US Issues Additional Russian/Ukrainian Designations and New General License, EU Extends Sanctions Targeting Russia

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On December 20, 2016, the US Department of Treasury's Office of Foreign Assets Control (OFAC) added 15 individuals and entities and two vessels to the List of Specially Designated Nationals and Blocked Persons (SDN List) and identified certain subsidiaries of entities included on the Sectoral Sanctions Identifications List (SSI List). The US Department of Commerce's Bureau of Industry and Security (BIS) is in the process of finalizing a companion rule for publication that will amend the Entity List in conjunction with certain entities designated by OFAC.

OFAC also issued General License No. 11 which authorizes certain transactions that are ordinarily incident and necessary for US persons to request, contract for, pay for, receive or utilize a project design review or permit from the Russian federal institution FAU Glavgosekspertiza Rossii, which was designated as an SDN earlier this year.¹

This action follows the December 19 extension by the European Union of sanctions against Russia regarding Ukraine until July 31, 2017.²

New Additions to the SDN List

The US designated six individuals, each of whom holds an executive position within Bank Rossiya, ABR Management or Sobinbank. In addition, one individual was designated in connection with business dealings involving the Russian Ministry of Defense.

Four construction and transportation entities were designated for operating in the Crimea region of Ukraine and an additional four entities were designated for supporting OJSC Sovfracht. OFAC also designated the vessels "Marshal Zhukov" and "Stalingrad" as property in which Trans-Flot JSC has an interest.

See General License No. 11 here.

See December 16, 2016 European Union decision here. See previous alerts explaining the scope of these sanctions here.

All property and interests in property of these individuals and entities located in the United States or within the possession or control of a US person³, wherever located, are considered blocked and may not be dealt in. Any entity in which one or more blocked persons holds a 50 percent or greater ownership interest in the aggregate is itself considered blocked by operation of law. US persons may not engage in any dealings, directly or indirectly, with blocked persons.

OFAC has added the following individuals, entities, and vessels to the SDN List:

Individuals:

- DEDOV, Mikhail Aleksandrovich, Russia; DOB 04 Sep 1952; Gender Male (individual) [UKRAINE-EO13661].
- KLISHIN, Mikhail Alekseevich, Russia; DOB 09 Oct 1954; Gender Male (individual) [UKRAINE-EO13661].
- KOVALCHUK, Kirill Mikhailovich, Russia; DOB 1968; Gender Male (individual) [UKRAINE-EO13661].
- LEBEDEV, Dmitri Alekseevich, Russia; DOB 1968; Gender Male (individual) [UKRAINE-EO13661].
- MANSUROV, Dmitri Flerovich, Russia; DOB 1977; Gender Male (individual) [UKRAINE-EO13661].
- MINAEV, Oleg Aleksandrovich, Russia; DOB 1971; Gender Male (individual) [UKRAINE-EO13661].
- PRIGOZHIN, Yevgeniy Viktorovich (a.k.a. PRIGOZHIN, Evgeny), Russia; DOB 1961; Gender Male (individual) [UKRAINE-EO13661].

Entities:

- CRIMEAN PORTS (a.k.a. STATE UNITARY ENTERPRISE OF THE REPUBLIC OF CRIMEA 'CRIMEAN PORTS'; a.k.a. SUE RK 'CRIMEAN PORTS'; a.k.a. "SUE RC 'KMP'"), 28 Kirov Street, Kerch, Republic of Crimea 98312, Ukraine; Email Address crimeaport@mail.ru; Registration ID 1149102012620; V.A.T. Number 9111000450 [UKRAINE-EO13685].
- CRIMEAN RAILWAY (a.k.a. FEDERAL STATE UNITARY ENTERPRISE 'CRIMEAN RAILWAY'; a.k.a. KRYMZHD; a.k.a. THE RAILWAYS OF CRIMEA), 34 Pavlenko Street, Simferopol, Republic of Crimea 95006, Ukraine; Website http://www.crimearw.ru; Email Address ngkkjd@mail.ru; Registration ID 1159102022738; V.A.T. Number 9102157783 [UKRAINE-EO13685].
- INSTITUT STROIPROEKT, AO (a.k.a. AKTSIONERNOE OBSHCESTVO INSTITUT STROIPROEKT; a.k.a. AO INSTITUT STROIPROEKT; a.k.a. AO INSTITUTE STROYPROEKT; f.k.a. INSTITUT STROIPROEKT ZAKRYTOE AKTSIONERNOE OBSHCHESTVO; a.k.a. INSTITUTE STROYPROECT; a.k.a. STROYPROEKT; a.k.a. STROYPROEKT ENGINEERING GROUP), D. 13 Korp. 2 LiteraA Prospekt Dunaiski, St. Petersburg 196158, Russia; 13/2 Dunaisky Prospect, St. Petersburg 196158, Russia; Website http://www.stpr.ru; Email Address Most@stpr.ru; alt. Email Address Murina@stpr.ru; Registration ID 1027810258673; Tax ID No. 7826688390; Government Gazette Number 11117863 [UKRAINE-EO13685].
- KARST, OOO (a.k.a. CONSTRUCTION HOLDING COMPANY OLD CITY KARST; a.k.a.
 OBSHCESTVO S OGRANICHENNOI OTVETSTVENNOSTYU KARST; a.k.a. "KARST LTD."; a.k.a. "LLC
 KARST"), D. 4 Litera A Pomeshchenie 69 ul. Kapitanskaya, St. Petersburg 199397, Russia; 4
 Kapitanskaya Street, Unit A, Office 69-N, St. Petersburg 199397, Russia; Website
 http://www.oldcitykarst.ru; Registration ID 1037800012711; Tax ID No. 7801106690; Government Gazette
 Number 48937526 [UKRAINE-EO13685].

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A US person is defined to include any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States

⁴ A copy of OFAC's "Revised Guidance on Entities Owned by Persons Whose Property and Interests in Property are Blocked" is available here.

- LLC RUSCHEMTRADE, st. Mashinostroitelnyj, 3, Rostov-on-Don 344090, Russia; 86/1, Temryuk, Krasnodar 353500, Russia; Website http://ruschemtrade.com [UKRAINE-EO13685] (Linked To: OJSC SOVFRACHT).
- SOLID LTD (a.k.a. OOO SOLID), ul Mira 4, Novorossiysk, Krasnodarskiy kray 630024, Russia [UKRAINE-EO13685] (Linked To: OJSC SOVFRACHT).
- TRANS-FLOT JSC (a.k.a. JSC TRANS-FLOT), ul Ventseka 1/97, Samara 443099, Russia: Website www.trans-flot.ru [UKRAINE-EO13685] (Linked To: OJSC SOVFRACHT).
- TRANSPETROCHART CO LTD, prospekt Engelsa 30, St Petersburg 194156, Russia [UKRAINE-EO136851 (Linked To: OJSC SOVFRACHT).

Vessels:

- MARSHAL ZHUKOV Russia flag; Vessel Registration Identification IMO 9690224 (vessel) [UKRAINE-EO13685] (Linked To: TRANS-FLOT JSC).
- STALINGRAD Russia flag; Vessel Registration Identification IMO 9690212 (vessel) [UKRAINE-EO13685] (Linked To: TRANS-FLOT JSC).

New Additions to the SSI List

The United States identified on the SSI List a number of subsidiaries owned 50 percent or more by two SSIs, the Russian Agricultural Bank and OAO Novatek. The Russian Agricultural Bank was originally designated on July 29, 2014 pursuant to Directive 1, which targets the Russian financial services sector. Directive 1 prohibits US persons from engaging in, directly or indirectly, all transactions in provision of financing for, and other dealings in new debt of longer than 30 days maturity or new equity of persons determined to be subject to Directive 1, their property, or their interests in property.

OAO Novatek was designated on July 16, 2014 pursuant to Directive 2, which targets the Russian energy sector. Directive 2 prohibits US persons from engaging in, directly or indirectly, all transactions in provision of financing for, and other dealings in new debt of longer than 90 days maturity or new equity of persons determined to be subject to Directive 2, their property, or their interests in property.

OFAC stated that, although these entities already were subject by operation of law to the same restrictions as their parent entities due to the 50 percent or greater ownership interest by SSIs, their identification on the SSI List will help the public more effectively comply with sanctions.⁵

Directive 1 (linked to the Russian Agricultural Bank)

- AGROKREDIT-INFORM, AO (a.k.a. AKTSIONERNOE OBSHCHESTVO 'AGROKREDIT-INFORM'; a.k.a. CLOSED JOINT-STOCK COMPANY 'AGROCREDIT-INFORM'), 3 per. Gagarinski, Moscow 119034, Russia; 3 Gagarinsky Pereulok, Moscow, Russia; Executive Order 13662 Directive Determination -Subject to Directive 1; Registration ID 1087746334400; Tax ID No. 7704681172; Government Gazette Number 85651516; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- ALBASHSKI ELEVATOR, OAO (f.k.a. AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA ALBASHKI ELEVATOR; a.k.a. OAO 'ALBASHSKI ELEVATOR'; a.k.a. OPEN JOINT STOCK COMPANY 'ALBASHSKIY ELEVATOR'; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'ALBASHSKI ELEVATOR'), 15 per. Zaporozhski Stanitsa Novominskaya, Kanevskoi Raion, Krasnodarski Kr. 353701, Russia; 15 Zaporogskiy Pereulok, Novominskaya Village, Kanevskoy District, Krasnodar Region, Russia; Email Address albashskiy@mail.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Registration ID 1022303977112; Tax ID No. 2334001310; Government Gazette Number 00940430;. [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).

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- BELOGLINSKI ELEVATOR, OAO (f.k.a. AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA BELOGLINSKI ELEVATOR; a.k.a. OAO 'BELOGLINSKI ELEVATOR'; a.k.a. OPEN JOINT STOCK COMPANY 'BELOGLINSKIY ELEVATOR'; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'BELOGLINSKI ELEVATOR'), 1 ul. Privokzalnaya S. Belaya Glina, Beloglinski Raion, Krasnodarski Kr. 353040, Russia; 1 Privokzalnaya Str., Belaya Glina Village, Leningradsky Village, Krasnodar Region, Russia; Email Address belnep00@mail.ru; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1022303499074; Tax ID No. 2326002180; Government Gazette Number 00940482; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- EYANSKI ELEVATOR, OAO (a.k.a. OPEN JOINT STOCK COMPANY 'EYANSKI ELEVATOR'; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'EYANSKI ELEVATOR'; f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA EYANSKI ELEVATOR), 29 ul. Grigoreva Stanitsa Novopokrovskaya, Novopokrovski Raion, Krasnodarski Kr. 353020, Russia; 29 Grigorieva Str., Novopokrovskaya Village, Novopokrovskiy District, Krasnodar Region, Russia; Email Address eya_silo@mail.ru; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1022304420478; Tax ID No. 2344003814; Government Gazette Number 00940588; [UKRAINE-E013662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- KHOMYAKOVSKI KHLADOKOMBINAT, ZAO (a.k.a. CLOSED JOINT STOCK COMPANY 'HOMIAKOVSKIY COLD STORAGE COMPLEX'; a.k.a. ZAKRYTOE AKTSIONERNOE OBSHCHESTVO 'KHOMYAKOVSKI KHLADOKOMBINAT'; f.k.a. ZAKRYTOE AKTSIONERNOE OBSHCHESTVO KHOMYAKOVSKI KHLADOKOMBINAT), 16V ul. Khomyakovskaya Pos. Khomyakova, Tula, Tulskaya Obl. 300098, Russia; 16 Homiakovskaya Str., Homiakovo, Tula, Russia; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1047100123586; Government Gazette Number 59192911; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- KRYLOVSKI ELEVATOR, OAO (a.k.a. OAO 'KRYLOVSKI ELEVATOR'; a.k.a. OPEN JOINT STOCK COMPANY 'KRYLOVSKIY ELEVATOR'; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'KRYLOVSKI ELVATOR'; f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA KRYLOVSKI ELEVATOR), 1 ul. Krasnogvardeiskaya Stanitsa Oktyabrskaya, Krylovski Raio, Krasnodarski Kr. 352085, Russia; 1 Krasnogvardeiskaya Str., Oktiabrskaya Village, Krylovski District, Krasnodar Region, Russia; Email Address klv_el@ibox.ru; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1022304103678; Tax ID No. 2338003767; Government Gazette Number 26982360; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- LADOZHSKI ELEVATOR, OAO (f.k.a. AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA LADOZHSKI ELEVATOR; a.k.a. OAO 'LADOZHSKI ELEVATOR'; a.k.a. OPEN JOINT STOCK COMPANY 'LADOGSKIY ELEVATOR'; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'LADOZHSKI ELEVATOR'), 115 ul. Konshinykh Stanitsa Ladozhskaya, Ust-Labinski Raion, Krasnodarski Kr. 352320, Russia; 115 Konshinykh Str., Ladogskaya Village, Ust-Labinskiy District, Krasnodar Region, Russia; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1022304972029; Tax ID No. 2356007563; Government Gazette Number 26370125; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- MALOROSSISKI ELEVATOR, OAO (f.k.a. AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA MALOROSSISKI ELEVATOR RUS; a.k.a. OPEN JOINT STOCK COMPANY 'MALOROSSIYSKIY ELEVATOR'; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'MALOROSSISKI ELEVATOR'), 1 ul. Sadovaya Stanitsa Arkhangelskaya, Tikhoretski Raion, Krasnodarski Kr. 352118, Russia; 1 Sadovaya Str., Arkhangelskaya Village, Tikhoretskiy District, Krasnodar Region, Russia; Email Address 72307@mail.ru; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1022304872754; Tax ID No. 2354003059; Government Gazette Number 00940708; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- RASSVET, OAO (a.k.a. OAO 'RASSVET'; a.k.a. OPEN JOINT STOCK COMPANY 'RASSVET'; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'RASSVET'; f.k.a. ZAKRYTOE AKTSIONERNOE OBSHCHESTVO RASSVET), D. Retyum, Luzhski Raion, Leningradskaya Obl. 188230, Russia; Retiun Village, Lujskiy District, Leningrad Region, Russia; Website www.emitent-spb.ru; Email Address lugarassvet@mail.ru; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1024701557726; Tax ID No. 4710004180; Government Gazette Number 00547371; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).

- ROVNENSKI ELEVATOR, OAO (f.k.a. AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA ROVNENSKI ELEVATOR; a.k.a. OAO 'ROVNENSKI ELEVATOR'; a.k.a. OPEN JOINT STOCK COMPANY 'ROVNENSKIY ELEVATOR'; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'ROVNENSKI ELEVATOR'), 1 ul. Mira Pos. Kubanski, Novopokrovski Raion, Krasnodarski Kr. 353011, Russia; 1 Mira Str., Kubanskiy Village, Novopokrovskiy District, Krasnodar Region, Russia; Email Address rovnenskiy@mail.ru; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1022304420709; Tax ID No. 2344007569; Government Gazette Number 00940743; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- STEPNYANSKI ELEVATOR, OAO (f.k.a. AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA STEPNYANSKI ELEVATOR; a.k.a. OAO 'STEPNYANSKI ELEVATOR'; a.k.a. OPEN JOINT STOCK COMPANY 'STEPNYANSIKY ELEVATOR'; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'STEPNYANSKI ELEVATOR'), 2 ul. Krupskaya S. Krasnoe, Kushchevski Raion, Krasnodarski Kr. 352010, Russia; 2 Krupskoi Str., Krasnoe Village, Kutshevskiy District, Krasnodar Region, Russia; Email Address step_el@inbox.ru; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 10223074243279; Tax ID No. 2340003980; Government Gazette Number 00940648; [UKRAINE-E013662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- TD AGROTORG, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU
 'TORGOVY' DOM 'AGROTORG'; a.k.a. TRADING COMPANY 'AGROTORG' LTD.), 3 per. Gagarinski,
 Moscow 119034, Russia; 3 Gagarinsky Pereulok, Moscow, Russia; Email Address fednev@rshb.ru;
 Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1047796863916;
 Tax ID No. 7704537299; Government Gazette Number 75319328; [UKRAINE-EO13662] (Linked To:
 RUSSIAN AGRICULTURAL BANK).
- UMANSKI ELEVATOR, OAO (a.k.a. OPEN JOINT STOCK COMPANY 'UMANSKIY ELEVATOR'; f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA UMANSKI ELEVATOR; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'UMANSKI ELEVATOR'), 1 per. Elevatorny Stanitsa Leningradskaya, Leningradski Raion, Krasnodarski Kr. 353740, Russia; 1 Elevatorniy Pereulok, Leningradskaya Village, Leningradskiy District, Krasnodar Region, Russia; Email Address umansk-elyr@mail.ru; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1022304292416; Tax ID No. 2341000195; Government Gazette Number 00940849; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).
- VELICHKOVSKI ELEVATOR, OAO (a.k.a. OPEN JOINT STOCK COMPANY 'VELICHKOVSKIY ELEVATOR'; f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO OTKRYTOGO TIPA VELICHKOVSKI ELEVATOR; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO 'VELICHKOVSKI ELEVATOR'), 1 ul. Elevatornaya Stanitsa Straovelichkovskaya, Kalininski Raion, Karsnodarski Kr. 353793, Russia; 1 Elevatornaya Str., Starovelichkovskaya Village, Kalininskiy Village, Krasnodar Region, Russia; Email Address velsilos@mail.ru; Executive Order 13662 Directive Determination Subject to Directive 1; Registration ID 1022303950360; Tax ID No. 2333003442; Government Gazette Number 00940536; [UKRAINE-EO13662] (Linked To: RUSSIAN AGRICULTURAL BANK).

Directive 2 (linked to OAO Novatek)

- NOVATEK SEVERO-ZAPAD, OOO (a.k.a. LIMITED LIABILITY COMPANY 'NOVATEK NORTH-WEST'; a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU 'NOVATEK SEVERO-ZAPAD'; a.k.a. OOO NOVATEK SEVERO-ZAPAD), d. 7 Litera A ul. Paradnaya, St. Petersburg 191014, Russia; Executive Order 13662 Directive Determination Subject to Directive 2; Registration ID 5067847486229 (Russia); Government Gazette Number 96782616 (Russia); [UKRAINE-EO13662] (Linked To: OAO NOVATEK).
- NOVATEK-CHELYABINSK, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU 'NOVATEK- CHELYABINSK'; a.k.a. OOO NOVATEK-CHELYABINSK; f.k.a. YAMALGAZRESURS-CHELYABINSK OOO), 42 prospekt Lenina, Chelyabinsk, Chelyabinskaya Obl. 454091, Russia; Executive Order 13662 Directive Determination Subject to Directive 2; Registration ID 1107404003376; Tax ID No. 7404056114; Government Gazette Number 68628371; [UKRAINE-EO13662] (Linked To: OAO NOVATEK).

- NOVATEK-KOSTROMA, OOO (f.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU KOSTROMSKAYA REGIONALNAYA KOMPANIYA PO REALIZATSII GAZA; a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU 'NOVATEK-KOSTROMA'; a.k.a. OOO NOVATEK-KOSTROMA), 37 ul. Lesnaya, Kostroma, Kostromskaya Obl. 156005, Russia; Website http://www.kostroma.novatek.ru/; Email Address p.marchenko@gas-kostroma.ru; Executive Order 13662 Directive Determination Subject to Directive 2; Registration ID 1024400511794; Tax ID No. 4401017834; Government Gazette Number 50101120; [UKRAINE-E013662] (Linked To: OAO NOVATEK).
- NOVATEK-PERM, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU
 'NOVATEK-PERM'; a.k.a. OOO 'NOVATEK-PERM'), 41 ul. Petropavlovskaya, Perm, Permski Kr. 614000,
 Russia; Email Address info@perm.novatek.ru; Executive Order 13662 Directive Determination Subject to
 Directive 2; Registration ID 1105904008297; Tax ID No. 5904230529; Government Gazette Number
 65136070; [UKRAINE-EO13662] (Linked To: OAO NOVATEK).
- NOVATEK-PUROVSKI ZPK, OOO (f.k.a. NOVA ZPK OOO; a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU 'NOVATEK-PUROVSKI ZPK'; a.k.a. OOO NOVATEK-PUROVSKY ZPK), D. Limbei, Purovski Raion, Yamalo-Nenetski Okr. 629880, Russia; Email Address comon@zpk.novatek.ru; Executive Order 13662 Directive Determination Subject to Directive 2; Registration ID 1048900851515; Tax ID No. 8911020197; Government Gazette Number 73157577; [UKRAINE-EO13662] (Linked To: OAO NOVATEK).
- NOVATEK-TARKOSALENEFTEGAZ, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU 'NOVATEK-TARKOSALENEFTEGAZ'; f.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU PUR LEND; a.k.a. OOO NOVATEK-TARKOSALENEFTGAS), 28 ul. Tarasova, Tarko-Sale, Purovski Raion, Yamalo-Nentski Okr. 629850, Russia; Email Address global@tsng.novatek.ru; Executive Order 13662 Directive Determination Subject to Directive 2; Registration ID 1058901201920; Tax ID No. 8911020768; Government Gazette Number 33589611; [UKRAINE-EO13662] (Linked To: OAO NOVATEK).
- NOVATEK-TRANSERVIS, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU 'NOVATEK-TRANSERVIS'; a.k.a. OOO NOVATEK-TRANSERVICE), D. Limbei, Purovski Raion, Yamalo-Nenetski Okr. 629880, Russia; Email Address novatek-ts@ts.novatek.ru; Executive Order 13662 Directive Determination Subject to Directive 2; Registration ID 1036301402576; Tax ID No. 6330024410; Government Gazette Number 14563310; [UKRAINE-EO13662] (Linked To: OAO NOVATEK).
- NOVATEK-UST-LUGA, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU 'NOVATEK-UST-LUGA'; a.k.a. OOO 'NOVATEK-UST-LUGA'), 5 ul. Shkolnaya D. Vistino, Kingiseppski Raion, Leningradskaya Obl. 188477, Russia; Executive Order 13662 Directive Determination Subject to Directive 2; Registration ID 1074707002457; Tax ID No. 4707026057; Government Gazette Number 80675261; [UKRAINE-EO13662] (Linked To: OAO NOVATEK).
- NOVATEK-YARSALENEFTEGAZ, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU 'NOVATEK-YARSALENEFTEGAZ'), 9 ul. Respubliki, Salekhard, Yamalo-Nenetski Okr., Russia; Email Address v.solovyh@novatek.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; Registration ID 1138901001194; Tax ID No. 8901028126; Government Gazette Number 27013953; [UKRAINE-EO13662] (Linked To: OAO NOVATEK).
- SHERVUD PREMER, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU
 'SHERVUD PREMER'; a.k.a. SHERVUD PREMIER OOO), 8 per. Olsufevski, Moscow 119021, Russia;
 Executive Order 13662 Directive Determination Subject to Directive 2; Registration ID 1027700226707;
 Tax ID No. 7716160907; Government Gazette Number 18470373; [UKRAINE-EO13662] (Linked To: OAO NOVATEK).
- TERNEFTEGAZ, ZAO (a.k.a. ZAO TERNEFTGAS), str. 2 ter. Promyshlenaya zone No. 11 Krasnoselkup, Krasnoselkupski Raion, Yamalo-Nenetski A.O. 629380, Russia; Executive Order 13662 Directive Determination - Subject to Directive 2; Registration ID 1098911000473; Tax ID No. 8912002715; Government Gazette Number 71216169 [UKRAINE-EO13662] (Linked To: OAO NOVATEK).

 YARGEO, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU 'YARGEO'; a.k.a. OOO YARGEO), 12/2 ul. Zvereva, Nadym, Yamalo-Nenetski Okr. 629730, Russia; Email Address loskutova@yargeo.novatek.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; Registration ID 1038900502728; Tax ID No. 8901014564; Government Gazette Number 71215589; [UKRAINE-EO13662] (Linked To: OAO NOVATEK).

General License No. 11

FAU Glavgosekspertiza Rossii was originally designated on September 1, 2016 by OFAC pursuant to Executive Order 13685 of December 19, 2014 (EO 13685) ("Blocking Property of Certain Persons and Prohibiting Certain Transactions With Respect to the Crimea Region of Ukraine") in connection with its involvement in the Kerch Bridge project. FAU Glavgosekspertiza Rossii is a Russian federal institution authorized to conduct official examinations of project documentation for significant construction works in Russian Federation territory.⁷

General License No. 11 authorizes US persons to engage in all transactions and activities that would otherwise have been prohibited by EO 13685 and "that are ordinarily incident and necessary to requesting, contracting for, paying for, receiving or utilizing a project design review or permit from FAU Glavgosekspertiza Rossii office(s) in the Russian Federation."

For the general license to apply, the underlying project must be located wholly within the Russian Federation which, as defined in the general license, does not include the Crimea region of Ukraine. The activity also may not involve any other dealing in blocked property or violate any other applicable sanctions regulations. FAU Glavgosekspertiza Rossii remains blocked on the SDN List and dealings with FAU Glavgosekspertiza Rossii remain prohibited unless expressly authorized by OFAC.

Companies doing business in Russia and Ukraine should monitor closely any measures imposed by the United States to ensure compliance. Penalties for noncompliance can be severe.

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This publication is prepared for the general information of our clients and other interested persons. It is not, and does not attempt to be, comprehensive in nature. Due to the general nature of its content, it should not be regarded as legal advice.

⁶ See Executive Order 13685 here.

See OFAC September 1, 2016 Press Release "Treasury Sanctions Individuals and Entities for Sanctions Evasion and Activities Related to the Conflict in Ukraine" (designating FAU Glavgosekpertiza Rossii) here.