

U.S. Sanctions Additional Russian Targets

April 8, 2018

On April 6, 2018, the U.S. Department of the Treasury's ("Treasury") Office of Foreign Assets Control ("OFAC"), in consultation with the U.S. Department of State, designated three dozen Russian "oligarchs," government officials, and related entities as specially designated nationals ("SDNs"). All were designated under pre-existing Ukraine/Russia-related authorities provided by Executive Order ("E.O.") 13661, relating to (among others) senior officials of the Government of the Russian Federation and their supporters, and E.O. 13662, relating to persons and entities operating in specified sectors of the Russian economy. Effective today, the newly designated persons and entities are included on OFAC's list of SDNs (the "SDN List"). Treasury also designated the Russian state-owned arms export monopoly and a related financial institution as SDNs because of their activities relating to the Syrian conflict.

If you have any questions concerning this memorandum, please reach out to your regular firm contact or the following author.

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OFAC simultaneously released two general licenses, General Licenses 12 ("GL 12") and 13 ("GL 13"), that authorize a two-month wind-down period for operations involving many of the specified entities and a one-month period to dispose of holdings in three of the new SDNs that are publicly listed companies. OFAC also released new Frequently Asked Questions related to both the designations and the general licenses.

NEWLY DESIGNATED ENTITIES

The list of newly designated Russian persons and entities, provided here as Annex A, includes:

- Seven Russian oligarchs and 12 companies they own or otherwise control;
- 17 senior officials of the Russian government or state-owned enterprises; and
- State-owned weapons export monopoly Rosoboroneksport and its subsidiary bank, AO RFK-Bank.

Although each of the designated oligarchs was included in the list of oligarchs in the report issued under Section 241 of CAATSA,¹ that was not itself the basis for designation (nor is this action necessarily an indication that others listed in the report will be sanctioned). Each was designated under pre-existing authorities, either for being or being a supporter of a senior Russian government official under E.O. 13661 or for being active in the Russian energy sector under E.O. 13662. The Treasury press release announcing the designations focused on these links, as well as various ties to Russian officials and alleged misdeeds. Thus, as predicted, while there is political pressure to sanction "oligarchs," as with previous designations the actual listing of individuals is driven by the underlying sanctions authority and political considerations, not mere inclusion on the massive list of individuals created under Section 241.

¹ Countering America's Adversaries Through Sanctions Act ("CAATSA"), Pub. L. 115-44.



I. Impact of Designations

As with all SDN designations, all assets within U.S. jurisdiction of the newly designated persons and entities are now blocked and transactions within U.S. jurisdiction involving these persons and entities are prohibited. This includes transactions (1) involving U.S. citizens (including dual citizens), legal entities, or lawful permanent residents (i.e., “green card holders”) (together, “U.S. Persons”), (2) within or passing through the United States, (3) involving procurement of goods or services from the United States, or (4) involving U.S. dollar interbank transfers. OFAC takes a very broad view of the scope of prohibited conduct involving SDNs, considering such conduct to include almost any direct, indirect, or contingent interest an SDN may have in a transaction and the “facilitation” of such transactions. As a result, persons acting within U.S. jurisdiction are now prohibited from substantially all dealings with the designated persons and entities or in their equity or debt (outside of the exceptions included in GL 12 and GL 13 discussed below).

Additionally, under U.S. secondary sanctions pursuant to Sections 226 and 228 of CAATSA, foreign financial institutions and foreign persons could be subject to U.S. sanctions for knowingly facilitating “significant” transactions for on behalf of the persons or entities blocked as a result of the new designations. This applies even to transactions entirely outside of U.S. jurisdiction. In determining whether or not a transaction is “significant,” OFAC has provided [guidance](#) that it will consider the totality of the facts and circumstances as well as the following seven broad factors: (1) the size, number, and frequency of the transaction(s); (2) the nature of the transaction(s); (3) the level of awareness of management and whether the transaction(s) are part of a pattern of conduct; (4) the nexus between the transaction(s) and a blocked person; (5) the impact of the transaction(s) on statutory objectives; (6) whether the transaction(s) involve deceptive practices; and (7) such other factors deemed relevant on a case-by-case basis. In other words, OFAC has very wide discretion. However, a transaction will not be considered significant if U.S. Persons would not require a specific license from OFAC to participate in it, such as actions authorized under GL 12 and GL 13.²

In cases in which a senior official of a government agency or state-owned enterprise has been sanctioned, but the agency or enterprise has not, dealings with the agency or enterprise within U.S. jurisdiction are still permitted but must not involve the sanctioned official. For example, persons acting within U.S. jurisdiction are prohibited from negotiating with or signing an agreement with an SDN official, even though he or she is acting in his or her official rather than personal capacity.³

II. Effect on Subsidiaries

Under OFAC’s [50% Rule](#), the prohibitions noted above also apply to entities, including U.S. entities, owned 50 percent or more by one or more blocked persons. The property and interests of such persons are blocked even though the entities themselves are not named on the SDN List. An entity blocked pursuant to the 50% Rule is itself treated as a blocked person for future calculations, so that an entity owned 25% by a 50% subsidiary of blocked person A and 25% by named SDN B is also blocked (as is

² OFAC FAQ 542, available at https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_other.aspx#542 (Apr. 6, 2018).

³ OFAC FAQ 505, available at https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_other.aspx#505 (Feb. 13, 2017). This FAQ addresses the Venezuelan sanctions program, but parallel principles would apply.

any entity of which it in turn owns 50%).⁴ If the ownership of sanctioned persons in an entity drops below 50% as a result of *bona fide* transaction or transactions outside U.S. jurisdiction, then typically the subsidiary is unblocked; however, any property of the former subsidiary that was blocked within the United States remains blocked until released by OFAC license, and if a subsidiary is itself named on the SDN List, severing the link to the sanctioned parent does not automatically terminate the sanctions designation (though it may be grounds to seek reconsideration from OFAC).

III. Secondary Sanctions and Impact on Family Members

Under U.S. secondary sanctions implemented by Sections 226 and 228 of CAATSA, foreign persons are subject to being designated as an SDN for knowingly facilitating “significant” transactions for or on behalf of any person sanctioned under Russia-related U.S. sanctions, and foreign financial institutions may also be subject to restrictions on or loss of their U.S. correspondent accounts. Furthermore, while designation of an individual as an SDN does not affect his or her family members, the secondary sanctions authority under Section 228 to designate foreign persons facilitating significant transactions extends to the SDN or his or her child, spouse, parent, or sibling. Although imposition of these sanctions is nominally mandatory, in practice the assessment of “significance” involves very wide discretion, and in any event no sanctions are imposed without a further affirmative act by U.S. authorities. Our prior alert memo on CAATSA discusses these authorities in greater detail.⁵

NEW GENERAL LICENSES

OFAC issued two new general licenses, with immediate effect, to mitigate the disruptions caused by the new designations.

I. General License 12

GL 12 provides that all transactions and activities ordinarily incident to the maintenance or winding down of operations, contracts, or other agreements entered into prior to April 6, 2018, including the importation of goods, services, or technology into the United States, are authorized until 12:01 A.M (EDT) on June 5, 2018, with respect to the following blocked entities:

- AgroHolding Kuban
- Basic Element Limited
- B-Finance Ltd.
- EN+ Group PLC
- JSC EuroSibEnergo
- GAZ Group
- Gazprom Burenie, OOO
- Ladoga Menedzhment, OOO
- NPV Engineering Open Joint Stock Company

⁴ For more detail on the 50% Rule, see [OFAC Issues New Guidance on Entities Owned by Blocked Persons](#) (Aug. 14, 2014)

⁵ See [Congress Reaches Agreement on New Sanctions against Russia, North Korea, and Iran](#) (July 27, 2017).

- Renova Group
- Russian Machines
- United Company RUSAL PLC
- Any other entity in which one or more of the above persons own, directly or indirectly, a 50 percent or greater interest.

Dealings with other listed individuals and entities, and entities they control under the 50% Rule, are not covered by the wind-down license. Furthermore, GL 12 does not permit the disposition of any interest in a blocked entity (see, however, GL 13 below), nor does it permit any payment to or for the direct or indirect benefit of a blocked person, even if ordinarily incident to maintenance and wind-down activities; any such payment owed to the blocked person must be paid into a blocked account in the United States. Finally, it does not permit the export of any goods from the United States to the blocked person.

The precise scope of the wind-down license is somewhat vague and there will doubtless be a number of interpretive questions (such as whether payment for services rendered during the wind-down period can be received afterwards), but at a minimum it will be critical to mitigating short-term impacts (particularly for U.S. entities that are blocked pursuant to the 50% Rule, of which there are several). At a minimum, the licenses should permit business as usual (subject to the obligation to place any payments due to a blocked person in a U.S. blocked account and the immediate prohibition on U.S. exports) and an orderly termination of operations involving a blocked person. There is no apparent barrier to receiving U.S. dollar payments from blocked persons in connection with the generally licensed activities. It is also worth noting again that activities that would be covered by GL 12 for a U.S. Person are not sanctionable for foreign persons.

GL 12 includes reporting requirements for any authorized activities. All U.S. Persons participating in activity authorized by GL 12 are required to provide OFAC with a comprehensive report of each transaction within 10 business days of the expiration of GL 12 (i.e., by June 19, 2018). Each report must identify the names and addresses of parties involved, the type and scope of activities conducted, and the dates on which the activities occurred.

II. General License 13

GL 13 authorizes until 12:01 A.M (EDT) on May 7, 2018, all transactions and activities ordinarily incident and necessary to divest or transfer debt, equity or other holdings in the following newly designated SDNs to non-U.S. persons (or the facilitation of such transactions between non-U.S. persons):

- En+ Group plc
- GAZ Group
- UC Rusal plc

Both U.S. Persons and non-U.S. persons can take advantage of GL 13, and OFAC confirmed in [FAQ 570](#) that this authorization extends to global depositary receipts related to shares in those three entities. Authorized transactions include “facilitating, clearing, and settling transactions to divest to a non-U.S. person.” However, neither a U.S. Person nor, importantly, any blocked person may be the buyer. As a result, share or debt buybacks or equivalent transactions are not permissible.

GL 13 contains no indication that it applies to subsidiaries of the named entities; paragraph (a) authorizes “the following blocked persons,” but unlike GL 12 there is no reference to subsidiaries deemed blocked under the 50% Rule, and paragraph (b)(3) excludes “any person whose property and interests in property are blocked pursuant to 31 C.F.R. part 589 other than the blocked persons listed in paragraph (a) of this general license.” It appears to follow from the plain language that subsidiaries not on the list are not covered by the license; however, it is not clear whether OFAC in fact intended that result, especially given some of the publicly traded debt of these entities is in fact issued by subsidiaries of a listed company.

Similar to the reporting requirements of GL 12, U.S. Persons who participated in transactions authorized by this license must, within 10 business days of May 7, 2018 (i.e., by May 21, 2018), file a detailed report of each transaction with OFAC.

ADDITIONAL OFAC GUIDANCE

OFAC clarified some of the applications of the new designations in a series of related FAQs. Among its other clarifications, OFAC noted:

- U.S. Person employees of blocked persons or entities not covered by GL 12 are prohibited from engaging in transactions with such individuals or entities, including the provision or receipt of goods or services, effectively imposing an immediate prohibition on continuing with their jobs. ([FAQ 567](#)) This will also be the case for entities blocked by GL 12 following expiration of the license, but during the transition period U.S. Person employees should be able to continue business in the ordinary course.
- U.S. Person entities that ordered goods from newly blocked persons or entities before April 6, 2018, may still accept the goods in accordance with the requirements and time limitations of GL 12, so long as any payments for the goods are deposited in a blocked account at a U.S. financial institution. ([FAQ 569](#))
- For U.S. Person companies in which a blocked person or entity holds less than a 50 percent interest, the U.S. company must block all property and interests in property in which the blocked person or entity has an interest. This includes any payments, dividends, or disbursements of profits to the blocked person. Any payments required must be made to a blocked account at a U.S. financial institution. ([FAQ 573](#))

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CLEARY GOTTLIB

ANNEX A

The following persons were added to the SDN List on April 6, 2018:

- AKIMOV, Andrey Igorevich, Russia; DOB 1953; POB Leningrad, Russia; Gender Male; Chairman of the Management Board of Gazprombank (individual) [UKRAINE-EO13661].
- BOGDANOV, Vladimir Leonidovich, Russia; DOB 28 May 1951; POB Suyerka, Uporovsky District, Tyumen Region, Russian Federation; Gender Male (individual) [UKRAINE-EO13662].
- DERIPASKA, Oleg Vladimirovich, Moscow, Russia; 64 Severnaya Street, Oktyabrsky, Khutor, Ust-Labinsky District, Krasnodar Territory 352332, Russia; 5, Belgrave Square, Belgravia, London SW1X 8PH, United Kingdom; DOB 02 Jan 1968; POB Dzerzhinsk, Nizhny Novgorod Region, Russia; citizen Russia; alt. citizen Cyprus; Gender Male (individual) [UKRAINE-EO13661] [UKRAINE-EO13662].
- DYUMIN, Alexey Gennadyevich (a.k.a. DYUMIN, Alexei), Russia; DOB 28 Aug 1972; POB Kursk, Russian Federation; Gender Male (individual) [UKRAINE-EO13661].
- FRADKOV, Mikhail Efimovich (Cyrillic: ФРАДКОВ, Михаил Ефимович), Russia; DOB 01 Sep 1950; POB Kurumoch, Kuibyshev Region, Russia; Gender Male; Director of the Russian Institute for Strategic Studies (individual) [UKRAINE-EO13661].
- FURSENKO, Sergei (a.k.a. FURSENKO, Sergey; a.k.a. FURSENKO, Sergey Aleksandrovich); DOB 11 Mar 1954; POB Saint-Petersburg (F.K.A. Leningrad), Russian Federation; citizen Russia; Gender Male (individual) [UKRAINE-EO13661].
- GOVORUN, Oleg, Russia; DOB 15 Jan 1969; POB Bratsk, Irkutsk Region, Russia; Gender Male; Head of the Presidential Directorate for Social and Economic Cooperation with the Commonwealth of Independent States Member Countries, the Republic of Abkhazia, and the Republic of South Ossetia (individual) [UKRAINE-EO13661].
- KERIMOV, Suleiman Abusaidovich (Cyrillic: КЕРИМОВ, Сулейман Абусаидович) (a.k.a. KERIMOV, Suleyman), Moscow, Russia; Antibes, France; DOB 12 Mar 1966; POB Derbent, Republic of Dagestan, Russia; citizen Russia; Gender Male (individual) [UKRAINE-EO13661].
- KOLOKOLTSEV, Vladimir Alexandrovich, Russia; DOB 11 May 1961; POB Nizhny Lomov, Penza Region, Russia; Gender Male; Minister of Internal Affairs of the Russian Federation, General of the Police of the Russian Federation (individual) [UKRAINE-EO13661].
- KOSACHEV, Konstantin, Russia; DOB 17 Sep 1962; POB Moscow, Russia; nationality Russia; Gender Male; Chairperson of the Council of the Federation Committee on Foreign Affairs (individual) [UKRAINE-EO13661].
- KOSTIN, Andrey Leonidovich, Moscow, Russia; DOB 21 Sep 1956; POB Moscow, Russian Federation; Gender Male (individual) [UKRAINE-EO13661].
- LEONE MARTINEZ, Miguel Jose (a.k.a. LEONE, Miguel), Severo Diaz 38, Col. Ladron de Guevara, Guadalajara, Jalisco 44600, Mexico; DOB 16 May 1980; citizen Italy; alt. citizen Venezuela; Website www.miguelleone.com; Gender Male; Passport YA1867648 (Italy) (individual) [SDNTK] (Linked To: LOS CUINIS).

- MILLER, Alexey Borisovich, Moscow, Russia; DOB 31 Jan 1962; POB Saint-Petersburg, Russian Federation; Gender Male (individual) [UKRAINE-EO13661].
- PATRUSHEV, Nikolai Platonovich, Russia; DOB 11 Jul 1951; POB Leningrad, Russian Federation; nationality Russia; Gender Male; Secretary of the Russian Federation Security Council (individual) [UKRAINE-EO13661].
- PEREZ ALVEAR, Jesus (a.k.a. "Chucho Perez"), Guerrero, Mexico; DOB 12 Nov 1984; POB Distrito Federal, Mexico; nationality Mexico; Gender Male; R.F.C. PEAJ-841112-UD1 (Mexico); C.U.R.P. PEAJ841112HDFRLS06 (Mexico) (individual) [SDNTK] (Linked To: CARTEL DE JALISCO NUEVA GENERACION; Linked To: LOS CUINIS; Linked To: GALLISTICA DIAMANTE).
- REZNIK, Vladislav Matusovich, Moscow, Russia; DOB 17 May 1954; Gender Male (individual) [UKRAINE-EO13661].
- ROTENBERG, Igor Arkadyevich (a.k.a. ROTENBERG, Igor Arkadevich); DOB 09 May 1973; POB Leningrad, Russia; Gender Male (individual) [UKRAINE-EO13662].
- SHAMALOV, Kirill Nikolaevich; DOB 22 Mar 1982; POB Leningrad, Russia; Gender Male (individual) [UKRAINE-EO13662].
- SHKOLOV, Evgeniy Mikhailovich, Russia; DOB 31 Aug 1955; POB Dresden, Germany; nationality Russia; Gender Male; Aide to the President of the Russian Federation (individual) [UKRAINE-EO13661].
- SKOCH, Andrei Vladimirovich (a.k.a. SKOCH, Andrey), Russia; DOB 30 Jan 1966; POB Nikolsky (Moscow), Russia; Gender Male; Deputy of State Duma (individual) [UKRAINE-EO13661].
- TORSHIN, Alexander Porfiryevich, Moscow, Russia; DOB 27 Nov 1953; POB Mitoga village, Ust-Bolsheretsky district, Kamchatka region, Russian Federation; Gender Male (individual) [UKRAINE-EO13661].
- USTINOV, Vladimir Vasilyevich, Russia; DOB 25 Feb 1953; POB Nikolayevsk-on-Amur, Russian Federation; Gender Male (individual) [UKRAINE-EO13661].
- VALIULIN, Timur Samirovich, Russia; DOB 20 Dec 1962; POB Krasnozavodsk, Zagorsk District, Moscow Region, Russia; Gender Male; Chief of the General Administration for Combating Extremism of the Ministry of Internal Affairs of the Russian Federation (individual) [UKRAINE-EO13661].
- VEKSELBERG, Viktor Feliksovich, Russia; DOB 14 Apr 1957; POB Drogobych, Lviv region, Ukraine; Gender Male (individual) [UKRAINE-EO13662].
- ZHAROV, Alexander Alexandrovich (a.k.a. ZHAROV, Aleksandr), Russia; DOB 11 Aug 1964; POB Chelyabinsk, Russia; Gender Male; Head of the Federal Service for Supervision of Communications, Information Technology, and Mass Media (individual) [UKRAINE-EO13661].
- ZOLOTOV, Viktor Vasiliyevich, Russia; DOB 27 Jan 1954; POB Ryazanskaya oblast, Russia; nationality Russia; Gender Male; Director of the Federal Service of National Guard Troops and

Commander of the National Guard Troops of the Russian Federation (individual) [UKRAINE-EO13661].

The following entities were added to the SDN List on April 6, 2018:

- AGROHOLDING KUBAN (a.k.a. KUBAN AGRO; a.k.a. KUBAN AGROHOLDING), 77 Mira St., Ust-Labinsk, Krasnodar Territory 352330, Russia; 1 Montazhnaya St., Ust-Labinsk, Krasnodar Territory, Russia; 116 Mira St., Ust-Labinsk, Krasnodar Territory, Russia; 1 G. Konshinykh St., Krasnodar Territory, Russia; 2 Rabochaya St., Ust-Labinsk, Krasnodar Territory, Russia [UKRAINE-EO13661] [UKRAINE-EO13662] (Linked To: DERIPASKA, Oleg Vladimirovich; Linked To: BASIC ELEMENT LIMITED).
- BASIC ELEMENT LIMITED (a.k.a. BAZOVY ELEMENT), Esplanade 44, Saint Helier JE4 9WG, Jersey; 30 Rochdelskaya Street, Moscow 123022, Russia; Registration ID 84039 [UKRAINE-EO13661] [UKRAINE-EO13662] (Linked To: DERIPASKA, Oleg Vladimirovich).
- B-FINANCE LTD, Vanterpool Plaza, 2nd Floor, Wickhams Cay, Road Town, Tortola, Virgin Islands, British [UKRAINE-EO13661] [UKRAINE-EO13662] (Linked To: DERIPASKA, Oleg Vladimirovich).
- EN+ GROUP PLC, Esplanade 44, Saint Helier JE4 9WG, Jersey; 8 Cleveland Row, London SW1A 1DH, United Kingdom; 1 Vasilisy Kozhinoy St., Moscow 121096, Russia; Registration ID 91061 [UKRAINE-EO13661] [UKRAINE-EO13662] (Linked To: DERIPASKA, Oleg Vladimirovich).
- GALLISTICA DIAMANTE (a.k.a. GALLISTICA DIAMANTE S.A. DE C.V.; a.k.a. TICKET PREMIER), Aguascalientes, Aguascalientes, Mexico; Quinta Los Pirules Num. Ext. 182, Quinta Los Naranjos, Leon, Guanajuato 37210, Mexico; Website www.ticketpremier.mx [SDNTK].
- GAZ GROUP, 88 Lenin Avenue, Nizhny Novgorod 603950, Russia; 15/1 Rochdelskaya Str., Moscow 123022, Russia [UKRAINE-EO13661] [UKRAINE-EO13662] (Linked To: DERIPASKA, Oleg Vladimirovich; Linked To: RUSSIAN MACHINES).
- GAZPROM BURENIE, OOO (f.k.a. BUROVAYA KOMPANIYA OAO GAZPROM, DOCHERNEE OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU; a.k.a. GAZPROM BURENIYE LLC; a.k.a. GAZPROM DRILLING; a.k.a. LIMITED LIABILITY COMPANY GAZPROM BURENIYE; a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU GAZPROM BURENIE), 12A, ul. Nametkina, Moscow 117420, Russia; Website www.burgaz.ru; Email Address mail@burgaz.gazprom.ru; Registration ID 1028900620319; Tax ID No. 5003026493; Government Gazette Number 00156251 [UKRAINE-EO13662] (Linked To: ROTENBERG, Igor Arkadyevich).
- JSC EUROSIBENERGO, 165 Chkalova Street, Divnogorsk, Krasnoyarsk Krai 663091, Russia; 1 Vasilisy Kozhinoy Street, Moscow 121096, Russia; Registration ID 5087746073817; Tax ID No. 7706697347; Identification Number 88303955 [UKRAINE-EO13661] [UKRAINE-EO13662] (Linked To: DERIPASKA, Oleg Vladimirovich; Linked To: EN+ GROUP PLC).

- LADOGA MENEDZHMENT, OOO (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU LADOGA MENEDZHMENT; a.k.a. OOO LADOGA MANAGEMENT), 10, naberezhnaya Presnenskaya, Moscow 123317, Russia; Registration ID 1147748143971; Tax ID No. 7729442761; Government Gazette Number 29437172 [UKRAINE-EO13662] (Linked To: SHAMALOV, Kirill Nikolaevich).
- NPV ENGINEERING OPEN JOINT STOCK COMPANY (a.k.a. AKTSIONERNOE OBSHCHESTVO ENPIVI INZHINIRING; a.k.a. AO ENPIVI INZHINIRING; a.k.a. ENPIVI INZHINIRING, AO; a.k.a. NPV ENGINEERING JOINT STOCK COMPANY; a.k.a. OJSC NPV ENGINEERING), 5, per. Strochenovski B., Moscow 115054, Russia; PER. Strochenovskii B D.5, Moscow 115054, Russia; Website www.npve.narod.ru; Email Address npw@npv.su; Registration ID 106774653683; Tax ID No. 7707587805; Government Gazette Number 95533058 [UKRAINE-EO13662] (Linked To: ROTENBERG, Igor Arkadyevich).
- RENOVA GROUP (a.k.a. JOINT-STOCK COMPANY RENOVA GROUP OF COMPANIES; a.k.a. JSC RENOVA GROUP OF COMPANIES), V, 28 Balaklavskiy Prospekt, Moscow 117452, Russia; 40, Malaya Ordynka, Moscow 115184, Russia; Registration ID 1047796880548; Tax ID No. 7727526670; Government Gazette Number 772701001 [UKRAINE-EO13662] (Linked To: VEKSELBERG, Viktor Feliksovich).
- ROSOBORONEKSPORT OAO (a.k.a. OJSC ROSOBORONEXPORT; a.k.a. ROSOBORONEKSPORT OJSC; a.k.a. ROSOBORONEXPORT; a.k.a. ROSOBORONEXPORT JSC; a.k.a. RUSSIAN DEFENSE EXPORT ROSOBORONEXPORT), 27 Stromynka ul., Moscow 107076, Russia; Website www.roe.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1117746521452; Tax ID No. 7718852163; Government Gazette Number 56467052; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives> [SYRIA] [UKRAINE-EO13662] (Linked To: ROSTEC).
- RUSSIAN FINANCIAL CORPORATION (a.k.a. AO RFK-BANK; a.k.a. BANK ROSSISKAYA FINANSOVAYA KORPORATSIYA AKTSIONERNOE OBSHCHESTVO; a.k.a. RFC-BANK; a.k.a. RUSSIAN FINANCIAL CORPORATION BANK JSC), St. George's Lane, D. 1, p. 1, Moscow 125009, Russia; d. 1 korp, 1 per. Georgievski, Moscow 125009, Russia; SWIFT/BIC RFCBRUMM; alt. SWIFT/BIC 044525257 [SYRIA].
- RUSSIAN MACHINES (a.k.a. RUSSKIE MASHINY), Ul. Rochdelskaya 15, 8, Moscow 123022, Russia; Registration ID 1112373000596; Tax ID No. 2373000582; Identification Number 37100386 [UKRAINE-EO13661] [UKRAINE-EO13662] (Linked To: DERIPASKA, Oleg Vladimirovich; Linked To: BASIC ELEMENT LIMITED).
- UNITED COMPANY RUSAL PLC, 44 Esplanade, St. Helier JE4 9WG, Jersey; 1 Vasilisy Kozhinoy Str., Moscow 121096, Russia; 11/F Central Twr., 28 Queen's Rd. C, Central District, Hong Kong; Registration ID 94939; Company Number F-17314 (Hong Kong); Business Number 51566843 (Hong Kong) [UKRAINE-EO13661] [UKRAINE-EO13662] (Linked To: EN+ GROUP PLC).

The following changes were made to OFAC's Sectoral Sanctions Identifications List:

- ROSOBORONEKSPORT OAO (a.k.a. OJSC ROSOBORONEXPORT; a.k.a. ROSOBORONEKSPORT OJSC; a.k.a. ROSOBORONEXPORT; a.k.a. ROSOBORONEXPORT JSC; a.k.a. RUSSIAN DEFENSE EXPORT ROSOBORONEXPORT), 27 Stromynka ul., Moscow 107076, Russia; Website www.roe.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1117746521452; Tax ID No. 7718852163; Government Gazette Number 56467052; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives> [UKRAINE-EO13662] (Linked To: ROSTEC). -to- ROSOBORONEKSPORT OAO (a.k.a. OJSC ROSOBORONEXPORT; a.k.a. ROSOBORONEKSPORT OJSC; a.k.a. ROSOBORONEXPORT; a.k.a. ROSOBORONEXPORT JSC; a.k.a. RUSSIAN DEFENSE EXPORT ROSOBORONEXPORT), 27 Stromynka ul., Moscow 107076, Russia; Website www.roe.ru; Executive Order 13662 Directive Determination - Subject to Directive 3; Registration ID 1117746521452; Tax ID No. 7718852163; Government Gazette Number 56467052; For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives> [SYRIA] [UKRAINE-EO13662] (Linked To: ROSTEC)