

December 21, 2014

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U.S. Imposes Comprehensive Sanctions Against Crimea

On December 19, 2014, in response to the situation in Crimea, President Obama issued a new [Executive Order](#) imposing sanctions against the “Crimea region of Ukraine” (“Crimea”), which is currently held by Russia. The Executive Order prohibits:

- new investment in Crimea by a United States person, wherever located;
- the importation into the United States, directly or indirectly, of any goods, services, or technology from Crimea;
- the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of any goods, services, or technology to Crimea; and
- any approval, financing, facilitation, or guarantee by a United States person, wherever located, of a transaction by a foreign person where the transaction by that foreign person would be prohibited by this section if performed by a United States person or within the United States.

Effectively, this subjects Crimea to a comprehensive sanctions regime similar to that applicable to countries such as Sudan. All transactions within U.S. jurisdiction (including those involving U.S. persons, U.S.-origin goods, or U.S.-origin services) involving Crimea, or persons or entities located, organized, or resident in the territory, are now impermissible. This also means that U.S. dollar transactions clearing through the U.S. financial system (including transactions between foreign persons) relating to Crimea are impermissible and must be rejected by financial institutions. In addition, the Executive Order provides authority to designate and block the assets of Crimean persons or entities, but no designations have yet been made.

The U.S. Department of the Treasury (the “Treasury Department”) simultaneously issued [Ukraine General License 4](#) (“GL 4”) authorizing the sale of certain agricultural commodities, medicine, and medical supplies (including replacement parts) to the Crimea region of Ukraine. GL 4 does not permit the export of any of the above-referenced goods to military or law enforcement purchasers or importers.

Finally, the Treasury Department designated 24 individuals and entities as Specially Designated Nationals pursuant to [Executive Order 13660](#), the original Ukraine-related Executive Order targeting persons found to be directly involved in the crisis in Ukraine. The list of sanctions designations is attached as an appendix.

If you have any questions, please feel free to contact any of your regular contacts at the Firm, or [Paul Marquardt](#) of our Washington office, listed on our website at <http://www.clearygottlieb.com>.

Appendix**Executive Orders:****Executive Order 13660 (March 6, 2014)**

http://www.treasury.gov/resource-center/sanctions/Programs/Documents/ukraine_eo.pdf

Executive Order (December 19, 2014)

http://www.treasury.gov/resource-center/sanctions/Programs/Documents/ukraine_eo4.pdf

License:**Ukraine General License 4**

http://www.treasury.gov/resource-center/sanctions/Programs/Documents/ukraine_gl4.pdf

U.S. Sanctioned Individuals and Entities Designated December 19, 2014:

ANTYUFEYEV, Vladimir (a.k.a. ALEXANDROV, Vladimir Gheorghievici; a.k.a. ANTIUFEEV, Vladimir Iurievici; a.k.a. ANTIUFEYEV, Vladimir; a.k.a. ANTYUFEYEV, Vladimir Yuryevich; a.k.a. SHEVTSOV, Vadim; a.k.a. SHEVTSOV, Vadim Gheorghievici; a.k.a. SHEVTSOV, Vladimir); DOB 19 Feb 1951; POB Novosibirsk, Russia (individual) [UKRAINE-EO13660].

BEREZIN, Fedor (a.k.a. BEREZIN, Fyodor; a.k.a. BEREZIN, Fyodor Dmitrievich); DOB 07 Feb 1960; POB Donetsk, Ukraine (individual) [UKRAINE-EO13660].

BEZLER, Igor Nikolayevich (a.k.a. BEZLER, Igor; a.k.a. BEZLER, Igor Mykolaiovych; a.k.a. BEZLER, Ihor); DOB 1965 (individual) [UKRAINE-EO13660].

GUBAREV, Pavel (a.k.a. HUBARYEV, Pavlo); DOB 10 Feb 1983; POB Sievierodonetsk, Ukraine (individual) [UKRAINE-EO13660].

KARYAKIN, Alexei Vyacheslavovich (a.k.a. KARIAKIN, Aleksey; a.k.a. KARYAKIN, Aleksey; a.k.a. KARYAKIN, Alexei); DOB 07 Apr 1980; POB Stahanov, Luhansk Oblast, Ukraine (individual) [UKRAINE-EO13660].

KHRYAKOV, Alexander (a.k.a. KHRYAKOV, Aleksandr Vitaliyovych; a.k.a. KHRYAKOV, Alexander Vitaliyovych; a.k.a. KHRYAKOV, Alexandr; a.k.a. KHRYAKOV, Oleksandr; a.k.a. KHRYAKOV, Oleksandr Vitaliyovych), Donetsk, Ukraine; DOB 06 Nov 1958; POB Donetsk, Ukraine (individual) [UKRAINE-EO13660].

KOZITSYN, Nikolai (a.k.a. KOZITSYN, Mykola; a.k.a. KOZITSYN, Mykola Ivanovych; a.k.a. KOZITSYN, Nikolay); DOB 20 Jun 1956; POB Donetsk Region; citizen Russia (individual) [UKRAINE-EO13660].

MALOFEYEV, Konstantin (a.k.a. MALOFEEV, Konstantin Valerevich; a.k.a. MALOFEEV, Konstantin Valerievich); DOB 03 Jul 1974; POB Pushchino, Moscow, Russia; Managing Partner of Marshall Capital Partners (individual) [UKRAINE-EO13660] (Linked To: MARSHALL CAPITAL PARTNERS).

MOZGOVOY, Aleksey (a.k.a. MOZGOVOI, Aleksei; a.k.a. MOZGOVOI, Alexei; a.k.a. MOZGOVOI, Oleksiy; a.k.a. MOZGOVOY, Aleksei; a.k.a. MOZGOVOY, Alexei; a.k.a. MOZGOVOY, Oleksiy; a.k.a. MOZGOVY, Aleksei; a.k.a. MOZGOVY, Oleksiy; a.k.a. MOZHOVVY, Oleksiy; a.k.a. MOZHOVY, Aleksei; a.k.a. MOZHOVY, Oleksiy; a.k.a. MOZHOVYY, Aleksei), Luhansk, Ukraine; DOB 03 Apr 1975; POB Nyzhnya Duvanka, Ukraine (individual) [UKRAINE-EO13660].

NEKLYUDOV, Dmitry Sergeyeovich (a.k.a. NEKLYUDOV, Dmitriy Sergeyeovich); DOB 17 Feb 1969; POB Simferopol, Ukraine (individual) [UKRAINE-EO13660]

PLOTNITSKY, Igor Venediktovich (a.k.a. PLOTNITSKY, Igor); DOB 24 Jun 1964; POB Kelmentsi, Ukraine (individual) [UKRAINE-EO13660].

POKLONSKAYA, Natalia Vladimirovna (a.k.a. POKLONSKA, Natalya; a.k.a. POKLONSKAYA, Natalia; a.k.a. POKLONSKAYA, Natalya); DOB 18 Mar 1980; POB Eupatoria, Ukraine; Prosecutor of Crimea (individual) [UKRAINE-EO13660].

RUDENKO, Miroslav Vladimirovich (a.k.a. RUDENKO, Miroslav; a.k.a. RUDENKO, Myroslav), Donetsk, Ukraine; DOB 21 Jan 1983; alt. DOB 1983; POB Debaltsevo, Donetsk Region, Ukraine (individual) [UKRAINE-EO13660].

SAVCHENKO, Petr (a.k.a. SAVCHENKO, Peter; a.k.a. SAVCHENKO, Peter A.; a.k.a. SAVCHENKO, Petro Oleksiiovich), Makeyevka, Ukraine; DOB 23 Feb 1968 (individual) [UKRAINE-EO13660] (Linked To: PROFAKTOR, TOV).

TSARYOV, Oleh Anatolievich (a.k.a. TSAREV, Oleg; a.k.a. TSARIOV, Oleh; a.k.a. TSAROV, Oleg; a.k.a. TSARYOV, Oleh), Stari Kodaky, Dnepropetrovsk Oblast, Ukraine; DOB 02 Jun 1970; POB Dnepropetrovsk, Ukraine (individual) [UKRAINE-EO13660].

ZAKHARCHENKO, Alexander; DOB 1976; POB Donetsk, Ukraine (individual) [UKRAINE-EO13660].

ZALDOSTANOV, Aleksandr (a.k.a. ZALDASTANOV, Aleksandr Sergeevich; a.k.a. ZALDOSTANOV, Alexander; a.k.a. ZALDOSTANOV, Alexander Sergeyeovich; a.k.a. "Khirurg"; a.k.a. "The Surgeon"); DOB 19 Jan 1963; POB Kirovograd, Ukraine (individual) [UKRAINE-EO13660].

DONBASS PEOPLE'S MILITIA (a.k.a. PEOPLE'S MILITIA OF DONBASS), Prospect Zasyadko.13, Donetsk, Ukraine; Email Address voenkom.dnr@mail.ru; alt. Email Address mobilisation@novorossia.co; alt. Email Address novoross24@mail.ru [UKRAINE-EO13660].

MARSHALL CAPITAL PARTNERS (a.k.a. MARSHALL CAPITAL), 5th Floor, Novinsky Passage Business Center, 31 Novinsky Boulevard, Moscow 123242, Russia; Website www.marcap.ru; Email Address info@marcap.ru [UKRAINE-EO13660].

NIGHT WOLVES (a.k.a. MOLODEZHNYAYA AVTONOMNAYA NEKOMMERCHESKAYA ORGANIZATSIYA NOCHNYE VOLKI; a.k.a. NOCHNIYE VOLKI; a.k.a. NOCHNYE VOLKI),

Nizhnije Mnevniky, 110, "Bike Center", Moscow, Russia; 110 Nizhniye Mnevniky, Moscow, Russia; 110 Nizhnie Mnevniky Ul., Moscow 123423, Russia; Registration ID 1037717009846; Government Gazette Number 14188237 [UKRAINE-EO13660].

NOVOROSSIYA PARTY (a.k.a. NEW RUSSIA PARTY), Ukraine [UKRAINE-EO13660].

O PLOT, Donetsk, Ukraine; Kharkiv, Ukraine [UKRAINE-EO13660].

PROFAKTOR, TOV (a.k.a. PROFAKTOR, LLC), Bud, 22/28, vul. Dzerzhynskogo, Makiivka 86100, Ukraine; Makeevka str., Donetsk Region 86157, Ukraine; Government Gazette Number 32084605 [UKRAINE-EO13660].

SOUTH-EAST MOVEMENT (a.k.a. SOUTHEAST MOVEMENT; a.k.a. YUGO-VOSTOK MOVEMENT), Ukraine [UKRAINE-EO13660].

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