U.S. Treasury Severs More Networks Providing Support for Putin and Russia's Elites

June 2, 2022

Targeting key nodes of Russian attempts to evade unprecedented U.S. sanctions

Kremlin elites, luxury assets, and Putin's favored yachts blocked

WASHINGTON – Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is taking further action to degrade the key networks used by Russia's elites, including President Vladimir Putin, to attempt to hide and move money and anonymously make use of luxury assets around the globe. Today's action targets a Kremlin-aligned yacht brokerage, several prominent Russian government officials, and a close Putin associate and moneymanager, Sergei Roldugin, who is a custodian of President Putin's offshore wealth. In order to further tighten and enforce existing sanctions, this action further identifies yachts and aircraft in which sanctioned Russian elites maintain interests.

"Russia's elites, up to and including President Putin, rely on complex support networks to hide, move, and maintain their wealth and luxury assets," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian Nelson. "Today's action demonstrates that Treasury can and will go after those responsible for shielding and maintaining these ill-gotten interests. We will continue to enforce our sanctions and expose the corrupt systems by which President Putin and his elites enrich themselves."

Today's actions were taken pursuant to Executive Orders (E.O.) 14024, E.O. 13685, and E.O. 13661, and further align the United States with its international partners and allies. Today's designations were taken in tandem with the U.S. Department of State and the U.S. Department of Commerce. The U.S. Department of State imposed sanctions on five of Russia's oligarchs and elites, including Maria Zakharova, the spokesperson of the Russian Ministry of Foreign Affairs; Alexey Mordashov, the leader of Severgroup and one of Russia's wealthiest billionaires; and family members and entities associated with the oligarchs and elites. The U.S. Department of Commerce is adding 71 additional parties located in Russia and Belarus to the Entity List, further restricting the Russian military's ability to obtain technologies and other items it needs to sustain aggression and project power.

PUTIN-LINKED YACHTS

Today, OFAC is identifying Russia-flagged **Graceful** and Cayman Islands-flagged **Olympia**, as blocked property in which President Vladimir Putin has an interest. On February 25, 2022, OFAC designated Vladimir Putin pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of the Government of the Russian Federation (GoR). While the leader of Russia, Putin has taken numerous trips on these yachts, including a 2021 trip in the Black Sea where he was joined by Alyaksandr Lukashenka, the OFAC-designated corrupt ruler of Belarus, who has supported Russia's war against Ukraine.



Olympia (Photo credit: Feadship)

OFAC also designated the following entities and an individual who were registered owners of or involved in the management of either Graceful or Olympia. OFAC designated Russian Federation state-owned, Cyprus-registered **SCF Management Services Cyprus Ltd** pursuant to E.O. 14024 for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, the GoR. OFAC designated **Ironstone Marine Investments**, **JSC Argument**, and **O'Neill Assets Corporation** pursuant to E.O. 14024 for having materially

assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Vladimir Putin. OFAC additionally designated JSC Argument's sole shareholder and former director, **Andrei Valeryevich Gasilov**, pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of JSC Argument.

OFAC also targeted two additional yachts linked to Putin, **Shellest** and **Nega**, which are owned by the Russian company **Non-Profit Partnership Revival of Maritime Traditions** (Revival of Maritime Traditions) and its Russian subsidiary **Limited Liability Company Gelios** (LLC Gelios), respectively. OFAC designated Revival of Maritime Traditions pursuant to E.O. 14024 for operating or having operated in the marine sector of the Russian Federation economy. OFAC designated LLC Gelios pursuant to E.O. 14024 for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Revival of Maritime Traditions. OFAC identified Shellest as blocked property in which Revival of Maritime Traditions has an interest and identified Nega as blocked property in which LLC Gelios has an interest. Shellest periodically travels to the coast where President Putin's infamous Black Sea Palace is located, and President Putin uses Nega for travel in Russia's North.



Shellest (Credit: Romeo United Yachts)

KREMLIN-ALIGNED YACHT BROKERAGE

Imperial Yachts SARL (Imperial Yachts) is a yacht brokerage that offers a variety of services relating to superyachts, including their design, order, charter, and management. In addition to their head office in Monaco, Imperial Yachts maintains an office in Russia's capital and provides yacht-related services to Russia's elites, including those in President Putin's inner circle. When not in use by their owners, superyachts can be offered for charter through businesses such as Imperial Yachts, generating income for the owners, who are in some cases Russia's oligarchs. Imperial Yachts conducts business with U.S.-designated oligarchs, including through providing management services to at least one yacht linked to an OFAC-designated individual.

OFAC designated Monaco-based Imperial Yachts and its Russian CEO, **Evgeniy Borisovich Kochman** (Kochman), pursuant to E.O. 14024 for operating or having operated in the marine sector of the Russian Federation economy. OFAC also designated Imperial Yachts pursuant to E.O. 14024 for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Kochman.

Additionally, OFAC identified the largest yacht currently available for charter through Imperial Yachts, **Flying Fox**, as blocked property in which Imperial Yachts has an interest.



Flying Fox (credit: Tom Drust)

The entities **OOO Nord Marine**, **OOO Yakht-Treid**, **OOO Bilding Management**, and **OOO Nord Marin Inzhiniring** were designated pursuant to E.O. 14024 for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Kochman.

PUTIN'S MIDDLE-MAN

Sergei Pavlovich Roldugin (Roldugin) is a close friend and part of a system that manages President Putin's offshore wealth. The two have known each other for over four decades, and Roldugin is the godfather to one of Putin's daughters. Roldugin is a cellist, conductor, and the artistic director of the St. Petersburg Music House, a state-owned cultural institution in Russia. **Elena Yuryevna Mirtova** (Mirtova), Roldugin's wife, is a soprano opera singer and

actress who has performed alongside her husband. Roldugin was previously designated by the European Union, United Kingdom, Australia, and New Zealand.

Roldugin was designated today pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of the GoR. Mirtova was designated pursuant to E.O. 14024 for being a spouse or adult child of Roldugin.

ADDITIONAL YACHTS AND AIRCRAFT

OFAC designated San Marino-based **SRL Skyline Aviation** (Skyline) pursuant to E.O. 13685 for operating in the Crimea region of Ukraine and identified aircraft **T7-OKY** as property in which Skyline has an interest. As part of a scheme involving jets owned by VTB Bank and controlled by the chief of staff of VTB Bank's CEO, Andrei Kostin (Kostin), the jets were transferred to an anonymous offshore company. Kostin's chief of staff still manages these jets, which Skyline operated. OFAC designated VTB Bank pursuant to E.O. 14024 for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, the GoR, and for operating or having operated in the financial services sector of the Russian Federation economy. OFAC designated Kostin in 2018 pursuant to E.O. 13661 for being an official of the GoR.

As part of today's action, OFAC also identified a yacht named **Sea Rhapsody** as property in which Kostin has an interest. Priced at \$65 million, Kostin's yacht Sea Rhapsody is flagged in the Marshall Islands and has an International Maritime Organization (IMO) number of 1010648.

T7-OKY ("T7-OKY@ZRH;21.01.2020" by https://www.flickr.com/photos/46423105@N03 is licensed under CC BY-NC-SA 2.0.)

OFAC identified Cayman Islands-flagged yacht, **Madame Gu**, helicopter **3A-MGU** housed on the yacht, and private plane **P4-MGU** as blocked property in which twice-designated Russian Federation Duma member and billionaire Andrei Vladimirovich Skoch (Skoch) has an interest. The 324-foot Madame Gu (IMO 1011331), which is valued at \$156 million, includes an elevator, beach club, gym, and requires significant maintenance and repair, including approximately \$1 million for painting annually. OFAC designated Skoch in 2022 pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of the GoR and in 2018 pursuant to E.O. 13661 for being an official of the GoR.

6/2/2022	U.S. Treasury Severs More Networks Providing Support for Putin and Russia's Elites U.S. Department of the Treasury
3A-MGL	U taking off from the deck of Madame Gu (Dutch Yachting via Youtube)
P4-MG	U ("Global Jet Luxembourg, P4-MGU, Airbus A319-115 CJ" by Anna Zvereva is licensed
	CC BY-SA 2.0.)
TOP	RUSSIAN GOVERNMENT OFFICIALS
Viiry Sl	yusar (Slyusar) is the President of United Aircraft Corporation (UAC), a Russian state-
	company and major supplier of aircraft to Russia's military, and one of the leading

actors in Russia's industry and defense sector with close ties to the GoR. UAC has supplied aircraft that have been used by Russia's military to threaten and destabilize Ukraine. UAC is 88 percent owned by Rostec, a Russian stated-owned defense company subject to the debt-related prohibitions of Directive 3 under E.O. 13662.

Slyusar was designated today pursuant to E.O. 14024 for having been a leader, official, senior executive officer, or member of the board of directors of the GoR and for operating or having operated in the aerospace sector of the Russian Federation economy. Slyusar has previously been designated by the European Union, Australia, Canada, New Zealand, and the United Kingdom.

Vitaly Savelyev (Savelyev) is the Minister of Transport of the Russian Federation and a member of the Board of Directors of Russian Railways; he also serves as the Chairman of the Board of Directors of Aeroflot. Savelyev was designated today pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of the GoR. Savelyev has previously been designated by the European Union and the United Kingdom.

Maxim Reshetnikov (Reshetnikov) is the Minister of Economic Development of the Russian Federation. Reshetnikov serves on the board of sanctioned Russian entities, including VTB Bank, VEB.RF, and Russian Railways. Reshetnikov was designated today pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of the GoR. Reshetnikov has previously been designated by the European Union, Australia, Canada, New Zealand and the United Kingdom.

Irek Envarovich Faizullin (Faizullin) is the Minister of Construction, Housing and Utilities of Russia and is a member of the board of directors of Russian Railways. Faizullin was designated today pursuant to E.O 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of the GoR. Faizullin has previously been designated by the European Union and the United Kingdom.

Dmitriy Yuryevich Grigorenko (Grigorenko) is the Deputy Prime Minister and Chief of the Government Staff of Russia. Grigorenko was designated today pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of the GoR. Grigorenko has previously been designated by the European Union, Australia, Canada, New Zealand and the United Kingdom.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the designated persons above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons are also blocked. All transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons are prohibited, unless authorized by a general or specific license issued by OFAC, or exempt. These prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any blocked person and the receipt of any contribution or provision of funds, goods, or services from any such person.

For identifying information on the individuals and entities sanctioned today, click here.

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