

# Sanctions Alert

A bi-monthly summary of sanctions news and events

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## EU News

### Central African Republic: EU Amends Sanctions Regime

On 7 May 2015, pursuant to [Council Regulation \(EU\) 2015/734](#), which amends [Council Regulation \(EU\) 224/2014](#), and [Council Decision \(CFSP\) 2015/739](#), which amends [Council Decision \(2013/798/CFSP\)](#), the EU modified its sanctions regime concerning the Central African Republic. The new legislation amended

(i) the examples contained in the listing criteria for persons and entities on which restrictive measures can be imposed and (ii) some derogations from existing restrictive measures.

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### Iran: ECJ Allows Annulment Application

On 5 May 2015, the General Court of the EU (the “General Court”), in [Petropars Companies v Council of the EU Case T-433/13](#), allowed an application for the annulment of Iran sanctions in so far as they concerned two out of four applicants. Pursuant to [Council Decision 2013/270/DFSP](#), amending [Council Decision 2010/413/CFSP](#), and [Council Implementing Regulation \(EU\) No 522/2013](#), implementing [Council Regulation \(EU\) No 267/2012](#) (together, the “Contested Legislation”), four Iranian companies (i) Petropars Iran Co. (“PPI”), (ii) Petropars Oilfields Services Co. (“POSCO”), (iii) Petropars Aria Kish Operation and Management Co. (“POMC”), and (iv) Petropars Resources Engineering Kish Co. (“PRE”) were added to the Iran sanctions list for being involved in nuclear activities and providing support to the Government of Iran.

The applicants relied on four pleas in law to support their application for annulment, claiming: (1) there was no legal basis for the applicants’ designation;

(2) an error of assessment by the EU; (3) a violation of the applicants’ fundamental rights and the principle of proportionality; and (4) a failure to notify two of the applicants, along with violations of the obligation to state reasons, the rights of defence, and effective judicial protection.

The General Court dismissed all pleas concerning PPI and POSCO, and both entities remain subject to sanctions.

The General Court held there was an error of assessment in respect of POMC and PRE and therefore the Contested Legislation in respect of these two applicants will be annulled. The restrictive measures against POMC and PRE will remain in force for two months until the time for an appeal by the Council has expired.

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## Burma: EU Extends Duration of Sanctions Regime

On 28 April 2015, the EU Council extended the duration of its Burma sanctions regime for another year, pursuant to [Council Decision \(CFSP\) 2015/666](#), which amends [Council Decision 2013/184/CFSP](#) (“Decision 184”). The restrictive measures established

by Council Regulation (EC) No 401/2013 and Decision 184 will remain in effect until 30 April 2016.

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## Al-Qaeda: EU Adds Two Individuals to the Sanctions List

On 20 April 2015, pursuant to [Commission Implementing Regulation \(EU\) 2015/617](#), which amends Council Regulation (EC) No 881/2002, the EU added Ali Ben Taher Ben Faleh Ouni Harzi and Tarak Ben Taher Ben Faleh Ouni Harzi to its

Al-Qaeda sanctions list, following their addition to the UN Al-Qaeda sanctions list. Both men are therefore subject to an EU-wide asset freeze.

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## Al-Qaeda: EU Annuls Restrictive Measures Against One Individual

On 14 April 2015, the General Court, in [Chafiq Ayadi v European Commission \(Case T-572/09\)](#), ruled in favour of annulling the restrictive measures imposed by [Commission Regulation \(EC\) No 954/2009](#) (“Regulation 954”), which amended [Council Regulation \(EC\) No 881/2002](#), insofar as those measures concerned Chafiq Ayadi. Ayadi was initially listed under Regulation 954 on the grounds of being associated with and contributing to the activities of Al-Qaeda, Osama bin Laden or the Taliban.

Ayadi challenged the allegations and the supporting evidence of his association with Al-Qaeda, bin Laden or the Taliban. He argued, following [Commission and Others v Kadi \(C-584/10P, C-593/10P and C-595/10P\)](#),

that the Commission failed to discharge its duty to examine, carefully and impartially, whether the alleged reasons for imposing restrictive measures on him were well founded. The General Court agreed with Ayadi, finding that none of the allegations against him were such as to justify the adoption of EU restrictive measures against him either because the reasons stated were insufficient or because there was a lack of information or evidence that might substantiate such reasons. Ayadi is no longer subject to the relevant restrictive measures.

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## Zimbabwe: ECJ Rejects Annulment Application

On 22 April 2015, the General Court, in [Tomana & Others v Council & Commission, Case T-190/12](#), rejected an application for the annulment of three pieces of EU legislation concerning restrictive measures in respect of Zimbabwe. The relevant EU legislation – (1) [Council Decision 2012/97/CFSP](#), (2) [Commission Implementing Regulation \(EU\) No 151/2012](#), and (3) [Council Implementing Decision 2012/124/CFSP](#) – imposed sanctions on 121 persons for either (i) being members of, or members associated with, the Zimbabwean government or (ii) seriously undermining democracy, respect for human rights and the rule of law in Zimbabwe. (The restrictive measures have been suspended in respect of these persons since February 2014.)

The applicants relied on five pleas in law to support their application, claiming: (1) there was no proper legal basis for including persons or entities who are neither leaders of Zimbabwe nor their associates on the list of persons subject to restrictive measures; (2) there was a manifest error of assessment; (3) the obligation to state reasons was infringed; (4) the applicants' right of defence was infringed; and (5) the principle of proportionality was infringed. The General Court rejected all five of the applicants' pleas and dismissed the action.

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## Zimbabwe: EU Removes Five Individuals from Sanctions List

On 20 April 2015, the EU Council removed five deceased individuals from its Zimbabwe sanctions list. Pursuant to [Council Regulation \(EU\) 2015/612](#), which amends [Council Regulation \(EC\) No 314/2004](#), and [Council Decision \(CFSP\) 2015/277](#), which amends [Council Decision 2011/101/CFSP](#), (1) Edward Takaruza

Chindori-Chininga, (2) Mike Tichafa Karakadzai, (3) Stanley Urayayi Sakupwanya, (4) Lovemore Sekeremayi, and (5) Nathan Marwirakuwa Shamuyarira have been removed from the sanctions list.

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## Ivory Coast: EU Removes Individuals from Sanctions List, Updates Information

On 20 April 2015, the EU Council amended its Ivory Coast sanctions list, pursuant to [Council Implementing Regulation \(EU\) 2015/615](#), which amends [Council Regulation \(EC\) No 560/2005](#), and

[Council Implementing Decision \(CFSP\) 2015/621](#), which amends [Council Decision 2010/656/CFSP](#).

As a result of these amendments, Pascal Affi N'Guessan and Marcel Gossio have been removed

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from the sanctions list and identifying information has been updated for the following six individuals: (1) Charles Blé Goudé; (2) Eugène N’Goran Kouadio

Djué; (3) Martin Kouakou Fofié; (4) Laurent Gbagbo; (5) Simon Gbagbo; and (6) Désiré Tagro.

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## DRC: EU Updates Identifying Information

On 20 April 2015, the EU Council updated the identifying information of individuals and entities subject to restrictive measures concerning the Democratic Republic of Congo (“DRC”) in order to mirror the UN Security Council Committee’s equivalent [update](#), which was published on 5 February 2015.

The list is contained in [Council Decision \(CFSP\) 2015/620](#), which amends [Decision 2010/788/CFSP](#), and in [Council Implementing Regulation \(EU\) 2015/614](#), which amends [Regulation \(EC\) No 1183/2005](#).

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## Syria: ECJ Rejects Annulment Application, Anbouba Appeal

On 30 April 2015, the General Court, in [Fares Al-Chihabi v Council of the EU \(Case T-593/11\)](#), rejected an application for the annulment of Syrian sanctions insofar as they concerned Fares Al-Chihabi. Al-Chihabi, a Syrian businessman who is President of the Aleppo Chamber of Industry, was initially listed on the Syrian sanctions list in 2011 pursuant to [Council Decision 2011/522/CFSP](#), amending [Council Decision 2011/273/CFSP](#), and [Council Regulation \(EU\) No 878/2011](#), amending [Council Regulation \(EU\) No 442/2011](#), for economically supporting the Syrian regime responsible for the violent repression of the civilian population in Syria.

Al-Chihabi relied on five pleas in law to support his application, claiming: (1) an infringement of the right to good administration and a breach of the obligation to state reasons; (2) an infringement of the rights of the defence and the right to effective judicial protection; (3) an infringement of fundamental

rights, including the right to property, the freedom to conduct a business and the right to the presumption of innocence; (4) an infringement of the right to privacy and breach of the principle of proportionality; and (5) manifest error in assessment. The General Court rejected all five pleas and dismissed the action.

On 21 April 2015, the Grand Chamber of the European Court of Justice (“Grand Chamber”), in the case of *Issam Anbouba v Council* ([C-605/13P](#) and [C-630/13P](#)), rejected Issam Anbouba’s appeal of the judgment of the General Court in [Anbouba v Council \(T-563/11\)](#). In both cases, Anbouba was seeking the annulment of restrictive measures concerning Syria insofar as they imposed restrictive measures against him. Anbouba was initially added to the Syrian sanctions list for providing economic support to the Syrian regime as president of the company Issam Anbouba Est.

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Anbouba's appeal was based on arguments against the General Court's approval of presumptions applied by the EU Council. The Grand Chamber rejected the grounds and dismissed the appeal. Anbouba therefore remains

sanctioned pursuant to [Council Decision 2011/782/CFSP](#) and [Council Regulation \(EU\) No 36/2012](#).

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## South Sudan: EU Combines Sanctions Regimes

On 7 May 2015, the EU Council adopted [Council Regulation \(EU\) 2015/735](#), repealing [Council Regulation \(EU\) No 748/2014](#), and [Council Decision \(CFSP\) 2015/740](#), repealing [Council Decision 2014/449/CFSP](#), regarding sanctions concerning South Sudan. This new legislation does not change the sanctions in place in respect of South Sudan, it simply amalgamates various regimes.

As a result, the existing restrictive measures, including asset freezes and travel bans, remain in place, and the list of designated persons and entities is unchanged. Further restrictive measures may be imposed on persons identified as obstructing the political process in South Sudan or committing serious violations of human rights.

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## US News

### OFAC Updates Guidance on Transactions with Russian Entities Subject to Sectoral Sanctions, Issues New Guidance on Remittances to Crimea

On 7 May 2015, the US Treasury Department's Office of Foreign Assets Control ("OFAC") issued three updates to its [Frequently Asked Questions related to Russia and Ukraine](#). OFAC revised the answer to [FAQ No. 395](#), which deals with letters of credit, to clarify that US persons may deal in letters of credit issued by Russian banks on the Sectoral Sanctions Identifications ("SSI") list if the underlying payment terms comply with the 30-day debt limit imposed by the SSI. OFAC also amended the answer to [FAQ No. 419](#), which deals with commercial transactions, to specify that payments received from SSI-listed entities should use a value date of not later than 30 days (or 90 days under Sectoral Sanctions Directive 2) from the point at

which title or ownership has transferred for payments relating to sales of goods, or from the date of each final invoice for payments relating to services, subscription arrangements, and progress payments. OFAC maintained its existing guidance that the payments must be received within the 30-day (or 90-day) period after the transfer of title or ownership, or the issuance of each final invoice, as applicable. Finally, OFAC issued a new [FAQ No. 453](#) clarifying that US financial institutions are allowed to service noncommercial personal remittances to Crimea even if neither the beneficiary nor the remitter is a US person.

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## OFAC Moves for Summary Judgment in Epsilon Car Audio Case

On 14 May 2015, OFAC filed a motion for summary judgment seeking to dismiss a court challenge filed by Epsilon Electronics, Inc. (“Epsilon”) against a \$4 million civil penalty imposed by OFAC. In imposing the fine last year, OFAC determined that Epsilon, a seller of car-audio equipment based in California, exported equipment to the United Arab Emirates with knowledge or reason to know that it would be reexported to Iran. Epsilon then sued OFAC to challenge both the imposition and the amount of the penalty. In its motion for summary judgment, OFAC is

arguing that its determination is entitled to deference, its findings were reasonable in light of the evidence, the penalty was not excessive, and Epsilon was given a fair opportunity to present its case before OFAC imposed the penalty. Epsilon’s response is due on 15 June. The case is *Epsilon Electronics Inc. v. United States Department of the Treasury*, Case No. 14-CV-2220, before Judge Reggie Walton of the United States District Court for the District of Columbia

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## US Court Sentences BNP Paribas Under Plea Agreement

On 1 May 2015, the US District Court for the Southern District of New York [sentenced](#) BNP Paribas to five years of probation and ordered it to pay a fine and forfeitures totaling roughly \$8.9 billion for violations of US sanctions. During probation, BNP Paribas will be required to enhance its compliance programme. The sentencing is consistent with a previously announced plea agreement, in which BNP Paribas admitted it violated US sanctions with respect to Sudan, Cuba, and Iran. US officials

particularly emphasised the Sudanese involvement and accused BNP of functioning as ‘the central bank for the government of Sudan’. The sentencing was the first time a financial institution had been convicted and sentenced for violations of US economic sanctions and involved the largest financial penalty ever imposed in a US criminal case.

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## OFAC Issues New Guidance on Transport Between the US and Cuba

On 5 May 2015, OFAC published new [guidance](#) on the carriage of passengers and cargo between the United States and Cuba in view of the new authorisations that OFAC issued in January of this year. The guidance clarifies that air carriers and commercial vessels may

transport US nationals and residents who qualify to travel to Cuba under a general licence, third-country nationals travelling on official business for a foreign government or intergovernmental organisation, Cuban nationals seeking admission to the United States,

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third-country nationals travelling to the United States with a valid visa or other travel authorisation, and non-immigrant Cuban nationals returning from the United States to Cuba. Carriers also may transport passengers' authorised accompanied baggage as well as cargo that is licenced or otherwise authorised for export to Cuba by the US Commerce Department's Bureau of Industry

and Security (BIS). However, vessel operators must be specifically licensed by OFAC to provide carriage between the US and Cuba, and a specific licence from BIS is required for the temporary sojourn in Cuba of an aircraft or vessel coming from the United States.

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## Four Companies and Five Individuals Indicted for Exports to Iran

On 17 April 2015, the US District Court in Houston, Texas, unsealed an [indictment](#) that charges four corporations and five individuals with a scheme to facilitate illegal exports from the United States to Iran by concealing the ultimate destination of the exported items.

According to the US Justice Department's [announcement](#), Smart Power Systems Inc. ("Smart Power") would acquire the commodities—including high-tech electronics, uninterruptible power supplies, and other items—in the United States and send them to Hosoda Taiwan Limited Corporation ("Hosoda") in Taiwan. Hosoda would ship the items to Golsad Istanbul Trading Ltd. ("Golsad") in Turkey, which would then forward them to Faratel Corporation ("Faratel") in Iran. Five individual defendants, based in the United States, Taiwan and Turkey, are alleged to control Smart Power, Hosoda and Golsad and are also accused of facilitating this scheme.

If convicted, the individual defendants could face a maximum of 20 years in federal prison and a fine of up to \$100,000 on each of the 24 counts of the indictment. Each corporate defendant could face a maximum fine of \$1 million for each count.

In addition, the US Commerce Department [added to the Entity List](#) eight non-US individuals and entities that allegedly facilitated the illegal exports. The designees include Hosoda, Golsad, Faratel and individuals associated with them, as well as a company based in mainland China that is not named as a defendant in the criminal case. All exports, reexports, and transfers to those persons of items subject to the Export Administration Regulations (EAR) now require a licence from BIS, which will ordinarily deny applications for such licences

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## US Lifts Sanctions Against Prominent Burmese Businessman and Companies

On 23 April 2015, the US Treasury Department [removed](#) Win Aung and two of his businesses from the Specially Designated Nationals (SDN) list. The

businesses are Dagon International Limited, [said to be](#) one of Burma's largest conglomerates, and its affiliate, Dagon Timber Limited. At the time Win Aung and his

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companies were added to the SDN list in January 2009, the US Treasury Department [described](#) him as a crony of the Burmese ruling junta and said he had provided significant financial donations and construction services to the junta. It is not immediately clear why he was delisted, but the US State Department's announcement of the delisting notes that additional

relaxation of US sanctions on Burma is dependent on further reforms in that country and that individual designees may petition for removal from the SDN list if they can provide evidence that they have changed their behaviour.

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## New Designations of Members of Criminal Organisations in El Salvador and Japan

On 16 April 2015, the US Treasury Department [blocked](#) the property of three individuals affiliated with the Central American street gang Mara Salvatrucha, also known as MS-13. The Treasury Department added Salvadoran nationals José Luís Mendoza Figueroa, Eduardo Erazo Nolasco, and Élmer Canales Rivera to the SDN list under the sanctions programme targeting Transnational Criminal Organizations (TCOs). The individuals were listed for their alleged leadership positions in MS-13 "cliques", the sub-units of the MS-13 network. All three are currently incarcerated in El Salvador but are alleged to be continuing their leadership operations from prison.

Separately, on 21 April 2015, the Treasury Department [blocked](#) the property of the entity, Kodo-kai, and its chairman, Teruaki Takeuchi, under the TCO sanctions. Kodo-kai is part of the Yamaguchi-gumi organisation, which is the most prominent faction of the Yakuza infrastructure. According to the US government, Kodo-kai members number in the thousands and are reputed to be the most violent faction of the Yamaguchi-gumi.

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## New Terrorism Designations in Greece, Somalia and Lebanon

On 21 April 2015, the US Treasury and State Departments [added](#) Christodoulos Xiros and Nikolaos Maziotis to the SDN list as Specially Designated Global Terrorists (SDGTs). Xiros is accused of being a prominent assassin in the 17 November organisation, which targeted Greek politicians and business leaders from the 1970s to the 2000s. He is currently incarcerated in Greece after having escaped while

on furlough from a prison sentence in January 2014. Before his re-arrest in January 2015, he was believed to be plotting an attack in Greece with the help of the Conspiracy of Fire Nuclei, a US-designated terrorist organisation. Maziotis is said to be the leader of another US-designated Greek terrorist organisation, Revolutionary Struggle. That group is said to be responsible for a number of attacks, including a

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rocket-propelled grenade attack on the US Embassy in Athens in 2007. Maziotis escaped custody prior to his 2010 trial but was re-arrested following a shootout in Athens.

Also on 21 April 2015, the US Treasury and State Departments [designated](#) Ahmed Diriye and Mahad Karate as SDGTs for their involvement with the Somali organisation al-Shabaab. Diriye is reportedly the current leader of al-Shabaab and took over in September 2014, following the death of Ahmed Abdi Godane. Karate is said to be involved with Amniyat, the intelligence arm of al-Shabaab, which provides logistics, support and coordination for al-Shabaab's activities. Through Amniyat, Karate is suspected of being involved in the 2 April attack on Garissa University College in Kenya.

On 28 April 2015, the US Treasury and State Departments [designated](#) Hizballah members Meliad Farah, Hassan el-Hajj Hassan, and Hussein Atris as SDGTs. Farah and Hassan are believed to be two key perpetrators of the July 2012 bombing of an airport in Burgas, Bulgaria. Atris, a member of Hizballah's overseas terrorism unit, was released from Thai prison in September 2014, where he was serving a sentence for possessing nearly three tons of ammonium nitrate, a key component in the manufacture of explosives. All three of the designated individuals are believed to be in Lebanon.

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## UK News

### UK Renews Terrorist Asset-Freezing Designation in Respect of One Individual

On 6 May 2015, HM Treasury issued a [General Notice of Renewal of Final Designation](#) by which it renewed the final designation in force against Mohammed Khaled under the Terrorist Asset-Freezing etc. Act 2010

(the "Act"). Khaled therefore continues to be subject to the financial sanctions imposed by the Act.

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### UK High Court Rules for Bank Mellat on Preliminary Damages Issues

On 6 May 2015, the UK High Court, in [Bank Mellat v HM Treasury \[2015\] EWHC 1258 \(Comm\)](#), decided on three preliminary issues for a damages claim brought by Bank Mellat against HM Treasury for loss and damage caused by the [Financial Restrictions \(Iran\)](#)

[Order 2009](#) (the "2009 Order"), the effect of which was to shut Bank Mellat out from the UK financial sector. The 2009 Order was declared unlawful by the Supreme Court in [Bank Mellat v HM Treasury \(No. 2\)](#) [2013] UKSC 39.

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The three preliminary issues for determination by the High Court were: (1) whether it is open to HM Treasury to contend that it did not act in a way which was incompatible with the European Convention on Human Rights (“ECHR”) or the Human Rights Act 1998, despite the Supreme Court judgment; (2) whether it is open to HM Treasury to contend that the loss caused to Bank Mellat is irrecoverable under English law as it is a form of “reflective loss”, i.e. a claim for diminution in the value of its shareholding (in this case, the shareholding relates to shares of Bank Mellat’s subsidiary company); and (3) how narrowly to define

the property interests of Bank Mellat that were harmed or interfered with by the 2009 order.

The High Court decided all three preliminary issues in favour of Bank Mellat holding: (1) it is not open to HM Treasury to contend that it did not act in a way which was incompatible with an ECHR right when the Supreme Court had decided that it had so acted; (2) Bank Mellat is free to pursue its claim for reflective loss; and (3) the property interests should not, at this stage, be defined as narrowly as HM Treasury desires.

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## UK Energy Secretary Orders the Sale of North Sea Assets by Russian Owner

On 20 April 2015, Edward Davey, Secretary of State for the Department of Energy and Climate Change for the previous UK government, notified LetterOne, an investment vehicle owned by a number of Russian and other individuals, including Mikhail Fridman, and Dea UK, a newly acquired subsidiary of LetterOne, that he proposed to revoke Dea UK’s North Sea petroleum licenses unless LetterOne arranged for a further change

of control of the Dea UK gas fields in the North Sea. Under the terms of the licenses held by Dea UK, Dea UK and LetterOne now have three months to effect a further change of control. However, the Davey did offer to extend this period to six months.

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# Sanctions Alert

Sanctions Alert is a publication of  
**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](mailto:sanctions@debevoise.com) or call:

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

**David O'Neil**  
Partner, Washington  
+1 202 383 8040  
daoneil@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

Please address inquiries  
regarding topics covered in  
this publication to the editors.

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