

US Issues Crimea Sanctions Advisory, Designates Additional Russian and Ukrainian Individuals and Entities

31 July 2015

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On July 30, 2015, the US Department of the Treasury's Office of Foreign Assets Control (OFAC) issued a Crimea Sanctions Advisory, identified certain subsidiaries of entities included on the Sectoral Sanctions Identifications List (SSI List), and added 19 Russian and Ukrainian individuals and entities to the List of Specially Designated Nationals and Blocked Persons (SDN List). We describe these actions below.

OFAC Crimea Sanctions Advisory

OFAC's Crimea Sanctions Advisory¹ highlights some of the practices that have been used to circumvent or evade the US sanctions targeting the Crimea region of Ukraine. The Advisory advises US persons² and persons conducting business in or through the US to be aware of these practices in order to implement controls to ensure compliance with their OFAC obligations.

The evasive practices identified in the Advisory include the omission or obfuscation of references to Crimea and locations within Crimea in documentation underlying financial services and international trade transactions involving US persons or the US.

In financial services transactions, OFAC has become aware that certain parties have engaged in a pattern of omitting full or partial originator or beneficiary address information from Society for Worldwide Interbank Financial Telecommunications (SWIFT) messages involving Crimean individuals or entities. OFAC notes that this fact pattern presents challenges to efforts by intermediary financial institutions to identify and interdict transactions related to Crimea and urges caution for parties conducting business in or through the US when processing payment instructions lacking complete address information when such transactions involve an individual or entity that has previously omitted address information of Crimean individuals or entities.

¹ A copy of OFAC's Crimea Sanctions Advisory is available [here](#).

² 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.

In certain international trade transactions, references to Crimea have been obscured in associated agreements and documentation. As an example, the Advisory states that certain individuals and entities list Crimean counterparties on financial and trade documents as being located in Russia rather than in Ukraine. A US company may have a distributor agreement with a third-country company that authorizes the sale of products in Russia, but the distributor may be unaware the US does not recognize Crimea as part of Russia or may intentionally exploit confusion over this fact to sell the US company's products to Crimean individuals or entities.

The Advisory states that these practices are intended to circumvent the existing sanctions compliance controls used by US persons and persons conducting business in or through the US and recommends three measures to mitigate the risk of processing transactions in apparent violation of OFAC sanctions on Crimea:

- Ensuring that transaction monitoring systems include appropriate search terms corresponding to major geographic locations in Crimea and not simply references to "Crimea." For example, payment instructions or trade documents may reference major cities or ports located in Crimea, and interdiction filters may not flag such transactions for review if the filters do not include an appropriately expansive list of search terms.
- Requesting additional information from parties (including financial institutions, corporate entities, and individuals) that previously have violated or attempted to violate US sanctions on Crimea. Such prior conduct could include, for example, routing transactions to or through US financial institutions with inaccurate or incomplete address information for Crimean individuals or entities.
- Clearly communicating US sanctions obligations to international partners (in both the financial and trade sectors) and discussing OFAC sanctions compliance expectations with correspondent banking and trade partners. Such communications should include, for example, a description of the prohibition on the direct and indirect exportation or reexportation of goods, technology, and services (including financial services) from the United States to Crimea.

The Advisory states that these are examples of steps that can be taken to mitigate risk, but parties should always tailor compliance measures to their own risk profile.

New Additions to the SSI List

The United States identified on the SSI List several subsidiaries owned 50 percent or more by Vnesheconombank (VEB) and Open Joint-Stock Company Rosneft Oil Company (Rosneft). Both VEB and Rosneft were previously sanctioned pursuant to Executive Order 13662 in July 2014. VEB is subject to sanctions targeting the Russian financial services sector pursuant to Directive 1, and Rosneft is subject to sanctions targeting the Russian energy sector pursuant to Directives 2 and 4³.

OFAC stated that, although these entities already were subject by operation of law to the same financing restrictions as their parent entities pursuant to OFAC's 50 percent rule guidance,⁴ their identification on the SSI List will help the public more effectively comply with the sanctions that apply to VEB and Rosneft.

OFAC has identified the following listing of subsidiaries that have been added to the SSI List pursuant to Directives 1 (linked to VEB), or to Directives 2 and 4 (linked to Rosneft):

Directive 1 (Linked to VEB):

- BANK BELVEB OJSC (a.k.a. BELVESHECONOMBANK OAO; a.k.a. BELVNESHECONOMBANK OPEN JOINT STOCK COMPANY), 29 Pobeditelei ave., Minsk 220004, Belarus; SWIFT/BIC BELB BY 2X; Website bveb.by; Executive Order 13662 Directive Determination - Subject to Directive 1; [UKRAINE-EO13662].
- DEVELOPMENT CORPORATION OF NORTH CAUCASUS OJSC (f.k.a. KRSK, OAO; a.k.a. OJSC NORTH CAUCASUS DEVELOPMENT CORPORATION; a.k.a. OPEN JOINT-STOCK COMPANY NORTH CAUCASUS DEVELOPMENT CORPORATION; a.k.a. OTKRYTOE AKTSIONERNOE

³ Rosneft was designated under Directive 2 in July 2014, and later designated under Directive 4 in September 2014.

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

OBSHCHESTVO KORPORATSIYA RAZVITIYA SEVERNOGO KAVKAZA), d. 139 ul. Pyatigorskaya Essentuki, Stavropolski krai 357625, Russia; Website krskfo.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1102632003253; [UKRAINE-EO13662].

- EXIAR (a.k.a. EKSAR OAO; a.k.a. EXIAR OJSC; a.k.a. ROSSISKOE AGENTSTVO PO STRAKHOVANIYU EKSPORTNYKH KREDITOV I INVESTITSI OTKRYTOE AKTSIONERNOE OBSHCHESTVO; a.k.a. RUSSIAN AGENCY FOR EXPORT CREDIT AND INVESTMENT INSURANCE OJSC), str. 1 3 1-i Zachatievski per, Moscow, 119034, Russia; Website exiar.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1117746811566; [UKRAINE-EO13662].
- EXIMBANK OF RUSSIA (a.k.a. GOSUDARSTVENNY SPETSIALIZIROVANNY ROSSISKI EKSPORTNO-IMPORTNY BANK (ZAKRYTOE AKTSIONERNOE OBSHCHESTVO); a.k.a. ROSEKSIMBANK, ZAO; a.k.a. RUSSIAN EXPORT-IMPORT BANK; a.k.a. STATE SPECIALIZED RUSSIAN EXPORT-IMPORT BANK (CLOSED JOINT-STOCK COMPANY)), d.13 str. 1 per.3-l Neopalimovski, Moscow 119121, Russia; SWIFT/BIC EXIR RU MM; Website eximbank.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1027739109133; All offices worldwide; for more information on directives, [UKRAINE-EO13662].
- FAR EAST AND BAIKAL REGION DEVELOPMENT FUND OJSC (a.k.a. FOND RAZVITIYA DALNEGO VOSTOKA I BAIKALSKOGO REGIONA, OAO; a.k.a. OJSC THE FAR EAST AND BAIKAL REGION DEVELOPMENT FUND; a.k.a. OPEN JOINT-STOCK COMPANY THE FAR EAST AND BAIKAL REGION DEVELOPMENT FUND; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO FOND RAZVITIYA DALNEGO VOSTOKA I BAIKALSKOGO REGIONA), d. 82 str. 2 ul. Sadovnicheskaya, Moscow 115035, Russia; Website fondvostok.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1112721010995; For more information on directives, [UKRAINE-EO13662].
- FEDERAL CENTER FOR PROJECT FINANCE (a.k.a. FTSPF, OAO; a.k.a. OAO FEDERALNY TSENTR PROEKTNOGO FINANSIROVANIYA; f.k.a. ZAKRYTOE AKTSIONERNOE OBSHCHESTVO FEDERALNY CENTR PROEKTNOGO FINANSIROVANIYA; a.k.a. "FCPF"), d. 14 prospekt Olimpiski, Moscow 129090, Russia; Website fcpf.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1027739088410; [UKRAINE-EO13662].
- GLOBEXBANK (a.k.a. AKTSIONERNOE OBSHCHESTVO KOMMERCHESKI BANK GLOBEKS; f.k.a. CJSC GLOBEXBANK; a.k.a. GLOBEKSBANK, AO; a.k.a. GLOBEX COMMERCIAL BANK, JOINT STOCK COMPANY; f.k.a. ZAKRYTOE AKTSIONERNOE OBSHCHESTVO KOMMERCHESKI BANK GLOBEKS), d. 59 str. 2 ul. Zemlyanoi Val, Moscow 109004, Russia; SWIFT/BIC GLOB RU MM; Website globexbank.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1027739326010; All offices worldwide; for more information on directives, [UKRAINE-EO13662].
- KRASLESINVEST CJSC (a.k.a. CJSC KRASLESINVEST; a.k.a. KRASLESINVEST, ZAO; a.k.a. THE CLOSED JOINT-STOCK COMPANY KRASLESINVEST; a.k.a. ZAKRYTOE AKTSIONERNOE OBSHCHESTVO KRASLESINVEST), d. 35 A ul. Partizana Zheleznyaka, Krasnoyarsk, Krasnoyarski krai 660022, Russia; Website kraslesinvest.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1082468004574; [UKRAINE-EO13662].
- PROMINVESTBANK (a.k.a. COMMERCIAL INDUSTRIAL AND INVESTMENT BANK PUBLIC JOINT STOCK COMPANY; a.k.a. JOINT STOCK COMMERCIAL INDUSTRIAL AND INVESTMENT BANK PUBLIC JOINT STOCK COMPANY; a.k.a. PSC PROMINVESTBANK; a.k.a. PUBLIC STOCK COMPANY JOINT STOCK COMMERCIAL INDUSTRIAL & INVESTMENT BANK), 12, Shevchenko lane, Kyiv 01001, Ukraine; SWIFT/BIC UPIB UA UX; Website pib.com.ua; Executive Order 13662 Directive Determination - Subject to Directive 1; All offices worldwide; for more information on directives, [UKRAINE-EO13662].
- RESAD LLC (a.k.a. LLC RESAD; a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU RESAD; a.k.a. RESAD, OOO), d. 5 ul. Bryanskaya, Moscow 121059, Russia; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1027739071337; [UKRAINE-EO13662].
- ROSE GROUP LIMITED (f.k.a. RGI INTERNATIONAL; f.k.a. RGI INTERNATIONAL LIMITED; a.k.a. "ROSE GROUP"), Frances House, Sir William Place, St. Peter Port GY1 4EU, Guernsey; Korobeinikov

Lane, 1, Moscow 119034, Russia; Website rosegroup.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; [UKRAINE-EO13662].

- RUSSIAN DIRECT INVESTMENT FUND MANAGEMENT COMPANY (a.k.a. LIMITED LIABILITY COMPANY RDIF MANAGEMENT COMPANY; a.k.a. MANAGEMENT COMPANY RDIF LLC; a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU UPRAVLYAYUSHCHAYA KOMPANIYA RFPI; a.k.a. RDIF MANAGEMENT COMPANY; a.k.a. RDIF MANAGEMENT COMPANY LLC; a.k.a. UK RFPI, OOO), d. 9 prospekt Akademika Sakharova, Moscow 107996, Russia; Website rdif.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1117746429371; [UKRAINE-EO13662].
- SME BANK (a.k.a. AKTSIONERNOE OBSHCHESTVO ROSSISKI BANK PODDERZHKI MALOGO I SREDNEGO PREDPRINIMATELSTVA; a.k.a. JSC RUSSIAN BANK FOR SMALL AND MEDIUM ENTERPRISES SUPPORT; a.k.a. JSC SME BANK; a.k.a. MSP BANK AO; f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO ROSSISKI BANK RAZVITIYA), 79 ul. Sadovnicheskaya, Moscow 115035, Russia; SWIFT/BIC RUDV RU MM; Website mspbank.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1027739108649; All offices worldwide; [UKRAINE-EO13662].
- SVIAZ-BANK (a.k.a. INTERREGIONAL BANK FOR SETTLEMENTS OF THE TELECOMMUNICATIONS AND POSTAL SERVICES; a.k.a. MEZHREGIONALNY KOMMERCHESKI BANK RAZVITIYA SVYAZI I INFORMATIKI (PUBLICHNOE AKTSIONERNOE OBSHCHESTVO); a.k.a. SVIAZ-BANK AKB PAO), 7 Tverskaya ul., Moscow 125375, Russia; SWIFT/BIC SVIZ RU MM; Website sviaz-bank.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1027700159288; All offices worldwide; [UKRAINE-EO13662].
- VEB ASIA LIMITED, Suite 5808, 58/F, Two International Finance Center, 8 Finance Street Central, Hong Kong, China; Executive Order 13662 Directive Determination - Subject to Directive 1; [UKRAINE-EO13662].
- VEB CAPITAL (a.k.a. LIMITED LIABILITY COMPANY VEB CAPITAL; a.k.a. LLC VEB-CAPITAL; a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU INVESTITSIONNAYA KOMPANIYA VNESHKONOMBANKA (VEB KAPITAL); a.k.a. VEB CAPITAL LLC; a.k.a. VEB KAPITAL, OOO), d. 7 str. A ul. Mashki Poryvaevoi, Moscow 107078, Russia; Website vebcapital.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1097746831709; For more information on directives, [UKRAINE-EO13662].
- VEB ENGINEERING LLC (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU VEB INZHINIRING; a.k.a. VEB INZHINIRING, OOO), d. 9 prospekt Akademika Sakharova, Moscow 107996, Russia; Website vebeng.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1107746181674; [UKRAINE-EO13662].
- VEB LEASING OJSC (a.k.a. OJSC VEB-LEASING; a.k.a. OPEN JOINT-STOCK COMPANY VEB-LEASING; a.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO VEB-LIZING; a.k.a. VEB-LIZING, OAO), d. 10 ul. Vozdvizhenka, Moscow 125009, Russia; Website veb-leasing.ru; Executive Order 13662 Directive Determination - Subject to Directive 1; Public Registration Number 1037709024781; [UKRAINE-EO13662].

Directives 2 & 4 (Linked to Rosneft):

- CJSC VANKORNEFT (a.k.a. VANKORNEFT; a.k.a. ZAO VANKORNEFT), Dobrovolskoy Brigady St., 15, Krasnoyarsk Territory 660077, Russia; Email Address info@vankoroil.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662] (Linked To: OPEN JOINT-STOCK COMPANY ROSNEFT OIL COMPANY).
- NEFT-AKTIV LLC (a.k.a. OOO NEFT-AKTIV; a.k.a. RN-AKTIV OOO), Ulica Kaluzhskaya M., d., 15, str. 28, Moscow 119071, Russia; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].

- OJSC ACHINSK REFINERY (a.k.a. ACHINSK REFINERY; a.k.a. OAO ACHINSK OIL REFINERY VNK), Achinsk Refinery industrial area, Bolsheuluisky district, Krasnoyarsk territory 662110, Russia; Email Address sekr1@anpz.rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- OJSC ANGARSK PETROCHEMICAL COMPANY (a.k.a. ANGARSK REFINERY), Angarsk, Irkutsk region 665830, Russia; 6 ul. K. Marksa, Angarsk 665830, Russia; Website www.anhk.ru; Email Address delo@anhk.rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- OJSC KUYBYSHEV REFINERY (a.k.a. KUIBYSHEV REFINERY; a.k.a. OJSC KUIBYSHEV REFINERY), 25 Groznenskaya st., Samara 443004, Russia; Email Address sekr@knpz.rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- OJSC NOVOKUYBYSHEV REFINERY (a.k.a. NOVOKUIBYSHEVSK REFINERY; a.k.a. OJSC NOVOKUYBYSHEV REFINERY), Novokuibyshevsk, Samara region 446207, Russia; Email Address sekr@nknz.rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- OJSC ORENBURGNEFT (a.k.a. OAO JSC ORENBURGNEFT; a.k.a. ORENBURGNEFT), Magistralnaya St., 2, Buzuluk, the Orenburg Region 461040, Russia; st. Magistralnaya 2, Buzuluk 461040, Russia; Email Address orenburgneft@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- OJSC RN HOLDING (a.k.a. RN HOLDING OAO), 60 Oktyabrskaya ul., Uvat 626170, Russia; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 1047200153770 (Russia); Tax ID No. 7225004092 (Russia); Government Gazette Number 74743120 (Russia); [UKRAINE-EO13662].
- OJSC RUSSIAN REGIONAL DEVELOPMENT BANK (a.k.a. RUSSIAN REGIONAL DEVELOPMENT BANK; a.k.a. "VBR"), 65/1 Sushevsky Val, Moscow 129594, Russia; 65 Sushchevskiy val, Moscow 129594, Russia; Website www.vbrr.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID 3287 (Russia); [UKRAINE-EO13662].
- OJSC SAMOTLORNEFTEGAZ (a.k.a. SAMOTLORNEFTEGAZ; a.k.a. SAMOTLORNEFTEGAZ JSC), Lenina St. 4, the Tyumen Region, Khanty-Mansiysk, Autonomous District, Nizhnevartovsk 628606, Russia; Email Address NVSNGinfo@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- OJSC SYZRAN REFINERY (a.k.a. OPEN JOINT-STOCK OIL AND GAS COMPANY SYZRAN; a.k.a. SYZRAN REFINERY), 1 Astrakhanskaya st., Syzran, Samara region 446009, Russia; Moskvorechje street 105, Building 8, Moscow 115523, Russia; Email Address sekr@snpz.rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- PJSC VERKHNECHONSKNEFTEGAZ (a.k.a. OJSC VERKHNECHONSKNEFTEGAZ; a.k.a. VERKHNECHONSKNEFTEGAZ), Baikalskaya St., 295 B, Irkutsk 664050, Russia; Email Address vcng@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- RN-KOMSOMOLSKY REFINERY LLC (a.k.a. KOMSOMOLSK REFINERY; a.k.a. LLC RN-KOMSOMOLSK REFINERY; a.k.a. RN-KOMSOMOLSKI NPZ OOO), 115 Leningradskaya st., Komsomolsk-on-Amur, Khabarovsk region 681007, Russia; Email Address knpz@rosneft.ru; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].

- RN-YUGANSKNEFTEGAZ LLC (a.k.a. RN-YUGANSKNEFTEGAZ OOO; a.k.a. YUGANSKNEFTEGAZ), Lenina St., 26, Nefteyugansk, Tyumen Region 628309, Russia; Email Address rn_yng@yungjsc.com; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- ROSNEFT FINANCE S.A., 46A Avenue John F Kennedy, 2nd Floor, Luxembourg 1855, Luxembourg; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].
- ROSNEFT TRADE LIMITED (f.k.a. TNK TRADE LIMITED), Elenion Building 5 Themistokli Dervi, 2nd floor, Lefkosia, Nicosia 1066, Cyprus; Email Address hnm@rosneft-sh.com.cy; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; Registration ID C122790; [UKRAINE-EO13662].
- ROSNEFT TRADING S.A., 2, Rue Place du Lac, 1204, Geneva, Switzerland; Website www.rosneft.com; Executive Order 13662 Directive Determination - Subject to Directive 2; alt. Executive Order 13662 Directive Determination - Subject to Directive 4; [UKRAINE-EO13662].

New Additions to the SDN List

The United States also announced 19 additional designations to the SDN List pursuant to Executive Orders (EOs) 13660, 13661 and 13685.

Pursuant to EO 13660, OFAC designated four former Yanukovich regime officials and close associates, who are already on the European Union (EU) sanctions list.

In addition, pursuant to EO 13661 OFAC designated a total of 15 individuals and entities. OFAC listed seven individuals and six entities linked to serious and sustained sanctions evasion by the previously designated parties, Gennady Timchenko, Boris Rotenberg, and Kalashnikov Concern. Two entities also were listed for operating in the arms or related materiel sector.

Finally, pursuant to EO 13685, OFAC designated five Crimean port operators and one sea ferry operator because they operate in the Crimea region. Three of the port operators and the sea ferry operator already were designated by the EU.

OFAC has provided the following listing of individuals and entities designated on the SDN List:

Individuals:

- BULYUTIN, Andrey, London, United Kingdom; DOB 19 Oct 1979; POB Izhevsk, Russia; citizen Russia; Passport 515356705 (Russia); Business Development Manager at Kalashnikov Concern (individual) [UKRAINE-EO13661].
- KLYUYEV, Andriy Petrovych (a.k.a. KLIUIEV, Andrii Petrovych; a.k.a. KLUEV, Andriy; a.k.a. KLYUEV, Andriy; a.k.a. KLYUYEV, Andrey); DOB 12 Aug 1964; POB Donetsk, Ukraine (individual) [UKRAINE-EO13660].
- KOLBIN, Petr (a.k.a. KOLBIN, Peter; a.k.a. KOLBIN, Petr Viktorovich; a.k.a. KOLBIN, Pyotr); DOB 02 Jan 1952; POB Russia (individual) [UKRAINE-EO13661].
- KURCHENKO, Sergey Vitalievich (a.k.a. KURCHENKO, Sergei; a.k.a. KURCHENKO, Sergii; a.k.a. KURCHENKO, Serhiy; a.k.a. KURCHENKO, Serhiy Vitaliyovych); DOB 21 Sep 1985 (individual) [UKRAINE-EO13660].
- OMELCHENKO, Aleksander (a.k.a. OMELCHENKO, Aleksandr Anatolyevich; a.k.a. OMELCHENKO, Alexander A.; a.k.a. OMELCHENKO, Alexander Anatolyevich; a.k.a. OMELCHENKO, Alexandr Anatolyevich); DOB 08 Sep 1983; POB Moscow, Russia; citizen Russia; Passport 721937258 (Russia); National ID No. 4598338396 (Russia); alt. National ID No. 4506978162 (Russia); Chief Export Officer for Kalashnikov Concern (individual) [UKRAINE-EO13661].
- PAANANEN, Kai (a.k.a. PAANANEN, Kai Lauri Johannes); DOB 21 Jul 1954; Chairman, SET Petrochemicals Oy; Managing Director, Southeast Trading Oy (individual) [UKRAINE-EO13661].

- ROTENBERG, Roman, Beregovaya, Street 6, Apartment 25, Moscow 125367, Russia; DOB 07 Apr 1981; citizen Russia; alt. citizen Finland; Passport 640848350 (Russia); alt. Passport 16038132 (Finland); alt. Passport 17017258 (Finland) (individual) [UKRAINE-EO13661].
- SEMENOVA, Olena Yurevna (a.k.a. SEMENOVA, Elena Iurevna); DOB 06 Dec 1978; citizen Ukraine; Passport ER747251 (Ukraine); National ID No. 2882908207 (Ukraine) (individual) [UKRAINE-EO13661].
- STAVYTSKY, Eduard Anatoliyovych (a.k.a. STAVYTSKYI, Eduard; a.k.a. STAVYTSKY, Eduard); DOB 04 Oct 1972; POB Lebedyn, Ukraine; citizen Ukraine; alt. citizen Israel (individual) [UKRAINE-EO13660].
- USACHEV, Oleg (a.k.a. USACHEV, Oleg Leonidovich); DOB 03 Jul 1970 (individual) [UKRAINE-EO13661].
- YANUKOVYCH, Oleksandr Viktorovych (a.k.a. YANUKOVICH, Alexander; a.k.a. YANUKOVICH, Oleksander; a.k.a. YANUKOVYCH, Aleksandr Viktorovych; a.k.a. YANUKOVYCH, Olexander); DOB 01 Jul 1973; POB Donetsk, Ukraine (individual) [UKRAINE-EO13660].

Entities:

- AIRFIX AVIATION OY, Tullimiehentie 4-6, Vantaa 01530, Finland; Chemin des Papillons 4, Geneva/Cointrin 1216, Switzerland [UKRAINE-EO13661].
- IPP OIL PRODUCTS (CYPRUS) LIMITED, 12 Esperidon Street, 4th Floor, Nicosia 1087, Cyprus; Public Registration Number C210706 [UKRAINE-EO13661].
- IZHEVSKY MEKHANICHESKY ZAVOD JSC (a.k.a. BAIKAL), 8 Promyshlennaya Str., Izhevsk 426063, Russia; Website <http://www.baikalinc.ru> [UKRAINE-EO13661].
- OPEN JOINT STOCK COMPANY "KONTSERN IZHMASH" (a.k.a. OJSC KONTSERN IZHMASH), 3 Deryabin Proezd, Izhevsk, Udmurt Republic 426006, Russia; Public Registration Number 1021801434380 [UKRAINE-EO13661].
- OY LANGVIK CAPITAL LTD, Tanskarlantie 9, Jorvas 02420, Finland; National ID No. 19607726 [UKRAINE-EO13661].
- PRIVATE JOINT-STOCK COMPANY MAKO HOLDING (a.k.a. MAKO HOLDING), Bohdan Khmelnytsky Avenue, Building 102, Voroshilovsky District, Donetsk, Donetsk Oblast 83015, Ukraine; Website <http://mako.ua/>; Email Address a.kyzura@mako-holding.com; Government Gazette Number 34436105 (Ukraine) [UKRAINE-EO13660] (Linked To: YANUKOVYCH, Oleksandr Viktorovych).
- SET PETROCHEMICALS OY, Ukonvaaja 2 A, Espoo 02130, Finland [UKRAINE-EO13661].
- SOUTHEAST TRADING OY (a.k.a. SOUTHEAST TRADING LTD), Bucharest, Romania; St. Petersburg, Russia; Espoo, Finland; Kannelkatu 8, Lappeenranta 53100, Finland; PL 148, Lappeenranta 53101, Finland [UKRAINE-EO13661].
- SOUTHPORT MANAGEMENT SERVICES LIMITED, De Castro Street 24, Akara Building, Wickhams Cay 1, Road Town, Tortola, Virgin Islands, British; Nicosia, Cyprus [UKRAINE-EO13661].
- STATE ENTERPRISE EVPATORIA SEA COMMERCIAL PORT (a.k.a. PORT OF EVPATORIA; a.k.a. PORT OF YEVPATORIA; a.k.a. SEAPORT OF YEVPATORIYA; a.k.a. YEVPATORIA COMMERCIAL SEAPORT; a.k.a. YEVPATORIA MERCHANT SEA PORT; a.k.a. YEVPATORIA SEA PORT; a.k.a. YEVPATORIYA COMMERCIAL SEA PORT; a.k.a. YEVPATORIYA SEA PORT), Mariners Square 1, Evpatoria, Crimea 97416, Ukraine; 1, Moryakov Sq, Yevpatoriya, Crimea 97408, Ukraine; 1 Moryakov Sq., Yevpatoria, Crimea 97416, Ukraine; Ukraine; 1 Moryakov Sq, Yevpatoriya, Crimea 97416, Ukraine; Email Address lada1@seavenue.net; alt. Email Address zamves@empt.com.ua; UN/LOCODE UA ZKA; Registration ID 01125583 (Ukraine) [UKRAINE-EO13685].
- STATE ENTERPRISE FEODOSIA SEA TRADING PORT (a.k.a. PORT OF FEODOSIA; a.k.a. SEAPORT OF FEODOSIYA; a.k.a. THEODOSIA COMMERCIAL SEAPORT; a.k.a. THEODOSIA MERCHANT SEA PORT; a.k.a. THEODOSIA SEA PORT), 14 Gorky Street, Theodosia 98100, Ukraine; 14, Gorky Str., Feodosiya, Crimea 98100, Ukraine; Gorky Street 11, Feodosia, Crimea 98100, Ukraine; Website

www.ukrport.org.ua; Email Address theodosia@port.kafa.crimea.ua; UN/LOCODE UA FEO; Registration ID 01125577 (Russia) [UKRAINE-EO13685].

- STATE ENTERPRISE KERCH SEA COMMERCIAL PORT (a.k.a. KERCH COMMERCIAL SEAPORT; a.k.a. KERCH MERCHANT SEA PORT; a.k.a. KERCH SEA PORT; a.k.a. PORT OF KERCH; a.k.a. SEAPORT OF KERCH; a.k.a. STATE ENTERPRISE KERCH COMMERCIAL SEA PORT), Kirova Street 28, Kerch, Crimea 98312, Ukraine; 28 Kirova Str., Kerch, Crimea 98312, Ukraine; 28, Kirov Str., Kerch, Crimea 98312, Ukraine; Ul. Kirov, 28, Kerch, Crimea 98312, Ukraine; ul Kirova 28, Kerch 98312, Ukraine; Website <http://www.kerchport.com>; alt. Website <http://www.ukrport.org.ua>; Email Address kntp@kerch.sf.ukrtel.net; alt. Email Address referent.port@mail.ru; alt. Email Address kntp@trport.kerch.crimea.com; UN/LOCODE UA KEH; Registration ID 01125554 [UKRAINE-EO13685].
- STATE ENTERPRISE SEVASTOPOL SEA TRADING PORT (a.k.a. PORT OF SEVASTOPOL; a.k.a. SEAPORT OF SEVASTOPOL; a.k.a. SEVASTOPOL COMMERCIAL SEAPORT; a.k.a. SEVASTOPOL MERCHANT SEA PORT; a.k.a. SEVASTOPOL SEA PORT; a.k.a. SEVASTOPOL SEA TRADE PORT; a.k.a. STATE ENTERPRISE SEVASTOPOL COMMERCIAL SEAPORT), 3 Place Nakhimova, Sevastopol 99011, Ukraine; 5, Nakhimova square, Sevastopol, Crimea 99011, Ukraine; Nahimova Square 5, Sevastopol, Crimea 99011, Ukraine; Email Address Sevport@stel.sebastopol.ua; alt. Email Address sevampu@ukr.net; alt. Email Address mail@morport.sebastopol.ua; UN/LOCODE UA SVP; Registration ID 01125548 (Ukraine) [UKRAINE-EO13685].
- STATE ENTERPRISE YALTA SEA TRADING PORT (a.k.a. PORT OF YALTA; a.k.a. SEAPORT OF YALTA; a.k.a. YALTA COMMERCIAL SEAPORT; a.k.a. YALTA MERCHANT SEA PORT; a.k.a. YALTA SEA PORT), Roosevelt Street 3, Yalta, Crimea 98600, Ukraine; 5, Roosevelt Str., Yalta, Crimea 98600, Ukraine; 5 Roosevelt Street, Yalta, Crimea 98600, Ukraine; Website yaltaport.com.ua; Email Address yasko@ukrpost.ua; alt. Email Address yasco@mail.ylt.crimea.com; UN/LOCODE UA YAL; Registration ID 01125591 (Ukraine) [UKRAINE-EO13685].
- STATE SHIPPING COMPANY KERCH SEA FERRY (a.k.a. STATE FERRY ENTERPRISE KERCH FERRY), Tselimbernaya Street 16, Kerch, Crimea 98307, Ukraine; 16 Tselimbernaya Street, Kerch, Crimea 98307, Ukraine; Registration ID 14333981 (Ukraine) [UKRAINE-EO13685].

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More information about the Russia 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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