

Client Alert

International Trade

1 December 2014

EU adds separatist names to Ukraine-related asset freeze list

As per a recent request from the EU Council,¹ the EU has extended its sanctions in relation to Ukraine by adding **13 persons and five organizations** to the asset freeze list based on their involvement in recent elections in the so-called 'Luhansk People's Republic' and 'Donetsk People's Republic'.

On 29 November 2014, **Regulation 1270/2014** was adopted and published by the EU,² adding another **13 persons** considered separatists in Eastern Ukraine to the list of parties subject to an asset freeze and visa ban.³ In addition, **five public organizations** deemed involved in action against Ukraine's territorial integrity have been added to the asset freeze list.⁴

The newly-added designated parties (and the reasoning given for them being sanctioned) effective **29 November 2014** are:

Individuals

1. Serhiy KOZYAKOV (*responsible for organising the so-called 'elections' of 2 November 2014 in the so-called 'Luhansk People's Republic' in his capacity as 'Head of the Luhansk Central Election Commission'*)
2. Oleg AKIMOV (*Deputy of the 'Luhansk Economic Union' in the 'National Council' of the 'Luhansk People's Republic'*)
3. Larisa AIRAPETYAN (*'Health Minister' of the so-called 'Luhansk People's Republic'*)
4. Yuriy SIVOKONENKO (*Member of the 'Parliament' of the so-called 'Donetsk People's Republic' and working in the Union of veterans of the Donbass Berkut*)
5. Aleksandr KOFMAN (*'First deputy speaker' of the 'Parliament' of the so-called 'Donetsk People's Republic'*)
6. Ravil KHALIKOV (*'First Deputy Prime Minister' and previous 'Prosecutor-General' of the so-called 'Donetsk People's Republic'*)
7. Dmitry SEMYONOV (*'Deputy Prime Minister for Finances' of the so-called 'Luhansk People's Republic'*)
8. Oleg BUGROV (*'Defense Minister' of the so-called 'Luhansk People's Republic'*)
9. Lesya LAPTEVA (*'Minister of Education, Science, Culture and Religion' of the so-called 'Luhansk People's Republic'*)

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¹ See [Council Conclusions on Ukraine](#) from 17 November 2014.

² See [Council Implementing Regulation \(EU\) No 1270/2014](#) of 28 November 2014 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. See also [Council Decision 2014/855/CFSP](#).

³ See Council, "[EU strengthens sanctions against separatists in Eastern Ukraine](#)", 28 November 2014.

⁴ The total number of parties listed under original Regulation 269/2014 imposing EU sanctions in respect of actions considered to undermine or threaten the territorial integrity, sovereignty and independence of Ukraine now stands at **132 persons and 28 entities** (see our alert from 12 September 2014 on the previous expansion of this list [here](#)).

10. Yevgeniy Eduardovich MIKHAYLOV (*'Head of the administration for governmental affairs' of the so-called 'Donetsk People's Republic'*)
11. Ihor Vladymyrovych KOSTENOK (*'Minister of Education' of the so-called 'Donetsk People's Republic'*)
12. Yevgeniy Vyacheslavovich ORLOV (*'Member of the 'National Council' of the so-called 'Donetsk's People's Republic'*)
13. Vladyslav Nykolayevych DEYNEGO (*'Deputy Head' of the 'People's Council' of the so-called 'Luhansk People's Republic'*)

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Organizations

1. Donetsk Republic (*'Public 'organisation' that presented candidates in the so-called 'elections' of the so-called 'Donetsk People's Republic' on 2 November 2014'*)
2. Peace to Luhansk Region (*'Public 'organisation' that presented candidates in the so-called 'elections' of the so-called 'Luhansk People's Republic' on 2 November 2014'*)
3. Free Donbass (*'Public 'organisation' that presented candidates in the so-called 'elections' of the so-called 'Donetsk People's Republic' on 2 November 2014'*)
4. People's Union (*'Public 'organisation' that presented candidates in the so-called 'elections' of the so-called 'Luhansk People's Republic' on 2 November 2014'*)
5. Luhansk Economic Union (*'Social organisation' that presented candidates in the illegal so-called 'elections' of the so-called 'Luhansk People's Republic' on 2 November 2014'*)

Under the asset freeze, all funds and economic resources belonging to or controlled by the listed parties that fall under EU jurisdiction (e.g., are held by EU banks) will be frozen. Furthermore, no funds or economic resources (in the broad sense) may be made available – directly or indirectly – to or for the benefit of the listed persons by parties falling under EU jurisdiction.⁵

⁵ The geographic scope of the new EU sanctions remains the same as before, applying in the following situations: within the EU territory; to nationals of EU Member States (regardless of whether they are inside or outside EU territory); on board vessels and aircraft under Member State jurisdiction; to companies incorporated or registered under the law of a Member State and to other companies in respect of business done in whole or in part in the EU.