# **Sanctions Comparison Chart**

From: (b)(6)

To: \_\_DL\_TFI\_Ukraine\_Russia <\_dl\_tfi\_ukraine\_russia@do.treas.gov>

**Date:** Tue, 02 Dec 2014 08:26:57 -0500

Attachments: 20141201 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (341.02 kB)

All,

FYI. Attached is the latest unclassified Comparison Chart. This includes the new EU designations from this weekend (13 individual separatists and 5 separatist political organizations) as well as those Japanese measures which have been publically released.

As it is a working document, please do not forward this outside of Treasury without consulting our office first.

Please let me know if you have any questions.



(b)(6) Policy Advisor

U.S. Department of the Treasury

Office of Terrorist Financing and Financial Crimes
Office: (b)(6) Blackberry: (b)(6)

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Russia/Former Government of Ukraine-related Designations - Persons (as of December 1, 2014)

US: United States
EU: European Union
SUI: Switzerland\*
CAN: Canada
LIE: Liechtenstein\*
AUS: Austria\*\*
AUST: Australia
JPN: Japan
NOR: Norway

\*Switzerland and Liechtenstein have issued 
"anti-circumvention" measures for many of 
the EU designated individuals and entities. 
These measures prohibit their financial 
institutions from entering into new business 
relationships with these individuals and 
entities (these measures short of asset freezes 
are denoted by black stripes). Likewise, in 
Switzerland, "new issue of long term 
financial instruments" for the five banks 
listed by the EU for debt and equity 
prohibitions will require authorization, only 
given if the they are within the average 
financial engagement of the past three years. 
\*\*Austria's original list was superceded by 
the shorter EU list; however, Austria has 
stated that it plans to add back those from 
original list (in gray)

Executive Orders 13660 and 13661 - Asset Freezes													
Russian Officials													
Viktor Alekseevich Ozerov	US	EU	SUI		LIE	AUS	AUST	NOR					
Vladimir Michailovich Dzhabarov	US	EU	SUI			AUS	AUST	NOR					一
Andrei Aleksandrovich Klishas	US	EU	SUI	CAN		AUS	AUST	NOR					$\vdash$
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Vladislov Yuryevich Surkov	US	EU	SUI	CAN		AUS	AUST	NOR				<del>                                     </del>	
Yelena Borisovna Mizulina	US	EU	SUI	CAN		AUS	AUST	NOR				<del>                                     </del>	
Valentina Ivaonovna Matvienko	US	EU	SUI	CAN		AUS	AUST	NOR				<del>                                     </del>	
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Sergei Ivanovich Menyailo	US	EU	SUI	CAN	LIE	AUS		NOR	JPN				
Mikhail Malyshev	US	EU	SUI	CAN		AUS	AUST	NOR	JPN				
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Aleksei Mikhailovich Chaily	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
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Oleksandr Hryhorovych Yakymenko		EU		CAN		AUS		NOR					
Andriy Volodymyrovych Portnov		EU		CAN		AUS		NOR					
Olena Leonidivna Lukash	1	EU	SUI	CAN	LIE	AUS	i	NOR					
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OAO Wysokototschnye Kompleski		EU	SUI	AUS	NOR			
OAO Almaz Antey		EU	SUI	AUS	NOR			
OAO NPO Bazalt		EU	SUI	AUS	NOR			

# FW: Published Regulation on Ukraine Sanctions Technical Points

(b)(6)From: To: (b)(6)"Manfull, Alexandre" (b)(6)

Date: Tue, 09 Dec 2014 09:45:52 -0500 Attachments: Reg.1290.12.4.14.pdf (337.6 kB)

FYI on the EU's updated Ukraine regs.

State (b)(6) From: Sent: Tuesday, December 09, 2014 8:31 AM
To: Fried, Daniel: State (b)(6) State (b)(6) Treasury (b)(6) State (b)(6) State (b)(6) State (b)(6) Mortlock, David

Subject: Published Regulation on Ukraine Sanctions Technical Points

On Friday the EU published the latest Ukraine sanctions legislation, Reg. 1290, attached, which covers the technicalities previously raised- what is Russia, what is shale, etc.

I believe you may have seen the draft of this.

Please let me know if you have any questions.

State (b)(6)

United States Mission to the European Union Rue Zinner 13

1000 Brussels,

State

This email is UNCLASSIFIED.

# Sanctions Comparison Chart

From: (b)(6)

\_DL\_TFI\_Ukraine\_Russia <\_dl\_tfi\_ukraine\_russia@do.treas.gov> To:

Cc: (b)(6)

Date: Fri, 19 Dec 2014 17:18:34 -0500

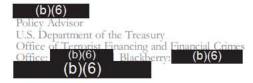
Attachments: 20141219 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (348.8 kB)

#### Good evening,

Please find attached an updated comparison chart, which includes today's U.S. separatist designations as well as additional separatist designations announced by Japan last week.

As before, since this is a working document, please do not forward outside of Treasury without consulting our office.

Have a merry Christmas and happy holidays! (b)(6)



(b)(6)From:

Sent: Tuesday, December 02, 2014 8:27 AM To: \_DL\_TFI\_Ukraine\_Russia

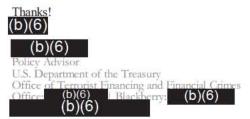
Subject: Sanctions Comparison Chart

All,

FYI. Attached is the latest unclassified Comparison Chart. This includes the new EU designations from this weekend (13 individual separatists and 5 separatist political organizations) as well as those Japanese measures which have been publically released.

As it is a working document, please do not forward this outside of Treasury without consulting our office first.

Please let me know if you have any questions.



Russia/Former Government of Ukraine-related Designations - Persons (as of December 19, 2014)

US: United States
EU: European Union
SUI: Switzerland\*
CAN: Canada
LIE: Liechtenstein\*
AUST: Australia
JPN: Japan
NOR: Norwan

\*Switzerland and Liechtenstein have issued 
"anti-circumvention" measures for many of 
the EU designated individuals and entities. 
These measures prohibit their financial 
institutions from entering into new business 
relationships with these individuals and 
entities (these measures short of asset freezes 
are denoted by black stripes). Likewise, in 
Switzerland, "new issue of long term 
financial instruments" for the five banks 
listed by the EU for debt and equity 
prohibitions will require authorization, only 
given if the they are within the average 
financial engagement of the past three years. 
\*\*Austria's original list was superceded by 
the shorter EU list; however, Austria has 
stated that it plans to add back those from 
original list (in gray)

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Viktor Alekseevich Ozerov	US	EU	SUI			AUS	AUST	NOR			<u> </u>		<b>└</b>
Vladimir Michailovich Dzhabarov	US	EU	SUI			AUS	AUST	NOR			<u> </u>		<b>└</b>
Andrei Aleksandrovich Klishas	US	EU	SUI	CAN		AUS	AUST	NOR			<u> </u>		<b>└</b>
Nikolai Ivanovich Ryzhkov	US	EU	SUI			AUS	AUST	NOR			<u> </u>		<b>└</b>
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Aleksandr Borisovich Totoonov	US	EU	SUI			AUS	AUST	NOR			<u> </u>		<b>└</b>
Oleg Evgenefich Panteleev	US	EU	SUI			AUS	AUST	NOR					<u> </u>
Sergei Mikhailovich Mironov	US	EU	SUI			AUS	AUST	NOR					<b>└</b>
Sergei Vladimirovich Zheleznyak	US	EU	SUI			AUS	AUST	NOR					
Leonid Eduardovich Slutski	US	EU	SUI	CAN		AUS	AUST	NOR					
Dmitry Olegovich Rogozin	US	EU	SUI	CAN		AUS	AUST	NOR					
Sergey Yur'yevich Glazyev	US	EU	SUI	CAN		AUS	AUST	NOR					
Vladislov Yuryevich Surkov	US	EU	SUI	CAN		AUS	AUST	NOR					
Yelena Borisovna Mizulina	US	EU	SUI	CAN		AUS	AUST	NOR					
Valentina Ivaonovna Matvienko	US	EU	SUI	CAN		AUS	AUST	NOR					
Sergey Naryshkin	US	EU	SUI	CAN	LIE	AUS	AUST	NOR					<u> </u>
Victor Ivanov	US			CAN									
Igor Sergun	US	EU	SUI	CAN	LIE	AUS	AUST	NOR					
Sergei Ivanov	US			CAN			AUST						
Alexei Gromov	US	EU	SUI	CAN		AUS	AUST	NOR					
Andrei Fursenko	US			CAN			AUST						
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Vladimir Kozhin	US			CAN			AUST						
Mikhail Vitalevich Margelov				CAN									
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Yury Viktorovich Ushakov				CAN									
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Vitalii Nikitich Ignatienko				CAN									
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Vyaecheslav Volodin	US	EU	SUI	CAN			AUST	NOR					
Dmitry Kozak	US	EU	SUI	CAN		AUS	AUST	NOR					
Aleksey Pushkov	US			CAN			AUST						
Alexander Babakov				CAN									
Oleg Belaventsev	US	EU	SUI	CAN		AUS	AUST	NOR					
Yevgeniy Murov	US			CAN									
Oleg Savelyev	US	EU	SUI	CAN		AUS	AUST	NOR					
Ludmila Shvetsova		EU	SUI	CAN		AUS		NOR					
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Nikolai Platonovich Patrushev		EU	SUI	CAN		AUS		NOR					
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Arkady Rotenberg	US	EU	SUI	CAN		AUS	AUST	NOR					
Boris Rotenberg	US			CAN			AUST						
Yuri Kovalchuk	US	EU	SUI	CAN		AUS	AUST	NOR					
Igor Sechin	US												
Sergey Chemezov	US	EU	SUI			AUS				<u> </u>	1		
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Alexander Mikhailovich Babakov		EU	SUI			AUS							
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Valery Gerasimov	1	EU	SUI	CAN		AUS		NOR		<u> </u>	<u> </u>		<u> </u>
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Sergei Ivanovich Menyailo	US	EU	SUI	CAN		AUS		NOR	JPN		1		
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Valery Medvedev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				
Sergey Aksyonov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
Vladimir Konsantinov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
Viktor Medvechuck	US						AUST						
Rustam Illmirovich Ternigaliev	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
Deniz Valentinovich Berezovskiy		EU	SUI		LIE	AUS	AUST	NOR	JPN		1		
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Sergei Pavlovych Tsekov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
Viktor Fedorovych Yanukovych	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				
Vitalii Yuriyovych Zakharchenko		EU	SUI	CAN	LIE	AUS		NOR					
Viktor Pavlovych Pshonka		EU	SUI	CAN	LIE	AUS		NOR					
Oleksandr Hryhorovych Yakymenko		EU		CAN		AUS		NOR					
Andriy Volodymyrovych Portnov	1	EU		CAN		AUS		NOR					1
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Viktor Viktorovych Yanukovych	1	EU		CAN		AUS		NOR		<u> </u>	<u> </u>		<u> </u>
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Mykola Yanovych Azarov		EU	SUI	CAN	LIE	AUS		NOR					
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Serhiy Vitaliyovych Kurchenko	1	EU		CAN		AUS	İ	NOR					1
Dmytro Volodymyrovych Tabachnyk	1	EU		CAN		AUS	1	NOR		<u> </u>	<b>†</b>	<u> </u>	t
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Mykhaylo (Mikhail) Markovych Dobkin	1		SUI	-	LIE	AUS	<u> </u>			<b>!</b>	<u> </u>	<u> </u>	<u> </u>
Yuriy Ivanyushchenko	1	ļ	SUI		LIE	AUS	ļ			<u> </u>	<u> </u>	<u> </u>	<u> </u>
Hennadiy Adolfovych Kernes	1	1	SUI		LIE	AUS					<u> </u>	<u> </u>	
Borys Viktoryovych Kolesnikov			SUI		LIE	∟_				_	ш_		
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Volodymyr Vasylovych Kozak			SUI		LIE								
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Oleksander Victorovych Klymenko Valeriy Koryak		EU	301			AUS							

Yuriy Ivanyushchenko	1										$\overline{}$	$\overline{}$	
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German Prokopiv		EU	SUI	CAN	LIE	AUS		NOR	JPN		1	$\top$	<b>†</b>
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Valeriy Bolotov	US		SUI	CAN		AUS			JPN	Ь—	<b>⊥</b>	$\bot$	ـــــ
Andriy Purgin	US	EU	SUI	CAN	LIE	AUS		NOR	JPN				
Denys Pushylin	US	EU	SUI	CAN		AUS	AUST	NOR	JPN			1	
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Viacheslav Ponomariov	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN		+	†	<del>†                                      </del>
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Igor Mykolaiovych Bezler	US	EU	SUI	CAN		AUS		NOR	JPN				Ь.
Igor Kakidzyanov		EU	SUI	CAN		AUS		NOR	JPN	1			
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Roman Lyagin		EU	SUI	CAN		AUS		NOR	JPN				Ь.
Aleksandr Malykhin		EU	SUI	CAN	LIE	AUS		NOR	JPN	1			
Natalia Vladimirovna Poklonskaya	US	EU	SUI	CAN	LIE	AUS		NOR	JPN		+	†	<del>†                                      </del>
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Igor Sergeievich Chetchenko (aka Shevchenko)		EU	SUI	CAN	LIE	AUS		NOR	JPN				Ь.
Valery Vladimirovich Kaurov	US	EU	SUI	CAN		AUS		NOR	JPN	1			
Alexander Borodai	US	EU	SUI	CAN		AUS		NOR	JPN		1		1
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Alexander Khodakovsky		EU	SUI	CAN		AUS		NOR	JPN				Ь.
Alexandr Alexsandrovich Kalyussky		EU	SUI	CAN		AUS		NOR	JPN	1			
Alexandr Khryakov	US	EU	SUI	CAN		AUS		NOR	JPN		1		1
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Marat Bashirov	ļ	EU	SUI	CAN		AUS		NOR	JPN	—	+	+	₩
Vasyl Nikitin		EU	SUI	CAN		AUS		NOR	JPN	1	1	1	
Aleksey Karyakin	US	EU	SUI	CAN		AUS		NOR	JPN	$\overline{}$	1	1	T
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Yuriy Ivakin		EU	SUI	CAN		AUS		NOR	JPN			Ь—	₩
Igor Plotnitsky	US	EU	SUI		_	AUS		NOR	JPN	1	1	1	1
Nikolay (Mykola) Kozitsyn	US	EU	SUI	CAN		AUS		NOR	JPN	-	+	+	<b>†</b>
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Pavel Gubarev	US	EU	SUI	CAN		AUS		NOR	JPN		T	T	T
Ekaterina Gubareva		EU	SUI	CAN		AUS		NOR	JPN		+	+	<del>†                                      </del>
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Vostok Battalion		EU	SUI	CAN		AUS		NOR	JPN				
Vladimir Antyufeyev (aka Vladimir Shevtsov)	US	EU	SUI	CAN		AUS		NOR	JPN				
Oksana Tchigrina		EU	SUI	CAN		AUS		NOR	JPN		+	+	<del>†                                      </del>
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Luhansk Economic Union		EU							JPN				
Donbass People's Militia	US												
Marshall Capital Fund	US										ļ		
Dmitry Neklyudov	US										-		
Novorossiya Party	US												
Oplot  Detr Sayabanka	US										-		
Petr Savchenko Oleh Tsaryov	US												
South-East Movement (Yugo-Vostok Movement)	US										<u> </u>		
Night Wolves	US												
Aleksandr Zaldostanov	US										<b>†</b>		
Crimean Entities		•	•								•		_
Chernomorneftegaz	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				
Feodosia (Feodosiya Enterprise)	US	EU	SUI	CAN	LIE	AUS		NOR	JPN				
State ferry enterprise "Kerch ferry"		EU	SUI	CAN		AUS		NOR					
State enterprise "Sevastopol commercial seaport"		EU	SUI	CAN		AUS		NOR					
State enterprise "Kerch commercial seaport"		EU	SUI	CAN		AUS		NOR					
State enterprise Universal - Avia		EU	SUI	CAN		AUS		NOR					
Resort Nizhnyaya Oreanda		EU	SUI	CAN		AUS		NOR					
Crimean enterprise "Azov distillery plant"		EU	SUI	CAN		AUS		NOR					
State concern "National Association of producers Massandra"		EU	SUI	CAN		AUS		NOR					
State enterprise Magarach of the national institute of wine		EU	SUI	CAN		AUS		NOR					
State enterprise "Factory of sparkling wine Novy Svet"		EU	SUI			AUS		NOR					
Russian National Commercial Bank	<u> </u>	EU	SUI	CAN		AUS		NOR					
Russian Entities (*Captured in EU sectoral measure, see below)													
Bank Rossiya	US		<u> </u>	CAN		Ш	AUST			<u> </u>	<u> </u>	<u> </u>	
SMP Bank	US			CAN			AUST					<u> </u>	
InvestKapitalBank	US			CAN			AUST						
Volga Group	US		<u> </u>	CAN		Ш	AUST			<u> </u>	1	<u> </u>	
Aquanika	US		<u> </u>	CAN			AUST			<u> </u>	1	<u> </u>	
CJSC Zest	US		<u> </u>	CAN		Ш					1	<u> </u>	
JSB Sobin Bank	US			CAN									
Avia Group LLC	US			CAN			AUST						
Avia Group Nord LLC	US			CAN			AUST						
Sakhatrans LLC	US			CAN									
Stroytransgaz Group	US			CAN			AUST				ļ		
Stroytransgaz Holding	US			CAN							ļ		
Stroytransgaz LLC	US		ļ	CAN							-		
Stroytransgaz OJSC	US			CAN							ļ		
Stroytransgaz-M LLC	US			CAN							-		-
Limited Liability Company Investment Company	US			CAN			ALIOT				-		
Transoil	US			CAN			AUST				-		
Stroygazmontazh	03			CAN			AUST				-		
ExpoBank  ResEparate Park		-	<u> </u>	CAN	-	$\vdash$			-	-	-	-	
RosEnergoBank Almaz-Antey	US	EU	SUI			AUS		NOR					
Allidz-Alitey	03	EU	301	CAN		AUS		NOR					
Federal State Unitary Enterprise State Research and Production Enterprise Bazalt	US			CAN									
JSC Concern Sozvezdie	US		<del>                                     </del>	CAN						<del>                                     </del>	<del>                                     </del>	<u> </u>	
JSC MIC NPO Mashinostroyenia	US			CAN							<u> </u>		
Kalishnikov Concern	US	*	<del>                                     </del>	CAN						<del>                                     </del>	<del>                                     </del>	<u> </u>	
KBP Instrument Design Bureau	US			CAN							<u> </u>		
Radio-Electronic Technologies	US			CAN									
Uralvagonzavod	US	*	<u> </u>								1		
United Shipbuilding Corporation	US			CAN							<b>†</b>		
Dobrolet (aka Dobrolyot)		EU	SUI	CAN		AUS		NOR			1		
OAO Dolgoprudny Research Production Enterprise	US			CAN						l		t	
Mytishchinski Mashinostroitelny Zavod, OAO	US			CAN							1	Ì	
Kalinin Machine Plan JSC	US			CAN									
Almaz-Antey GSKB	US												
JSC NIIP	US			CAN									
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Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")	- 00			CAN									
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Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")  Executive Order 13662 - Sectoral Sanctions  Financial Instituions - New Debt and Equity Prohibition (*Not specifically listed but Sberbank  VTB Bank OAO  VEB  Gazprombank OAO	US US US US US	EU EU EU	SUI SUI SUI	f a de CAN CAN CAN CAN	signat	ed bar	nk)	NOR NOR	JPN JPN JPN				
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Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")  Executive Order 13662 - Sectoral Sanctions  Financial Instituions - New Debt and Equity Prohibition (*Not specifically listed but Sberbank  VTB Bank OAO  VEB  Gazprombank OAO  Bank of Moscow  Russian Agricultural Bank (aka Rosselkhozbank)	US US US US US US	EU EU EU EU *	SUI SUI SUI SUI	f a de CAN CAN CAN CAN	signat	ed bar	nk)	NOR NOR NOR	JPN JPN JPN				
Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")  Executive Order 13662 - Sectoral Sanctions  Financial Instituions - New Debt and Equity Prohibition (*Not specifically listed but Sberbank  VTB Bank OAO  VEB  Gazprombank OAO  Bank of Moscow  Russian Agricultural Bank (aka Rosselkhozbank)  Energy Companies - Debt Prohibition  Rosneft	US US US US US US US US	EU EU EU *	SUI SUI SUI SUI *	f a de CAN CAN CAN CAN	signat		nk)	NOR NOR * NOR	JPN JPN JPN				
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Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")  Executive Order 13662 - Sectoral Sanctions  Financial Instituions - New Debt and Equity Prohibition (*Not specifically listed but Sberbank  VTB Bank OAO  YEB  Gazprombank OAO  Bank of Moscow  Russian Agricultural Bank (aka Rosselkhozbank)  Energy Companies - Debt Prohibition  Rosneft  OAO Novatek  Gazprom Neft  AK Transneft OAO  Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU apply are not applied to specific companies but cover their provision "in Russia")  OAO Gazprom	US U	EU E	SUI SUI SUI SUI * SUI SUI SUI	f a de CAN CAN CAN CAN CAN		AUS AUS S, Serv		NOR NOR * NOR NOR NOR	JPN JPN * JPN				
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Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")  Executive Order 13662 - Sectoral Sanctions  Financial Instituions - New Debt and Equity Prohibition (*Not specifically listed but Sberbank  VTB Bank OAO  VEB  Gazprombank OAO  Bank of Moscow  Russian Agricultural Bank (aka Rosselkhozbank)  Energy Companies - Debt Prohibition  Rosneft  OAO Novatek  Gazprom Neft  AK Transneft OAO  Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU apply are not applied to specific companies but cover their provision "in Russia")  OAO Gazprom	US U	EU EV EV extrictions on	SUI SUI SUI SUI * SUI SUI SUI	f a de CAN CAN CAN CAN CAN		AUS AUS S, Serv		NOR NOR * NOR NOR NOR NOR NOR nod techni	JPN JPN * JPN				

Defense and Related Material Companies - Debt Prohibition (*Captured as 50%-own	ned subsidiary of	Rostec; **De	signat	ed as	full aset fr	eze, no	ted abov	/e)				
Rostec	US											
OPK Oboronprom	*	EU	SUI		AU	6	NOR					
United Aircraft Corporation		EU	SUI		AU	6	NOR					
Uralvagonzavod	**	EU	SUI		AU	3	NOR					
(*Designated as full asset freeze, noted above)  JSC Sirius	I	EU	SUI		AU	6	NOR		I	l		
ICC Civing	I	EII	CIII		ALL		NOP		_			
OJSC Stankoinstrument		EU	SUI		AU		NOR			ļ	<u> </u>	ـــــ
OAO JSC Chemcomposite	*	EU	SUI		AU		NOR		-		-	-
JSC Kalashnikov	*	EU	-		AU:	_	NOR		<u> </u>		<u> </u>	ļ
JSC Tula Arms Plant		EU	SUI		AU	5	NOR				<u> </u>	
NPK Tchnologii Maschinostrojenija		EU	SUI		AU	6	NOR					
OAO Wysokototschnye Kompleski		EU	SUI		AU	6	NOR					
OAO Almaz Antey		EU	SUI		AU	6	NOR					
OAO NPO Bazalt		EU	SUI		AU	6	NOR					

Russia/Former Government of Ukraine-related Designations - Persons (as of January 5, 2014)

US: United States
EU: European Union
SUI: Switzerland\*
CAN: Canada
LIE: Liechtenstein\*
AUST: Australia
JPN: Japan
NOR: Norway

\*Switzerland and Liechtenstein have issued 
"anti-circumvention" measures for many of 
the EU designated individuals and entities. 
These measures prohibit their financial 
institutions from entering into new business 
relationships with these individuals and 
entities (these measures short of asset freezes 
are denoted by black stripes). Likewise, in 
Switzerland, "new issue of long term 
financial instruments" for the five banks 
listed by the EU for debt and equity 
prohibitions will require authorization, only 
given if the they are within the average 
financial engagement of the past three years. 
\*\*Austria's original list was superceded by 
the shorter EU list; however, Austria has 
stated that it plans to add back those from 
original list (in gray)

Executive Orders 13660 and 13661 - Asset Freezes													
Russian Officials													
Viktor Alekseevich Ozerov	US	EU	SUI		LIE	AUS	AUST	NOR					
Vladimir Michailovich Dzhabarov	US	EU	SUI			AUS	AUST	NOR			†		T
Andrei Aleksandrovich Klishas	US	EU	SUI	CAN		AUS	AUST	NOR					┢
Nikolai Ivanovich Ryzhkov	US	EU	SUI			AUS	AUST	NOR					┢
Evegni Viktorovich Bushmin	US	EU	SUI			AUS	AUST	NOR					┢
Aleksandr Borisovich Totoonov	US	EU	SUI			AUS	AUST	NOR					┢
Oleg Evgenefich Panteleev	US	EU	SUI			AUS	AUST	NOR					┢
Sergei Mikhailovich Mironov	US	EU	SUI			AUS	AUST	NOR			$\vdash$	$\vdash$	┢
Sergei Vladimirovich Zheleznyak	US	EU	SUI			AUS	AUST	NOR			<del>                                     </del>		┢
Leonid Eduardovich Slutski	US	EU	SUI	CAN		AUS	AUST	NOR		-	$\vdash$	<del>                                     </del>	┢
Dmitry Olegovich Rogozin	US	EU	SUI			AUS	AUST	NOR		-	$\vdash$	<del>                                     </del>	┢
Sergey Yur'yevich Glazyev	US	EU	SUI	CAN		AUS	AUST	NOR		-	$\vdash$	<del>                                     </del>	┢
Vladislov Yuryevich Surkov	US	EU	SUI	CAN		AUS	AUST	NOR		-	$\vdash$	<del>                                     </del>	┢
Yelena Borisovna Mizulina	US	EU	SUI	CAN		AUS	AUST	NOR		-	$\vdash$	<del>                                     </del>	┢
Valentina Ivaonovna Matvienko	US	EU	SUI	CAN		AUS	AUST	NOR		-	$\vdash$	<del>                                     </del>	┢
Sergey Naryshkin	US	EU	SUI	CAN		AUS	AUST	NOR		-	$\vdash$	<del>                                     </del>	┢
Victor Ivanov	US		301	CAN		AUU	A001	NOK	1	-	$\vdash$	<del>                                     </del>	┢
Igor Sergun	US	EU	SUI	CAN	LIE	AUS	AUST	NOR		-	$\vdash$	<del>                                     </del>	┢
Sergei Ivanov	US		301	CAN		AUU	AUST	NOK	1	-	$\vdash$	<del>                                     </del>	┢
Alexei Gromov	US	EU	SUI	CAN		AUS	AUST	NOR	_		<del>                                     </del>		╁
Andrei Fursenko	US		301	CAN		AUS	AUST	NOK			<b>├</b>	├──	├
Vladimir Yakunin	US		+	CAN			AUST		+-		<b>├</b>	├──	├
Vladimir Kozhin	US		+	CAN			AUST		+-		<b>├</b>	├──	├
Mikhail Vitalevich Margelov	- 03		+	CAN			AUST		+-		<b>├</b>	├──	├
Vladimir Pliqin		EU	SUI	CAN	LIE	AUS		NOR	_		<b>├</b>	├──	├
Yury Viktorovich Ushakov		LU	301	CAN	LIL	AUS		NOK			<b>├</b>	├──	├
Dmitry Konstantinovich Kiselyov		EU	SUI	UAIT	LIE	AUS		NOR	_		-		╁
Vitalii Nikitich Ignatienko		LU	301	CAN	LIL	AUS		NOK			<b>├</b>	├──	├
Arkadii Viktorovich Bahkin		+	+	CAN					+-		<b>├</b>	├──	├
Vyaecheslav Volodin	US	EU	SUI	CAN	LIE		AUST	NOR	_		<del>                                     </del>		╁
Dmitry Kozak	US	EU	SUI	CAN		AUS	AUST	NOR			<del>                                     </del>		╁
Aleksey Pushkov	US	LO	301	CAN	LIL	AUS	AUST	NOK	1		<del>                                     </del>		╁
Alexander Babakov	- 03		+	CAN	_		AUST		+-		-	$\vdash$	⊢
Oleg Belaventsev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	_		-	$\vdash$	₩
Yevgeniy Murov	US	EU	301	CAN	LIE	AUS	AUST	NOK	₩		-	$\vdash$	₩
Oleg Savelyev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	_		<b>├</b>	├──	├
Ludmila Shvetsova	- 03	EU	SUI			AUS	AUST	NOR			<del>                                     </del>		╁
Sergei Neverov	US	EU	SUI			AUS		NOR		-	$\vdash$	<del>                                     </del>	┢
Vladimir Zhirinovsky			001	CAN		700		HOIL	1		<del>                                     </del>		┢
Sergey Beseda	US	EU	SUI			AUS		NOR			<del>                                     </del>		┢
Igor Shchegolev	US		301	CAN		700		NOK			_		$\vdash$
Mikhail Efimovich Fradkov		EU	SUI	CAN		AUS		NOR		-	$\vdash$	<del>                                     </del>	┢
Nikolai Platonovich Patrushev		EU	SUI			AUS		NOR			<del>                                     </del>		╁
Aleksandr Vailievich Bortnikov		EU	SUI	CAN	$\vdash$	AUS		NOR	_	<b>!</b>	<del>                                     </del>	$\vdash$	$\vdash$
Rashid Gumarovich Nurgaliev		EU	SUI		<u> </u>	AUS		NOR	_	<b>!</b>	<del>                                     </del>	$\vdash$	$\vdash$
Boris Vyacheslavovich Gryzlov		EU	SUI		$\vdash$	AUS		NOR	_	<b>!</b>	<del>                                     </del>	$\vdash$	$\vdash$
Mikhail Vladimirovich Degtyarev		EU	SUI	CAN	$\vdash$	AUS		NOR	_	<b>!</b>	<del>                                     </del>	$\vdash$	$\vdash$
Ramzan Akhmadovitch Kadyrov		EU	SUI	CAN	$\vdash$	AUS		NOR	_	<b>!</b>	<del>                                     </del>	$\vdash$	$\vdash$
Alexander Nikolayevich Tkachyov		EU	SUI		$\vdash$	AUS		NOR	_	-	$\vdash$	$\vdash$	$\vdash$
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Vladimir Georgyevich Kulishov		+	-	CAN	-	-		-	+-	<u> </u>	$\vdash$	$\vdash$	$\vdash$
Valerii Yuriovych Travkin		EII	CLU		_	ALIC		NOD	_	1	<del>                                     </del>	$\vdash$	$\vdash$
Yuri Leonidovich Vorobiov		EU	SUI	CAN	├	AUS		NOR		1	<b>├</b>	Ь—	₩
Vladimir Volfovich Zhirinovsky		EU	SUI			AUS		NOR		1		Щ.	Ш.

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Vladimir Abdualiyevich Vasilyev		EU	SUI	CAN		AUS		NOR					
Viktor Petrovich Vodolatsky		EU	SUI	CAN		AUS		NOR					
Leonid Ivanovich Kalashnikov		EU	SUI	CAN		AUS		NOR					
Vladimir Stepanovich Nikitin		EU	SUI	CAN		AUS		NOR					
Oleg Vladimirovich Lebedev		EU	SUI	CAN		AUS		NOR					
Ivan Ivanovich Melnikov		EU	SUI	CAN		AUS		NOR					
Igor Vladimirovich Lebedev		EU	SUI	CAN		AUS		NOR				T	
Nikolai Vladimirovich Levichev		EU	SUI	CAN		AUS		NOR			<u> </u>	$\vdash$	
Svetlana Sergeevna Zhurova		EU	SUI	CAN		AUS		NOR				$\vdash$	-
Aleksey Vasilevich Naumets		EU	SUI	OAIT		AUS		NOR			<del>                                     </del>	$\vdash$	
Russian Cronies			301			700		NOK					
Gennady Timchenko	US			CAN			AUST					-	
Arkady Rotenberg	US	EU	SUI	CAN		AUS	AUST	NOR					$\vdash$
Boris Rotenberg	US		301	CAN		AUS	AUST	NOK					$\vdash$
Yuri Kovalchuk	US	EU	SUI	CAN	_	AUS	AUST	NOR			-	₩	$\vdash \vdash$
Igor Sechin	US	E0	301	CAN		AUS	AUST	NOK			-	₩	$\vdash$
	US	EU	SUI			AUS					-	₩	$\vdash$
Sergey Chemezov  Konstantin Melefovov	US	EU	SUI	CAN		AUS		NOR			-	₩	$\vdash$
Konstantin Malofayev	05	EU	SUI	CAN		AUS		NOR				<u> </u>	<u> </u>
Nikolay Shamalov				CAN				NOR				<u> </u>	<b>—</b>
Alexander Mikhailovich Babakov		EU	SUI			AUS							
Russian Military													
Alexander Vitko		EU	SUI		LIE	AUS	AUST	NOR					<u> </u>
Anatoly Alekseevich Sidorov		EU	SUI	匚	LIE	AUS	AUST	NOR	oxdot		oxdot	$\Box$	
Aleksandr Galkin		EU	SUI	_	LIE	AUS	AUST	NOR					ı —
Alexander Mihailovich Nosatov		EU	SUI		LIE	AUS		NOR					
Valery Vladimirovich Kulikov		EU	SUI		LIE	AUS		NOR					
Lt. Gen. Igor Turchenyuk		EU	SUI	Ĺ	LIE	AUS		NOR					
Valery Gerasimov		EU	SUI	CAN	LIE	AUS		NOR					
Vladimir Shamanov		EU	SUI	CAN	LIE	AUS		NOR					
General Dmitry Vitalievich Bulgakov				CAN									
Lieutenant-General Yuriy Eduardovich Sadovenko				CAN								$\vdash$	
Colonel-General Oleg Leonidovich Salyukov				CAN								$\vdash$	
Colonel-General Nikolay Bogdanovskiy				CAN								$\vdash$	
Farmer Illusinian Community Illusinian Community (Community Entities													
Former Ukrainian Government/ Ukrainian Separatists / Separatist Entities													
Igor Strelkov (Ihor Strielkov)	US	EU	SUI	CAN		AUS	AUST	NOR	JPN				<u> </u>
Sergei Ivanovich Menyailo	US	EU	SUI	CAN		AUS		NOR	JPN				
Mikhail Malyshev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				
Valery Medvedev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN			T	$\Box$
Sergey Aksyonov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN			$\vdash$	· '
Vladimir Konsantinov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN			$\vdash$	
Viktor Medvechuck	US						AUST					$\vdash$	
Rustam Illmirovich Ternigaliev	US	EU	SUI		LIE	AUS	AUST	NOR	JPN			$\vdash$	
Deniz Valentinovich Berezovskiy		EU	SUI		LIE	AUS	AUST	NOR	JPN			$\vdash$	-
Aleksei Mikhailovich Chaily	US	EU	SUI		LIE	AUS	AUST	NOR	JPN			$\vdash$	-
Pyotr Anatoliyovych Zima	US	EU	SUI		LIE	AUS	AUST	NOR	JPN			$\vdash$	-
Yuriy Zherebtsov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN			$\vdash$	-
Sergei Pavlovych Tsekov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN			$\vdash$	-
Viktor Fedorovych Yanukovych	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN			$\vdash$	
Vitalii Yuriyovych Zakharchenko	- 55	EU	SUI	CAN	LIE	AUS	ACCI	NOR	01.14			$\vdash$	$\vdash \vdash$
Viktor Pavlovych Pshonka		EU	SUI	CAN	LIE	AUS		NOR				$\vdash$	$\vdash \vdash$
·	-	EU	301	CAN	LIL	AUS		NOR				<del>                                     </del>	$\vdash$
Oleksandr Hryhorovych Yakymenko				CAN		_		NOR				<u> </u>	$\vdash \vdash$
Andriy Volodymyrovych Portnov		EU EU	SUI	CAN	1.15	AUS		NOR				<u> </u>	$\vdash \vdash$
Olena Leonidivna Lukash			SUI									<u> </u>	$\vdash \vdash$
Andrii Petrovych Kliuiev		EU	501	CAN	LIE	AUS		NOR				<u> </u>	$\vdash \vdash$
Viktor Ivanovych Ratushniak		EU EU	SUI	CAN	Lie	AUS		NOR	<u> </u>	-	1	$\vdash$	$\vdash$
Oleksandr Viktorovych Yanukovych Viktor Viktorovych Yanukovych		EU	301	CAN	LIE	AUS		NOR NOR	-	-	<del>                                     </del>	┝─╵	$\vdash$
Artem Viktorovych Pshonka		EU		CAN	-	AUS			-	-	<del>                                     </del>	┝─╵	$\vdash$
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Raisa Vasylivna Bohatyriova	1	EU	SUI	CAN	LIE	AUS		NOR	<u> </u>	-	<u> </u>	<del>                                     </del>	$\vdash\vdash\vdash$
Ihor Oleksandrovych Kalinin	1	EU	CLII	CAN	1.0	AUS		NOR	<u> </u>	-	<u> </u>	<del>                                     </del>	$\vdash \vdash$
Serhiy Abruzov	1	EU	SUI	$\vdash$	LIE	AUS		NOR	-	-	<u> </u>	<b>├</b> ─	${f H}$
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Yuriy Ivanyushchenko			SUI	<u> </u>	LIE	AUS			-	-	<u> </u>	<b>├</b> ─	ш
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Eduard Anatoliyovych Stavytsky		EU	SUI		LIE	AUS		NOR			<u> </u>	<u> </u>	
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Olga Fedorovna Kovatidi		EU	SUI	CAN		AUS	AUST	NOR	JPN		1	1	
German Prokopiv	1	EU	SUI	CAN		AUS		NOR	JPN	-	1	1	
Valeriy Bolotov	US	EU	SUI	CAN		AUS		NOR	JPN	$\vdash$	+	+	<del>                                     </del>
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Andriy Purgin	US	EU	SUI	CAN		AUS		NOR	JPN		$\bot$	$oldsymbol{ol}}}}}}}}}}}}}}}}}$	<u> </u>
Denys Pushylin	US	EU	SUI	CAN		AUS	AUST	NOR	JPN			<u> </u>	
Sergey Gennadevich Tsyplakov		EU	SUI	CAN		AUS		NOR	JPN		T	T	
Petr Grigorievich Jarosh	1	EU	SUI	CAN		AUS		NOR	JPN		+	1	<del></del>
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Roman Lyagin		EU	SUI	CAN		AUS		NOR	JPN		$\bot$	$oldsymbol{ol}}}}}}}}}}}}}}}}}$	<u> </u>
Aleksandr Malykhin		EU	SUI	CAN	LIE	AUS		NOR	JPN				
Natalia Vladimirovna Poklonskaya	US	EU	SUI	CAN		AUS		NOR	JPN		1	1	i e
Igor Sergeievich Chetchenko (aka Shevchenko)		EU	SUI	CAN		AUS		NOR	JPN		+	+	$\vdash$
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Alexander Borodai	US	EU	SUI	CAN		AUS		NOR	JPN				
Alexander Khodakovsky		EU	SUI	CAN		AUS		NOR	JPN		1	1	
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Alexandr Khryakov	US	EU	SUI	CAN		AUS		NOR	JPN			Ь	<u>L</u>
Marat Bashirov		EU	SUI	CAN		AUS		NOR	JPN				
Vasyl Nikitin		EU	SUI	CAN		AUS		NOR	JPN		1	1	
Aleksey Karyakin	-110	EU			-	AUS				$\vdash$	+-	+	$\vdash$
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Yuriy Ivakin		EU	SUI	CAN		AUS		NOR	JPN		Ш.	Ь.	Щ.
Igor Plotnitsky	US	EU	SUI			AUS		NOR	JPN	ı —		1	
Nikolay (Mykola) Kozitsyn	US	EU	SUI	CAN		AUS		NOR	JPN	$\overline{}$	1	1	
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Oleksiy (Aleksey) Mozgovy	US	EU	SUI	CAN	_	AUS		NOR	JPN	—	₩	+	Ь—
Victor Yuriiovych Anosov		<u> </u>		CAN			L		L_			<u></u>	
Viacheslav Anatoliiovych Apraksimov				CAN						1			
Fedir Dmytrovych Berezin	US	EU	SUI	CAN		AUS		NOR	JPN	$\overline{}$	+	1	
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Valerii Kostiantynovych Mussienko				CAN						ĺ			
Viacheslav Mykolaiovych Petrov				CAN							1	1	
Ihor Venedyktovych Plotnytsky			1	CAN		<del>                                     </del>	$\vdash$		<b>-</b>		+	+	$\vdash$
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Yurii Oleksandrovych Protsenko				CAN						<u> </u>		Ь	<u>L</u>
Oleh Anatoliiovych Vasin				CAN									
Serhii Anatolioyovych Zdriliuk		EU	SUI	CAN		AUS		NOR	JPN		1	1	1
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Luhansk People's Republic	US	EU	SUI	CAN		AUS		NOR	JPN	$\vdash$	₩	↓	<u> </u>
Donetsk People's Republic	US	EU	SUI	CAN		AUS		NOR	JPN				
Pavel Gubarev	US	EU	SUI	CAN		AUS		NOR	JPN	1			
Ekaterina Gubareva		EU	SUI	CAN		AUS		NOR	JPN		1	1	
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International Union of Public Associations "Great Don Army"		EU	SUI	CAN		AUS		NOR	JPN				<u> </u>
Sobol		EU	SUI	CAN		AUS		NOR	JPN	1			
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Army of the Southeast			SUI				$\Box$	NOR	JPN	-		₩	Ь—
Donbass People's Republic		EU	SUI	CAN		AUS		NOR	JPN	1			
Vostok Battalion		EU	SUI	CAN		AUS		NOR	JPN				
Vladimir Antyufeyev (aka Vladimir Shevtsov)	US	EU	SUI	CAN		AUS		NOR	JPN		+	+-	<b>†</b>
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Oksana Tchigrina	4	EU	SUI	CAN	_	AUS		NOR	JPN	—	₩		<u> </u>
Boris Litvinov		EU	SUI	CAN		AUS		NOR	JPN				
Sergey Abisov		EU	SUI	CAN	I	AUS		NOR		1		1	
Alexander Zakharchenko	US	EU	SUI	CAN		AUS		NOR	JPN	$\overline{}$	1	<b>†</b>	$\vdash$
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Vladimir Kononov		EU	SUI	CAN		AUS		NOR	JPN		Ь—	$\bot$	<b></b>
Miroslav Vladimirovich Rudenko							. 1			1	1	1	1
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Gennadiv Nikolajovych Tsypkalov	US									$\overline{}$	+-		
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Andrey Yurevich Pinchuk	US	EU EU	SUI	CAN CAN		AUS		NOR NOR					
Andrey Yurevich Pinchuk Oleg Bereza	US	EU	SUI SUI SUI	CAN		AUS AUS		NOR					
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Andrey Yurevich Pinchuk Oleg Bereza Andrei Nikolaevich Rodkin	US	EU EU EU	SUI SUI SUI	CAN CAN CAN		AUS AUS AUS		NOR NOR NOR	JPN				
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Luhansk Economic Union		EU							JPN				
Donbass People's Militia	US												
Marshall Capital Fund	US		ļ									<u> </u>	
Dmitry Neklyudov	US		-									_	
Novorossiya Party	US											-	
Oplot  Patr Sayabanka	US		-									-	
Petr Savchenko Oleh Tsaryov	US		1									+	
South-East Movement (Yugo-Vostok Movement)	US		1									1	
Night Wolves	US		1									1	
Aleksandr Zaldostanov	US												
Crimean Entities													
Chernomorneftegaz	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				П
Feodosia (Feodosiya Enterprise)	US	EU	SUI			AUS		NOR	JPN		1		
State ferry enterprise "Kerch ferry"		EU	SUI	CAN		AUS		NOR			1		
State enterprise "Sevastopol commercial seaport"		EU	SUI	CAN		AUS		NOR					
State enterprise "Kerch commercial seaport"		EU	SUI	CAN		AUS		NOR					
State enterprise Universal - Avia		EU	SUI	CAN		AUS		NOR					
Resort Nizhnyaya Oreanda		EU	SUI	CAN		AUS		NOR					
Crimean enterprise "Azov distillery plant"		EU	SUI	CAN		AUS		NOR					
State concern "National Association of producers Massandra"		EU	SUI	CAN		AUS		NOR					
State enterprise Magarach of the national institute of wine		EU	SUI	CAN		AUS		NOR					
State enterprise "Factory of sparkling wine Novy Svet"		EU	SUI	CAN		AUS		NOR					
Russian National Commercial Bank		EU	SUI	CAN		AUS		NOR					
Russian Entities (*Captured in EU sectoral measure, see below)													
Bank Rossiya	US			CAN			AUST						
SMP Bank	US			CAN			AUST						
InvestKapitalBank	US			CAN			AUST						
Volga Group	US			CAN			AUST						
Aquanika	US		1	CAN			AUST			<u> </u>	1	1	<u> </u>
CJSC Zest	US		1	CAN		Ш					1	1	<u> </u>
JSB Sobin Bank	US			CAN									
Avia Group LLC	US			CAN			AUST						
Avia Group Nord LLC	US			CAN			AUST						
Sakhatrans LLC	US		ļ	CAN								<u> </u>	
Stroytransgaz Group	US		ļ	CAN			AUST					<u> </u>	
Stroytransgaz Holding	US		-	CAN								_	
Stroytransgaz LLC	US			CAN						-		_	1
Stroytransgaz OJSC	US		-	CAN								_	
Stroytransgaz-M LLC	US		<del>                                     </del>	CAN					-	-	-	+	<u> </u>
Limited Liability Company Investment Company	US		1	CAN			AUST					-	
Transoil Stroygazmontazh	US		1	CAN			AUST					1	
Stroygazmontazh ExpoBank	03		1	CAN			AUST					1	
RosEnergoBank				CAN									
Almaz-Antey	US	EU	SUI			AUS		NOR					
Aillidz-Ailtey			301			700		NOK				1	
Federal State Unitary Enterprise State Research and Production Enterprise Bazalt	US			CAN									
JSC Concern Sozvezdie	US			CAN									
JSC MIC NPO Mashinostroyenia	US		1	CAN							1	1	
Kalishnikov Concern	US	*		CAN						<u> </u>	+		1
KBP Instrument Design Bureau	US			CAN									
Radio-Electronic Technologies	US			CAN									
Uralvagonzavod	US	*									1		
United Shipbuilding Corporation	US			CAN								1	
Dobrolet (aka Dobrolyot)		EU	SUI	CAN		AUS		NOR			1		
OAO Dolgoprudny Research Production Enterprise	US			CAN									
Mytishchinski Mashinostroitelny Zavod, OAO	US			CAN									
Kalinin Machine Plan JSC	US			CAN									
Almaz-Antey GSKB	US												
JSC NIIP	US			CAN								匚	匸
Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")				CAN									
Executive Order 13662 - Sectoral Sanctions													
Financial Instituions - New Debt and Equity Prohibition (*Not specifically listed bu	_				signat	ed bar	nk)						
Sberbank	US	EU		CAN				NOR	JPN				
VTB Bank OAO	US	EU	SUI					NOR	JPN		1	<u> </u>	<u> </u>
VEB	US	EU	SUI					NOR	JPN		1	1	<u> </u>
Gazprombank OAO	US	EU	SUI			Ш		NOR	JPN		1	1	1
			*	CAN				*	*		1	1	<u> </u>
Bank of Moscow	US	*											
Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank)		* EU	SUI	CAN				NOR	JPN				
Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank) Energy Companies - Debt Prohibition	US US	EU		CAN					JPN				
Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank)	US		SUI	CAN		AUS		NOR	JPN				
Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank) Energy Companies - Debt Prohibition	US US	EU		CAN		AUS			JPN				
Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank) <b>Energy Companies - Debt Prohibition</b> Rosneft OAO Novatek	US US	EU				AUS			JPN				
Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank) Energy Companies - Debt Prohibition Rosneft OAO Novatek Gazprom Neft	US US US	EU	SUI					NOR	JPN				
Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank) Energy Companies - Debt Prohibition Rosneft OAO Novatek Gazprom Neft AK Transneft OAO	US US US US US	EU EU EU	SUI SUI	CAN	provision	AUS AUS	qoods	NOR NOR					
Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank) Energy Companies - Debt Prohibition Rosneft OAO Novatek Gazprom Neft	US US US US US US US US , Norwegian and O	EU EU EU	SUI SUI	CAN	provisio	AUS AUS	goods,	NOR NOR NOR					
Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank) Energy Companies - Debt Prohibition Rosneft OAO Novatek Gazprom Neft AK Transneft OAO Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU	US US US US US US US US , Norwegian and O	EU EU EU	SUI SUI	CAN	provision	AUS AUS	goods,	NOR NOR NOR					
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Bank of Moscow Russian Agricultural Bank (aka Rosselkhozbank) Energy Companies - Debt Prohibition Rosneft  OAO Novatek Gazprom Neft AK Transneft OAO Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU technology apply are not applied to specific companies but cover their provision " OAO Gazprom Gazprom Neft	US , Norwegian and (in Russia") US US	EU EU EU Canadian rest	SUI SUI	CAN s on p	provision	AUS AUS on of c	goods,	NOR NOR NOR services					

Defense and Related Material Companies - Debt Prohibition (	*Captured as 50%-owned sub	sidiary of	Rostec; **De	signat	ed as	full aset	reeze	e, noted abo	ve)				
Rostec		US					Т						
OPK Oboronprom		*	EU	SUI		A	JS	NOR					
United Aircraft Corporation			EU	SUI		A	IS	NOR					
Uralvagonzavod		**	EU	SUI		A	IS	NOR					
JSC Sirius			EU	SUI			IS	NOR					匚
(*Designated as full asset freeze, noted above)													
										-	<u> </u>	<b>└</b>	₩
OJSC Stankoinstrument			EU	SUI			JS	NOR				<b>└</b>	
OAO JSC Chemcomposite			EU	SUI		A	JS	NOR					
JSC Kalashnikov		*	EU	SUI		A	JS	NOR					
JSC Tula Arms Plant			EU	SUI		A	IS	NOR					
NPK Tchnologii Maschinostrojenija			EU	SUI		A	IS	NOR					
OAO Wysokototschnye Kompleski			EU	SUI		A	IS	NOR					
OAO Almaz Antey			EU	SUI		A	JS	NOR					
OAO NPO Bazalt			EU	SUI		A	JS	NOR					

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# Comparison Sanctions Plans



Date: Thu, 19 Feb 2015 17:13:38 -0500

Attachments: 20150218 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (368.02 kB)



Here's the comparison chart I mentioned. Even though it's based on publicly available information (and classified Unclass/FOUO), please have your team treat it carefully and not circulate it.

Russia/Former Government of Ukraine-related Designations - Persons (as of February 18, 2015)

US: United States
EU: European Union
SUI: Switzerland\*
CAN: Canada
LIE: Liechtenstein\*
AUS: Australia
JPN: Japan
NOR: Norway

\*Switzerland and Liechtenstein have issued 
"anti-circumvention" measures for many of 
the EU designated individuals and entities. 
These measures prohibit their financial 
institutions from entering into new business 
relationships with these individuals and 
entities (these measures short of asset freezes 
are denoted by black stripes). Likewise, in 
Switzerland, "new issue of long term 
financial instruments" for the five banks 
listed by the EU for debt and equity 
prohibitions will require authorization, only 
given if the they are within the average 
financial engagement of the past three years. 
\*\*Austria's original list was superceded by 
the shorter EU list; however, Austria has 
stated that it plans to add back those from 
original list (in gray)

Executive Orders 13660 and 13661 - Asset Freezes											
Russian Officials											
Viktor Alekseevich Ozerov	US	EU	SUI			AUS	AUST	NOR			
Vladimir Michailovich Dzhabarov	US	EU	SUI			AUS	AUST	NOR			
Andrei Aleksandrovich Klishas	US	EU	SUI	CAN		AUS	AUST	NOR			
Nikolai Ivanovich Ryzhkov	US	EU	SUI			AUS	AUST	NOR			
Evegni Viktorovich Bushmin	US	EU	SUI			AUS	AUST	NOR			
Aleksandr Borisovich Totoonov	US	EU	SUI			AUS	AUST	NOR			
Oleg Evgenefich Panteleev	US	EU	SUI			AUS	AUST	NOR			
Sergei Mikhailovich Mironov	US	EU	SUI			AUS	AUST	NOR			
Sergei Vladimirovich Zheleznyak	US	EU	SUI			AUS	AUST	NOR			
Leonid Eduardovich Slutski	US	EU	SUI	CAN		AUS	AUST	NOR			
Dmitry Olegovich Rogozin	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Sergey Yur'yevich Glazyev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Vladislov Yuryevich Surkov	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Yelena Borisovna Mizulina	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Valentina Ivaonovna Matvienko	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Sergey Naryshkin	US	EU	SUI	CAN		AUS	AUST	NOR			
Victor Ivanov	US			CAN							
Igor Sergun	US	EU	SUI	CAN		AUS	AUST	NOR			
Sergei Ivanov	US			CAN			AUST				
Alexei Gromov	US	EU	SUI	CAN		AUS	AUST	NOR			
Andrei Fursenko	US			CAN			AUST				
Vladimir Yakunin	US						AUST				
Vladimir Kozhin	US			CAN			AUST				
Mikhail Vitalevich Margelov				CAN							
Vladimir Pligin		EU	SUI	CAN		AUS		NOR			
Yury Viktorovich Ushakov				CAN							
Dmitry Konstantinovich Kiselyov		EU	SUI	CAN	LIE	AUS		NOR			
Vitalii Nikitich Ignatienko				CAN							
Arkadii Viktorovich Bahkin				CAN							
Vyaecheslav Volodin	US	EU	SUI	CAN	LIE		AUST	NOR			
Dmitry Kozak	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Aleksey Pushkov	US			CAN			AUST				
Alexander Babakov				CAN							
Oleg Belaventsev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Yevgeniy Murov	US			CAN							
Oleg Savelyev	US	EU	SUI	CAN		AUS	AUST	NOR			
Ludmila Shvetsova		EU	SUI	CAN		AUS		NOR			
Sergei Neverov	US	EU	SUI	CAN	LIE	AUS		NOR			
Vladimir Zhirinovsky				CAN							
Sergey Beseda	US	EU	SUI	CAN		AUS		NOR			
Igor Shchegolev	US			CAN							
Mikhail Efimovich Fradkov		EU	SUI	CAN		AUS		NOR			
Nikolai Platonovich Patrushev		EU	SUI	CAN		AUS		NOR			
Aleksandr Vailievich Bortnikov		EU	SUI	CAN		AUS		NOR			
Rashid Gumarovich Nurgaliev		EU	SUI	CAN		AUS		NOR			
Boris Vyacheslavovich Gryzlov		EU	SUI	CAN		AUS		NOR			
Mikhail Vladimirovich Degtyarev		EU	SUI	CAN		AUS		NOR			
Ramzan Akhmadovitch Kadyrov		EU	SUI	CAN		AUS		NOR			
Alexander Nikolayevich Tkachyov		EU	SUI	CAN		AUS		NOR			
Vladimir Georgyevich Kulishov				CAN							
Valerii Yuriovych Travkin				CAN							
Yuri Leonidovich Vorobiov		EU	SUI	CAN		AUS		NOR			
Vladimir Volfovich Zhirinovsky		EU	SUI			AUS		NOR		Г	Г

Vladimir Abdualiyevich Vasilyev Viktor Petrovich Vodolatsky Leonid Ivanovich Kalashnikov													
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Vladimir Stepanovich Nikitin		EU	SUI	CAN		AUS		NOR			1		
Oleg Vladimirovich Lebedev		EU	SUI	CAN		AUS		NOR			+	$\vdash$	
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Ivan Ivanovich Melnikov		EU		CAN	_	AUS		NOR			₩	$\vdash$	-
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Nikolai Vladimirovich Levichev		EU	SUI	CAN		AUS		NOR			<u> </u>		
Svetlana Sergeevna Zhurova		EU	SUI	CAN		AUS		NOR					
Aleksey Vasilevich Naumets		EU	SUI	CAN		AUS		NOR					
Anatoly Ivanovich Antonov		EU		CAN		AUS					<b>†</b>	$\vdash$	
Arkady Viktorovich Bakhin		EU		07.00		AUS					+	$\vdash$	
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losif (Joseph) Davydovich Kobzon		EU		CAN		AUS					+	$\vdash$	
Valery Fedorovich Rashkin		EU		CAN		AUS					$\vdash$	ldot	
Russian Cronies													
Gennady Timchenko	US			CAN			AUST						
Arkady Rotenberg	US	EU	SUI	CAN		AUS	AUST	NOR					
Boris Rotenberg	US			CAN			AUST				†		
Yuri Kovalchuk	US	EU	SUI	CAN		AUS	AUST	NOR			<b>†</b>	$\vdash$	
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Konstantin Malofayev	US	EU	SUI	CAN		AUS		NOR		<u> </u>	₩	<b>└</b>	
Nikolay Shamalov		EU	SUI	CAN		AUS		NOR		<u> </u>	$\bot$		
Alexander Mikhailovich Babakov		EU	SUI	L	$L^{T}$	AUS				L		L	L
Russian Military													
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Alexander Mihailovich Nosatov		EU	SUI	CAN	LIE	AUS		NOR					
Valery Vladimirovich Kulikov		EU	SUI	CAN	LIE	AUS		NOR				Г	
Lt. Gen. Igor Turchenyuk		EU	SUI	CAN		AUS		NOR			t	┢	
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Valery Gerasimov				CAN							₩		
Vladimir Shamanov		EU	SUI	CAN	LIE	AUS		NOR			<b>↓</b>	igspace	
General Dmitry Vitalievich Bulgakov				CAN							oxdot		
Lieutenant-General Yuriy Eduardovich Sadovenko				CAN							<u> </u>		
Colonel-General Oleg Leonidovich Salyukov				CAN									
Colonel-General Nikolay Bogdanovskiy				CAN									
Andrei Veleryevich Kartapolov		EU		CAN		AUS					<b>†</b>	$\vdash$	
Former Ukrainian Government/ Ukrainian Separatists / Separatist Entities													
Igor Strelkov (Ihor Strielkov)	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN		-	-	
Sergei Ivanovich Menyailo	US	EU	SUI	CAN		AUS		NOR	JPN		†		
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Mikhail Malyshev		EU	SUI					NOR	JPN		ļ	$\perp$	
Valery Medvedev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				
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Valery Medvedev Sergey Aksyonov	US US	EU EU	SUI		LIE LIE	AUS AUS	AUST AUST	NOR NOR	JPN JPN				
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/iacheslav Anatoliiovych Apraksimov				CAN							T	T	П
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Oleh Tsaryov	US												
South-East Movement (Yugo-Vostok Movement)	US			CAN									
Night Wolves	US												
Aleksandr Zaldostanov	US			CAN									
Pavel Dremov aka Batya		EU		CAN		AUS							
Alexey Milchakov aka Fritz, Serbian		EU		CAN		AUS							H
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Uralvagonzavod	US	*										
United Shipbuilding Corporation	US			CAN								
Dobrolet (aka Dobrolyot)		EU	SUI	CAN	AUS		NOR					
OAO Dolgoprudny Research Production Enterprise	US			CAN								
Mytishchinski Mashinostroitelny Zavod, OAO	US			CAN								
Kalinin Machine Plan JSC	US			CAN								
Almaz-Antey GSKB	US											
JSC NIIP	US			CAN								
Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")				CAN								
Executive Order 13662 - Sectoral Sanctions												
Financial Instituions - New Debt and Equity Prohibition (*Not specifically listed	d but covered as 50%	owned subside	diary o	f a desi	ignated ba	nk)						
Sberbank	US	EU	SUI	CAN		T	NOR	JPN			$\Box$	
VTB Bank OAO	US	EU	SUI	CAN			NOR	JPN				
VEB	US	EU	SUI	CAN			NOR	JPN				
Gazprombank OAO	US	EU	SUI	CAN			NOR	JPN				
Bank of Moscow	US	*	*	CAN		1	*	*		l		
Russian Agricultural Bank (aka Rosselkhozbank)	US	EU	SUI	CAN			NOR	JPN				
Energy Companies - Debt Prohibition						1						
Rosneft	US	EU	SUI	CAN	AUS		NOR					
OAO Neverteli	US			CAN								
OAO Novatek												
Gazprom Neft	US	EU	SUI		AUS		NOR				l i	
Gazprom Neft AK Transneft OAO	US	EU	SUI		AUS		NOR					
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### RE: quick question - RU

(b)(6)From:

State (b)(6) (b)(6)(b)(6)To:

(b)(6)Cc:

Mon, 09 Mar 2015 09:30:43 -0400 Date:

Attachments: 20150226 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (356.08 kB)

Hi State (b)(6

I have attached the latest comparison chart which best illustrates where we have differences in sanctioned individuals and entities.

As far as the distinctions in our actual sanction tools, quickly off the top of my head ((b)(6) and (b)(6) please chime in with anything I'm. missing):

- Sanctions
  - We have sanctioned more inner circle/cronies (in particular Timchenko and Boris Rotenberg)
  - (b)(5)0
- Debt and equity bans
  - Across all sectors (energy, defense, and finance):
    - the EU has a carve out for trade finance supporting non-sanctioned trade by EU countries (not third countries
       the EU definition of equity is more narrow ((b)(6)) or (b)(6) should have more information on this)
  - - Our allowable maturity threshold is set at 90 days, while EU is at 30 days.
    - We imposed the debt and equity ban on Novatek, which is a private company but owned by a sanctioned individuals, while the EU did not
  - Defense
    - We imposed the financing ban on Rostec, which is a huge conglomerate, while the EU did a few smaller firms.
- Crimea ban
  - We both have bans on trade now. U.S. is more expansive, including investment (I think this was the distinction, (D)(5) and (b)(6)correct me if I'm wrong)

Here is our off the shelf background summary also:

Treasury has designated (e.g. imposed full blocking sanctions on) 74 individuals and 43 entities in Ukraine and Russia, including Russian government and legislative officials, separatist leaders, members of the Russian leadership's inner circle, and four banks. In addition, we have developed, in close cooperation with the EU, sanctions on a more narrow set of transactions for 14 companies. These measures include unique sanctions to raise costs of financing for Russian financial institutions and other companies by prohibiting dealing in new debt of various tenors and/or equity issued by Russia's six largest financial institutions, four energy firms, and one major defense conglomerate, focusing primarily on state-owned companies. We have also imposed a prohibition on the exploration and development of frontier oil projects in Russia that applies to a total of five energy companies, two of which are subject to the financing provision as well. Our G-7 partners and Australia have adopted similar measures across the same sectors. Finally, both the U.S. and EU have adopted bans on trade and investment in Crimea, with minor differences.

I do not know total for EU off the top of my head. Will see if I can find.

#### (b)(6)

From:

2015 9:16 AM State (b)(6) To:

Subject: Re: quick question - RU

(b)(6)in TFFC, who I believe has been tracking this

State (b)(6) From:

Sent: Monday. March 09, 2015 09:14 AM Eastern Standard Time

(b)(6)To: Subject: quick question - RU

Hello,

I don't suppose either of you have a very quick summary of the gaps between US and EU sanctions on RU? What we've done that they have not, and vice-versa? I need to put something together quickly for our Ambassador and Country Team in the next two hours. I know there are gaps around oligarchs, that some of the debt financing time thresholds differ, and that we used to be behind on Crimea (but not anymore)?

Also, do you happen to have total numbers of persons and entities sanctioned, both US and EU?

First Secretary, Economics / U.S. Embassy, London /

State (b)(6)

#### Russia/Former Government of Ukraine-related **Designations - Persons (as of February 26, 2015)**

US: United States EU: European Union AUS: Austria\*\* AUST: Australia JPN: Japan NOR: Norway

\*Switzerland and Liechtenstein have issued "anti-circumvention" measures for many of the EU designated individuals and entities These measures prohibit their financial institutions from entering into new business relationships with these individuals and SUI: Switzerland\* entities (these measures short of asset freezes CAN: Canada are denoted by black stripes). Likewise, in Switzerland, "new issue of long term are denoted by black stripes). Likewise, in Switzerland, "new issue of long term financial instruments" for the five banks listed by the EU for debt and equity prohibitions will require authorization, only given if the they are within the average financial engagement of the past three years \*\*Austria's original list was superceded by the shorter EU list; however, Austria has stated that it plans to add back those from original list (in gray)

Executive Orders 13660 and 13661 - Asset Freezes											
Russian Officials											
Viktor Alekseevich Ozerov	US	EU	SUI		LIE	AUS	AUST	NOR			
Vladimir Michailovich Dzhabarov	US	EU	SUI		LIE	AUS	AUST	NOR			
Andrei Aleksandrovich Klishas	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Nikolai Ivanovich Ryzhkov	US	EU	SUI		LIE	AUS	AUST	NOR			
Evegni Viktorovich Bushmin	US	EU	SUI		LIE	AUS	AUST	NOR			
Aleksandr Borisovich Totoonov	US	EU	SUI		LIE	AUS	AUST	NOR			
Oleg Evgenefich Panteleev	US	EU	SUI		LIE	AUS	AUST	NOR			
Sergei Mikhailovich Mironov	US	EU	SUI		LIE	AUS	AUST	NOR			
Sergei Vladimirovich Zheleznyak	US	EU	SUI		LIE	AUS	AUST	NOR			
Leonid Eduardovich Slutski	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Dmitry Olegovich Rogozin	US	EU	SUI	CAN		AUS	AUST	NOR			
Sergey Yur'yevich Glazyev	US	EU	SUI	CAN		AUS	AUST	NOR			
Vladislov Yuryevich Surkov	US	EU	SUI	CAN		AUS	AUST	NOR			
Yelena Borisovna Mizulina	US	EU	SUI	CAN		AUS	AUST	NOR			
Valentina Ivaonovna Matvienko	US	EU	SUI	CAN		AUS	AUST	NOR			
Sergey Naryshkin	US	EU	SUI	CAN		AUS	AUST	NOR		l	Г
Victor Ivanov	US			CAN							
Igor Sergun	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Sergei Ivanov	US		-	CAN			AUST				
Alexei Gromov	US	EU	SUI	CAN	_	AUS	AUST	NOR			
Andrei Fursenko	US		-	CAN	_		AUST				
Vladimir Yakunin	US		1				AUST				
Vladimir Kozhin	US		1	CAN			AUST				
Mikhail Vitalevich Margelov			1	CAN							
Vladimir Pliqin		EU	SUI	CAN	LIE	AUS		NOR			
Yury Viktorovich Ushakov				CAN							
Dmitry Konstantinovich Kiselyov		EU	SUI	CAN	LIE	AUS		NOR			
Vitalii Nikitich Ignatienko				CAN							
Vyaecheslav Volodin	US	EU	SUI	CAN	LIE		AUST	NOR			
Dmitry Kozak	US	EU	SUI	CAN		AUS	AUST	NOR			
Aleksey Pushkov	US			CAN			AUST				
Alexander Babakov			1	CAN							
Oleg Belaventsev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Yevgeniy Murov	US			CAN							
Oleg Savelyev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR			
Ludmila Shvetsova		EU	SUI	CAN	LIE	AUS		NOR			
Sergei Neverov	US	EU	SUI	CAN	LIE	AUS		NOR			
Vladimir Volfovich Zhirinovsky		EU	SUI	CAN		AUS		NOR			
Sergey Beseda	US	EU	SUI	CAN		AUS		NOR			
Igor Shchegolev	US			CAN							
Mikhail Efimovich Fradkov		EU	SUI	CAN		AUS		NOR			
Nikolai Platonovich Patrushev		EU	SUI	CAN		AUS		NOR			
Aleksandr Vailievich Bortnikov		EU	SUI	CAN		AUS		NOR			
Rashid Gumarovich Nurgaliev		EU	SUI	CAN		AUS		NOR			
Boris Vyacheslavovich Gryzlov	İ	EU	SUI	CAN		AUS		NOR			
Mikhail Vladimirovich Degtyarev		EU	SUI	CAN		AUS		NOR			
Ramzan Akhmadovitch Kadyrov		EU	SUI	CAN		AUS		NOR			
Alexander Nikolayevich Tkachyov		EU	SUI	CAN		AUS		NOR			
Vladimir Georgyevich Kulishov				CAN							
Valerii Yuriovych Travkin				CAN							
Yuri Leonidovich Vorobiov		EU	SUI	CAN		AUS		NOR			
Vladimir Abdualiyevich Vasilyev		EU	SUI			AUS		NOR			
Viktor Petrovich Vodolatsky		EU	SUI			AUS		NOR			$\overline{}$

Leonid Ivanovich Kalashnikov		EU	SUI	CAN		AUS		NOR					
Vladimir Stepanovich Nikitin		EU	SUI	CAN		AUS		NOR					
Oleg Vladimirovich Lebedev		EU	SUI	CAN		AUS		NOR					
Ivan Ivanovich Melnikov		EU	SUI	CAN		AUS		NOR			1		
Igor Vladimirovich Lebedev		EU	SUI	CAN		AUS		NOR					
Nikolai Vladimirovich Levichev		EU	SUI	CAN		AUS		NOR					
Svetlana Sergeevna Zhurova		EU	SUI	CAN		AUS		NOR			1		_
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Aleksey Vasilevich Naumets		EU	SUI			AUS		NOR			<u> </u>		₩
Anatoly Ivanovich Antonov		EU		CAN		AUS							Ь.
Arkady Viktorovich Bakhin		EU		CAN		AUS							
losif (Joseph) Davydovich Kobzon		EU		CAN		AUS							
Valery Fedorovich Rashkin		EU		CAN		AUS							
Russian Cronies													
Gennady Timchenko	US			CAN			AUST						
Arkady Rotenberg	US	EU	SUI	CAN		AUS	AUST	NOR			1		
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Boris Rotenberg											_		_
Yuri Kovalchuk	US	EU	SUI	CAN		AUS	AUST	NOR					Ь.
Igor Sechin	US												
Sergey Chemezov	US	EU	SUI	CAN		AUS							
Konstantin Malofayev	US	EU	SUI	CAN		AUS		NOR					
Nikolay Shamalov		EU	SUI	CAN		AUS		NOR					
Alexander Mikhailovich Babakov		EU	SUI			AUS							
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Russian Military													
Alexander Vitko		EU	SUI		LIE	AUS	AUST	NOR		1			
Anatoly Alekseevich Sidorov		EU	SUI		LIE	AUS	AUST	NOR					
Aleksandr Galkin	1	EU	SUI		LIE	AUS	AUST	NOR		<b>†</b>	1		
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Vladimir Shamanov	1	EU	SUI	CAN	LIE	AUS		NOR			1		
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Andrei Veleryevich Kartapolov		EU		CAN		AUS							
Former Ukrainian Government/ Ukrainian Separatists / Separatist Entities													
Igor Strelkov (Ihor Strielkov)	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				
Sergei Ivanovich Menyailo	US	EU	SUI	CAN	LIE	AUS	7.00.	NOR	JPN		1		
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Mikhail Malyshev	US	EU	SUI	CAN		AUS	AUST	NOR	JPN				<u></u>
Valery Medvedev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				
Sergey Aksyonov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
Vladimir Konsantinov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
Viktor Medvechuck	US						AUST				1		
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Deniz Valentinovich Berezovskiy		EU	SUI		LIE	AUS	AUST	NOR	JPN				
Aleksei Mikhailovich Chaily	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
Pyotr Anatoliyovych Zima	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
Yuriy Zherebtsov	US	EU	SUI		LIE	AUS	AUST	NOR	JPN				
Sergei Pavlovych Tsekov	US	EU	SUI		1.15	AUS	AUST	NOR	JPN		1		
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German Prokopiv		EU	SUI	CAN		AUS		NOR	JPN	_	-	-	
Valeriy Bolotov	US	EU	SUI	CAN		AUS		NOR	JPN	_	-	-	
Andriy Purgin	US	EU	SUI	CAN		AUS		NOR	JPN	_			
Denys Pushylin	US	EU	SUI	CAN		AUS	AUST	NOR	JPN	_			
Sergey Gennadevich Tsyplakov		EU	SUI	CAN		AUS		NOR	JPN				
Petr Grigorievich Jarosh		EU	SUI	CAN		AUS		NOR	JPN				
Oleg Grigorievich Kozyura		EU	SUI	CAN		AUS		NOR	JPN				
Viacheslav Ponomariov	US	EU	SUI	CAN		AUS	AUST	NOR	JPN				
Igor Mykolaiovych Bezler	US	EU	SUI	CAN		AUS		NOR	JPN				
Igor Kakidzyanov		EU	SUI	CAN	LIE	AUS		NOR	JPN				
Oleg Tsariov		EU	SUI	CAN	LIE	AUS		NOR	JPN				
Roman Lyagin		EU	SUI	CAN		AUS		NOR	JPN				
Aleksandr Malykhin		EU	SUI	CAN		AUS		NOR	JPN		1		
Natalia Vladimirovna Poklonskaya	US	EU	SUI	CAN		AUS		NOR	JPN				
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Alexandr Khryakov	US	EU	SUI	CAN	<u> </u>	AUS		NOR	JPN	<u> </u>	-	1	-
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Yuriy Ivakin		EU	SUI	CAN		AUS		NOR	JPN				
Igor Plotnitsky (aka Ihor Venedyktovych Plotnytsky)	US	EU	SUI	CAN		AUS		NOR	JPN	L	$\bot$		
Nikolay (Mykola) Kozitsyn	US	EU	SUI	CAN		AUS		NOR	JPN				
Oleksiy (Aleksey) Mozgovy	US	EU	SUI	CAN		AUS		NOR	JPN				
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Pavel Gubarev	US	EU	SUI	CAN		AUS		NOR	JPN				
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Federal State of Novorossiya		EU	SUI	CAN		AUS		NOR	JPN				
International Union of Public Associations "Great Don Army"		EU	SUI	CAN		AUS		NOR	JPN				
Sobol		EU	SUI	CAN		AUS		NOR	JPN				
Lugansk Guard		EU	SUI	CAN		AUS		NOR	JPN				
Army of the Southeast		EU	SUI	CAN		AUS		NOR	JPN				
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Vladimir Antyufeyev (aka Vladimir Shevtsov)	US	EU	SUI	CAN		AUS		NOR	JPN				
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Luhansk Economic Union		EU		CAN		AUS			JPN		1		T
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Marshall Capital Fund	US				$\vdash$						1	<b>†</b>	t
Dmitry Neklyudov	US			CAN							+	+-	+-
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Novorossiya Party									-		₩	₩	₩
Oplot	US	EU		CAN		AUS					<b>↓</b>	<b>↓</b>	╙
Petr Savchenko	US										<u> </u>	<u> </u>	<u> </u>
Profactor Tov	US			CAN									
Oleh Tsaryov	US										1		
South-East Movement (Yugo-Vostok Movement)	US			CAN							+	<del>                                     </del>	$t^{-}$
				CAIN					-		+-	+	$\leftarrow$
Night Wolves	US										+	₩	₩
Aleksandr Zaldostanov	US			CAN									Ц_
Pavel Dremov aka Batya		EU		CAN		AUS							
Alexey Milchakov aka Fritz, Serbian		EU		CAN		AUS							
Arseny Pavlov aka Motorola		EU		CAN		AUS					†	<b>†</b>	t
Mikhail Tolstykh aka Givi		EU		CAN		AUS					+	+-	+-
											+	₩	₩
Eduard Basurin		EU		CAN		AUS						—	₩
Alexandr Shubin		EU		CAN		AUS						<u> </u>	Ш.
Sergey Litvin		EU		CAN		AUS							
Sergey Ignatov		EU		CAN		AUS							
Ekaterina Filippova		EU		CAN		AUS					1	t	t
Aleksandr Timofeev											+	+-	$\leftarrow$
		EU		CAN	$\vdash$	AUS			<del>                                     </del>	<u> </u>	+-	+-	+-
Evgeny Manuilov		EU	-	CAN	$\vdash$	AUS			<u> </u>	<u> </u>	₩	₩	₩
Viktor Yatsenko		EU		CAN	ш	AUS			L			<b>↓</b>	<b>↓</b>
Olga Besedina		EU		CAN	ı T	AUS			l	l	1	1	1
Zaur Ismailov		EU		CAN		AUS					1		
Cossack National Guard	1	EU		CAN	Н	AUS			<b>t</b>	<u> </u>	1	+	$\vdash$
		EU	$\vdash$	CAN	$\vdash$	AUS			<del>                                     </del>	$\vdash$	+-	+	+
Sparta battalion					$\vdash$				<u> </u>	<u> </u>	₩	₩	₩
Somali battalion		EU		CAN	ш	AUS						<b>↓</b>	<b>⊥</b>
Zarya battalion		EU	L T	CAN	LΠ	AUS			L	L	L	L	1
Prizrak brigade		EU		CAN		AUS							
Kalmius battalion		EU		CAN		AUS					†	<b>†</b>	t
Death battalion		EU		CAN		AUS					+	+-	+-
		EU		CAN		AUS			<u> </u>				Щ
Crimean Entities										_			_
Chernomorneftegaz	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				$oxed{oxed}$
Feodosia (Feodosiya Enterprise)	US	EU	SUI	CAN	LIE	AUS		NOR	JPN				
State ferry enterprise "Kerch ferry"		EU	SUI	CAN		AUS		NOR					
State enterprise "Sevastopol commercial seaport"		EU	SUI	CAN		AUS		NOR			+	<del>                                     </del>	t
		EU	SUI	CAN		AUS		NOR			+-	-	$\leftarrow$
State enterprise "Kerch commercial seaport"											+	₩	₩
State enterprise Universal - Avia		EU	SUI	CAN		AUS		NOR				—	₩
Resort Nizhnyaya Oreanda		EU	SUI	CAN		AUS		NOR			<u> </u>	<u> </u>	<u> </u>
Crimean enterprise "Azov distillery plant"		EU	SUI	CAN		AUS		NOR					
State concern "National Association of producers Massandra"		EU	SUI	CAN		AUS		NOR			T		
State enterprise Magarach of the national institute of wine		EU	SUI	CAN		AUS		NOR			1		T
State enterprise "Factory of sparkling wine Novy Svet"		EU	SUI	CAN		AUS		NOR		-	+	<del>                                     </del>	$\vdash$
Russian National Commercial Bank									_		+-	+	$\leftarrow$
		EU	SUI	CAN	ш	AUS		NOR			┸		ـــــ
Russian Entities (*Captured in EU sectoral measure, see below)													
Bank Rossiya	US			CAN			AUST						
SMP Bank	US			CAN			AUST				T		
InvestKapitalBank	US			CAN			AUST				†	<b>†</b>	t
'	US			CAN			AUST				+	+-	+-
Volga Group									-		+-	₩	₩
Aquanika	US			CAN			AUST			I	1	1	1
CJSC Zest	US										-	+-	+-
JSB Sobin Bank				CAN									
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Avia Group LLC	US			CAN									
Avia Group LLC Avia Group Nord LLC	US US			CAN CAN			AUST						
Avia Group LLC Avia Group Nord LLC Sakhatrans LLC	US US US			CAN CAN CAN			AUST						
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JSC NIIP	US			CAN	-	+	1					
Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")	- 55		<u> </u>	CAN	-	+	1					
Executive Order 13662 - Sectoral Sanctions				07.11			1					
Financial Institutions - New Debt and Equity Prohibition (*Not specifically list	ted but covered	as 50%-own	ed sub	sidiary	of a desi	gnated	bank)					
Sberbank	US	EU	SUI				NOR	JPN				
VTB Bank OAO	US	EU	SUI	CAN			NOR	JPN				
VEB	US	EU	SUI	CAN			NOR	JPN				
Gazprombank OAO	US	EU	SUI	CAN			NOR	JPN				
Bank of Moscow	US	*	*	CAN			*	*				
Russian Agricultural Bank (aka Rosselkhozbank)	US	EU	SUI	CAN			NOR	JPN				
Energy Companies - Debt Prohibition												
Rosneft	US	EU	SUI	CAN	AUS	5	NOR					
OAO Novatek	US			CAN								
Gazprom Neft	US	EU	SUI		AUS	3	NOR					
AK Transneft OAO	US	EU	SUI		AUS	6	NOR					
Energy Companies - Goods, Services and Technology in Oil Sector Activities	s (*EU, Norwegia	an and Cana	dian re	estrictio	ns on pr	vision	of good	s, serv	ices			
and technology apply are not applied to specific companies but cover their	provision "in Ru	ssia")					Ŭ					
Rosneft	US	*		*	*		*					
OAO Gazprom	US	*		*	*		*					
Gazprom Neft	US	*		*	*		*					
Lukoil OAO	US	*		*	*		*					
Surgutneftegas	US	*		*	*		*					
Defense and Related Material Companies - Debt Prohibition (*Captured as 50	0%-owned subsi	diary of Ros	tec; **	Design	ated as fu	ll aset f	reeze, n	oted a	bove)			
Rostec	US											
OPK Oboronprom	*	EU	SUI		AUS	3	NOR					
United Aircraft Corporation		EU	SUI		AUS	3	NOR					
Uralvagonzavod												
	**	EU	SUI		AUS	5	NOR					
Defense and Related Material Companies - Prohibition on technical assistan (*Designated as full asset freeze, noted above)				and fina			-	l-use g	oods	and to	echno	logy
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(*Designated as full asset freeze, noted above)		rvices, finan	SUI	and fina	incial ass	istance	for dua	l-use g	joods	and to	echno	logy
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(*Designated as full asset freeze, noted above)  JSC Sirius  OJSC Stankoinstrument  OAO JSC Chemcomposite  JSC Kalashnikov	ce, brokering se	EU EU EU EU	SUI SUI SUI SUI	and fina	AUS AUS AUS AUS	istance	NOR NOR NOR NOR	l-use g	joods	and to	echno	logy
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## **Updated Sanctions Comparison Chart**

From: (b)(6)

To: \_\_DL\_TFI\_Ukraine\_Russia <\_dl\_tfi\_ukraine\_russia@do.treas.gov>

Cc: (b)(6)

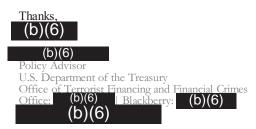
Date: Wed, 11 Mar 2015 10:23:26 -0400

Attachments: 20150311 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (360.41 kB)

Hi everyone,

Please find attached an updated sanctions comparison chart with today's designations, as well as Switzerland's addition of 28 EU-designated individuals to their "anti-circumvention measures". I also noted where the EU's re-listing of former Yanukovich regime members omitted four of the original names. (<a href="http://www.reuters.com/article/2015/03/06/us-ukraine-crisis-eu-sanctions-idUSKBN0M21BB20150306">http://www.reuters.com/article/2015/03/06/us-ukraine-crisis-eu-sanctions-idUSKBN0M21BB20150306</a>).

As usual, please do not forward the chart outside of Treasury without consulting our office.



#### Russia/Former Government of Ukraine-related **Designations - Persons (as of March 11, 2015)**

US: United States EU: European Union AUS: Austria\*\* AUST: Austarlia JPN: Japan NOR: Norway

\*Switzerland and Liechtenstein have issued "anti-circumvention" measures for many of the EU designated individuals and entities These measures prohibit their financial institutions from entering into new business relationships with these individuals and SUI: Switzerland\* entities (these measures short of asset freezes CAN: Canada are denoted by black stripes). Likewise, in Switzerland, "new issue of long term are denoted by black stripes). Likewise, in Switzerland, "new issue of long term financial instruments" for the five banks listed by the EU for debt and equity prohibitions will require authorization, only given if the they are within the average financial engagement of the past three years \*\*Austria's original list was superceded by the shorter EU list; however, Austria has stated that it plans to add back those from original list (in gray)

Executive Orders 13660 and 13661 - Asset Freezes												
Russian Officials												
Viktor Alekseevich Ozerov	US	EU	SUI		LIE	AUS	AUST	NOR				
Vladimir Michailovich Dzhabarov	US	EU	SUI		LIE	AUS	AUST	NOR				
Andrei Aleksandrovich Klishas	US	EU	SUI	CAN		AUS	AUST	NOR				
Nikolai Ivanovich Ryzhkov	US	EU	SUI		LIE	AUS	AUST	NOR				
Evegni Viktorovich Bushmin	US	EU	SUI		LIE	AUS	AUST	NOR				
Aleksandr Borisovich Totoonov	US	EU	SUI		LIE	AUS	AUST	NOR				
Oleg Evgenefich Panteleev	US	EU	SUI		LIE	AUS	AUST	NOR				
Sergei Mikhailovich Mironov	US	EU	SUI		LIE	AUS	AUST	NOR				
Sergei Vladimirovich Zheleznyak	US	EU	SUI		LIE	AUS	AUST	NOR				
Leonid Eduardovich Slutski	US	EU	SUI	CAN	LIE	AUS	AUST	NOR				
Dmitry Olegovich Rogozin	US	EU	SUI	CAN	LIE	AUS	AUST	NOR				
Sergey Yur'yevich Glazyev	US	EU	SUI	CAN	LIE	AUS	AUST	NOR				
Vladislov Yuryevich Surkov	US	EU	SUI	CAN		AUS	AUST	NOR				
Yelena Borisovna Mizulina	US	EU	SUI	CAN		AUS	AUST	NOR				
Valentina Ivaonovna Matvienko	US	EU	SUI	CAN		AUS	AUST	NOR				
Sergey Naryshkin	US	EU	SUI	CAN		AUS	AUST	NOR				
Victor Ivanov	US			CAN								
Igor Sergun	US	EU	SUI	CAN	LIE	AUS	AUST	NOR				
Sergei Ivanov	US			CAN			AUST					
Alexei Gromov	US	EU	SUI	CAN		AUS	AUST	NOR				
Andrei Fursenko	US		00.	CAN		AUU	AUST	NOIL			-	
Vladimir Yakunin	US		+	UAIT			AUST					
Vladimir Kozhin	US		+	CAN			AUST					
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Dmitry Konstantinovich Kiselyov		EU	SUI	CAN	LIE	AUS		NOR				<u> </u>
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Alexander Babakov	110		0111						<u> </u>			<b>├</b>
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Nikolai Platonovich Patrushev		EU	SUI	CAN		AUS		NOR				<u> </u>
Aleksandr Vailievich Bortnikov		EU	SUI	CAN		AUS		NOR	<u> </u>			<u> </u>
Rashid Gumarovich Nurgaliev		EU	SUI	CAN		AUS		NOR				<u> </u>
Boris Vyacheslavovich Gryzlov		EU	SUI	CAN		AUS		NOR	<del>                                     </del>	<u> </u>	<u> </u>	<b>└</b>
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Ramzan Akhmadovitch Kadyrov		EU	SUI	CAN		AUS		NOR	<u> </u>	<u> </u>	<u> </u>	Ь—
Alexander Nikolayevich Tkachyov		EU	SUI	CAN		AUS		NOR	<u> </u>			<u> </u>
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Viktor Petrovich Vodolatsky		EU	SUI	CAN		AUS		NOR				

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Anatoly Ivanovich Antonov		EU	SUI	CAN		AUS							
Arkady Viktorovich Bakhin		EU	SUI	CAN		AUS							
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Alexander Mikhailovich Babakov		EU	SUI			AUS					T		
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Stanislav Schulyak			-			AUS					ļ		
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Yuriy Ivanyushchenko		EU	SUI		LIE	AUS		NOR			-	<u> </u>	
Olga Fedorovna Kovatidi		EU	SUI	CAN		AUS	AUST	NOR	JPN		-	<u> </u>	
German Prokopiv		EU	SUI	CAN		AUS		NOR	JPN		-	<u> </u>	
Valeriy Bolotov	US	EU	SUI	CAN		AUS		NOR	JPN		_		
Andriy Purgin	US	EU	SUI	CAN		AUS		NOR	JPN				
Denys Pushylin	US	EU	SUI	CAN		AUS	AUST	NOR	JPN		ļ		
Sergey Gennadevich Tsyplakov		EU	SUI	CAN		AUS		NOR	JPN				
Petr Grigorievich Jarosh		EU	SUI	CAN		AUS		NOR	JPN				
Oleg Grigorievich Kozyura		EU	SUI	CAN		AUS		NOR	JPN				
Viacheslav Ponomariov	US	EU	SUI	CAN		AUS	AUST	NOR	JPN				
Igor Mykolaiovych Bezler	US	EU	SUI	CAN	LIE	AUS		NOR	JPN				
Igor Kakidzyanov		EU	SUI	CAN	LIE	AUS		NOR	JPN				
Oleg Tsariov		EU	SUI	CAN		AUS		NOR	JPN				
Roman Lyagin	US	EU	SUI	CAN		AUS		NOR	JPN				
Aleksandr Malykhin		EU	SUI	CAN		AUS		NOR	JPN				
Natalia Vladimirovna Poklonskaya	US	EU	SUI	CAN		AUS		NOR	JPN				
Igor Sergeievich Chetchenko (aka Shevchenko)		EU	SUI	CAN		AUS		NOR	JPN				
Valery Vladimirovich Kaurov	US	EU	SUI	CAN		AUS		NOR	JPN				
Alexander Borodai	US	EU	SUI	CAN	_	AUS		NOR	JPN		1		
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Alexandr Khryakov	US	EU	SUI	CAN	<u> </u>	AUS		NOR	JPN	<u> </u>	1	-	<b>-</b>
Marat Bashirov		EU	SUI	CAN	_	AUS		NOR	JPN	<u> </u>	1	1	<u> </u>
Vasyl Nikitin		EU	SUI	CAN		AUS		NOR	JPN		1	<u> </u>	
Aleksey Karyakin	US	EU	SUI	CAN		AUS		NOR	JPN		1	<u> </u>	
Yuriy Ivakin	US	EU	SUI	CAN		AUS		NOR	JPN				
Igor Plotnitsky (aka Ihor Venedyktovych Plotnytsky)	US	EU	SUI	CAN	oxdot	AUS		NOR	JPN	oxdot	$oxedsymbol{oxed}$	$ldsymbol{ldsymbol{ldsymbol{eta}}}$	$ldsymbol{ldsymbol{ldsymbol{eta}}}$
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Oleksiy (Aleksey) Mozgovy	US	EU	SUI	CAN		AUS		NOR	JPN				
Victor Yuriiovych Anosov				CAN									
Viacheslav Anatoliiovych Apraksimov				CAN									
Fedir Dmytrovych Berezin	US	EU	SUI	CAN		AUS		NOR	JPN				
Ruslan Yunirovish Ilkaev				CAN									
Valerii Kostiantynovych Mussienko			1	CAN									
Viacheslav Mykolaiovych Petrov		1	1	CAN	_						1		
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Serhii Anatolioyovych Zdriliuk	US	EU	SUI	CAN	_	AUS		NOR	JPN		-	-	
Luhansk People's Republic	US	EU	SUI	CAN		AUS		NOR	JPN		ļ	-	
Donetsk People's Republic	US	EU	SUI	CAN		AUS		NOR	JPN		ļ	-	
Pavel Gubarev	US	EU	SUI	CAN		AUS		NOR	JPN				
Ekaterina Gubareva	US	EU	SUI	CAN		AUS		NOR	JPN		ļ		
Federal State of Novorossiya		EU	SUI	CAN		AUS		NOR	JPN				
International Union of Public Associations "Great Don Army"		EU	SUI	CAN		AUS		NOR	JPN				
Sobol		EU	SUI	CAN		AUS		NOR	JPN				
Lugansk Guard		EU	SUI	CAN		AUS		NOR	JPN				
Army of the Southeast		EU	SUI	CAN		AUS		NOR	JPN				
Donbass People's Republic		EU	SUI	CAN		AUS		NOR	JPN				
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Vladimir Antyufeyev (aka Vladimir Shevtsov)	US	EU	SUI	CAN		AUS		NOR	JPN		1		
Oksana Tchigrina		EU	SUI	CAN		AUS		NOR	JPN				
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Alexander Zakharchenko	US	EU	SUI	CAN		AUS		NOR	JPN		<del>                                     </del>	<del>                                     </del>	<del>                                     </del>
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South-East Movement (Yugo-Vostok Movement)	US			CAN									t
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Aleksandr Zaldostanov	US			CAN								<u> </u>	<u> </u>
Pavel Dremov aka Batya		EU	SUI	CAN		AUS							<u>L</u>
Alexey Milchakov aka Fritz, Serbian		EU	SUI	CAN		AUS							
Arseny Pavlov aka Motorola		EU	SUI	CAN		AUS							
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Eurasian Youth Union	US											<u> </u>	Ļ—
Aleksandr Dugin	US												<u> </u>
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Chernomorneftegaz	US	EU	SUI	CAN	LIE	AUS	AUST	NOR	JPN				
Feodosia (Feodosiya Enterprise)	US	EU	SUI	CAN	LIE	AUS		NOR	JPN			1	
State ferry enterprise "Kerch ferry"		EU	SUI	CAN		AUS		NOR					
State enterprise "Sevastopol commercial seaport"		EU	SUI	CAN		AUS		NOR			1	$\vdash$	<b>†</b>
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State enterprise "Factory of sparkling wine Novy Svet"		EU EU	SUI	CAN		AUS		NOR NOR					
Russian National Commercial Bank	US	EU	SUI	CAN		_		NOR					
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Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika  CJSC Zest  JSB Sobin Bank	US US US US US US US	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika  CJSC Zest  JSB Sobin Bank  Avia Group LLC	US US US US US US US US US US US US	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika CJSC Zest JSB Sobin Bank  Avia Group LLC  Avia Group Nord LLC	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group Aquanika CJSC Zest JSB Sobin Bank Avia Group LUC Avia Group Nord LLC Sakhatrans LLC Stroytransgaz Group	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group Aquanika CJSC Zest JSB Sobin Bank Avia Group LUC Avia Group Nord LLC Sakhatrans LLC Stroytransgaz Group	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC Stroytransgaz Group Stroytransgaz Holding Stroytransgaz LLC	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika  CJSC Zest  JSB Sobin Bank Avia Group LLC  Avia Group LUC  Sakhatrans LLC  Stroytransgaz Group  Stroytransgaz Holding  Stroytransgaz LLC  Stroytransgaz LLC  Stroytransgaz LLC  Stroytransgaz LLC	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC Stroytransgaz Foroup  Stroytransgaz Holding Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz OJSC Stroytransgaz-M LLC	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group  Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group LLC Sakhatrans LLC Stroytransgaz Group Stroytransgaz Holding Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz Abolding Stroytransgaz Abolding Stroytransgaz Abolding Stroytransgaz M LLC Limited Liability Company Investment Company	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC Stroytransgaz Group Stroytransgaz Holding Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz USC Stroytransgaz-M LLC Limited Liability Company Investment Company Transoil	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group  Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group LLC Sakhatrans LLC Stroytransgaz Group Stroytransgaz Holding Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz Abolding Stroytransgaz Abolding Stroytransgaz Abolding Stroytransgaz M LLC Limited Liability Company Investment Company	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC  Stroytransgaz Group Stroytransgaz Holding Stroytransgaz LLC Stroytransgaz USC Stroytransgaz OSC Stroytransgaz M LLC Limited Liability Company Investment Company Transoil Stroygazmontazh	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group LLC Sakhatrans LLC Stroytransgaz Group Stroytransgaz Group Stroytransgaz ULC Stroytransgaz ULC Stroytransgaz ULC Stroytransgaz ULC Limited Liability Company Investment Company Transoil Stroygazmontazh ExpoBank	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika CJSC Zest  JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC Stroytransgaz Group  Stroytransgaz Holding Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Limited Liability Company Investment Company Transoil Stroygazmontazh Expo8ank RosEnergo8ank	US US US US US US US US US US US US US U	EU EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group LLC Sakhatrans LLC Stroytransgaz Group Stroytransgaz Group Stroytransgaz ULC Stroytransgaz ULC Stroytransgaz ULC Stroytransgaz ULC Stroytransgaz ULC Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz ULC Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding	US US US US US US US US US US US US US U	EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group  Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group LLC Sakhatrans LLC Stroytransgaz Group Stroytransgaz Holding Stroytransgaz LLC Stroytransgaz UCS Stroytransgaz UCS Stroytransgaz UCS Stroytransgaz Ablating Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz-M LLC Limited Liability Company Investment Company Transoil Stroygazmontazh ExpoBank RossEnergoBank Almaz-Antey	US US US US US US US US US US US US US U	EU EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank  InvestKapitalBank  Volga Group  Aquanika  CISC Zest  JSB Sobin Bank  Avia Group LLC  Avia Group LLC  Sakhatrans LLC  Stroytransgaz Group  Stroytransgaz Holding  Stroytransgaz LLC  Stroytransgaz LLC  Stroytransgaz-US  Stroytransgaz-M LLC  Limited Liability Company Investment Company  Transoil  Stroygazmontazh  ExpoBank  RosEnergoBank  Almaz-Antey	US US US US US US US US US US US US US U	EU EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika CJSC Zest  JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC Stroytransgaz Group  Stroytransgaz Holding Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz LLC Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Stroytransgaz Hold Limited Liability Company Investment Company Transoil Stroygazmontazh Expo8ank RosEnergo8ank	US US US US US US US US US US US US US U	EU EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank Volga Group Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC Stroytransgaz Group Stroytransgaz Holding Stroytransgaz LLC Stroytransgaz USC Stroytransgaz ULC Limited Liability Company Investment Company Transoil Stroygazmontazh ExpoBank RosEnergoBank Almaz-Antey  Federal State Unitary Enterprise State Research and Production Enterprise Bazalt JSC Concern Sozvezdie	US US US US US US US US US US US US US U	EU EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika CJSC Zest  JSB Sobin Bank  Avia Group LLC  Avia Group Nord LLC  Sakhatrans LLC  Stroytransgaz Group  Stroytransgaz Holding  Stroytransgaz LLC  Stroytransgaz ULC  Stroytransgaz LLC  Stroytransgaz USC  Stroytransgaz Holding  Stroytransgaz Holding  Stroytransgaz Holding  Stroytransgaz HUC  Limited Liability Company Investment Company  Transoil  Stroygazmontazh  ExpoBank  RosEnergoBank  Almaz-Antey  Federal State Unitary Enterprise State Research and Production Enterprise Bazalt  JSC Concern Sozvezdie  JSC MIC NPO Mashinostroyenia	US US US US US US US US US US US US US U	EU EU EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika CJSC Zest JSB Sobin Bank Avia Group LLC Avia Group Nord LLC Sakhatrans LLC Stroytransgaz Group  Stroytransgaz Holding Stroytransgaz UC Stroytransgaz UC Stroytransgaz UC Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Froytransgaz Holding Stroytransgaz Holding Stroytransgaz Holding Froytransgaz Holding Stroytransgaz Holding Froytransgaz Holding Fr	US US US US US US US US US US US US US U	EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR NOR					
Russian National Commercial Bank  Russian Entities (*Captured in EU sectoral measure, see below)  Bank Rossiya  SMP Bank InvestKapitalBank  Volga Group  Aquanika CJSC Zest  JSB Sobin Bank  Avia Group LLC  Avia Group Nord LLC  Sakhatrans LLC  Stroytransgaz Group  Stroytransgaz Holding  Stroytransgaz LLC  Stroytransgaz UC  Stroytransgaz Holding  Frederia State Unitary Enterprise State Research and Production Enterprise Bazalt  JSC Concern Sozvezdie  JSC MIC NPO Mashinostroyenia	US US US US US US US US US US US US US U	EU	SUI	CAN CAN CAN CAN CAN CAN CAN CAN CAN CAN		AUS	AUST AUST AUST AUST AUST AUST AUST AUST	NOR NOR NOR					

Uralvagonzavod	US	*		1 1			1					$\neg$
United Shipbuilding Corporation	US			CAN		+	1					
Dobrolet (aka Dobrolyot)	- 55	EU	SUI	CAN	AU	S	NOR					
OAO Dolgoprudny Research Production Enterprise	US			CAN	7.0							
Mytishchinski Mashinostroitelny Zavod, OAO	US			CAN		1	1					
Kalinin Machine Plan JSC	US			CAN			1					
Almaz-Antey GSKB	US						1					
JSC NIIP	US			CAN								
Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")				CAN			1					
Executive Order 13662 - Sectoral Sanctions												
Financial Instituions - New Debt and Equity Prohibition (*Not specifically liste	ed but covered	as 50%-own	ed sub	sidiar	v of a des	anated	bank)					
Sberbank	US	EU	SUI				NOR	JPN				
VTB Bank OAO	US	EU	SUI	CAN		1	NOR	JPN				
VEB	US	EU	SUI				NOR	JPN				
Gazprombank OAO	US	EU	SUI	CAN		1	NOR	JPN				
Bank of Moscow	US	*	*	CAN			*	*				
Russian Agricultural Bank (aka Rosselkhozbank)	US	EU	SUI	CAN			NOR	JPN				
Energy Companies - Debt Prohibition												
Rosneft	US	EU	SUI	CAN	AU	S	NOR					
OAO Novatek	US			CAN								
	US	EU	SUI	U/LIT	AU	2	NOR					-
Gazprom Neft	US	EU	SUI				NOR					
AK Transneft OAO  Energy Companies - Goods, Services and Technology in Oil Sector Activities				L CATIONI	AU				iooo			
and technology apply are not applied to specific companies but cover their p			ulan re	estrictio	ons on pr	OVISION	or good	s, serv	ices			
Rosneft	US	*	_	*	*	1	*	Г				
OAO Gazprom	US	*		*	*	+	*					
Gazprom Neft	US	*		*	*	+	*					
Lukoil OAO	US	*		*	*		*					
Surgutneftegas	US	*		*	*		*					
Defense and Related Material Companies - Debt Prohibition (*Captured as 50		liary of Ros	tec: **	Design	ated as fu	III aset f	reeze. n	oted a	hove)			
Rostec	US		Ι			1	1	1				
OPK Oboronprom	*	EU	SUI		AU	8	NOR		-			
United Aircraft Corporation		EU	SUI		AU		NOR		-			
Uralvagonzavod	**	EU	SUI		AU		NOR					
										1 4 .		
Defense and Related Material Companies - Prohibition on technical assistance	ce, brokering se	rvices, finan	cing,	and fin	anciai ass	istance	tor dua	ı-use g	jooas	and te	cnno	logy
(*Designated as full asset freeze, noted above)												
JSC Sirius		EU	SUI		AU	S	NOR					
OJSC Stankoinstrument		EU	SUI		AU	S	NOR					
OAO JSC Chemcomposite		EU	SUI		AU		NOR					
JSC Kalashnikov	*	EU	SUI		AU	S	NOR					
JSC Tula Arms Plant		EU	SUI		AU	S	NOR					]
NPK Tchnologii Maschinostrojenija		EU	SUI		AU	S	NOR					
OAO Wysokototschnye Kompleski		EU	SUI		AU	S	NOR					
OAO Almaz Antey		EU	SUI		AU	S	NOR					-
OAO NPO Bazalt		EU	SUI		AU		NOR					$\neg$
ONO NI O BUZUIC	l				.,,0							