



Sanctions Alert

A bi-monthly summary of sanctions news and events

Issue 40

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Iran News

P5+1 Prolongs Iran Sanctions Relief Until 10 July 2015

On 7 July, the P5+1 (the US, UK, France, China, Russia and Germany), the EU, and Iran mutually agreed to extend the temporary sanctions relief granted to Iran pursuant to the November 2013 Joint Plan of Action ("JPOA") outlining the framework for the continuing negotiations between the parties. The extension of the JPOA sanctions relief, which was due to expire on 7 July 2015, became effective on 8 July 2015 and will now expire on 10 July 2015, so that negotiations concerning a comprehensive solution to Iran's nuclear programme can continue.

This is the fourth extension to the JPOA sanctions relief, following the recent extension from 30 June 2015 until 7 July 2015.

The US Treasury has issued [guidance](#) on the most recent JPOA sanctions relief extension.

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Russia News

EU Renews Russia Economic Sanctions for Six Months

On 22 June, pursuant to [Council Decision \(CFSP\) 2015/971](#), amending [Council Decision 2014/512/CFSP](#), the EU Council ratified the EU Committee of Permanent Representatives' decision to renew the EU's economic sanctions against Russia for six months. Due to expire on 31 July 2015, these sectoral sanctions include capital market and financial restrictions on designated Russian banks, oil companies and arms companies, restrictions on the supply of certain oil industry-related equipment and services to Russia, an arms embargo, and additional restrictions on the supply of dual-use goods to Russia.

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EU Extends Crimea and Sevastopol Sanctions by a Further Year

On 19 June, pursuant to [Council Decision \(CFSP\) 2015/959](#), amending [Council Decision 2014/386/CFSP](#), the EU extended its sanctions against Russia relating to the annexation of Crimea and Sevastopol until 23 June 2016. Originally due to expire on 23 June 2015, these sanctions include a prohibition on the import of products from Crimea or Sevastopol into the EU, investment in or the provision of financial services to Crimea or Sevastopol, the provision of tourism services to the region, and on the export of a wide range of goods or technologies to Crimea or Sevastopol relating to the transport, telecommunications, and energy sectors or in the oil, gas, and minerals industries.

In its [press release](#), the Council reiterated its condemnation of Russia's illegal annexation of Crimea and Sevastopol and its commitment to the full implementation of its "non-recognition policy".

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Canada Targets Russian Energy Firms with Economic

Sanctions

On 29 June, pursuant to the [Regulations Amending the Special Economic Measures \(Russia\) Regulations \(SOR/2015-178\)](#), the Canadian government added fourteen entities to its economic sanctions list against Russia on the recommendation of the Minister of Foreign Affairs pursuant to subsections 4(1) to (3) of the [Special Economic Measures Act S.C. 1992, c. 17](#). The additions, brought in as a response to the actions of Russian-backed militants in Ukraine, include oil and gas firms (1) OJSC Gazprom Neft, (2) OJSC Surgutneftegas and (3) Transneft OAO.

The Canadian government also added three individuals, all of who are leaders of the Eurasian Youth Union, to its economic sanctions list: (1) Aleksandr Dugin, (2) Pavel Kanishchev and (3) Andrey Kovalenko.

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Switzerland Implements New Prohibition on Arms Imports from Russia and Ukraine

On 1 July, the Swiss Federal Council implemented new rules that ban the import of firearms, their components, accessories, ammunition and ammunition components from Russia and Ukraine, in accordance with the War Material Act and the Weapons Act. The prohibition also covers the import of military-related explosives, pyrotechnic devices and propellant power, which were not previously covered by the existing legislation.

The Federal Council states in its [press release](#) that these amendments further its “policy of ensuring that Switzerland cannot be misused to circumvent the measures imposed by the European Union”.

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Russia Renews Western Food Imports Ban

On 24 June, Russian President Vladimir Putin [announced](#) the one year renewal of Russia’s ban on food imports from the West. The extended ban is now due to expire on 5 August 2016. The majority of food products imported from the US, the EU, Australia, Canada and Norway are subject to the prohibition, though it does not include wine and spirits, bread, pasta, or cereals.

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EU News

ECJ Dismisses Appeal Against Belarus Listing

On 18 June, the Court of Justice dismissed Vadzim Ipatau's appeal to overturn the General Court's earlier decision to dismiss Ipatau's application for annulment of his listing in the EU's restrictive measures against Belarus in [Case C-535/14 P Ipatau v Council](#). Ipatau had been listed for violation of international electoral standards whilst Deputy Chairperson of the Belarus' Central Electoral Commission ("CEC").

In its judgment, the Court upheld the General Court's determination in [Case T-646/11 Ipatau v Council](#) that Ipatau's listing was adequate by virtue of the factual evidence that Ipatau and the CEC were responsible for breaching electoral standards during the 2010 Belarussian elections.

The Court also endorsed the General Court's finding that the Council was entitled to alter the reasons for Ipatau's listing in 2012, without hearing him beforehand, as the new reasons were grounded on the same basis as the original reasons, namely, Ipatau's senior position in the CEC.

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ECJ Considers Scope of "Logistical Support" to the Government of Iran as Iranian Company Loses Challenge to its Re-Listing

On 25 June, the General Court of the European Union dismissed Iran Offshore Engineering & Construction Company's ("IOEC") challenge to its re-listing under the EU's nuclear proliferation-related sanctions list against Iran in [Case T-95/14 Iranian Offshore v Council](#). In its judgment, the Court considered the EU Council's re-listing of IOEC on grounds that it was an "important entity" in Iran's energy sector which "provides financial and logistical support to the government of Iran".

IOEC had successfully applied to annul its designation in September 2013. The EU Council subsequently re-listed IOEC for providing "financial and logistical support to the Government of Iran" in November 2013.

In its judgment, the court considered that "logistical support" was not limited to transport activities, but included a broad range of different types of support which address the government's logistical needs. The court concluded that this covered IOEC's role in the construction and installation of offshore facilities, on which the Iranian oil and gas industry was effectively dependent, and upheld IOEC's designation as it provides logistical support to the Iranian government.

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EU Amends Terrorist Asset Freeze Reasons for Four Individuals and Three Entities

On 23 June, the EU [announced](#) that it has amended the statements of reasons for four individuals and three entities listed under its counter-terrorist asset freezing sanctions regime. This follows the provision of new information relevant to such listed persons to the EU Council.

The four individuals are (1) Abdelkarim al-Nasser, (2) Ibrahim Al Yacoub, (3) Hasan Izz-al-Din and (4) Khalid Shaikh Mohammed. The three entities are (1) Popular Front for the Liberation of Palestine, (2) Popular Front for the Liberation of Palestine – General Command and (3) Fuerzas armadas revolucionarias de Colombia (FARC).

The aforementioned persons are listed pursuant to [Council Regulation \(EC\) 2580/2001](#) and [Common Position 2001/931/CFSP](#).

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Burundi: EU Warns of Potential Sanctions

On 22 June, the EU issued a [statement](#) that it is “determined to adopt, if necessary, targeted restrictive measures” against persons responsible for “acts of violence and repression and serious human rights violations”. The potential restrictive measures may also be imposed on persons that hinder the “search for a political solution” within the framework put forward by the African Union and East African Community. This statement follows news that President Nkurunziza plans to run for a third term in office.

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Iran: EU Updates Nuclear Proliferation Sanctions List

On 25 June, pursuant to [Council Implementing Regulation \(EU\) 2015/1001](#), implementing [Council Regulation \(EU\) 267/2012](#), and [Council Decision \(CFSP\) 2015/1008](#), amending [Council Decision 2010/413/CFSP](#), the EU removed Mahmood Jannatian, CF Sharp & Co and seven entities associated with IRISL, an Iranian shipping company, from its nuclear proliferation-related sanctions list. The IRISL entities that have been removed are (1) Bright-Nord GmbH und Co. KG, (2) Cosy-East GmbH und Co. KG, (3) Great-West GmbH und Co. KG, (4) Happy-Süd GmbH und Co. KG, (5) NHL Basic Ltd, (6) NHL Nordland GmbH and (7) Prosper Basic GmbH.

The EU also updated the listings of six entities: (1) Iran Marine Industrial Company (SADRA), (2) Shahid Beheshti University, (3) Naftiran Intertrade Company, (4) First Islamic Investment Bank, (5) HK Intertrade Company Ltd and (6) Petro Suisse.

Individuals and entities included on the sanctions list are subject to an EU-wide asset freeze.

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North Korea: EU Adds Korea National Insurance Company and Six Senior Employees to Sanctions List

On 2 July, pursuant to [Commission Implementing Regulation \(EU\) 2015/1062](#), amending [Council Regulation \(EC\) 329/2007](#), the EU added Korea National Insurance Company GmbH (“KNIC”) to its North Korea sanctions list on grounds that KNIC, by generating substantial foreign exchange revenue, could be contributing resources to North Korea’s nuclear, ballistic missile, or other weapons of mass destruction-related programmes. Furthermore, KNIC’s headquarters in Pyongyang are linked to the Korean Worker’s Party, a designated entity.

The EU also listed six KNIC senior employees: (1) So Tong Myong (Managing Director), (2) Pak Chun-San (Head of Department), (3) Sin Kyu-Nam (Head of Department), (4) Kim Il-Su, (5) Kang Song-Nam and (6) Choe Chun-Sik.

Individuals and entities included on the sanctions list are subject to an EU-wide asset freeze and travel ban.

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Syria: EU Removes President Bashar al-Assad’s Cousin from Sanctions List

On 22 June, pursuant to [Council Implementing Regulation \(EU\) 2015/961](#), implementing [Council Regulation 36/2012](#), and [Council Implementing Decision \(CFSP\) 2015/973](#), implementing [Council Decision 2013/255/CFSP](#), the EU removed Fawwaz al-Assad, the cousin of President Bashar al-Assad, from its sanctions list in respect of Syria. Fawwaz al-Assad, who was originally listed in May 2011 for his involvement in violence against civilians as part of the Shabiha militia, died earlier this year.

Individuals and entities included on the sanctions list are subject to an EU-wide asset freeze and travel ban.

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US News

US and Cuba Re-Establish Diplomatic Relations

On 1 July, US President Barack Obama [announced](#) that the United States and Cuba have reached an agreement to re-establish normal diplomatic relations. The two countries are expected to open embassies on each other’s soil on 20 July. US Secretary of State John Kerry [confirmed](#) that he would be personally travelling to Cuba to reopen the embassy. The establishment of relations between the US and Cuba does not itself change the US sanctions toward Cuba, although the Obama administration earlier this year adopted measures relaxing certain aspects of the existing sanctions, and further changes are likely in the future. Because many of the US

sanctions are prescribed by statute, a complete lifting of the US embargo against Cuba is likely to require an act of Congress.

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John Bean Technologies Settles with OFAC for IRISL Shipments

On 19 June, the US Treasury Department's Office of Foreign Assets Control ("OFAC") [announced](#) that the US company John Bean Technologies Corporation ("JBT") had agreed to pay \$391,950 to settle civil liability for apparent sanctions violations. In April 2009, JBT sold goods to a Chinese company that were shipped on blocked vessels controlled by Islamic Republic of Iran Shipping Lines ("IRISL"). In addition, in May and June 2009, JBT made arrangements to reimburse third parties for payments to IRISL that could not be processed through normal channels because of US sanctions. IRISL is designated as a Specially Designated National ("SDN") under the Weapons of Mass Destruction Proliferators Sanctions Regulations, and many of the vessels it owns are individually listed on the SDN list. The transactions were not self-disclosed, and OFAC considered them a non-egregious case.

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National Bank of Pakistan's New York Branch Settles with OFAC for Payments to SDN Airline

On 18 June, OFAC [announced](#) that The National Bank of Pakistan, New York Branch ("NBP"), agreed to pay \$28,800 to settle apparent sanctions violations. Between 6 June 2013 and 31 January 2014, NBP processed seven funds transfers, totalling \$55,952.14, to an account held by Kyrgyz Trans Avia. The US government [designated](#) Kyrgyz Trans Avia, an airline based in Kyrgyzstan, under the Specially Designated Global Terrorist programme on 31 May 2013 because it had served as an intermediary for Iran's Mahan Air and Iran Air in acquiring aircraft. NBP's sanctions interdiction filter failed to generate an alert for the transactions, and the transactions were processed straight through. The transactions were not self-disclosed, and OFAC considered them a non-egregious case.

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US Makes New Narcotics and Terrorism Designations

On 24 June, the US Treasury Department [designated](#) senior Taliban member Maulawi Abdul Rashid Baluch as a Specially Designated Global Terrorist (SDGT) pursuant to Executive Order No. 13224. Prior to his 2014 arrest by Afghan security forces, Rashid was involved in high-level operational and narcotics-related financial activities for the Taliban. In mid-2013, Rashid is alleged to have ordered the placement of an improvised explosive device that

killed one US soldier and to have assisted three suicide bomb attacks in Nimruz province. Rashid is also alleged to have assisted in the collection and disbursement of narcotics-related funds for the Taliban.

Also on 24 June, the US Treasury Department [designated](#) a number of individuals and entities with ties to La Oficina de Envigado (“La Oficina”) under the Foreign Narcotics Kingpin Designation Act (the “Kingpin Act”). Among the designated are four Colombian nationals, identified as criminal financiers, narcotics traffickers, or collaborators, alleged to be aligned with La Oficina and an agricultural company, Semilanos S.A., which allegedly has close relations with one of named La Oficina affiliates. Also designated is the chief liaison to La Oficina for Clan Usuga, Octavio Cartagena Benitez. According to the Treasury Department, La Oficina and Clan Usuga are powerful narcotics traffickers who formed a power-sharing agreement for criminal activity in Medellin in 2013. La Oficina has been [designated](#) under the Kingpin Act since June 26, 2014.

On 10 June, the US Treasury Department [designated](#) seven persons from Iraq and Lebanon for their alleged support of Hizballah. Their designation as SDGTs was made pursuant to Executive Order No. 13224. Hizballah member Adham Tabaja, though his Lebanese real estate development firm Al-Inmaa group for Tourism Works and its subsidiaries, is alleged to be using his dominant market position to provide Hizballah with a lucrative investment vehicle. Lebanese businessman Kassem Hejeij allegedly supports Tabaja and his companies and facilitates Hizballah’s commercial activities. Husayn Ali Faour and his company Car Care Center were also sanctioned for allegedly supplying Hizballah with vehicles. Faour is alleged to be a part of Hizballah Islamic Jihad, which is the unit responsible for carrying out Hizballah’s overseas terrorist activities.

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OFAC Grants Numerous Requests for Removal from SDN List

On 24 June, the US Treasury Department [deleted](#) eighteen individuals and entities from the Specially Designated Nationals (SDN) List. The removals were from the narcotics trafficking list, the Kingpin Act list, and the SDGT list. According to the [Wall Street Journal](#), the Treasury Department explained that most of them petitioned and provided sufficient information to justify their removal.

On 11 June, the US Treasury Department [removed](#) the bank Privredna Banka Sarajevo AD and former Serbian finance minister Milenko Vracar from the SDN list. Both Vracar and the bank have been on the SDN List since 2003 pursuant to Executive Order No. 13219, which authorised sanctions against those threatening stabilisation efforts in the Balkans. The [Wall Street Journal](#) reports that each petitioned for removal from the list and the Treasury Department determined that circumstances no longer justified their remaining on the list.

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US Man Pleads Guilty to Smuggling \$65 Million of Sensitive Electronics to Russia

On 11 June, Alexander Brazhnikov, of Mountainside, New Jersey, pleaded guilty to smuggling export-controlled

electronics from the US to Russia. According to the [US Attorney's Office for the District of New Jersey](#), Brazhnikov was responsible for nearly 2,000 illegal shipments to Russia valued at more than \$65 million. Brazhnikov agreed to plead guilty to an [information](#) charging him with one count each of conspiracy to launder money, conspiracy to submit false or misleading export information, and conspiracy to violate export controls imposed under the International Emergency Economic Powers Act (IEEPA). He faces a maximum possible penalty of 20 years imprisonment and a \$500,000 fine on the money-laundering charge and 5 years imprisonment and a \$250,000 fine on each of the remaining two charges. Brazhnikov is due to be sentenced on 15 September 2015. According to the US Attorney's Office, Brazhnikov also has agreed to a \$65 million forfeiture.

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Taiwanese National Pleads Guilty to Arranging Illegal Exports from US to Iran

On 25 June, a US federal court in San Antonio, Texas, accepted the guilty plea of Kunlin Hsieh, a sales manager for the Taiwanese company Junbon Enterprises Co., on charges of conspiring to violate the US sanctions laws. [According to the government](#), Hsieh conspired over a nearly seven-year period to obtain electronic parts from US companies without disclosing that their ultimate destination was Iran. These electronics were “dual-use”, meaning that they have both military and civilian capabilities. Hsieh is scheduled to be sentenced on 25 September 2015 and faces a maximum of 20 years in prison and a possible fine of up to \$1,000,000. Hsieh's co-defendant, a Latvian national also employed by Junbon, is scheduled for trial in mid-August. Both individuals have been in custody since 13 August 2014, when they were arrested in Albuquerque, New Mexico.

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UN News

Al-Qaeda: UN Security Council Amends Entry for Individual

On 26 June, the UN Security Council Committee issued a [press release](#) concerning amendments to the listing of Adil Muhammad Mahmud Abd Al-Khaliq on the Al-Qaeda Sanctions List pursuant to Security Council Resolutions 1267 and 1989.

The amendments deleted references to the provision of electrical parts utilised in explosives, computers, GPS devices and military equipment as well as allegations that Al-Khaliq was given small arms and explosives training by Al-Qaeda in South Asia and that he fought alongside Al-Qaeda in Afghanistan. The updated listing for Al-Khaliq notes that he continued raising and collecting funds for Al-Qaeda and the Taliban respectively after his release from a prison sentence in Bahrain in early 2008.

Individuals and entities on the Al-Qaeda Sanctions List are subject to the arms embargo, assets freeze and

travel ban stipulated in paragraph 1 of [Security Council Resolution 2161](#).

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South Sudan: UN Security Council Imposes Sanctions on Six Rival Commanders

On 1 July, the UN Security Council Committee announced the addition of six individuals to the South Sudan Sanctions List pursuant to [Security Council Resolution 2206](#) (“Resolution 2206”). The six individuals are: (1) Gabriel Jok Riak, (2) Simon Gatwech Dual, (3) James Koang Chuol, (4) Santino Deng Wol, (5) Marial Chanuong Yol Mangok and (6) Peter Gadet.

The [press release](#) notes that government commander Major General Yol Mangok “led the slaughter of Nuer civilians in and around Juba, many who were buried in mass graves” and that Lieutenant General Jok Riak and Major General Deng Wol are also government commanders. Major General Gatwech Dual, Major General Koang Chuol and Major General Gadet are commanders of the government opposition, with the last of these allegedly responsible for targeting “civilians, including women, in April 2014 during an assault on Bentui, including targeted killings on the basis of ethnicity”.

Individuals and entities on the South Sudan Sanctions List are subject to the travel ban and assets freeze stipulated in paragraphs 9 and 12 of Resolution 2206.

The US [implemented the UN action](#) on 2 July 2015, by adding Lieutenant General Jok Riak and Major General Gatwech Dual to the list of individuals blocked under its South Sudan sanctions programme, which targets groups and individuals who threaten the peace, security, or stability of South Sudan. The US had already listed Major General Gadet, Major General Yol Mangok, Major General Koang Chuol and Major General Deng Wol.

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UK News

UK High Court Refuses Listed Person’s Wife’s Application for an Interim Injunction to Unfreeze Bank Accounts

In [Hmicho v Barclays Bank PLC \[2015\] EWHC 1757 \(QB\)](#) Mr Justice Picken refused to grant Mrs Hmicho an interim injunction requiring Barclays Bank to unfreeze her bank accounts. Barclays originally froze Mrs Hmicho’s bank accounts in May 2015 after her husband was listed on the EU’s Syria-related sanctions list pursuant to [Council Regulation \(EU\) No. 36/2012](#) (as amended, “Regulation 36”). The UK transposed Regulation 36 into UK domestic law through the [Syria \(European Union Financial Sanctions\) Regulations 2012](#) (the “UK Regulations”).

The court held that it did not have the necessary “high degree of assurance” that Barclays was not entitled to hold the reasonable suspicion that Mr Hmicho owned or controlled the funds in Mrs Hmicho’s Barclays Bank accounts. In arriving at this conclusion, the court noted that Mr Hmicho had transferred funds to his wife’s account once he was identified as a designated person, and that two cash deposits were paid into Mrs Hmicho’s account shortly after Mr Hmicho had been denied access to a safe deposit box, before being withdrawn and subsequently paid into an account in Mrs Hmicho’s name at National Westminster Bank Plc.

Barclays, concerned that it would commit an offence contrary to the UK Regulations if it were to release the funds in Mrs Hmicho’s account, submitted that it would be “wholly inappropriate” for the court to require it to act in a manner that would put it at risk of committing a criminal offence. Relying on [*K Ltd v National Westminster Bank Plc* \[2007\] 1 WLR 311](#), the court agreed with Barclays. It found that the balance of convenience firmly rested with Barclays, and that damages would not be an inadequate remedy for Mrs Hmicho if she was successful at trial.

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Related Developments in Anti-Money Laundering Initiatives

EU Directive on Anti-Money Laundering Becomes Effective

On 26 June, the Fourth Anti-Money Laundering Directive came into effect. The directive is the legal embodiment of recommendations from the Financial Action Task Force, an international body that sets anti-money laundering standards, and all EU member states are now required to adopt it. The directive requires enhanced measures for a number of key areas, but it particularly stresses the recording of beneficial owners.

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US and UK Publish Money Laundering Assessments

On 12 June, the US Treasury Department [published](#) the National Money Laundering Risk Assessment and the National Terrorist Financing Risk Assessment. The assessments seek to survey the current US anti-money laundering (“AML”) landscape and discuss the ways in which entities attempt to launder money through the US financial system. Generally, regulators hope that companies read these assessments to better situate their AML programmes.

On 23 June, the UK [published](#) its National Strategic Assessment of Serious and Organised Crime. It contains a section on money laundering and discusses the current risks and trends seen by UK law enforcement officials.

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