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International Trade

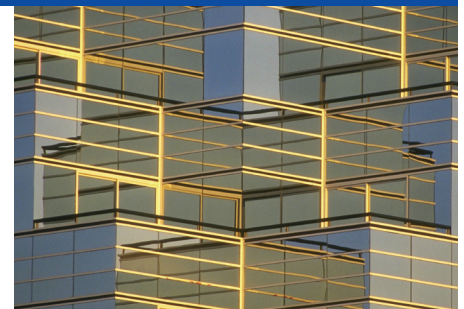
June 2014

The United States Designates Seven Individuals Under Executive Order 13660 Relating to Separatist Activity in Ukraine

On June 20, 2014, the US Office of Foreign Assets Control (“OFAC”) issued further designations under Executive Order 13660 (“EO 13660”). 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. This round of designations targets seven individuals who, according to the United States, are separatists in Ukraine responsible for or complicit in actions or policies that threaten the peace, security, stability, sovereignty or territorial integrity of Ukraine, and/or asserting governmental authority over a part or region of Ukraine without the authorization of the government of Ukraine.

The additional seven individuals designated on June 20, 2014 are:

- BOLOTOV, Valery (a.k.a. BOLOTOV, Valeri; a.k.a. BOLOTOV, Valeriy); DOB 1970; alt. DOB 1971 (individual) [UKRAINE]
- GIRKIN, Igor Vsevolodovich (a.k.a. STRELKOV, Igor Ivanovich; a.k.a. STRELKOV, Ihor; a.k.a. STRELOK, Igor), Shenkurskiy Passage (Proyezd), House 8-6, Apartment 136, Moscow, Russia; DOB 17 Dec 1970; citizen Russia; Passport 4506460961 (individual) [UKRAINE]
- KAUROV, Valery Vladimirovich (a.k.a. KAUROV, Valerii Volodymyrovych; a.k.a. KAUROV, Valeriy; a.k.a. KAUROV, Valery); DOB 02 Apr 1956; POB Odessa, Ukraine (individual) [UKRAINE]
- MENYAILO, Sergei Ivanovich (a.k.a. MENYAILO, Sergej; a.k.a. MENYAILO, Sergey); DOB 22 Aug 1960; POB Alagir, North Ossetia, Russia; Acting Governor of Sevastopol (individual) [UKRAINE]
- PONOMARYOV, Vyacheslav (a.k.a. PONOMAREV, Vyacheslav; a.k.a. PONOMARYOV, Vachislav); DOB 02 May 1965 (individual) [UKRAINE]
- PURGIN, Andrey Yevgenyevich (a.k.a. PURGIN, Andrei; a.k.a. PURGIN, Andrej; a.k.a. PURGIN, Andriy; a.k.a. PURGYN, Andriy; a.k.a. PURHIN, Andriy); DOB 26 Jan 1972 (individual) [UKRAINE]
- PUSHILIN, Denis (a.k.a. PUSHYLIN, Denis; a.k.a. PUSHYLIN, Denis Volodymyrovych; a.k.a. PUSHYLIN, Denys); DOB 09 May 1981; POB Makeevka, Ukraine (individual) [UKRAINE]



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- 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 Person¹, wherever located, are considered blocked and may not be dealt in. Any entity in which a blocked party holds a 50 percent or greater ownership interest 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.

Today's action targets individuals identified as "separatist leaders" by the United States. OFAC's press release announcing these new designations provides the following descriptions of each individual:

- Vyacheslav Ponomaryov—a separatist leader, and former self-proclaimed "people's mayor" of Slovyansk
- Denis Pushilin—a leader of a group calling itself the "Donetsk People's Republic"
- Andrey Purgin—the co-head of a council running the separatist government in Donetsk and founder of the pro-Russian "Republic of Donetsk" organization
- Igor Girkin (also known as Igor Strelkov)—the self-described "commander-in-chief of the Donetsk People's Republic"

- Valery Bolotov—self-proclaimed governor of the separatist-controlled Luhansk region
- Sergei Menyailo—the de facto "acting governor" of Sevastopol and part of a commission established to ensure the effectiveness of Russian federal executive bodies in Crimea
- Valery Kaurov—the self-described "president of Novorossiya"

More information about EO 13660 can be found [here](#). This EO has been complemented by two other Executive Orders, [13661](#) and [13662](#), as well as a bill signed into law by the President on April 3, 2014 (more information found [here](#)). As noted above, the Ukraine-related sanctions measures also have been supplemented by export licensing restrictions. More information about the previous export restrictions can be found [here](#) and [here](#).

Companies doing business in Russia and Ukraine should monitor closely any measures imposed by the United States to ensure compliance. Penalties for noncompliance are severe. We will continue to track and report on any additional sanctions developments.

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¹ 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.

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