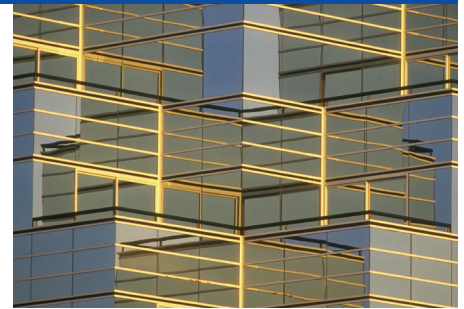


# ClientAlert

## International Trade

March 2014

# EU imposes sanctions on 21 politicians and military officers from Russia and Crimea



### I. Introduction

In response to the Crimea crisis, the EU Council decided today to impose **sanctions against individuals in Russia and the Crimea** in the form of an asset freeze targeting persons responsible for actions which threaten the “territorial integrity, sovereignty and independence of Ukraine.”<sup>1</sup> These restrictions were published in Regulation 269/2014 in the *Official Journal of the EU* on 17 March 2014 and entered into force on the same day.<sup>2</sup>

### II. List of Persons Covered by the Sanctions

The EU Member States introduced an **asset freeze** against certain politicians and members of the military. The asset freeze list—set out in Annex I to Regulation 269/2014—currently covers the following persons:

1. Sergey Valeryevich Aksyonov (*Elected as Prime Minister of Crimea*)
2. Vladimir Andreevich Konstantinov (*Speaker of the Supreme Council of the Autonomous Republic of Crimea*)
3. Rustam Ilmirovich Temirgaliev (*Deputy Chairman of the Council of Ministers of Crimea*)
4. Deniz Valentinovich Berezovskiy (*Commander of the Ukrainian Navy*)
5. Aleksei Mikhailovich Chaliy (*Mayor of Sebastopol*)
6. Pyotr Anatoliyovych Zima (*New head of the Crimean Security Service*)
7. Yuriy Zherebtsov (*Counsellor of the Speaker of the Verkhovna Rada of Crimea*)
8. Sergey Pavlovych Tsekov (*Vice Speaker of the Verkhovna Rada*)
9. Ozerov, Viktor Alekseevich (*Chairman of the Security and Defense Committee of the Federation Council*)
10. Dzhubarov, Vladimir Michailovich (*First Deputy-Chairman of the International Affairs Committee of the Federation Council*)
11. Klishas, Andrei Aleksandrovich (*Chairman of the Committee on Constitutional Law of the Federation Council*)

For more information, please contact:

#### EU Sanctions Team

James Killick  
Partner, Brussels  
+ 32 2 239 2552  
[jkillick@whitecase.com](mailto:jkillick@whitecase.com)

Sara Nordin  
Associate, Brussels & Hong Kong  
+ 32 2 239 2576  
[snordin@whitecase.com](mailto:snordin@whitecase.com)

Charlotte Van Haute  
Associate, Brussels  
+32 2 239 2623  
[cvanhaute@whitecase.com](mailto:cvanhaute@whitecase.com)

Fabienne Vermeeren  
Regional Director Europe –  
International Trade Services, Brussels  
+ 32 2 239 2606  
[fvermeeren@whitecase.com](mailto:fvermeeren@whitecase.com)

#### US Sanctions Team

Richard Burke  
Partner, Washington, DC  
+1 202 626 3687  
[rburke@whitecase.com](mailto:rburke@whitecase.com)

Nicole Erb  
Partner, Washington, DC  
+1 202 626 3694  
[nerb@whitecase.com](mailto:nerb@whitecase.com)

Kristina Zissis  
Counsel, Washington, DC  
+1 202 626 3636  
[kzissis@whitecase.com](mailto:kzissis@whitecase.com)

Cristina Brayton-Lewis  
Associate, Washington, DC  
+1 202 729 2407  
[cbraytonlewis@whitecase.com](mailto:cbraytonlewis@whitecase.com)

Tanya Hanna  
Associate, Washington, DC  
+1 202 637 6294  
[thanna@whitecase.com](mailto:thanna@whitecase.com)

<sup>1</sup> See [Council conclusions of 17 March 2014](#).

<sup>2</sup> See [Council Regulation 269/2014](#).

12. Ryzhkov, Nikolai Ivanovich (*Member of the Committee for federal issues, regional politics and the North of the Federation Council*)
13. Bushmin, Evgeni Viktorovich (*Deputy Speaker of the Federation Council*)
14. Totoonov, Aleksandr Borisovich (*Member of the Committee on culture, science and information of the Federation Council*)
15. Panteleev, Oleg Evgenevich (*First Deputy Chairman of the Committee on Parliamentary Issues*)
16. Mironov, Sergei Mikhailovich (*Member of the Council of the State Duma; Leader of Fair Russia faction in the Duma*)
17. Zheleznyak, Sergei Vladimirovich Evgenevich (*Deputy Speaker of the State Duma*)
18. Slutski, Leonid Eduardovi (*Chairman of the Commonwealth of Independent States (CIS) Committee of the State Duma (member of the LDPR)*)
19. Vitko, Aleksandr Viktorovich (*Commander of the Black Sea Fleet, Vice-Admiral*)
20. Sidorov, Anatoliy Alekseevich (*Commander of Russia's Western Military District*)
21. Galkin, Aleksandr (*Commander of Russia's Southern Military District*)

As a result of this asset freeze, all funds and economic resources belonging to, or controlled by, the listed persons and that fall under EU jurisdiction (e.g., held by EU banks) will be frozen. Furthermore, *no funds or economic resources may be made available—directly or indirectly—to or for the benefit of the listed persons by parties falling under EU jurisdiction.*

Member States can authorise derogations from the asset freeze in certain limited circumstances. There are two notable situations (in addition to the standard provisions relating to the basic needs, legal services, etc.): first, where release of funds is to satisfy a court or arbitral decision that predates the asset freeze, where the beneficiary is not the listed person (Article 5 of Regulation 269/2014), and second, where a payment by a listed party is due under a contract that pre-dates the asset freeze, provided the payment does not benefit that listed party (Article 6 of Regulation 269/2014).

These sanctions apply to the **EU territory** (including its airspace), **nationals of EU Member States** (including those located outside the EU), and **on board vessels and aircraft under Member State jurisdiction**. Sanctions further apply to **companies incorporated or registered under the law of an EU Member State and to other non-EU companies in respect of business done in whole or in part in the EU**. This means that non-EU companies can be covered by the newly adopted measures, depending on the particular circumstances under which they perform their business activities in the EU.

**The United States today also announced sanctions against 11 individuals, in addition to issuing a new Executive Order expanding the scope of potential sanctions.** Our US colleagues' alert describing the US measures can be accessed [here](#).

These new sanctions follow the earlier imposition of an EU asset freeze against 18 Ukrainian individuals,<sup>3</sup> and the signature of a US Executive Order authorizing the blocking of property and interests in property of any person found to be responsible for or complicit in the situation in Ukraine.<sup>4</sup>

More information on the EU's sanctions regime against other countries can be found in our latest Client Alerts on [Iran, Syria and Belarus](#).

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<sup>3</sup> See [EU Ukraine sanctions – 6 March 2014](#).

<sup>4</sup> See [US Ukraine sanctions – 6 March 2014](#).

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