

Ukraine-related Sanctions: EU Strengthens Sectoral Sanctions against Russian Economic Interests, and Lists Additional Sanctioned Persons

I. OVERVIEW

On September 12, 2014, the EU strengthened its “Level 3” sectoral sanctions targeting Russian economic interests. The additional sanctions are set out in Council Decision 2014/659/CFSP (“[Decision 2014/659](#)”) and Council Regulation (EU) No 960/2014 (“[Regulation 960/2014](#)”) (together the “Additional Rules”), which amend Council Decision 2014/512/CFSP (“Decision 2014/512”) and Council Regulation (EU) No 833/2014 (“Regulation 833/2014”), previously adopted on July 31, 2014,¹ and discussed in Cleary Gottlieb’s August 1, 2014 [alert memorandum](#).

The new restrictive measures notably tighten financial restrictions on the five Russian banks and development banks already sanctioned and expand these restrictions to three defense and three energy companies. In addition, the scope of the export controls has been broadened, including by prohibiting the provision of certain services necessary for deep water and Arctic oil exploration and production, and shale oil projects in Russia. The new measures also clarify and expand preexisting measures through amendments of the definition of terms used in the Regulation. Finally, 24 persons were added to the list of individuals subject to an asset freeze and travel bans, including members of the new leadership in the Donbass region of Ukraine.

Adopted by the Council on September 8, 2014, the restrictive measures entered into force on the date of their publication in the *Official Journal of the European Union*, on September 12, 2012. This memorandum provides an overview of the EU’s most recent expansion of its sanctions program in connection with the situation in Ukraine.

¹ Council Decision 2014/659/CFSP of September 8, 2014, OJ 2014 L271/54 and Council Regulation (EU) 960/2014 of September 8, 2014, OJ 2014 L271/3 amend Council Decision 2014/512/CFSP of July 31, 2014, OJ 2014 L229/13 and Council Regulation (EU) No 833/2014 of July 31, 2014, OJ 2014 L 229/1, respectively.

II. EXPANDED RESTRICTIONS ON ACCESS TO CAPITAL MARKETS

A. Tightened Restrictions on Access to Capital Markets for Certain Financial Institutions

Decision 2014/512 and Regulation 833/2014 of July 31, 2014 prohibited the trade of transferable securities and money-market instruments with a maturity exceeding 90 days, issued after August 1, 2014 by: (i) five major state-owned Russian banks and development banks; (ii) their subsidiaries established outside the EU; and (iii) those acting on behalf or at the direction of the banks or their subsidiaries established outside of the EU (collectively, the “Targeted Financial Institutions”). The five listed banks were: Sberbank, VTB Bank, Gazprombank, Vnesheconombank (VEB), and Rosselkhozbank.

The Additional Rules tighten the restrictions on access to capital markets for these banks.

The prohibition on dealing with transferable securities and money market instruments is extended to financial instruments with a maturity exceeding 30 days, as opposed to 90 days previously, for financial instruments issued after September 12, 2014².

The definition of “transferable securities” is amended to cover³ “*the following classes of securities which are negotiable on the capital market, with the exception of instruments of payment, ~~such as:~~*”

- (i) shares in companies and other securities equivalent to shares in companies, partnerships or other entities, and depositary receipts in respect of shares,*
- (ii) bonds or other forms of securitised debt, including depositary receipts in respect of such securities, and*
- (iii) any other securities giving the right to acquire or sell any such transferable securities ~~or giving rise to a cash settlement.~~*

It is also prohibited to provide certain ancillary services, including “investment services” (which replaces the term “brokering” originally used).

² The prohibition in Article 5 (1) of Regulation 833/2014, as amended, now reads: “*to directly or indirectly purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments with a maturity exceeding 90 days, issued after 1 August 2014 to 12 September 2014, or with a maturity exceeding 30 days, issued after 12 September 2014*” by the Targeted Financial Institutions (emphasis added).

³ Article 5 (1) of Regulation 833/2014, as amended (changes marked).

The Additional Rules further prohibit granting or being “*part of any arrangement*” to grant new loans or credit with a maturity exceeding 30 days to the Targeted Financial Institutions, after September 12, 2014,⁴ except in the case of:

- (i) loans or credit that have a specific and documented objective to provide financing for non-prohibited imports or exports of goods and non-financial services between the Union and Russia; or
- (ii) loans that have a specific and documented objective to provide emergency funding to meet solvency and liquidity criteria for legal persons established in the Union, whose proprietary rights are owned for more than 50 % by the five affected banks.

Other financial services, such as deposit business or payment services, with the Targeted Financial Institutions remain permissible. The inclusion of loans into the prohibition further aligns the EU sanctions with those imposed by the United States.

B. New Restrictions on Access to Capital Markets for Certain Companies in the Defense and Energy Sectors

The Additional Rules also impose new restrictions on access to capital markets for certain companies in the defense and energy sectors.

Article 5 of Regulation 833/2014 restricts access to capital markets by prohibiting dealing in transferable securities and money-market instruments, as well as the granting of loans (Article 5 (3)), with a maturity exceeding 30 days issued after September 12, 2014 by (i) three Russian defense companies, (ii) three state-controlled Russian companies in the crude oil and petroleum industry, (iii) subsidiaries of those companies established outside the EU, or (iv) those acting on behalf or at the direction of those companies or of their subsidiaries established outside the EU. The restrictions mirror those imposed on the Targeted Financial Institutions.

The three Russian defense companies are OPK Oboronprom, United Aircraft Corporation, and Uralvagonzavod (listed in Annex V). The three Russian entities in the crude oil and petroleum industry are Rosneft, Transneft, and Gazprom Neft (listed in Annex VI).

⁴ Article 5 (3) of Regulation 833/2014; Recital 6 to Regulation 960/2014 further states “[l]oans are only to be considered new loans if they are drawn after 12 September 2014.”

III. ADDITIONAL EXPORT RESTRICTIONS

A. New Restrictions on Certain Services Necessary for Deep Water Oil Exploration and Production, Arctic Oil Exploration or Production and Shale Oil Projects

The Additional Rules broaden the restrictions on exports related to deep water or Arctic oil exploration and production, or shale oil projects in Russia. Regulation 960/2014 inserts an Article 3a in Regulation 833/2014, which prohibits the provision, directly or indirectly of four “*associated services*” necessary for deep water oil exploration and production, arctic oil exploration and production, or shale oil projects in Russia. The targeted associated services are: (i) drilling, (ii) well testing, (iii) logging and completion services, and (iv) supply of specialized floating vessels. Some of these services were arguably already covered by the prior authorization requirement for technical assistance under Article 4 (3) of Regulation 833/2014.

Article 3a (2) of Regulation 833/2014 contains a grandfathering clause which allows for the provision of the “*associated services*” as part of “*the execution of an obligation arising from a contract or a framework agreement concluded before 12 September 2014 or ancillary contracts necessary for the execution of such contracts.*” Article 3a (3) also allows for the provision of “*associated services*” necessary for the urgent prevention or mitigation of emergency situations (*i.e.*, “*an event likely to have a serious and significant impact on human health and safety or the environment*”).

B. Ban on Exports of Dual-Use Goods and Technologies Extended to Certain Mixed Defense Companies

The Additional Rules expand the prohibition on exports of dual-use goods. Decision 2014/512 and Regulation 833/2014 of July 31, 2014 prohibited the sale, supply, transfer, or export, directly or indirectly, of dual-use goods and technology to Russia or for use in Russia, if the dual-use items were or may be intended for military use or for a military end-user.⁵ The provision of related technical assistance, brokering services, financing or financial assistance to persons in Russia or for use in Russia was also prohibited.

The Additional Rules insert an Article 2a in Regulation 833/2014, which prohibits the sale, supply, transfer, or export, directly or indirectly, of dual-use goods and technologies,⁶ whether or not originating in the Union, to nine mixed defense companies

⁵ Where the end-user is the Russian military, the use will be deemed to be military (and therefore prohibited).

⁶ As included in Annex I to Council Regulation (EC) No 428/2009 of May 5, 2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items, OJ 2009 L134/1.

in Russia, as listed in a new Annex IV to Regulation 833/2014. The listed companies are: JSC Sirius, OJSC Stankoinstrument, OAO JSC Chemcomposite, JSC Kalashnikov, JSC Tula Arms Plant, NPK Technologii Maschinostrojenija, OAO Wysokototschnye Kompleksi, OAO Almaz Antey, OAO NPO Bazalt. The amendment also prohibits providing, to the listed Russian companies, related technical assistance, brokering services or certain other services as well as financing or financial assistance as regards the goods and services in question.

The Additional Rules provide that the new prohibitions “*shall be without prejudice to the execution of contracts or agreements concluded before 12 September 2014 and to the provision of assistance necessary to the maintenance and safety of existing capabilities within the EU*” (Article 2a (3) of Regulation 833/2014).

Moreover, a general exemption is provided as regards the new prohibitions: they do not apply to exports, sales, supplies or transfers of “*dual-use goods and technologies intended for the aeronautics and for the space industry, or the related provision of technical and financial assistance, for non-military use and for a non-military end user, as well as for maintenance and safety of existing civil nuclear capabilities within the EU, for non-military use and for a non-military end user*” (Article 2a (4) of Regulation 833/2014).

C. Slight Change to Arms Embargo Language

Regulation 960/2014 amends slightly the language of Regulation 833/2014 related to the arms embargo, and in particular the prohibition on financing or financial assistance.

Decision 2014/512 of July 31, 2014 imposed an embargo on the export and import of arms to and from Russia. Regulation 833/2014 implemented Decision 2014/512 and prohibited the provision of technical assistance, financing or financial assistance related to goods and technology listed in the Common Military List.⁷ The amended text of Article 4 (1)(b) clarifies that the provision of “*insurance and reinsurance*” is also prohibited.

This language may have been added by Regulation 960/2014 to better reflect the existing wording of Decision 2014/512 with regard to the prohibition on financing and financial assistance, which already referred to insurance and reinsurance.

⁷ Article 4 (1) of Regulation 833/2014; the Member States have defined common criteria for their arms export controls, and drafted a common list of military equipment, attached to Council Declaration of June 13, 2000, issued on the occasion of the adoption of the common list of military equipment covered by the European Union code of conduct on arms export, OJ 2000 C191. The latest version was published in OJ 2014 C107/1.

IV. ADDITIONAL SANCTIONED INDIVIDUALS AND ENTITIES

The Additional Rules also extend the list of individual and entities subject to asset freezes and travel bans.

As detailed in Cleary Gottlieb's [alert memorandum of March 17, 2014](#), Council Decision 2014/145/CFSP ("Decision 2014/145")⁸ requires Member States to take measures to prevent the entry into or transit through their territories of the sanctioned individuals. Council Regulation (EU) No 269/2014 ("Regulation 269/2014")⁹ imposes the freezing of funds and economic resources belonging to, owned, held, or controlled by sanctioned individuals and entities.¹⁰

A number of the additional individuals and entities subject to sanctions fall under a category of persons considered to be "*dealing with the separatist groups in the Donbass region*," which had not been covered until now. Council Decision 2014/658/CFSP ("Decision 2014/658") and Council Regulation (EU) No 959/2014 ("Regulation 959/2014") therefore amend Decision 2014/145 and Regulation 269/2014,¹¹ respectively, to broaden the Council's legal basis for imposing sanctions and reflect the different categories of designated individuals and entities.¹²

⁸ Council Decision 2014/145/CFSP of March 17, 2014, OJ 2014 L78/16.

⁹ Council Regulation (EU) 269/2014 of March 17, 2014, OJ 2014 L78/6.

¹⁰ Regulation 269/2014 also lists exceptions under which the Member States' competent authorities may authorize the release or making available of certain frozen funds or economic resources, such as for payment due under a contract or agreement concluded or under an obligation that arose before the listing of the sanctioned individual or entity. Other examples include funds or economic resources that may be released or made available if (i) necessary to satisfy the basic needs of sanctioned individuals or entities, (ii) intended exclusively for payment of reasonable professional fees or reimbursement of incurred expenses associated with the provision of legal services, (iii) fees or service charges for routine holding or maintenance of frozen funds or economic resources, (iv) necessary for certain extraordinary expenses, or (v) subject to an arbitral decision, or a judicial or administrative decision. See Articles 4-6 of Regulation 269/2014.

¹¹ Council Decision 2014/658/CFSP of September 8, 2014, OJ 2014 L271/47, Council Regulation (EU) No 959/2014 of September 8, 2014, OJ 2014 L271/1, as previously amended. Regulation 959/2014 requires that "(e) *natural or legal persons, entities or bodies conducting transactions with the separatist groups in the Donbass region of Ukraine*" be added to Article 3 (1) of Regulation 269/2014 (emphasis added). It is unclear exactly how this amendment is to be integrated into the provision, which previously contained no numbering and read "*Annex I shall include natural persons responsible for, actively supporting or implementing, actions or policies which undermine or threaten the territorial integrity, sovereignty and independence of Ukraine, or stability or security in Ukraine, or which obstruct the work of international organisations in Ukraine, and natural or legal persons, entities or bodies associated with them, or legal persons, entities or bodies in Crimea or Sevastopol whose ownership has been transferred contrary to Ukrainian law, or legal persons, entities or bodies which have benefited from such a transfer.*"

¹² Revised Article 1 (1) of Decision 2014/145, previously amended by Council Decision 2014/265/CFSP of May 12, 2014 OJ 2014 L137/9.

The Additional Rules added 24 individuals to the list of names¹³ of those considered responsible for actions which undermine or threaten the territorial integrity, sovereignty, and independence of Ukraine.¹⁴ This brings the total of persons subject to sanctions under Decision 2014/145 and Regulation 269/2014 to 119 individuals and 23 entities. (See Appendix for full list.)

Finally, Decision 2014/658 extends Decision 2014/145's validity until March 15, 2015. Decision 2014/145 was initially applicable until September 17, 2014.

* * *

Please feel free to raise any concerns you may have with any of your regular contacts at the firm, or with [Till Müller-Ibold](#) in our Brussels office or [Sunil Gadhia](#) in our London office regarding European sanctions, or [Paul Marquardt](#) in our Washington office regarding US sanctions.

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¹³ The list has been amended various times, and most recently on July 30, 2014, by Council Decision 2014/508/CFSP of July 30, 2014, OJ 2014 L226/23 and Council Implementing Regulation (EU) No 826/2014 of July 30, 2014, OJ 2014 L226/16, which listed eight individuals and three entities.

¹⁴ Council Decision 2014/145/CFSP, OJ 2014 L78/16 and Council Regulation (EU) No 269/2014, OJ 2014 L78/6.

APPENDIX**Lists of individuals and entities considered responsible for actions which undermine or threaten the territorial integrity, sovereignty, and independence of Ukraine****I. Sanctioned Individuals**

1. Sergey Valeryevich AKSYONOV, d.o.b. 26.11.1972
2. Vladimir Andreevich KONSTANTINOV, d.o.b. 19.11.1956, Vladimirovca, Slobozia District, Republic of Moldova
3. Rustam Ilmirovich TEMIRGALIEV, d.o.b. 15.08.1976
4. Deniz Valentinovich BEREZOVSKIY, d.o.b. 15.07.1974
5. Aleksei Mikhailovich CHALIY, d.o.b. 13.06.1961
6. Pyotr Anatolyevich ZIMA, d.o.b. 29.3.1965
7. Yuriy Gennadyevich ZHEREBTSOV, d.o.b. 19.11.1965
8. Sergey Pavlovych TSEKOV, d.o.b. 28.03.1953
9. OZEROV, Viktor Alekseevich, d.o.b. 5.1.1958 in Abakan, Khakassia
10. DZHABAROV, Vladimir Michailovich, d.o.b. 29.9.1952
11. KLISHAS, Andrei Aleksandrovich, d.o.b. 9.11.1972 in Sverdlovsk
12. RYZHKOV, Nikolai Ivanovich, d.o.b. 28.9.1929 in Duleevka, Donetsk region, Ukrainian SSR
13. BUSHMIN, Evgeni Viktorovich, d.o.b. 4.10.1958 in Lopatino, Sergachiisky region, RSFSR
14. TOTOONOV, Aleksandr Borisovich, d.o.b. 3.3.1957 in Ordzhonikidze, North Ossetia
15. PANTELEEVA, Oleg Evgenevich, d.o.b. 21.7.1952 in Zhitnikovskoe, Kurgan region
16. MIRONOV, Sergei Mikhailovich, d.o.b. 14.2.1953 in Pushkin, Leningrad region
17. ZHELEZNYAK, Sergei Vladimirovich, d.o.b. 30.7.1970 in St Petersburg (former Leningrad)
18. SLUTSKI, Leonid Eduardovich, d.o.b. 4.01.1968 in Moscow
19. VITKO, Aleksandr Viktorovich, d.o.b. 13.9.1961 in Vitebsk (Belarusian SSR)
20. Anatoliy Alekseevich SIDOROV, d.o.b. 2.7.1958
21. Aleksandr Viktorovich GALKIN, d.o.b. 22.3.1958
22. ROGOZIN, Dmitry Olegovich, d.o.b. 21.12.1963; in Moscow

23. GLAZYEV, Sergey, d.o.b. 1.1.1961, Zaporozhye, (Ukrainian SSR)
24. MATVIYENKO, Valentina Ivanova, d.o.b. 7.4.1949, Shepetovka, Khmelnytskyi oblast (Ukrainian SSR)
25. NARYSHKIN, Sergei Evgenevich, d.o.b. 27.10.1954, St Petersburg (former Leningrad)
26. KISELYOV, Dmitry Konstantinovich, d.o.b. 26.4.1954
27. NOSATOV, Alexander Mihailovich, d.o.b. 27.3.1963 Sevastopol, (Ukrainian SSR)
28. KULIKOV, Valery Vladimirovich, d.o.b. 1.9.1956, Zaporozhye, (Ukrainian SSR)
29. SURKOV, Vladislav Yurievich, d.o.b. 21.9.1964, Solntsevo, Lipetsk
30. Mikhail Grigoryevich MALYSHEV, d.o.b. 10.10.1955
31. Valery Kirillovich MEDVEDEV, d.o.b. 21.8.1946, Russia
32. LTL. Gen. Igor Nikolaevich TURCHENYUK, d.o.b. 5.12.1959, Kirghizia/Osh
33. Elena Borisovna MIZULINA, d.o.b. 9.12.1954, Buly, Kostroma Oblast
34. Dmitry Nikolayevich KOZAK, Born 7.11.1958 in Kirovohrad, Ukrainian SSR
35. Oleg Yevgenyevich BELAVENTSEV, Born 15.9.1949 in Moscow
36. Oleg Genrikhovich SAVELYEV, Born 27.10.1965 in Leningrad
37. Sergei Ivanovich MENYAILO, Born 22.8.1960 in Alagir, North-Ossetian Autonomous SSR, RSFSR
38. Olga Fedorovna KOVATIDI, Born 7.5.1962 in Simferopol, Ukrainian SSR
39. Ludmila Ivanovna SHVETSOVA, Born 24.9.1949 in Alma-Ata, USSR
40. Sergei Ivanovich NEVEROV, Born 21.12.1961 in Tashtagol, USSR
41. Igor Dmitrievich SERGUN, Born 28.3.1957
42. Valery Vasilevich GERASIMOV, Born 8.9.1955 in Kazan
43. German PROKOPIV
44. Valeriy Dmitrievich BOLOTOV, d.o.b. 13.2.1970, Stachanov, Lugansk Oblast, Ukrainian SSR
45. Andriy Yevgenevich PURGIN, d.o.b. 26.1.1972
46. Denys PUSHYLIN, Born in Makiivka
47. Sergey Gennadevich TSYPLAKOV, d.o.b. 1.5.1983, Donetsk, Ukrainian SSR
48. Igor Vsevolodovich GIRKIN (a.k.a. Igor Strelkov), d.o.b. 17.12.1970, passport no. 4506460961
49. Vyacheslav Viktorovich VOLODIN, Born 4 February 1964 in Alekseevka, Saratov region
50. Vladimir SHAMANOV, Born 15.02.1954 in Barnaul
51. Vladimir Nikolaevich PLIGIN, Born 19.05.1960 in Ignatovo, Vologodsk Oblast, USSR

52. Petr Grigorievich JAROSH
53. Oleg Grigorievich KOZYURA, Born 19.12.1962 in Zaporozhye
54. Viacheslav PONOMARIOV (Vyacheslav Vladimirovich Ponomariov), d.o.b. 2.5.1965, Slovinsk
55. Igor Mykolaiovych BEZLER (Igor Nikolaevich Bezler), d.o.b. 30.12.1965, Simferopol
56. Igor KAKIDZYANOV
57. Oleg Anatolevich TSARIOV, d.o.b. 2.6.1970, Dnipropetrovsk
58. Roman LYAGIN, d.o.b. 30.5.1980, Donetsk
59. Aleksandr MALYKHIN
60. Natalia Vladimirovna POKLONSKAYA, Born 18.03.1980 in Eupatoria
61. Igor Sergeievich SHEVCHENKO,
62. Aleksandr Yurevich BORODAI, d.o.b. 25.7.1972 in Moscow
63. Alexander KHODAKOVSKY
64. Aleksandr Aleksandrovich KALYUSSKY
65. Alexander KHRYAKOV
66. Marat BASHIROV
67. Vasyl NIKITIN
68. Aleksey KARYAKIN, 1979
69. Yuriy IVAKIN
70. Igor PLOTNITSKY
71. Nikolay KOZITSYN, June 20, 1956 in Donetsk region
72. Oleksiy MOZGOVY
73. Mikhail Efimovich FRADKOV, Born on 1.9.1950 in Kurumoch, Kuibyshev region
74. Nikolai Platonovich PATRUSHEV, Born on 11.7.1951 in Leningrad (St Petersburg)
75. Aleksandr Vasilievich BORTNIKOV, Born on 15.11.1951 in Perm
76. Rashid Gumarovich NURGALIEV, Born on 8.10.1956 in Zhetikara, Kazakh Soviet Socialist Republic
77. Boris Vyacheslavovich GRYZLOV, Born on 15.12.1950 in Vladivostok
78. Sergei Orestovoch BESEDA, 1954
79. Mikhail Vladimirovich DEGTYAREV, Born on 10.7.1981 in Kuibyshev (Samara)
80. Ramzan Akhmadovitch KADYROV, Born on 5.10.1976 in Tsentaroy
81. Alexander Nikolayevich TKACHYOV, Born on 23.12.1960 in Vyselki
82. Pavel GUBAREV, Born on 10.2.1983 in Sievierodonetsk

83. Ekaterina GUBAREVA, Born on 5.7.1983 in Kakhovka
84. Fedor BEREZIN, Born on 7.2.1960 in Donetsk
85. Valery Vladimirovich KAUROV, Born on 2.4.1956 in Odessa
86. Serhii Anatoliyovych ZDRILIUK, Born on 23.6.1972 in Vinnytsia region
87. Vladimir ANTYUFEYEV (a.k.a. Vladimir SHEVTSOV, Vladimir Iurievici ANTIUFEEV, Vladimir Gheorghievici ALEXANDROV, Vadim Gheorghievici SHEVTSOV), Born on 19.2.1951 in Novosibirsk
88. Alexey Alexeyevich GROMOV, Born on 31.5.1960; in Zagorsk (Sergiev Posad)
89. Oksana TCHIGRINA
90. Boris LITVINOV
91. Sergey ABISOV, Born on 27.11.1967
92. Arkady Romanovich ROTENBERG, Born on 15.12.1951 in Leningrad (St Petersburg)
93. Konstantin Valerevich MALOFEEV, Born on 3.7.1974 in Puschino
94. Yuriy Valentinovich KOVALCHUK, Born on 25.7.1951 in Leningrad (St Petersburg)
95. Nikolay Terentievich SHAMALOV, Born on 24.1.1950
96. Alexander ZAKHARCHENKO, Born on 1976 in Donetsk
97. Vladimir KONONOV (a.k.a. Tsar), Born on 14.10.1974 in Gorsky
98. Miroslav Vladimirovich RUDENKO, Born on 21.1.1983 in Debalcevo
99. Gennadiy Nikolaiovych TSYPKALOV, Born on 21.6.1973
100. Andrey Yurevich PINCHUK
101. Oleg BEREZA
102. Andrei Nikolaevich RODKIN
103. Aleksandr KARAMAN
104. Georgiy L'vovich MURADOV, Born on 19.11.1954
105. Mikhail Sergeyevich SHEREMET, Born on 23.5.1971 in Dzhankoy
106. Yuri Leonidovich VOROBIOV, Born on 2.2.1948 in Krasnoyarsk
107. Vladimir Volfovich ZHIRINOVSKY, Born on 10.6.1964 in Eidelstein
108. Vladimir Abdualiyevich VASILYEV, Born on 11.8.1949 in Klin
109. Viktor Petrovich VODOLATSKY, Born on 19.8.1957 in Azov Region
110. Leonid Ivanovich KALASHNIKOV, Born on 6.8.1960 in Stepnoy Dvorets
111. Vladimir Stepanovich NIKITIN, Born on 5.4.1948
112. Oleg Vladimirovich LEBEDEV, Born on 21.3.1964 in Orel/Rudny
113. Ivan Icanovich MELNIKOV, Born on 7.8.1950 in Bogoroditsk

114. Igor Vladimirovich LEBEDEV, Born on 27.9.1972 in Moscow
115. Nikolai Vladimirovich LEVICHEV, Born on 28.5.1953 in Pushkin
116. Svetlana Sergeevna ZHUROVA, Born on 7.1.1972 in Pavlov-on-the-Neva
117. Aleksey Vasilevich NAUMETS, Born on 11.2.1968
118. Sergey Viktorovich CHEMEZOV, Born on 20.8.1952 in Cheremkhovo
119. Alexander Mikhailovich BABAKOV, Born on 8.2.1963 in Chisinau

II. Sanctioned Entities

1. PJSC Chernomorneftegaz (a.k.a Chornomornaftogaz)
2. Feodosia (a.k.a Feodossyskoje Predpriyatije po obespetscheniju nefteproduktami)
3. State ferry enterprise 'Kerch ferry' (Gosudarstvenoye predpriyatiye Kerchenskaya paromnaya pereprava)
4. State enterprise 'Sevastopol commercial seaport' (Gosudarstvenoye predpriyatiye Sevastopolski morskoy torgovy port)
5. State enterprise 'Kerch commercial sea port' (Gosudarstvenoye predpriyatiye Kerchenski morskoy torgovy port)
6. State enterprise Universal–Avia (Gosudarstvenoye predpriyatiye 'Universal-Avia')
7. Resort 'Nizhnyaya Oreanda'
8. Crimean enterprise 'Azov distillery plant' (Azovsky likerovodochny zavod)
9. State concern 'National Association of producers "Massandra"' (Nacionalnoye proizvodstvenno agrarnoye obyedinenye Massandra)
10. 'State enterprise Magarach of the national institute of wine' (Gosudarstvenoye predpriyatiye 'Agrofirma Magarach' nacionalnogo instituta vinograda i vina 'Magarach')
11. State enterprise 'Factory of sparkling wine Novy Svet' (Gosudarstvenoye predpriyatiye 'Zavod shampanskykh vin Novy Svet')
12. So called 'Lugansk People's Republic' ('Luganskaya narodnaya respublika')
13. So called 'Donetsk People's Republic' ('Donétskaya národnaya respúblika')
14. So called 'Federal State of Novorossiya' ('Federativnoye Gosudarstvo Novorossiya')
15. International Union of Public Associations 'Great Don Army'
16. 'Sobol'
17. So-called 'Lugansk Guard'
18. So-called 'Army of the Southeast'
19. So-called 'Donbass People's Militia'

20. 'Vostok battalion'
21. Joint-Stock Company Concern Almaz-Antey (a.k.a. Almaz-Antey Corp; Almaz-Antey Defense Corporation; Almaz-Antey JSC)
22. Dobrolet (a.k.a. Dobrolyot)
23. Russian National Commercial Bank

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