

Sanctions Alert

A bi-monthly summary of sanctions news and developments

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Russia News

EU Expands Russia Sanctions Regime

On 12 May 2014, the EU expanded the underlying criteria of its sanctions regime against Russia and the Ukraine to provide for the possible listing of the following categories of persons:

- natural persons (and natural or legal persons, entities or bodies associated with them)
 - (i) responsible for actively supporting or implementing actions or policies which undermine the territorial integrity, sovereignty and independence of Ukraine or the stability or security in Ukraine or (ii) who obstruct the work of international organisations in Ukraine; and
- legal persons, entities or bodies in Crimea or Sevastopol whose ownership has been transferred contrary to Ukrainian law, as well as legal persons, entities or bodies which have benefited from such a transfer.

These new criteria were issued pursuant to Council Regulation (EU) No. 476/2014 and Council Decision 2014/265/CFSP. Initially, the EU only designated two types of person (and their associates): (i) those responsible for undermining or threatening the territorial integrity, sovereignty and independence of Ukraine and (ii) those responsible for the misappropriation of Ukrainian state funds or for human rights violations in Ukraine.

Thirteen individuals and two entities have been designated under the new criteria. This expansion of the list of designated individuals brings the total number of individuals designated by the EU to 61; this is the first time the EU has sanctioned entities pursuant to its Russia/Ukraine sanctions.

The designated individuals are: (1) Vyacheslav Viktorovich Volodin; (2) Vladimir Shamanov; (3) Vladimir Nikolaevich Pligin; (4) Petr Grigorievich Jarosh; (5) Oleg Grigorievich Kozyura; (6) Viacheslav Ponomariov; (7) Igor Mykolaiovych Bezler; (8) Igor Kakidzyanov; (9) Oleg Tsariov; (10) Roman Lyagin; (11) Aleksandr Malykhin; (12) Natalia Vladimirovna Pokloskaya; and (13) Igor Sergeievich Shevchenko.

The designated entities, both based in the Crimea, are PJSC Chernomorneftegaz, a gas company, and Feodosia, an oil supplier; according to the EU, both were appropriated by the Government of Crimea. PJSC Chernomorneftegaz was already designated by the US on 11 April 2014 under Executive Order (“E.O.”) 13660, and by Canada on 12 April 2014 pursuant to the Special Economic Measures (Ukraine) Regulations.

The EU Council noted that: “preparatory work by the Commission and Member States is underway on possible targeted measures, as requested by the European Council in March, so that further steps can be taken should events require. The European Union will pay particular attention to all parties’ attitudes and behaviour towards the holding of free and fair Presidential elections when deciding about possible future measures”.

[Council Regulation \(EU\) No. 476/2014 \(PDF\)](#)

[Council Decision 2014/265/CFSP \(PDF\)](#)

[Council Conclusions on Ukraine \(PDF\)](#)

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Canada Amends and Expands Sanctions on Russia

Canada has imposed additional economic sanctions on 15 individuals and 18 entities under regulations amending the Special Economic Measures (Russia) Regulations (the “Regulations”), which entered into force on 17 March 2014. It had previously designated 32 individuals and one entity (Bank Rossiya), which overlap with US sanctions.

The Regulations target persons in Russia, or Russian nationals, believed to be connected with the government of Russia, and individuals or entities believed, directly or indirectly, to facilitate, support, provide funding for, or contribute to the deployment of Russian armed forces to Crimea.

On 28 April 2014, nine individuals and two entities were designated. The individuals are: (1) Vyacheslav Volodin; (2) Dmitry Kozak; (3) Aleksey Pushkov; (4) Alexander Mikhailovich Babakov; (5) Oleg Evgenyevich Belaventsev; (6) Evgeniy Alexsevevich Morov; (7) Vladimir Volfovich Zhirinovskiy; (8) Arkady Rotenberg; and (9) Boris Rotenberg. The entities are (1) ExpoBank and (2) RosEnergoBank.

On 4 May 2014, 16 additional entities were listed: (1) Aquanika; (2) Avia Group LLC; (3) Avia Group Nord LLC; (4) CJSC Zest; (5) InvestCapitalBank; (6) JSB Sobinbank; (7) Sakhatrans LLC; (8) SMP Bank; (9) Stroygazmontazh; (10) Stroytransgaz Group; (11) Stroytransgaz Holding; (12) Stroytransgaz LLC; (13) Stroytransgaz OJSC; (14) Stroytransgaz-M LLC; (15) The Limited Liability Company Investment Company Abros; and (16) Volga Group.

On 12 May 2014, six additional individuals were listed: (1) Valery Vasilevich Gerasimov; (2) Igor Girkin (also known as Igor Strelkov); (3) Sergei Ivanovich Menyailo; (4) Sergei Ivanovich Neverov; (5) Oleg Genrikhovich Savelyev; and (6) Ludmila Ivanovna Shvetsova.

ExpoBank, the 103rd biggest Russian bank by assets in 2013, is reportedly attempting to challenge its designation. In a letter to Canada’s Minister of Foreign Affairs, ExpoBank argued that it had been targeted in error, and that the sanctions were supposed to have been imposed on a Ukrainian bank with the same name.

Canada’s Prime Minister Stephen Harper stated that Canada would take further action if Ukraine’s sovereignty and territorial integrity continued to be threatened.

Prior to this latest round of Canadian measures, the Russian ambassador to Canada, Georgiy Mamedov, had stated that Russia would reciprocate if Canada imposed sanctions on Russian financial institutions.

[Special Economic Measures \(Russia\) Regulations](#)

[Regulations Amending the Special Economic Measures \(Russia\) Regulations of 28 April 2014](#)

[Regulations Amending the Special Economic Measures \(Russia\) Regulations of 4 May 2014](#)

[Regulations Amending the Special Economic Measures \(Russia\) Regulations of 12 May 2014](#)

[Statement by Canada’s Prime Minister](#)

[Overview of Canadian Sanctions on Russia](#)

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Canada Amends and Expands Sanctions on Ukraine

On 12 May 2014, Canada designated six additional individuals under regulations amending the Special Economic Measures (Ukraine) Regulations of 17 March 2014. This brings the total number of individuals designated by Canada under the Ukrainian regulations to 17; one entity has been designated to date (Chernomorneftegaz).

The Ukrainian measures impose asset freezes and travel bans on persons in Ukraine, or Ukrainian nationals, believed to be engaged in activities that directly or indirectly facilitate, support, provide funding for, or contribute to the deployment of Russian armed forces to Crimea or to the seizing of control

of Ukrainian government and military entities inside Crimea.

The designated individuals are: (1) Olga Fedorovna Kovatidi; (2) German Prokopiiv; (3) Valeriy Bolotov; (4) Andriy Purgin; (5) Denys Pushylin; and (6) Sergey Gennadevich Tsyplakov.

[Special Economic Measures \(Ukraine\) Regulations](#)

[Regulations Amending the Special Economic Measures \(Ukraine\) Regulations of 12 May 2014](#)

[Overview of Canadian Sanctions on Ukraine](#)

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UK Freezes Approximately \$23 Million of Ukraine-Connected Assets

On 28 April 2014, the UK's Serious Fraud Office (the "SFO") announced the opening of a criminal investigation into possible money laundering arising from suspicions of corruption in Ukraine. The SFO is the government department responsible for investigating and prosecuting serious and complex fraud and corruption in the UK.

In connection with the investigation, the SFO obtained a restraint order freezing approximately

\$23 million of assets in the UK. For reasons of confidentiality, no further details were disclosed. Criminal legislation provides for the freezing of UK property at the request of a foreign country.

[SFO Press Release](#)

[Reuters Article](#)

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US Issues Ukraine-Related Sanctions Regulations, Authorises Certain Legal Services to Blocked Persons

On 8 May 2014, the US Treasury Department's Office of Financial Assets Control ("OFAC") issued implementing regulations for the Ukraine-related sanctions programme. The new Ukraine-Related Sanctions Regulations (Title 31 CFR Part 589) have been issued in an abbreviated format, and OFAC has stated that it intends to supplement them with a more comprehensive set of regulations in the future. Currently, the regulations incorporate by reference the prohibitions in Executive Orders 13660, 13661 and 13662, which have been included in the regulations as Appendices A, B and C, respectively. Among other things, the regulations include definitions of terms such as "property", "property interest" and "transfer", provisions for handling blocked property, and provisions governing the effect of prohibited transfers. In these respects, the regulations are generally similar to OFAC's other sanctions programmes involving blocking of assets.

The new Ukraine-Related Sanctions Regulations set out the "50% rule", whereby any entity in which a blocked person owns a 50% or greater interest is also subject to blocking, even if that entity does not itself appear on the list of blocked persons. The "50% rule" has existed as a matter of interpretative guidance for a number of years and has now been included explicitly in the new regulations.

The regulations also include a number of general licences, in other words, authorisations that can be used by anyone who meets the criteria described in the regulations without the need to apply to OFAC. The general licences in the new Ukraine-Related Sanctions Regulations include authorisations for certain transactions by financial institutions holding blocked property, for emergency medical treatment, and for certain legal services.

In particular, US persons are authorised to provide legal services to blocked persons limited to advice on the requirements of, and compliance with, US law or representation in legal proceedings in the US. Payment for these legal services may be received from funds located outside the United States subject to certain reporting and other requirements. However, payment from blocked funds in the United States, from blocked funds in the hands of a United States person or from a blocked person other than the client is not permitted without a specific licence from OFAC.

[Ukraine-related Sanctions Regulations – Federal Register Publication \(PDF\)](#)

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Putin Signs New Law on Payment Systems

In response to Visa and MasterCard's decision to stop providing financial transaction services to clients of Rossiya Bank, Sobinbank and SMP Bank, after the banks were designated under US sanctions, Russian president Vladimir Putin has enacted strict regulations on international payment systems operating in Russia.

The regulations, promulgated on 5 May 2014, require international payment systems operating in Russia to establish a processing centre in Russia and to maintain their provision of services to Russian clients. To encourage compliance with the regulations, a security deposit amounting to the average value of two days'

worth of transactions will have to be deposited at Russia's central bank. Non-compliance may result in the daily forfeit of 10% of the security deposit. In 2013, Visa and MasterCard processed approximately \$1.9 billion in transactions per day between them.

The regulations also provide for the creation of a domestic cashless transaction system by 1 July 2014.

[Guardian Article](#)

[The Moscow Times Article](#)

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UK News

House of Commons Considers the Cost Effectiveness of Sanctions

On 6 May 2014, the Treasury Select Committee of the UK's House of Commons heard evidence about the cost effectiveness of economic and financial sanctions.

Evidence was heard from Raoul Ruparel (Head of Economic Research, Open Europe), Gary Campkin (Director of International Strategy, The City UK), John Lough (Associate Fellow, Russia and Eurasia Programme at Chatham House), Roger Munnings

(Chairman, Russo-British Chamber of Commerce) and Dr Chi Kong Chyong (Director, Energy Policy Forum at the University of Cambridge).

[Parliamentary Agenda for 6 May 2014](#)

[Transcript of the Oral Evidence](#)

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US News

OFAC Reissues Syrian Sanctions Regulations and Blocks Property of Syrian and Russian Individuals, Syrian Companies and Russian Bank

On 2 May 2014, OFAC amended and reissued the Syrian Sanctions Regulations in their entirety. The amended regulations incorporate the blocking prohibitions imposed by several executive orders issued since the date the regulations were last amended. The amended regulations also include the general licences which previously were found only on OFAC's website. This brings the regulations into line with the current state of the sanctions regime, and it eliminates the confusion that sometimes resulted from the failure of the regulations to reflect the current scope of the sanctions programme.

The new Syria Sanctions Regulations set out for the first time the "50% rule". OFAC has in the past stated that it would explicitly incorporate the rule in future regulations, and the new Syria Sanctions Regulations appear to mark the first time that OFAC has actually done so.

Separately, on 8 May 2014, OFAC designated six senior officials of the Syrian government, two Syrian refinery companies, a Russian bank and a senior executive of that bank under the Syria sanctions programme. The government officials were designated pursuant to E.O. 13573 (blocking property of

designated senior officials of Syria) and include an advisor to President Bashar Al-Assad, Brigadier General Bassam Al-Hassan, whom OFAC alleges is involved in the Syrian government's development of non-conventional weapons and missiles. The designated bank, Tempbank, based in Moscow, Russia, is alleged to have provided millions of dollars in cash to the Syrian government as well as to have facilitated transactions on behalf of the Central Bank of Syria and SYTROL, a Syrian state oil company sanctioned by the US and EU. OFAC stated that Mikhail Gagloev, the Chairman of Tempbank's Management Committee, was designated for acting on behalf of Tempbank, including personal travel to Damascus to conduct business with the Syrian regime on behalf of Tempbank. Both Tempbank and Mr. Gagloev were designated pursuant to E.O. 13582, which allows blocking of property of persons found to have "materially assisted" the government of Syria.

[Syrian Sanctions Regulation – Federal Register Publication \(PDF\)](#)

[Treasury Department Press Release \(Designations\)](#)

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US Authorises New Sanctions in Response to Conflict in the Central African Republic; Designates 5 Individuals

On 13 May 2014, President Obama signed an E.O. authorising blocking sanctions against persons determined to be contributing to the conflict in the Central African Republic (“CAR”). The Secretary of the Treasury, in consultation with the Secretary of State, is authorised to designate any person determined to have engaged in, supported or be a leader of any entity that has engaged in: (i) efforts that threaten the peace, security or stability of the CAR; (ii) efforts that threaten the transition agreements or the political transition process in the CAR; (iii) efforts that undermine democratic processes or institutions in the CAR; (iv) the targeting of women, children or any other civilians through acts of violence that would constitute a serious abuse or violation of international humanitarian law; (v) the use or recruitment of child soldiers; (vi) the obstruction of the delivery or

distribution of humanitarian aid; (vii) attacks against UN missions or other peacekeeping operations; or (viii) any person that supplies, sells or transfers to the CAR, or receives in the CAR, arms and related materiel, or provides advice, training or assistance, including financial assistance, related to military activities.

In an annex to the E.O., five individuals were designated for sanctions, including the former President of the CAR, François Bozize, the former Minister of Public Security, Nouredine Adam, and three leaders of militias or other armed groups.

[Executive Order \(PDF\)](#)

[OFAC Announcement](#)

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US Designates Individuals and Companies as Narcotics Traffickers

On 7 May 2014, OFAC blocked the property of four individuals and four companies located in Canada, Barbados, Panama and China under the Foreign Narcotics Kingpin Designation Act (“Kingpin Act”). OFAC alleges that two of the individuals, Canadian nationals Daniel Maurice Louie and Kevin Gim Louie (a father and son), operate a multi-million dollar enterprise that buys and sells significant quantities of chemicals used to manufacture synthetic drugs, including synthetic cannabinoids and cathinones. The other designated individuals are Francine Denise Louie, who is the wife of

Daniel Louie and mother of Kevin Louie, and Tramayne Primus, a Barbadian national who is a business associate of the Louies. The designated entities include three companies with offices in Canada, Barbados and Panama, which OFAC asserts are controlled by the Louies and used in their drug trafficking operation. The fourth entity is a Chinese pharmaceutical company, Boyle Chemical Co., Ltd., which OFAC alleges to be the foreign source of the chemicals used by the Louies to manufacture synthetic drugs.

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On 1 May 2014, OFAC blocked the property of Atiqullah Ahmady Mohammad Din, his brother Sadiq Ahmady and four entities under the Kingpin Act. OFAC alleges that Mr. Mohammad Din, an Afghan national, is a major heroin and opium trafficker in southern Afghanistan who, through his network, manufactures, sells and smuggles abroad multiple tons of heroin. Mr. Mohammad Din is also alleged to handle the personal and business affairs of a Taliban financier who was designated as a major narcotics trafficker in

October 2010. Mr. Ahmady and the four entities, three of which are based in Afghanistan and the fourth in Dubai of the United Arab Emirates, were designated for acting on behalf of Mr. Mohammad Din and supporting his narcotics trafficking activities.

[OFAC Announcement \(Louie\)](#)

[Treasury Department Press Release \(Mohammad Din\)](#)

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US Targets Two Individuals Under Recent South Sudan Sanctions

On 6 May 2014, the Treasury Department sanctioned Marial Chanuong and Peter Gadget pursuant to E.O. 13664, which authorises sanctions against persons that threaten the peace, security or stability of South Sudan. Mr. Chanuong is the commander of the South Sudanese Government's Presidential Guard. The Treasury Department stated that Mr. Chanuong led operations that used tanks to target political figures, killing numerous bodyguards and slaughtered civilians and subsequently buried them in mass

graves. Mr. Gadget is a commander of anti-government forces allegedly responsible for, among other acts, indiscriminately attacking civilians in April 2014. The US government does not believe that Mr. Gadget will abide by any future agreements that seek to bring peace to South Sudan.

[Treasury Department Press Release](#)

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US Insurer Settles with OFAC Under Cuban Assets Control Regulations

On 8 May 2014, OFAC announced that American International Group, Inc. agreed to a settlement in connection with insurance policies allegedly issued by its Canadian subsidiaries covering Cuba-related risks. According to OFAC, the policies included general liability, D&O and travel insurance coverages.

[OFAC Enforcement Announcement \(PDF\)](#)

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US-Incorporated Spanish-Language Travel Website Settles Allegations of Providing Cuba Travel Services

On 6 May 2014, OFAC announced that Decolar.com, Inc. (“Decolar”), a Spanish language travel website, paid \$2,809,800 to settle potential liability for apparent violations of the Cuban Assets Control Regulations. Decolar is headquartered in Buenos Aires, Argentina, but is incorporated in Delaware. OFAC alleges that, between May 2009 and March 2012, Decolar assisted 17,836 persons with hotel reservations in Cuba and flight reservations for travel between Cuba and countries other than the United States.

OFAC determined that Decolar voluntarily disclosed the matter to OFAC and that the disclosures occurred “prior to agency notice”. OFAC considered the following factors.

pursuant to the Economic Sanctions Enforcement Guidelines: Decolar demonstrated reckless disregard for US sanctions requirements by relying on a third-party’s oral assurances that the company’s conduct did not require a licence from OFAC, Decolar’s senior

management appears to have been aware of the conduct, the apparent violations resulted in significant harm to the United States’ objectives in sanctioning Cuba, Decolar is a sophisticated travel services provider and the company had no risk-based OFAC compliance programme at the time of the apparent violations. Mitigating these factors, OFAC considered that the Cuba-related transactions appear to be a very small portion of Decolar’s overall business, Decolar has not been subject to an OFAC enforcement action in the five years previous to the earliest apparent violation, the company immediately stopped the Cuba-related services upon discovering the apparent violations, Decolar recently adopted an OFAC compliance programme and Decolar cooperated with OFAC by providing all relevant information regarding the apparent violations.

[OFAC Enforcement Announcement \(PDF\)](#)

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Individual Settles Alleged Violations of Iranian Sanctions

On 6 May 2014, OFAC announced that an individual from Washington state paid \$29,340 to settle alleged violations of the Iranian Transactions and Sanctions Regulations. OFAC did not identify the individual by name. According to OFAC, between May 2007 and November 2009, the individual, acting as a third-party recipient, sold, exported and supplied unlicensed medical goods and related financial services to Iran. The alleged violations comprised 19 separate transactions with a total value of \$49,341.

OFAC determined that the individual did not voluntarily disclose the matter and the alleged

violations constituted a non-egregious case. OFAC considered as an aggravating factor that the individual demonstrated reckless conduct by persisting in the conduct after OFAC issued a warning letter for similar past activities. In mitigation, OFAC considered that the individual had not previously received a penalty notice, that the medical goods were potentially licensable under existing OFAC policy and that the individual cooperated with OFAC’s investigation and agreed to toll the statute of limitations.

[OFAC Enforcement Announcement \(PDF\)](#)

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US Firm and Individuals Indicted for Shipping Machinery to Iran

On 23 April 2014, the US Attorney's Office for the Middle District of Pennsylvania announced that Hetran Inc., a US company, had been indicted for allegedly exporting to

Iran a lathe used to manufacture high-grade steel. Also indicted were the company's chief executive officer, one of its overseas sales representatives, and

several Iranian individuals and entities. If convicted, the defendants face a fine of up to \$1 million, and the individual defendants also face prison sentences of up to 10 years.

[Justice Department Press Release \(PDF\)](#)

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UN News

UN and EU Remove Individuals from Al-Qaida Sanctions List

On 15 and 29 April 2014, the UN Security Council Committee concerning Al-Qaida removed Youssef Ben Abdul Baki Ben Youcef Abdaoui and Wali ur Rehman, respectively, from the UN list of persons, groups and entities associated with Al-Qaida. The list was established pursuant to Security Council Resolution 2083 (2012), which provides for the imposition of asset freezes, travel bans and an arms embargo.

Mr. Rehman was designated for being a member of Tehrik-e Taliban, alternatively referred to as the 'Pakistani Taliban'. Mr. Abdaoui was stated to have been a member of an Italian organisation directly linked with the Organisation of Al-Qaida in the Islamic Maghreb.

Following the UN's delisting of Mr. Abdaoui, the European Commission adopted Implementing Regulation (EU) No. 450/2014 on 30 April 2014,

removing Mr. Abdaoui from its list of restrictive measures imposed against persons and entities associated with the Al Qaida network. The Implementing Regulation amended for the 213th time Council Regulation (EC) No. 881/2002 of 27 May 2002. Mr. Rehman is still designated by the EU.

[UN Press Release Regarding Youcef Abdaoui](#)

[UN Press Release Regarding Wali ur Rehman](#)

[Security Council Resolution 2083 \(2012\) \(PDF\)](#)

[Commission Implementing Regulation \(EU\) No. 450/2014 \(PDF\)](#)

[Council Regulation \(EC\) No. 881/2002](#)

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UN Lifts Ivory Coast Diamonds Ban and Eases Arms Embargo

On 29 April 2014, the UN Security Council unanimously adopted Resolution 2153 (2014), lifting the UN diamond sanctions and easing the arms embargo originally imposed on the Ivory Coast under Security Council Resolution 1572 (2004) of 15 November 2004. Resolution 2153 will be valid until 30 April 2015.

The diamond sanctions required states to take the necessary measures to prevent the direct or indirect import of all rough diamonds from the Ivory Coast to their territory. Member states have now agreed that the import of rough diamonds shall no longer be prohibited “in light of the country’s progress towards implementing the Kimberley Process Certification Scheme and its improved governance of the sector”. The Kimberley Process was established in 2003 to prevent the trade of so-called ‘conflict diamonds’.

The arms embargo required states to take the necessary measures to prevent the supply to the Ivory Coast of arms and related material. Resolution 2153

exempts from the embargo the requirement to declare supplies (to the relevant sanctions committee) of non-lethal equipment and the provision of technical aid, training or financial services intended to enable the Ivorian security forces to maintain public order. Also now exempt from the regime are supplies intended solely for the support of, or use by: the United Nations Operation in the Ivory Coast and the French forces supporting it; supplies intended for use by a State evacuating its nationals and others for whom it had consular responsibility in the country; and supplies intended for use in security sector reform.

The sanctions regime will next be reviewed in 2015.

[Security Council Resolution 2153 \(2014\)](#)

[Security Council Resolution 1572 \(2004\) \(PDF\)](#)

[Overview of UN Sanctions concerning Ivory Coast](#)

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Sanctions Alert

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Debevoise & Plimpton LLP

919 Third Avenue
New York, New York 10022
+1 212 909 6000
www.debevoise.com

Washington, D.C.
+1 202 383 8000

London
+44 20 7786 9000

Paris
+33 1 40 73 12 12

Frankfurt
+49 69 2097 5000

Moscow
+7 495 956 3858

Hong Kong
+852 2160 9800

Shanghai
+86 21 5047 1800

For further information in relation
to any of the above, please email
sanctions@debevoise.com or call:

Satish Kini
Partner, Washington
+1 202 383 8190
smkini@debevoise.com

Carl Micarelli
Counsel, New York
+1 212 909 6813
cmicarelli@debevoise.com

Jessica Gladstone
International Counsel, London
+44 20 7786 9166
jgladstone@debevoise.com

Matthew Getz
International Counsel, London
+44 20 7786 5518
mgetz@debevoise.com

Jane Rahman
Associate, London
+44 20 7786 5463
jrahman@debevoise.com

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regarding topics covered in
this publication to the editors.

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