

ClientAlert

International Trade

March 2015

US Imposes Additional Ukraine/Russia-Related Sanctions By Designating Individuals and Entities Pursuant to Executive Orders 13660 and 13685



On March 11, 2015, the US Department of the Treasury's Office of Foreign Assets Control (OFAC) issued further designations pursuant to Executive Order 13660 (EO 13660) and Executive Order 13685 (EO 13685). EO 13660, which was signed on March 6, 2014, authorizes the United States to impose sanctions on certain persons if they are found to have engaged in certain actions or policies that contribute to the situation in Ukraine.¹ EO 13685, which was signed on December 19, 2014, authorizes the United States to impose sanctions on certain persons if they are found to operate in the Crimea region of Ukraine.²

OFAC imposed these sanctions on 14 individuals and 2 entities. These sanctions follow similar action taken by the European Union and Canada on February 16, 2015.

The 14 individuals designated on March 11, 2015 are:

- ABISOV, Sergei (a.k.a. ABISOV, Sergei Vadimovich); DOB 27 Nov 1967; POB Simferopol, Crimea, Ukraine (individual) [UKRAINE-EO13660].
- ARBUZOV, Serhiy (a.k.a. ARBUZOV, Sergey G.; a.k.a. ARBUZOV, Serhiy Hennadiyovych); DOB 24 Mar 1976; POB Donetsk, Ukraine; Former First Deputy Prime Minister of Ukraine (individual) [UKRAINE-EO13660].
- AZAROV, Mykola Yanovych (a.k.a. AZAROV, Mykola Nikolai Yanovych; a.k.a. PAKHLO, Nikolai Yanovich); DOB 17 Dec 1947; POB Kaluga, Russia; Former Prime Minister of Ukraine (individual) [UKRAINE-EO13660].
- BOHATYRIOVA, Raisa Vasylivna (a.k.a. BOGATYRIOVA, Raisa; a.k.a. BOGATYROVA, Raisa; a.k.a. BOGATYRYOVA, Raisa; a.k.a. BOHATYREVA, Raisa; a.k.a. BOHATYROVA, Raisa; a.k.a. BOHATYRYOVA, Raisa; a.k.a. BOHATYRYOVA, Rayisa); DOB 06 Jan 1953; POB Bakal, Chelyabinsk, Russia (individual) [UKRAINE-EO13660].
- DUGIN, Aleksandr (a.k.a. DUGIN, Aleksandr Gelyevich; a.k.a. DUGIN, Alexander Gelyevich); DOB 07 Jan 1962 (individual) [UKRAINE-EO13660].

¹ Our client alert regarding EO 13660 is available [here](#).

² Our client alert regarding EO 13685 is available [here](#).

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- GUBAREVA, Ekaterina (a.k.a. GUBAREVA, Yekaterina); DOB 05 Jul 1983 (individual) [UKRAINE-EO13660].
- IVAKIN, Yuriy Vladimirovich (a.k.a. IVAKIN, Yuri); DOB 13 Aug 1954; POB Perevalsk, Ukraine (individual) [UKRAINE-EO13660].
- KANISHCHEV, Pavel; DOB 1986 (individual) [UKRAINE-EO13660].
- KARAMAN, Aleksandr (a.k.a. CARAMAN, Aleksandru; a.k.a. KARAMAN, Alexander; a.k.a. KARAMAN, Oleksandr); DOB 26 Jul 1956; POB Republic of Mordovia, Russia (individual) [UKRAINE-EO13660].
- KHODAKOVSKYY, Oleksandr Sergeyeovich (a.k.a. KHODAKOVSKIY, Aleksandr; a.k.a. KHODAKOVSKY, Alexander); DOB 18 Dec 1972; POB Donetsk, Ukraine (individual) [UKRAINE-EO13660].
- KOVALENKO, Andrey; DOB 30 Dec 1985 (individual) [UKRAINE-EO13660].
- KOZYURA, Oleg Grigorievich (a.k.a. KOZYURA, Oleg Grigoryevich); DOB 19 Dec 1962; POB Zaporozhye, Ukraine; Head of the Office of the Federal Migration Service in the City of Sevastopol (individual) [UKRAINE-EO13660].
- LYAGIN, Roman (a.k.a. LIAGIN, Roman; a.k.a. LIAHIN, Roman; a.k.a. LYAHIN, Roman); DOB 30 May 1980; POB Donetsk, Ukraine (individual) [UKRAINE-EO13660].
- ZDRILIUK, Serhii Anatoliyovych (a.k.a. ZDRILIUK, Serghiei; a.k.a. ZDRILYUK, Sergei; a.k.a. ZDRILYUK, Sergey; a.k.a. ZDRYLYUK, Serhiy); DOB 23 Jun 1972; POB Vinnytsia Region, Ukraine; nationality Ukraine; citizen Russia (individual) [UKRAINE-EO13660].

The two entities designated on March 11, 2015 are:

- EURASIAN YOUTH UNION, Russia 3, Bagrationovskiy Proezd, House 7, Area 20 B, Office 405, Moscow 121087, Russia; Website <http://rossia3.ru>; Email Address esm@rossia3.ru [UKRAINE-EO13660].
- RUSSIAN NATIONAL COMMERCIAL BANK (a.k.a. RNKB OAO; a.k.a. ROSSISKI NATSIONALNY KOMMERCHESKI BANK OTKRYTOE AKTSIONERNOE OBSHCHESTVO; a.k.a. "RNCB"), d. 9 korp. 5 ul. Krasno proletarskaya, Moscow 127030, Russia; SWIFT/BIC RNCORU33; Website <http://www.rncb.ru>; Email Address rncb@rncb.ru; BIK (RU) 044525607; Registration ID 1027700381290 (Russia); Tax ID No. 7701105460 (Russia); Government Gazette Number 09610705 (Russia) [UKRAINE-EO13685].

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 blocked parties hold 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 parties. Provision of goods, services or support for blocked parties is identified as a criterion for potential future designation.

OFAC's press release announcing these new designations provides the following description of each of the individuals and entities that have been designated:

- Roman Lyagin: Chairman of the Central Election Commission (CEC) and minister of social and labor policy of the self-proclaimed Donetsk People's Republic (DPR). Designated for having asserted governmental authority over a part or region of Ukraine without the authorization of the Government of Ukraine, and for having engaged in actions that have undermined democratic processes in Ukraine.
- Yuriy Ivakin: Leader of the ministry of internal affairs of the self-proclaimed LPR. Designated for asserting governmental authority over a part or region of Ukraine without the authorization of the Government of Ukraine, and for being a leader of the self-proclaimed Luhansk People's Republic (LPR).
- Aleksandr Karaman: Has held a number of leadership posts within the self-proclaimed DPR, including minister for social and labor policy, foreign minister, deputy prime minister, and deputy chairman of the council of ministers. Karaman is being designated for being a leader of the self-proclaimed DPR, and for threatening the peace, stability, sovereignty, and territorial integrity of Ukraine.
- Oleksandr Khodakovskyy: Former head of the self-proclaimed DPR security service, and chief of the Vostok Battalion, a unit of the DPR militia that engaged in fighting with the Ukrainian military at Donetsk Airport. Designated for being responsible for or complicit in actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine, and for asserting governmental authority over a part or region of Ukraine without the authorization of the Government of Ukraine.
- Serhii Zdriliuk: Senior "rebel commander" served as an aide to Igor Girkin (a.k.a. Igor Strelkov), former "defense minister" of the self-proclaimed DPR. Zdriliuk and Girkin were involved in the takeover of Ukraine's Crimea region. Designated for actions that threaten the territorial integrity of Ukraine. (Girkin was designated in June 2014.)

³ 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.

- The Eurasian Youth Union: Actively recruited individuals with military and combat experience to fight on behalf of the self-proclaimed DPR and stated that it has a covert presence in Ukraine. Aleksandr Dugin, Andrey Kovalenko, and Pavel Kanishchev are leaders of the Eurasian Youth Union. This group and its leaders are being designated for being responsible for or complicit in actions or policies that threaten the peace, security, stability, or sovereignty or territorial integrity of Ukraine.
- Ekaterina Gubareva: Previously foreign minister of self-proclaimed DPR. Designated for being responsible for or complicit in actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine.
- Sergei Abisov: Minister of interior affairs of the self-proclaimed Republic of Crimea. Designated for asserting governmental authority over a part or region of Ukraine without the authorization of the Government of Ukraine.
- Oleg Kozyura: Head of the Federal Migration Service of Russia in Sevastopol, Crimea, responsible for the systematic and expedited issuance of Russian passports for the residents of Crimea. Designated for leading an entity that has asserted governmental authority over a part of Ukraine without the authorization of the Government of Ukraine.
- Russian National Commercial Bank (RNCB): RNCB had no presence in the Crimea region of Ukraine prior to its occupation and attempted annexation by Russia. Following the annexation, RNCB bought or took over branches of retreating banks and now operates the largest banking network in Crimea. Designated for operating in the Crimea region of Ukraine.
- Mykola Azarov: Former Prime Minister of Ukraine. Designated for the misappropriation of state assets of Ukraine.
- Serhiy Arbuzov: Former First Deputy Prime Minister and former acting Prime Minister of Ukraine. Designated for acting on behalf of former Ukrainian President Viktor Yanukovich as First Deputy Prime Minister and as a member of Yanukovich's inner circle.
- Raisa Bohatyriova: Former Minister of Health of Ukraine. Currently under investigation in Ukraine for the large-scale embezzlement of state funds and the illegal transfer of those funds outside the territory of Ukraine. Designated for the misappropriation of state assets of Ukraine.

More information about the Ukraine/Russia-related sanctions, including the corresponding Executive Orders and sanctions measures, can be found [here](#).

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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