NYI ZAVOD'), 4 ul. Kolontsova Mytishchi, Mytishchinski Raion, Moskovskayaobl 141009, Russia; UL. Koloncova, d.4, Mytishi, Moscow region 141009, Russia; Website www.nmzavod.ru; Email Address nmzavod@mail.ru; Registration ID 1095029003860 (Russia); Government Gazette Number 61540868 (Russia) [UKRAINE-EO13661].

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 OAO '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; f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO NAUCHNO PROIZVODSTVENNOE OBEDINENIE ALMAZ IMENI AKADEMIKA A.A. RASPLETINA; a.k.a. "GSKB"), 16-80, Leningradsky Prospect, Moscow 125190, Russia; Website <http://www.raspletin.ru/>; Email Address info@raspletin.ru; alt. Email Address almaz_zakupki@mail.ru [UKRAINE-EO13661].

ROSTEC (a.k.a. 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 ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow

2018-08-116: 000906

119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

From: (b)(6)
Sent: Wednesday, February 11, 2015, 5:51 PM
To: (b)(6)
Cc: (b)(6); Baher, Le a; (b)(6)
Subject: RE: Request from ATF

Duplicates content of pages marked with Bates Nos. 000897-000899



Duplicates content of pages marked with Bates Nos. 000897-000899

Re: Request from ATF

From: (b)(6)
To: (b)(6)
Cc: (b)(6) "Baher, Le a" (b)(6)
Date: Thu, 12 Feb 2015 13:40:16 -0500

Thanks so much for the quick response, (b)(6).

Best,
(b)(6)

From: (b)(6)
Sent: Thursday, February 12, 2015 09:42 AM
To: (b)(6)
Cc: Baher, Le a; (b)(6)
Subject: RE: Request from ATF

Hi (b)(6),

Just to confirm, there have been no defense related entities designated under E.O. 13685.

Also, here are the additional identifiers for the defense related entities you are requesting:

KONSTRUKTORSKOE BYURO PRIBOROSTROENIYA OTKRYTOE AKTSIONERNOE OBSHCHESTVO (a.k.a. INSTRUMENT DESIGN BUREAU; a.k.a. JSC KBP INSTRUMENT DESIGN BUREAU; a.k.a. KBP INSTRUMENT DESIGN BUREAU; a.k.a. KBP INSTRUMENT DESIGN BUREAU JOINT STOCK COMPANY; a.k.a. "KBP OAO"), 59 Shcheglovskaya Zaseka ul., Tula 300001, Russia; Website www.kbptula.ru; Email Address kbkedr@tula.net; Registration ID 1117154036911 (Russia); Government Gazette Number 07515747 (Russia) [UKRAINE-EO13661].

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 AKTSIONERNOE OBSHCHESTVO DOIGOPRUDNENSKOE NAUCHNO PROIZVODSTVENNOE PREDPRIYATIE), 1 Pl. Sobina, Dolgoprudny, Moskovskaya obl. 141700, Russia; Proshchad Sobina 1, Dolgoprudny 141700, Russia; Email Address dnpp@orc.ru; Registration ID 1025001202544; Tax ID No. 5008000322; Government Gazette Number 07504318 [UKRAINE-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; Email Address info@zik.ru [UKRAINE-EO13661].

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 Ul. Gagarina, Zhukovskiy, Moskovskaya Obl 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) [UKRAINE-EO13661].

MYTISHCHINSKI MASHINOSTROITELNY ZAVOD, OAO (a.k.a. JSC MYTISHCHINSKI MACHINE-BUILDING PLANT; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'MYTISHCHINSKI MASHINOSTROITELNY ZAVOD'), 4 ul. Kolontsova Mytishchi, Mytishchinski Raion, Moskovskayaobl 141009, Russia; UL. Koloncova, d.4, Mytishi, Moscow region 141009, Russia; Website www.mmzavod.ru; Email Address mmzavod@mail.ru; Registration ID 1095029003860 (Russia); Government Gazette Number 61540868 (Russia) [UKRAINE-EO13661].

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 OAO '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; f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO NAUCHNO PROIZVODSTVENNOE OBEDINENIE ALMAZ

IMENI AKADEMIKA A.A. RASPLETINA; a.k.a. "GSKB"), 16-80, Leningradsky Prospect, Moscow 125190, Russia; Website <http://www.raspletin.ru/>; Email Address info@raspletin.ru; alt. Email Address almaz_zakupki@mail.ru [UKRAINE-EO13661].

ROSTEC (a.k.a. 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 ROSTEKHNOLOGII; a.k.a. STATE CORPORATION ROSTEKHNOLOGII), 24 Usacheva ul., Moscow 119048, Russia; 21 Gogolevsky Blvd., Moscow 119991, Russia; Website www.rostec.ru; Email Address info@rostec.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1077799030847 (Russia); Tax ID No. 7704274402 (Russia); Government Gazette Number 94137372 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>. [UKRAINE-EO13662].

From: (b)(6)
Sent: Wednesday, February 22, 2018, 10:05 AM
To: (b)(6)
Cc: (b)(6); Baher, Le a
Subject: RE: Request from ATF

Duplicates content of pages marked with Bates Nos. 000897-000899



Duplicates content of pages marked with Bates Nos. 000897-000899

Duplicates content of pages marked with Bates Nos. 000897-000899

Bates Nos. 2018-08-116:
000914 - 000916
Pending Consultation Response

Bates Nos. 2018-08-116:
000917 - 000921

Duplicate pages marked
Bates Nos. 2018-08-116:
000646 - 000650

Bates Nos. 2018-08-116:
000922 – 000960
Submitter Notice Process
Initiated and/or Pending
Consultation Responses

(b)(6) Weekly Report Feb 26 2015

From: (b)(6)
To: (b)(6)
Date: Thu, 26 Feb 2015 14:07:31 -0500
Attachments: (b)(6)Week y Report Feb 26 2015.docx (24.22 kB)

(b)(6)

Here is my weekly report. Sorry this is a bit late busy morning!

Thanks
(b)(6)

(b)(6)

Weekly Report for February 20 to February 26, 2015

Upcoming Significant Matters

[None]

Activities for the Week Ending February 26, 2015 to be Reported to E&I

Licensing

Ukraine. We and OFAC are discussing with ATF (b)(5)

(b)(5)

(b)(5)

(b)(5)

(b)(5)

(b)(6)

Other Activities for the Week Ending February 26, 2015

I attended an Enforcement meeting on how to treat (b)(5)

(b)(5). (Smith, (b)(6)).

We had a call with the Bureau of Ocean Energy Management (BOEM), part of the Department of the Interior, regarding (b)(5)

We are currently reviewing follow-up information from BOEM related to this question.

(b)(6)

We attended a meeting with Enforcement and OGT regarding potential sanctions evasion through (b)(5) (b)(6)

I discussed with (b)(6) in Enforcement certain issues regarding terms in (b)(5)

(b)(5). (b)(6)

I discussed with (b)(6) in Enforcement how (b)(5)

(b)(5). (b)(6)

I discussed with (b)(6) in Compliance how to treat a (b)(5)

(b)(5). (b)(6)

I updated and provided John and Andrea with copies of new (b)(5) for Ukraine. (b)(6)

I discussed with OFAC Policy and Compliance a potential (b)(5) related to the Ukraine sanctions, and discussed with (b)(6) possible precedents for that (b)(5). (b)(6)

I reviewed and cleared a designation package for (b)(5) (b)(5). (b)(6)

I finalized review of and cleared on a Compliance enforcement matter against the (b)(5). (b)(6)

We finalized review of an internet communications GL for Crimea, with input from (b)(6) on a provision (b)(5) (b)(6)

I reviewed and cleared one Sudan license and two urgent Sudan licenses. (b)(6)

I responded to two phone calls on the main line regarding Ukraine issues. (b)(6)

I attended a Treasury-wide financial services lunch and learn on the financial services industry, titled "The Public-Private Partnership." (b)(6)

FW: Ukraine FAQs on Website

From: (b)(6)
To: (b)(6)
Cc: (b)(6) "Manfu , Alexandre" (b)(6)
Date: Fr , 27 Feb 2015 10:04:13 -0500
Attachments: ukra ne_faqs_asof20150227.docx (23.85 kB)

Hi (b)(6),

Attached is a Word doc of the current Ukraine/Russia FAQs. Note that the links are not included in this since I just copy/pasted it from the website.

What browser are you using? The print button functionality currently works in IE and Mozilla but does not work in Chrome.

Any idea on when these will go out?

Thanks,
(b)(6)

From : (b)(6)
Sent: Friday, February 27, 2015 09:39 AM
To: D. OFAC IT Support
Cc: (b)(6) "Manfu , Alexandre"
Subject: Ukraine FAQs on Website

Good morning!

We've been asked to update the Ukraine sectoral sanctions related FAQs to reflect potential upcoming changes. There is a very tight deadline for this ask, so I'm hoping someone from SSD could send me a Word document with all of the current FAQs on the sectoral sanctions topic page ([here](#)). As soon as possible would be greatly appreciated.

As a secondary concern, I tried to pull my own version of the FAQs, but the "print this FAQ" and "print this entire FAQ topic" links are not working on our website (at least not for the sectoral sanctions page). When you select these options, the website just generates a blank document for you to print. It would be great if we could restore this functionality in the near to medium term.

Thank you in advance! Please let me know if you have any questions.

(b)(6)

Questions Related to Sectoral Sanctions under Executive Order 13662

370. What do the prohibitions in Directives 1 and 2 mean? Are they blocking actions?

The sectoral sanctions imposed on specified persons operating in sectors of the Russian economy identified by the Secretary of Treasury were done under Executive Order 13662 through Directives issued by OFAC pursuant to its delegated authorities. Directive 1, issued on July 16, 2014, prohibits transacting in, providing financing for, or otherwise dealing in debt with a maturity of longer than 90 days or equity if that debt or equity is issued on or after the sanctions effective date ("new debt" or "new equity") by, on behalf of, or for the benefit of the persons operating in Russia's financial sector named under Directive 1, their property, or their interests in property. On September 12, 2014, OFAC amended Directive 1, reducing the tenor of prohibited debt from longer than 90 days to longer than 30 days.

Directive 2 separately prohibits transacting in, providing financing for, or otherwise dealing in new debt of greater than 90 days maturity if that debt is issued on or after the sanctions effective date by, on behalf of, or for the benefit of the persons operating in Russia's energy sector named under the Directive 2, their property, or their interests in property.

These actions pursuant to Directives 1 and 2 prohibit transactions by U.S. persons as defined in E.O. 13662, wherever they are located, and transactions within the United States. This action does not require U.S. persons to block the property or interests in property of the entities identified in the Directives, nor will persons identified in Directives 1 and 2 be added to the Specially Designated Nationals (SDN) List. U.S. persons should reject transactions or dealings that are prohibited by Directives 1 or 2, and to the extent required by Section 501.604 of the Reporting, Procedures and Penalties Regulations (31 C.F.R. part 501), U.S. persons must report to OFAC any rejected transactions within 10 business days. [9-12-2014]

371. What does OFAC interpret to be debt and equity? Are there other prohibited activities under Directives 1, 2, and 3? Can U.S. financial institutions continue to maintain correspondent accounts and process U.S. dollar-clearing transactions for the entities subject to these Directives?

The term debt includes bonds, loans, extensions of credit, loan guarantees, letters of credit, drafts, bankers acceptances, discount notes or bills, or commercial paper. The term equity includes stocks, share issuances, depositary receipts, or any other evidence of title or ownership.

The prohibitions in Directive 1 apply to all transactions involving new debt with a maturity of longer than 30 days or new equity; all financing in support of such new debt or new equity; and any dealing in, including provision of services in support of, such new debt or new equity.

The prohibitions in Directive 2 apply to all transactions involving new debt with a maturity of longer than 90 days; all financing in support of such new debt; and any dealing in, including provision of services in support of, such new debt.

The prohibitions in Directive 3 apply to all transactions involving new debt with a maturity of longer than 30 days; all financing in support of such new debt; and any dealing in, including provision of services in support of, such new debt.

All the prohibitions in these Directives extend to rollover of existing debt, if such rollover results in the creation of new debt with a maturity of longer than 30 days (for persons subject to Directives 1 or 3) or longer than 90 days (for persons subject to Directive 2).

Transacting in, providing financing for, or otherwise dealing in any debt or equity issued by, on behalf of, or for the benefit of persons subject to Directives 1, 2, or 3 is permissible, if the debt or equity was issued prior to the date on which the person was determined to be subject to the relevant Directive. In addition, transacting in, providing financing for, or otherwise dealing in debt instruments with maturities of 30 days or less (issued by, on behalf of, or for the benefit of persons subject to Directives 1 or 3) or 90 days or less (issued by, on behalf of, or for the benefit of persons subject to Directive 2), even if they are issued after the sanctions effective date, is permissible. Transacting in, providing financing for, or otherwise dealing in new equity instruments of persons subject to Directives 2 and 3 is permissible. U.S. financial institutions may continue to maintain correspondent accounts and process U.S. dollar-clearing transactions for the persons subject to the Directives, so long as those activities do not involve transacting in, providing financing for, or otherwise dealing in transaction types prohibited by these Directives.

On September 12, 2014, OFAC amended and reissued Directive 1, changing the allowable maturity of debt instruments issued by, on behalf of, or for the benefit of persons subject to Directive 1 from 90 days to 30 days. Transacting in, providing financing for, or otherwise dealing in debt with maturity of 90 days or less issued by, on behalf of, or for the benefit of the persons identified under Directive 1 is not prohibited if such debt instruments were issued prior to September 12, 2014, and the terms of such instruments do not change subsequently (see FAQ 394 for additional detail on what constitutes the changing of terms). Rollovers of such instruments must comply with the 30-day maturity limit imposed on September 12, 2014.

[9-12-2014]

372. Do Directives 1, 2, and 3 prohibit U.S. persons from entering into derivatives contracts linked to new debt or new equity issued by the entities subject to the Directives?

On September 12, 2014, OFAC issued General License 1A, which authorizes certain transactions involving derivative products that would otherwise be prohibited pursuant to Directives 1, 2, or 3. This General License 1A replaced and superseded General License No. 1, dated July 16, 2014, which authorized certain transactions involving derivative products that would have been prohibited pursuant to Directives 1 or 2. [9-12-2014]

373. Do the prohibitions imposed pursuant to the Directives also extend to entities owned 50 percent or more by one or more entities identified by these Directives, as per revised guidance OFAC issued on August 13, 2014?

Yes, these prohibitions apply to the named persons, their property, and their interests in property, which includes entities owned 50 percent or more by one or more persons identified as subject to the Directives. [9-12-2014]

374. If I own a Kalashnikov product, is that product blocked by sanctions? Am I able to resell a Kalashnikov product at a gun show or other secondary market?

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. If a U.S. person has an inventory of Kalashnikov Concern products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment), we advise that U.S. person to contact OFAC for further guidance on handling of the inventory. [7-16-2014]

375. If I have Kalashnikov products in my inventory, can I sell them?

If a U.S. person has an inventory of Kalashnikov Concern products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment), we advise that U.S. person to contact OFAC for further guidance on handling of the inventory. [7-16-2014]

391. Can U.S. persons issue and deal in new depositary receipts that are based on the equity of an entity subject to the Sectoral Sanctions Identification List (an SSI entity)?

In certain circumstances, yes. U.S. persons, including U.S. financial institutions, may issue and deal in depositary receipts that are based on equity issued by a person determined to be subject to Directive 1 prior to the date the person was determined to be subject to Directive 1. U.S. persons may not, however, deal in or issue depositary receipts that are based on equity issued by a person subject to Directive 1 on or after the sanctions effective date. Such transactions would constitute prohibited transactions or dealings in new equity under Directive 1. There are no equity-related prohibitions contained within Directives 2, 3, or 4, and thus U.S. persons are not prohibited from issuing or dealing in depositary receipts that are based on equity issued by persons subject only to those Directives. [9-12-2014]

392. How are banks expected to distinguish between transactions involving new versus old equity under Directive 1 if entities subject to Directive 1 issue new equity that utilizes the same International Securities Identification Number (ISIN) or other identifier as equity issued prior to the sanctions effective date?

Directive 1 prohibits U.S. persons from transacting in, providing financing for, or otherwise dealing in new equity for named persons, their property, or their interests in property. Directive 1 also prohibits such transactions from occurring in the United States. If a U.S. person decides to transact or otherwise deal in equity issued by an SSI entity prior to the sanctions effective date, the U.S. person should ensure that it is not transacting in, providing financing for, or otherwise dealing in the newly issued equity. To the extent that a U.S. person does in fact transact in, provide financing for, or otherwise deal in newly issued equity, such activity would constitute a violation of the prohibition set forth in Directive 1. [7-28-2014]

393. Does OFAC consider counterparty credit risk associated with derivatives transactions that are authorized pursuant to General License 1A to Executive Order 13662 to constitute new debt?

OFAC does not consider normal counterparty credit exposure encountered by a U.S. person to be an extension of credit when the U.S. person enters into an otherwise permissible derivatives transaction. U.S. persons engaging in such transactions should ensure that they do not hold, purchase, or sell the underlying asset in such transactions as described in Paragraph (b) of General License 1A. [7-28-2014]

394. If a U.S. person entered into a revolving credit facility or long-term loan arrangement for a person determined to be subject to Directives 1, 2, or 3 prior to the sanctions effective date, what are the

restrictions on drawdowns from that facility? Do all drawdowns and disbursements pursuant to the parent agreement need to carry repayment terms of 30 days or less (for persons subject to Directives 1 and 3) or 90 days or less (for persons subject to Directive 2)?

If a U.S. person entered into a long-term credit facility or loan agreement prior to the sanctions effective date, drawdowns and disbursements with repayment terms of 30 days or less (for persons subject to Directives 1 and 3) or 90 days or less (for persons subject to Directive 2) are permitted. Drawdowns and disbursements whose repayment terms exceed the applicable authorized tenor are not prohibited if the terms of such drawdowns and disbursements (including the length of the repayment period, the interest rate applied to the drawdown, and the maximum drawdown amount) were contractually agreed to prior to the sanctions effective date and are not modified on or after the sanctions effective date. U.S. persons may not deal in a drawdown or disbursement initiated after the sanctions effective date with a repayment term of longer than 30 days (for persons subject to Directives 1 and 3) or 90 days (for persons subject to Directive 2), if the terms of the drawdown or disbursement were negotiated on or after the sanctions effective date. Such a newly negotiated drawdown or disbursement would constitute a prohibited extension of credit. [9-12-2014]

395. Do Directives 1, 2, and 3 prohibit U.S. persons from advising or confirming a letter of credit that was issued on or after the sanctions effective date and that carries a term of longer than 30 days maturity (for Directives 1 and 3) or 90 days maturity (for Directive 2) when the beneficiary of that letter of credit is one of the entities identified as subject to the Directives?

U.S. persons may advise or confirm a letter of credit issued on behalf of a non-sanctioned entity in which an entity subject to Directive 1, 2, or 3 is the beneficiary (i.e., the exporter or seller of the underlying goods) because the subject letter of credit does not represent an extension of credit to the SSI entity.

U.S. persons may not advise or confirm a letter of credit if all of the following three conditions are met: (1) the letter of credit was issued on or after the sanctions effective date, (2) the letter of credit carries a term of longer than 30 days maturity (for persons subject to Directives 1 and 3) or 90 days maturity (for persons subject to Directive 2), and (3) an SSI entity is the applicant of the letter of credit (i.e., the importer or buyer of the underlying goods or services). This would constitute prohibited activity because the subject letter of credit would represent an extension of credit to the SSI entity. [9-12-2014]

396. How do I know when a name has been added, changed, or removed on the Sectoral Sanctions Identifications (SSI) List?

The SSI List available on OFAC's website is the latest version of the list and contains the most updated information on entities determined to be subject to one or more of the Directives. OFAC also maintains "changes files" that record all significant changes to the SSI List. Any addition, alteration, or removal of

an SSI record is considered a significant change and will appear in these files along with the date that such an action occurred. These files are offered in two formats and are called SSINew14.PDF and SSINew14.TXT. The changes files are produced by year, thus future file names will be SSINew15.PDF and SSINew15.TXT and so on. [9-12-2014]

404. Is the term "new equity" in Directive 1 limited to equity that is issued by an SSI entity after the sanctions effective date or would equity purchased or acquired by an SSI entity from a third party after the sanctions effective date be considered new equity?

The equity prohibitions in Directive 1 pertain to equity issued, directly or indirectly, by an SSI entity on or after the sanctions effective date. Directive 1 does not prohibit U.S. persons from dealing with an SSI entity as counterparty to transactions involving equity issued by a non-sanctioned party. [9-12-2014]

405. Does the prohibition on "otherwise dealing in new debt" of longer than 30 days maturity (for persons subject to Directives 1 and 3) or 90 days (for persons subject to Directive 2) of SSI entities, their property, or their interests in property prohibit dealing in debt with maturity that exceeds the applicable authorized tenor in which the SSI entity is not directly or indirectly the borrower?

Directives 1 and 3 prohibit U.S. persons from dealing in debt of longer than 30 days maturity and Directive 2 prohibits U.S. persons from dealing in debt of longer than 90 days maturity issued on or after the sanctions effective date in cases where the new debt is issued by an SSI entity subject to these Directives. Directives 1, 2, and 3 do not prohibit U.S. persons from dealing with an SSI entity as counterparty to transactions involving debt issued on or after the sanctions effective date by a non-sanctioned party. For example, U.S. persons are not prohibited from dealing in a loan exceeding the applicable authorized tenor that is issued after the sanctions effective date of sanctions provided by an SSI entity to a non-sanctioned third-party, dealing with an SSI entity who is the underwriter on new debt of a non-sanctioned third party exceeding the applicable authorized tenor, or accepting payment under a letter of credit with terms exceeding the applicable authorized tenor that is issued, advised, or confirmed by an SSI entity, so long as the SSI entity is not the borrower. [9-12-2014]

406. Does the prohibition on dealing in new equity of entities subject to Directive 1 apply to transactions in which those entities are not the issuer of the equity?

U.S. persons are not prohibited from dealing in new equity with an entity subject to Directive 1 if the entity is not the issuer of the equity. For instance, U.S. persons are not prohibited from transacting with

an entity subject to Directive 1 in support of new equity where the entity subject to Directive 1 is the underwriter of the equity and not the issuer. [8-27-2014]

407. May a U.S. person consent to a replacement of its participation by a non-U.S. person in a long-term loan facility that was extended to a person subject to Directives 1, 2, or 3 prior to the sanctions effective date?

A U.S. person is not prohibited by Directives 1, 2, or 3 from engaging in transactions necessary to exit or replace its participation in a long-term loan facility that was extended to an SSI entity prior to the sanctions effective date. This would not constitute dealing in new debt. U.S. persons involved in such facilities should ensure that all newly negotiated drawdowns or disbursements from the facility utilize repayment terms that are not prohibited by the applicable sanctions effective date. See FAQ 394? for additional information on what constitutes a permitted drawdown or disbursement from an existing long-term loan obligation. [9-12-2014]

408. Is a U.S. person permitted under Directives 1, 2, or 3 to extend credit for greater than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2) to a non-sanctioned party for the purpose of purchasing goods or services from a person subject to Directives 1, 2, or 3?

Directives 1, 2, and 3 do not prohibit U.S. persons from extending credit for longer than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2) to non-sanctioned parties for the purpose of purchasing goods or services from an SSI entity, so long as the SSI entity is not the indirect borrower. [9-12-2014]

409. If a person determined to be subject to Directives 1, 2, or 3 makes successive draws under a short-term facility created after the sanctions effective date (e.g., it borrows \$100 million with a 15-day maturity, then at the end of the 15 days, the debt “rolls over”), does the facility become prohibited if the SSI borrower makes successive short-term borrowings that cumulatively add up to more than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2)?

Two conditions must be met for short-term facilities created after the sanctions effective date to be permissible. As long as (1) each individual disbursement has a maturity of 30 or 90 days or less (depending on the applicable Directive) and the disbursement is paid back in full before the next disbursement and (2) the lender is not contractually required to roll over the balance for a cumulative period of longer than 30 or 90 days (depending on the applicable Directive) at the borrower’s request (i.e., it has the option to refuse the request for a new short-term loan and terminate the facility), the

loan is not prohibited, even though the same borrower may obtain a series of short-term loans from the same lender over a cumulative period exceeding 30 or 90 days (depending on the applicable Directive). U.S. persons may not deal in a drawdown or disbursement initiated after the sanctions effective date with a repayment term of longer than the applicable authorized tenor if the terms of the drawdown or disbursement are negotiated or re-negotiated on or after the sanctions effective date. Such a newly negotiated drawdown or disbursement would constitute a prohibited extension of credit. [9-12-2014]

410. Are U.S. persons prohibited from entering into new contracts after the sanctions effective date with persons subject to Directives 1, 2, or 3 that provide payment terms to the SSI entities of greater than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2)? For instance, if a U.S. person agrees to sell shares or assets to an SSI entity in a corporate transaction that becomes effective on or after the sanctions effective date, is the U.S. person prohibited from agreeing to deferred purchase payments, even if no interest is involved, that may be paid more than the permissible number of days later by the SSI entity?

Directives 1 and 3 prohibit new extensions of credit to SSI entities of greater than 30 days maturity and Directive 2 prohibits new extensions of credit to SSI entities of greater than 90 days maturity, and these prohibitions include deferred purchase agreements extending payment terms of longer than 30 days or 90 days (depending on the applicable Directive) to an SSI entity. Such agreements would constitute a prohibited extension of credit to an SSI entity if the terms were longer than the permissible number of days and the agreement was entered into on or after the sanctions effective date. OFAC does not consider the inclusion of an interest rate to be a necessary condition for establishing whether a transaction represents new debt. [9-12-2014]

411. What does the prohibition contained in Directive 3 under Executive Order 13662 mean? What is the scope of prohibited services?

OFAC issued Directive 3, introducing new prohibitions on all transactions in, provision of financing for, and other dealings in new debt of longer than 30 days maturity of persons determined to be subject to the Directive, their property, or their interests in property. Transactions by U.S. persons or within the United States involving derivative products whose value is linked to an underlying asset that constitutes new debt with maturity of longer than 30 days issued by a person subject to Directive 3 are authorized by General License 1A pursuant to Executive Order 13662.

[9-12-2014]

412. What does the prohibition contained in Directive 4 mean? What is the scope of prohibited services?

OFAC issued Directive 4, introducing new prohibitions on the provision of goods, services (except for financial services), and technology for certain activities involving certain persons operating in the energy sector of the Russian Federation. Directive 4 prohibits the direct or indirect provision, exportation, or reexportation of goods, services (except for financial services), or technology in support of exploration or production for deepwater, Arctic offshore, or shale projects that have the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory, and involve any person determined to be subject to Directive 4 or that person's property or interests in property. The prohibition on the exportation of services includes, for example, drilling services, geophysical services, geological services, logistical services, management services, modeling capabilities, and mapping technologies. The prohibition does not apply to the provision of financial services, e.g., clearing transactions or providing insurance related to such activities.

On September 12, 2014, OFAC issued General License 2, authorizing for 14 days all services and activities prohibited by Directive 4 that are ordinarily incident and necessary to the wind down of operations, contracts, or other agreements involving persons determined to be subject to Directive 4. In order to qualify under this General License, a transaction must (1) occur prior to 12:01 am E.D.T. September 26, 2014, and (2) relate to operations, contracts, or agreements that were in effect prior to September 12, 2014. General License 2 does not authorize any new provision, exportation, or re-exportation of goods, services, or technology except as needed to cease operations, contracts, or other agreements involving affected projects.

Please see this page for the Department of Commerce's related license requirement on exports of certain goods for deepwater, Arctic offshore, or shale projects that have the potential to produce oil or gas.

[9-12-2014]

413. For the purposes of Directive 4, how does OFAC define "deepwater" projects that have the potential to produce oil?

A project is considered to be a deepwater project if the project involves underwater activities at depths of more than 500 feet.

[9-12-2014]

414. Does Directive 4 apply to projects that have the potential to produce gas?

If a deepwater, Arctic offshore, or shale project in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory, and involving a person named under Directive 4 has the potential to produce oil, then the prohibition applies, irrespective of whether the project also has the potential to produce gas. If the project has the potential to produce gas only, then the prohibition does not apply.

[9-12-2014]

415. For persons determined to be subject to multiple Directives, how do the prohibitions and exemptions listed under one Directive affect prohibitions and exemptions under the other Directives?

Each Directive operates independently of the others. If a transaction involves a person subject to two Directives, for example, a U.S. person engaging in that transaction must comply with the requirements of both Directives. Exemptions in one Directive apply only to the prohibitions contained in that Directive and do not carry over to another Directive. For example, if a person is subject to both Directive 2 and Directive 4, the exemption for the provision of financial services by U.S. persons or in the United States under Directive 4 does not supersede the prohibition in Directive 2 on dealing in debt of longer than 90 days maturity of such a person. For these reasons, when OFAC references a prohibition involving an "SSI entity" in these FAQs or in other guidance, it is referring to an entity subject to the Directive(s) at issue in a particular FAQ or piece of guidance.

[9-12-2014]

416. What does the "sanctions effective date" mean in the context of sectoral sanctions pursuant to E.O. 13662?

For purposes of the sectoral sanctions, "sanctions effective date" means the date a person is determined to be subject to the prohibition(s) of the relevant Directive. When a person has been previously determined to be subject to a Directive and the prohibition in the Directive is subsequently amended, (1) the sanctions effective date for the prohibitions of the original Directive remains the date on which the person was identified as subject to the prohibitions of that Directive, and (2) the sanctions effective date for the amended Directive is the date of the amendment (or other date specified in the amended Directive).

[9-12-2014]

418. How does OFAC interpret the term "shale projects" with respect to the prohibitions in Directive 4 under Executive Order 13662?

The prohibitions in Directive 4 under Executive Order 13662 apply to deepwater, Arctic offshore, or shale projects with the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory. The term "shale projects" applies to projects that have the potential to produce oil from resources located in shale formations. Therefore, as long as the projects in question are neither deepwater nor Arctic offshore projects, the prohibitions in Directive 4 do not apply to exploration or production through shale to locate or extract crude oil (or gas) in reservoirs.

[11-18-2014]

419. How should U.S. persons account for the 30- and 90-day debt prohibitions under Directives 1, 2, and 3 as they relate to payment terms for the following types of transactions: (1) the sale of goods to an SSI entity, (2) the provision of services to and subscription arrangements involving SSI entities, and (3) progress payments for long-term projects?

U.S. persons may engage in commercial transactions with SSI entities provided that any such transactions do not represent a direct or indirect dealing in prohibited debt or equity. Because offering payment terms of longer than 30 or 90 days to an SSI entity may constitute a prohibited extension of credit to the SSI entity, U.S. persons should ensure that payment terms conform with the applicable debt prohibitions. For sales of goods to an SSI entity, U.S. persons may extend payment terms of up to 30 or 90 days from the point at which title or ownership of the goods transfers to the SSI entity. For the provision of services to, subscription arrangements involving, and progress payments for long-term projects involving SSI entities, U.S. persons may extend payment terms of up to 30 or 90 days from the point at which a final invoice (or each final invoice) is issued. In the event that a payment dispute arises causing a U.S. person to believe that it may not receive payment in full by the end of the 30- or 90-day period, the U.S. person should contact OFAC to determine whether a license or other authorization is required.

[12-11-2014]

420. Under Directive 4, does the term "production" encompass activities such as transportation, refining, or other dealings in oil extracted from deepwater, Arctic offshore, or shale projects?

For the purposes of Directive 4, the term “production” refers to the lifting of oil to the surface and the gathering, treating, field processing, and field storage of such oil. The production stage of a project ends when extracted oil is transported out of a field production storage tank or otherwise off of a field production site. Directive 4 does not prohibit the provision by U.S. persons or within the United States of goods, technology, or services to SSI entities when such transactions relate only to the transportation, refining, or other dealings involving oil that has already been extracted from a deepwater, Arctic offshore, or shale project and transported out of a field production storage tank or otherwise off of a field production site.

[12-11-2014]

421. How does OFAC interpret the term “Arctic offshore projects” with respect to the prohibitions in Directive 4 under Executive Order 13662?

The prohibitions in Directive 4 under Executive Order 13662 apply to deepwater, Arctic offshore, or shale projects with the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory. The term “Arctic offshore projects” applies to projects that have the potential to produce oil in areas that (1) involve drilling operations originating offshore, and (2) are located above the Arctic Circle. The prohibitions do not apply to horizontal drilling operations originating onshore where such drilling operations extend under the seabed to areas above the Arctic Circle.

[12-11-2014]

RE: Ukraine FAQs on Website

From: (b)(6)
To: (b)(6)
Cc: (b)(6) "Manfu, Alexandre" (b)(6)
Date: Fr, 27 Feb 2015 12:32:44 -0500
Attachments: ukra ne_faqs2_asof20150227.docx (28.5 kB)

Apologies in advance, but it's probably better to start with this version. This one maintains the current formatting and links so it will be less for us to try and reconcile later when we go to code them. Thanks!

From: (b)(6)
Sent: Friday, February 27, 2015 10:08 AM
To: (b)(6)
Cc: (b)(6) Manfu, Alexandre; (b)(6)
Subject: RE: Ukraine FAQs on Website

Thanks, (b)(6) We'll work from this document. Again, I really appreciate the speedy response. I think a lot of people have migrated to Chrome since it became available. I'll pass along the fact that this function does still work in IE and Mozilla.

We were told yesterday to prepare for an action "as early as Tuesday" (simultaneous with designations that are pending). I think we'll get more clarity on Monday.

Thanks again! You guys are rock stars!

From: (b)(6)
Sent: Friday, February 27, 2015 10:04 AM
To: (b)(6)
Cc: (b)(6) Manfu, Alexandre; (b)(6)
Subject: FW: Ukraine FAQs on Website

Hi (b)(6),

Attached is a Word doc of the current Ukraine/Russia FAQs. Note that the links are not included in this since I just copy/pasted it from the website.

What browser are you using? The print button functionality currently works in IE and Mozilla but does not work in Chrome.

Any idea on when these will go out?

Thanks,
(b)(6)

From: (b)(6)
Sent: Friday, February 27, 2015 09:39 AM
To: DL OFAC IT Support
Cc: (b)(6) Manfu, Alexandre
Subject: Ukraine FAQs on Website

Good morning!

We've been asked to update the Ukraine sectoral sanctions related FAQs to reflect potential upcoming changes. There is a very tight deadline for this ask, so I'm hoping someone from SSD could send me a Word document with all of the current FAQs on the sectoral sanctions topic page ([here](#)). As soon as possible would be greatly appreciated.

As a secondary concern, I tried to pull my own version of the FAQs, but the "print this FAQ" and "print this entire FAQ topic" links are not working on our website (at least not for the sectoral sanctions page). When you select these options, the website just generates a blank document for you to print. It would be great if we could restore this functionality in the near to medium term.

Thank you in advance! Please let me know if you have any questions.

(b)(6)

Questions Related to Sectoral Sanctions under Executive Order 13662

370. What do the prohibitions in Directives 1 and 2 mean? Are they blocking actions?

The sectoral sanctions imposed on specified persons operating in sectors of the Russian economy identified by the Secretary of Treasury were done under Executive Order 13662 through Directives issued by OFAC pursuant to its delegated authorities. Directive 1, issued on July 16, 2014, prohibits transacting in, providing financing for, or otherwise dealing in debt with a maturity of longer than 90 days or equity if that debt or equity is issued on or after the sanctions effective date ("new debt" or "new equity") by, on behalf of, or for the benefit of the persons operating in Russia's financial sector named under Directive 1, their property, or their interests in property. On September 12, 2014, OFAC amended Directive 1, reducing the tenor of prohibited debt from longer than 90 days to longer than 30 days.

Directive 2 separately prohibits transacting in, providing financing for, or otherwise dealing in new debt of greater than 90 days maturity if that debt is issued on or after the sanctions effective date by, on behalf of, or for the benefit of the persons operating in Russia's energy sector named under the Directive 2, their property, or their interests in property.

These actions pursuant to Directives 1 and 2 prohibit transactions by U.S. persons as defined in E.O. 13662, wherever they are located, and transactions within the United States. This action does not require U.S. persons to block the property or interests in property of the entities identified in the Directives, nor will persons identified in Directives 1 and 2 be added to the Specially Designated Nationals (SDN) List. U.S. persons should reject transactions or dealings that are prohibited by Directives 1 or 2, and to the extent required by Section 501.604 of the Reporting, Procedures and Penalties Regulations (31 C.F.R. part 501), U.S. persons must report to OFAC any rejected transactions within 10 business days. [9-12-2014]

371. What does OFAC interpret to be debt and equity? Are there other prohibited activities under Directives 1, 2, and 3? Can U.S. financial institutions continue to maintain correspondent accounts and process U.S. dollar-clearing transactions for the entities subject to these Directives?

The term *debt* includes bonds, loans, extensions of credit, loan guarantees, letters of credit, drafts, bankers acceptances, discount notes or bills, or commercial paper. The term *equity* includes stocks, share issuances, depositary receipts, or any other evidence of title or ownership.

The prohibitions in Directive 1 apply to all transactions involving new debt with a maturity of longer than 30 days or new equity; all financing in support of such new debt or new equity; and any dealing in, including provision of services in support of, such new debt or new equity.

The prohibitions in Directive 2 apply to all transactions involving new debt with a maturity of longer than 90 days; all financing in support of such new debt; and any dealing in, including provision of services in support of, such new debt.

The prohibitions in Directive 3 apply to all transactions involving new debt with a maturity of longer than 30 days; all financing in support of such new debt; and any dealing in, including provision of services in support of, such new debt.

All the prohibitions in these Directives extend to rollover of existing debt, if such rollover results in the creation of new debt with a maturity of longer than 30 days (for persons subject to Directives 1 or 3) or longer than 90 days (for persons subject to Directive 2).

Transacting in, providing financing for, or otherwise dealing in any debt or equity issued by, on behalf of, or for the benefit of persons subject to Directives 1, 2, or 3 is permissible, if the debt or equity was issued prior to the date on which the person was determined to be subject to the relevant Directive. In addition, transacting in, providing financing for, or otherwise dealing in debt instruments with maturities of 30 days or less (issued by, on behalf of, or for the benefit of persons subject to Directives 1 or 3) or 90 days or less (issued by, on behalf of, or for the benefit of persons subject to Directive 2), even if they are issued after the sanctions effective date, is permissible. Transacting in, providing financing for, or otherwise dealing in new equity instruments of persons subject to Directives 2 and 3 is permissible. U.S. financial institutions may continue to maintain correspondent accounts and process U.S. dollar-clearing transactions for the persons subject to the Directives, so long as those activities do not involve transacting in, providing financing for, or otherwise dealing in transaction types prohibited by these Directives.

On September 12, 2014, OFAC amended and reissued Directive 1, changing the allowable maturity of debt instruments issued by, on behalf of, or for the benefit of persons subject to Directive 1 from 90 days to 30 days. Transacting in, providing financing for, or otherwise dealing in debt with maturity of 90 days or less issued by, on behalf of, or for the benefit of the persons identified under Directive 1 is not prohibited if such debt instruments were issued prior to September 12, 2014, and the terms of such instruments do not change subsequently (see [FAQ 394](#) for additional detail on what constitutes the changing of terms). Rollovers of such instruments must comply with the 30-day maturity limit imposed on September 12, 2014.

[9-12-2014]

372. Do Directives 1, 2, and 3 prohibit U.S. persons from entering into derivatives contracts linked to new debt or new equity issued by the entities subject to the Directives?

On September 12, 2014, OFAC issued [General License 1A](#), which authorizes certain transactions involving derivative products that would otherwise be prohibited pursuant to Directives 1, 2, or 3. This [General License 1A](#) replaced and superseded General License No. 1, dated July 16, 2014, which authorized certain transactions involving derivative products that would have been prohibited pursuant to Directives 1 or 2. [9-12-2014]

373. Do the prohibitions imposed pursuant to the Directives also extend to entities owned 50 percent or more by one or more entities identified by these Directives, as per revised guidance OFAC issued on August 13, 2014?

Yes, these prohibitions apply to the named persons, their property, and their interests in property, which includes entities owned 50 percent or more by one or more persons identified as subject to the Directives. [9-12-2014]

374. If I own a Kalashnikov product, is that product blocked by sanctions? Am I able to resell a Kalashnikov product at a gun show or other secondary market?

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. If a U.S. person has an inventory of Kalashnikov Concern products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment), we advise that U.S. person to contact OFAC for further guidance on handling of the inventory. [7-16-2014]

375. If I have Kalashnikov products in my inventory, can I sell them?

If a U.S. person has an inventory of Kalashnikov Concern products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment), we advise that U.S. person to contact OFAC for further guidance on handling of the inventory. [7-16-2014]

391. Can U.S. persons issue and deal in new depositary receipts that are based on the equity of an entity subject to the Sectoral Sanctions Identification List (an SSI entity)?

In certain circumstances, yes. U.S. persons, including U.S. financial institutions, may issue and deal in depositary receipts that are based on equity issued by a person determined to be subject to Directive 1 prior to the date the person was determined to be subject to Directive 1. U.S. persons may not, however, deal in or issue depositary receipts that are based on equity issued by a person subject to Directive 1 on or after the sanctions effective date. Such transactions would constitute prohibited transactions or dealings in new equity under Directive 1. There are no equity-related prohibitions contained within Directives 2, 3, or 4, and thus U.S. persons are not prohibited from issuing or dealing in depositary receipts that are based on equity issued by persons subject only to those Directives. [9-12-2014]

392. How are banks expected to distinguish between transactions involving new versus old equity under Directive 1 if entities subject to Directive 1 issue new equity that utilizes the same International Securities Identification Number (ISIN) or other identifier as equity issued prior to the sanctions effective date?

Directive 1 prohibits U.S. persons from transacting in, providing financing for, or otherwise dealing in new equity for named persons, their property, or their interests in property. Directive 1 also prohibits such transactions from occurring in the United States. If a U.S. person decides to transact or otherwise deal in equity issued by an SSI entity prior to the sanctions effective date, the U.S. person should ensure that it is not transacting in, providing financing for, or otherwise dealing in the newly issued equity. To the extent that a U.S. person does in fact transact in, provide financing for, or otherwise deal in newly issued equity, such activity would constitute a violation of the prohibition set forth in Directive 1. [7-28-2014]

393. Does OFAC consider counterparty credit risk associated with derivatives transactions that are authorized pursuant to General License 1A to Executive Order 13662 to constitute new debt?

OFAC does not consider normal counterparty credit exposure encountered by a U.S. person to be an extension of credit when the U.S. person enters into an otherwise permissible derivatives transaction. U.S. persons engaging in such transactions should ensure that they do not hold, purchase, or sell the underlying asset in such transactions as described in Paragraph (b) of General License 1A. [7-28-2014]

394. If a U.S. person entered into a revolving credit facility or long-term loan arrangement for a person determined to be subject to Directives 1, 2, or 3 prior to the sanctions effective date, what are the restrictions on drawdowns from that facility? Do all drawdowns and disbursements pursuant to the parent agreement need to carry repayment terms of 30 days or less (for persons subject to Directives 1 and 3) or 90 days or less (for persons subject to Directive 2)?

If a U.S. person entered into a long-term credit facility or loan agreement prior to the sanctions effective date, drawdowns and disbursements with repayment terms of 30 days or less (for persons subject to Directives 1 and 3) or 90 days or less (for persons subject to Directive 2) are permitted. Drawdowns and disbursements whose repayment terms exceed the applicable authorized tenor are not prohibited if the terms of such drawdowns and disbursements (including the length of the repayment period, the interest rate applied to the drawdown, and the maximum drawdown amount) were contractually agreed to prior to the sanctions effective date and are not modified on or after the sanctions effective date. U.S. persons may not deal in a drawdown or disbursement initiated after the sanctions effective date with a repayment term of longer than 30 days (for persons subject to Directives 1 and 3) or 90 days (for persons subject to Directive 2), if the terms of the drawdown or disbursement were negotiated on or after the sanctions effective date. Such a newly negotiated drawdown or disbursement would constitute a prohibited extension of credit. [9-12-2014]

395. Do Directives 1, 2, and 3 prohibit U.S. persons from advising or confirming a letter of credit that was issued on or after the sanctions effective date and that carries a term of longer than 30 days maturity (for Directives 1 and 3) or 90 days maturity (for Directive 2) when the beneficiary of that letter of credit is one of the entities identified as subject to the Directives?

U.S. persons may advise or confirm a letter of credit issued on behalf of a non-sanctioned entity in which an entity subject to Directive 1, 2, or 3 is the beneficiary (i.e., the exporter or seller of the underlying goods) because the subject letter of credit does not represent an extension of credit to the SSI entity.

U.S. persons may not advise or confirm a letter of credit if all of the following three conditions are met: (1) the letter of credit was issued on or after the sanctions effective date, (2) the letter of credit carries a term of longer than 30 days maturity (for persons subject to Directives 1 and 3) or 90 days maturity (for persons subject to Directive 2), and (3) an SSI entity is the applicant of the letter of credit (i.e., the importer or buyer of the underlying goods or services). This would constitute prohibited activity because the subject letter of credit would represent an extension of credit to the SSI entity. [9-12-2014]

396. How do I know when a name has been added, changed, or removed on the Sectoral Sanctions Identifications (SSI) List?

The SSI List available on OFAC's website is the latest version of the list and contains the most updated information on entities determined to be subject to one or more of the Directives. OFAC also maintains "changes files" that record all significant changes to the SSI List. Any addition, alteration, or removal of an SSI record is considered a significant change and will appear in these files along with the date that such an action occurred. These files are offered in two formats and are called [SSINEW14.PDF](#) and [SSINEW14.TXT](#). The changes files are produced by year, thus future file names will be SSINEW15.PDF and SSINEW15.TXT and so on. [9-12-2014]

404. Is the term "new equity" in Directive 1 limited to equity that is issued by an SSI entity after the sanctions effective date or would equity purchased or acquired by an SSI entity from a third party after the sanctions effective date be considered new equity?

The equity prohibitions in Directive 1 pertain to equity *issued*, directly or indirectly, by an SSI entity on or after the sanctions effective date. Directive 1 does not prohibit U.S. persons from dealing with an SSI entity as counterparty to transactions involving equity issued by a non-sanctioned party. [9-12-2014]

405. Does the prohibition on “otherwise dealing in new debt” of longer than 30 days maturity (for persons subject to Directives 1 and 3) or 90 days (for persons subject to Directive 2) of SSI entities, their property, or their interests in property prohibit dealing in debt with maturity that exceeds the applicable authorized tenor in which the SSI entity is not directly or indirectly the borrower?

Directives 1 and 3 prohibit U.S. persons from dealing in debt of longer than 30 days maturity and Directive 2 prohibits U.S. persons from dealing in debt of longer than 90 days maturity issued on or after the sanctions effective date in cases where the new debt is issued by an SSI entity subject to these Directives. Directives 1, 2, and 3 do not prohibit U.S. persons from dealing with an SSI entity as counterparty to transactions involving debt issued on or after the sanctions effective date by a non-sanctioned party. For example, U.S. persons are not prohibited from dealing in a loan exceeding the applicable authorized tenor that is issued after the sanctions effective date of sanctions provided by an SSI entity to a non-sanctioned third-party, dealing with an SSI entity who is the underwriter on new debt of a non-sanctioned third party exceeding the applicable authorized tenor, or accepting payment under a letter of credit with terms exceeding the applicable authorized tenor that is issued, advised, or confirmed by an SSI entity, so long as the SSI entity is not the borrower. [9-12-2014]

406. Does the prohibition on dealing in new equity of entities subject to Directive 1 apply to transactions in which those entities are not the issuer of the equity?

U.S. persons are not prohibited from dealing in new equity with an entity subject to Directive 1 if the entity is not the issuer of the equity. For instance, U.S. persons are not prohibited from transacting with an entity subject to Directive 1 in support of new equity where the entity subject to Directive 1 is the underwriter of the equity and not the issuer. [8-27-2014]

407. May a U.S. person consent to a replacement of its participation by a non-U.S. person in a long-term loan facility that was extended to a person subject to Directives 1, 2, or 3 prior to the sanctions effective date?

A U.S. person is not prohibited by Directives 1, 2, or 3 from engaging in transactions necessary to exit or replace its participation in a long-term loan facility that was extended to an SSI entity prior to the sanctions effective date. This would not constitute dealing in new debt. U.S. persons involved in such facilities should ensure that all newly negotiated drawdowns or disbursements from the facility utilize repayment terms that are not prohibited by the applicable sanctions effective date. See [FAQ 394?](#) for additional information on what constitutes a permitted drawdown or disbursement from an existing long-term loan obligation. [9-12-2014]

408. Is a U.S. person permitted under Directives 1, 2, or 3 to extend credit for greater than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2) to a non-sanctioned party for the purpose of purchasing goods or services from a person subject to Directives 1, 2, or 3?

Directives 1, 2, and 3 do not prohibit U.S. persons from extending credit for longer than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2) to non-sanctioned parties for the purpose of purchasing goods or services from an SSI entity, so long as the SSI entity is not the indirect borrower. [9-12-2014]

409. If a person determined to be subject to Directives 1, 2, or 3 makes successive draws under a short-term facility created after the sanctions effective date (e.g., it borrows \$100 million with a 15-day maturity, then at the end of the 15 days, the debt “rolls over”), does the facility become prohibited if the SSI borrower makes successive short-term borrowings that cumulatively add up to more than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to Directive 2)?

Two conditions must be met for short-term facilities created after the sanctions effective date to be permissible. As long as (1) each individual disbursement has a maturity of 30 or 90 days or less (depending on the applicable Directive) and the disbursement *is paid back in full* before the next disbursement and (2) the lender is not contractually required to roll over the balance for a cumulative period of longer than 30 or 90 days (depending on the applicable Directive) at the borrower’s request (i.e., it has the option to refuse the request for a new short-term loan and terminate the facility), the loan is not prohibited, even though the same borrower may obtain a series of short-term loans from the same lender over a cumulative period exceeding 30 or 90 days (depending on the applicable Directive). U.S. persons may not deal in a drawdown or disbursement initiated after the sanctions effective date with a repayment term of longer than the applicable authorized tenor if the terms of the drawdown or disbursement are negotiated or re-negotiated on or after the sanctions effective date. Such a newly negotiated drawdown or disbursement would constitute a prohibited extension of credit. [9-12-2014]

410. Are U.S. persons prohibited from entering into new contracts after the sanctions effective date with persons subject to Directives 1, 2, or 3 that provide payment terms to the SSI entities of greater than 30 days (for persons subject to Directives 1 or 3) or 90 days (for persons subject to

Directive 2)? For instance, if a U.S. person agrees to sell shares or assets to an SSI entity in a corporate transaction that becomes effective on or after the sanctions effective date, is the U.S. person prohibited from agreeing to deferred purchase payments, even if no interest is involved, that may be paid more than the permissible number of days later by the SSI entity?

Directives 1 and 3 prohibit new extensions of credit to SSI entities of greater than 30 days maturity and Directive 2 prohibits new extensions of credit to SSI entities of greater than 90 days maturity, and these prohibitions include deferred purchase agreements extending payment terms of longer than 30 days or 90 days (depending on the applicable Directive) to an SSI entity. Such agreements would constitute a prohibited extension of credit to an SSI entity if the terms were longer than the permissible number of days and the agreement was entered into on or after the sanctions effective date. OFAC does not consider the inclusion of an interest rate to be a necessary condition for establishing whether a transaction represents new debt. [9-12-2014]

411. What does the prohibition contained in Directive 3 under Executive Order 13662 mean? What is the scope of prohibited services?

OFAC issued Directive 3, introducing new prohibitions on all transactions in, provision of financing for, and other dealings in new debt of longer than 30 days maturity of persons determined to be subject to the Directive, their property, or their interests in property. Transactions by U.S. persons or within the United States involving derivative products whose value is linked to an underlying asset that constitutes new debt with maturity of longer than 30 days issued by a person subject to Directive 3 are authorized by General License 1A pursuant to Executive Order 13662.

[9-12-2014]

412. What does the prohibition contained in Directive 4 mean? What is the scope of prohibited services?

OFAC issued Directive 4, introducing new prohibitions on the provision of goods, services (except for financial services), and technology for certain activities involving certain persons operating in the energy sector of the Russian Federation. Directive 4 prohibits the direct or indirect provision, exportation, or reexportation of goods, services (except for financial services), or technology in support of exploration or production for deepwater, Arctic offshore, or shale projects that have the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory, and involve any person determined to be subject to Directive 4 or that person's property or interests in property. The prohibition on the exportation of services includes, for example, drilling services, geophysical services, geological services, logistical services, management services, modeling capabilities, and mapping technologies. The prohibition **does not** apply to the provision of financial services, e.g., clearing transactions or providing insurance related to such activities.

On September 12, 2014, OFAC issued General License 2, authorizing for 14 days all services and activities prohibited by Directive 4 that are ordinarily incident and necessary to the wind down of operations, contracts, or other agreements involving persons determined to be subject to Directive 4. In order to qualify under this General License, a transaction must (1) occur prior to 12:01 am E.D.T. September 26, 2014, and (2) relate to operations, contracts, or agreements that were in effect prior to

September 12, 2014. General License 2 does not authorize any new provision, exportation, or re-exportation of goods, services, or technology except as needed to cease operations, contracts, or other agreements involving affected projects.

Please see [this page](#) for the Department of Commerce's related license requirement on exports of certain goods for deepwater, Arctic offshore, or shale projects that have the potential to produce oil or gas.

[9-12-2014]

413. For the purposes of Directive 4, how does OFAC define "deepwater" projects that have the potential to produce oil?

A project is considered to be a deepwater project if the project involves underwater activities at depths of more than 500 feet.

[9-12-2014]

414. Does Directive 4 apply to projects that have the potential to produce gas?

If a deepwater, Arctic offshore, or shale project in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory, and involving a person named under Directive 4 has the potential to produce oil, then the prohibition applies, irrespective of whether the project also has the potential to produce gas. If the project has the potential to produce gas only, then the prohibition does not apply.

[9-12-2014]

415. For persons determined to be subject to multiple Directives, how do the prohibitions and exemptions listed under one Directive affect prohibitions and exemptions under the other Directives?

Each Directive operates independently of the others. If a transaction involves a person subject to two Directives, for example, a U.S. person engaging in that transaction must comply with the requirements of both Directives. Exemptions in one Directive apply only to the prohibitions contained in that Directive and do not carry over to another Directive. For example, if a person is subject to both Directive 2 and Directive 4, the exemption for the provision of financial services by U.S. persons or in the United States under Directive 4 does not supersede the prohibition in Directive 2 on dealing in debt of longer than 90 days maturity of such a person. For these reasons, when OFAC references a prohibition involving an "SSI entity" in these FAQs or in other guidance, it is referring to an entity subject to the Directive(s) at issue in a particular FAQ or piece of guidance.

[9-12-2014]

416. What does the "sanctions effective date" mean in the context of sectoral sanctions pursuant to E.O. 13662?

For purposes of the sectoral sanctions, "sanctions effective date" means the date a person is determined to be subject to the prohibition(s) of the relevant Directive. When a person has been previously determined to be subject to a Directive and the prohibition in the Directive is subsequently amended, (1) the sanctions effective date for the prohibitions of the original Directive remains the date on which the person was identified as subject to the prohibitions of that Directive, and (2) the sanctions effective date for the amended Directive is the date of the amendment (or other date specified in the amended Directive).

[9-12-2014]

418. How does OFAC interpret the term "shale projects" with respect to the prohibitions in Directive 4 under Executive Order 13662?

The prohibitions in Directive 4 under Executive Order 13662 apply to deepwater, Arctic offshore, or shale projects with the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory. The term "shale projects" applies to projects that have the potential to produce oil from resources located in shale formations. Therefore, as long as the projects in question are neither deepwater nor Arctic offshore projects, the prohibitions in Directive 4 do not apply to exploration or production through shale to locate or extract crude oil (or gas) in reservoirs.

[11-18-2014]

419. How should U.S. persons account for the 30- and 90-day debt prohibitions under Directives 1, 2, and 3 as they relate to payment terms for the following types of transactions: (1) the sale of goods to an SSI entity, (2) the provision of services to and subscription arrangements involving SSI entities, and (3) progress payments for long-term projects?

U.S. persons may engage in commercial transactions with SSI entities provided that any such transactions do not represent a direct or indirect dealing in prohibited debt or equity. Because offering payment terms of longer than 30 or 90 days to an SSI entity may constitute a prohibited extension of credit to the SSI entity, U.S. persons should ensure that payment terms conform with the applicable debt prohibitions. For sales of goods to an SSI entity, U.S. persons may extend payment terms of up to 30 or 90 days from the point at which title or ownership of the goods transfers to the SSI entity. For the provision of services to, subscription arrangements involving, and progress payments for long-term projects involving SSI entities, U.S. persons may extend payment terms of up to 30 or 90 days from the point at which a final invoice (or each final invoice) is issued. In the event that a payment dispute arises causing a U.S. person to believe that it may not receive payment in full by the end of the 30- or 90-day period, the U.S. person should contact OFAC to determine whether a license or other authorization is required.

[12-11-2014]

420. Under Directive 4, does the term "production" encompass activities such as transportation, refining, or other dealings in oil extracted from deepwater, Arctic offshore, or shale projects?

For the purposes of Directive 4, the term “production” refers to the lifting of oil to the surface and the gathering, treating, field processing, and field storage of such oil. The production stage of a project ends when extracted oil is transported out of a field production storage tank or otherwise off of a field production site. Directive 4 does not prohibit the provision by U.S. persons or within the United States of goods, technology, or services to SSI entities when such transactions relate only to the transportation, refining, or other dealings involving oil that has already been extracted from a deepwater, Arctic offshore, or shale project and transported out of a field production storage tank or otherwise off of a field production site.

[12-11-2014]

421. How does OFAC interpret the term “Arctic offshore projects” with respect to the prohibitions in Directive 4 under Executive Order 13662?

The prohibitions in Directive 4 under Executive Order 13662 apply to deepwater, Arctic offshore, or shale projects with the potential to produce oil in the Russian Federation, or in maritime area claimed by the Russian Federation and extending from its territory. The term “Arctic offshore projects” applies to projects that have the potential to produce oil in areas that (1) involve drilling operations originating offshore, and (2) are located above the Arctic Circle. The prohibitions do not apply to horizontal drilling operations originating onshore where such drilling operations extend under the seabed to areas above the Arctic Circle.

[12-11-2014]

Bates Nos. 2018-08-116:
000988 – 000990
Submitter Notice Process
Initiated and/or Pending
Consultation Responses

RE: potential incoming license request re: Kalashnikov

From: (b)(6)
To: (b)(6) (b)(6)
Cc:
Date: Mon, 02 Mar 2015 12:52:25 -0500

Thanks, (b)(6) Adding (b)(6) for awareness.

From: (b)(6)
Sent: Monday, March 02, 2015 12:47 PM
To: (b)(6)
Subject: potent a ncom ng cense request re: Ka ashn kov

Hello (b)(6) and (b)(6)

I just wanted to give everyone a heads up about a call I just received from a USP working in the UK.

He wants to set up a clothing company that would use the Kalashnikov name on clothing; I told him it would not be allowed, but he could apply for license.

best
(b)(6)

Bates Nos. 2018-08-116:
000992 - 000998
Pending Consultation
Responses