U.S. DEPARTMENT OF THE TREASURY

Treasury Targets Corruption and the Kremlin's Malign Influence Operations in Moldova

October 26, 2022

WASHINGTON — Today, the Department of the Treasury's Office of Foreign Assets Control (OFAC) took action to counter the Government of the Russian Federation's (GoR) persistent malign influence campaigns and systemic corruption in Moldova by imposing sanctions on nine individuals and 12 entities. The individuals and entities sanctioned today include oligarchs widely recognized for capturing and corrupting Moldova's political and economic institutions and those acting as instruments of Russia's global influence campaign, which seeks to manipulate the United States and its allies and partners, including Moldova and Ukraine. The designations include former Moldovan government official Vladimir Plahotniuc, who engaged in state capture by exerting control over and manipulating key sectors of Moldova's government, including the law enforcement, electoral, and judicial sectors.

"The sanctions imposed today expose not only Russia's covert strategy in Moldova, but also demonstrate how corruption undermines the rule of law," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "Russian influence operations attempt to exploit weaknesses in target countries in order to destabilize them from within. The United States continues to support Moldovan efforts to combat corruption and counter Russian influence."

For years, the GoR has supported influence and destabilization campaigns, which often involve weaponizing corruption to further its goals. While the GoR pushes its narrative by supporting influence agents, it simultaneously takes advantage of corruption to advance its own interests.

ACTS OF CORRUPTION

OFAC is designating former Moldovan government official **Vladimir Plahotniuc** (Plahotniuc), a former Moldovan Member of Parliament who served as both de facto leader and elected chair of the Democratic Party of Moldova (PDM).

Plahotniuc maintained control over the country's law enforcement apparatus to target political and business rivals. Specifically, Plahotniuc directed Moldovan law enforcement to focus investigations on individuals and entities that were in political opposition to him and the PDM in advance of elections in 2018.

Plahotniuc also used Moldovan government officials as intermediaries to bribe law enforcement officials in order to maintain their loyalty and further cement his control over Moldova. In 2018, Plahotniuc ordered Moldovan government ministers to pass and implement proposals to increase financial incentives to law enforcement, to further buy their allegiance.

Plahotniuc controlled the judicial system and used Moldovan courts to manipulate and invalidate the June 2018 mayoral election in Chisinau. In a separate occurrence, Plahotniuc closed voting stations in areas where his party was not expected to do well.

Plahotniuc also maintained control of key media outlets, further enabling his influence and ability to exert leverage over the government to target his opponents and protect himself and his allies.

Plahotniuc explicitly engaged in corrupt arrangements with Moldovan government officials. For example, Plahotniuc arranged for the relative of a high-ranking Moldovan government official to obtain a key business position, in exchange for the official's support in appointing a Moldovan energy entity of Plahotniuc's choosing. Plahotniuc also attempted to bribe Moldovan politicians to switch political parties.

OFAC is designating Plahotniuc pursuant to E.O. 13818 for being a former government official, who is responsible for or complicit in, or who has directly or indirectly engaged in corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery. The State Department imposed visa restrictions on Plahotniuc in January 2020 under Section 7031(c) of the Department of State, Foreign Operations, and Related Programs Appropriations Act for his involvement in significant corruption. Plahotniuc and his immediate family members are generally ineligible for visas to the United States.

RUSSIA'S EFFORTS TO SUBVERT MOLDOVAN DEMOCRACY

Russia has attempted to subvert democracy around the world through both overt and covert influence operations. Recently, as Russia faces military setbacks and global outrage over its

brutal actions in Ukraine, Russia's operatives have considered increasingly desperate measures to prevent further erosion of its influence.

Ilan Mironovich Shor (Shor) is a Moldovan politician and chairman of the **Shor Party**, a populist Moldovan political party. He was previously arrested on money laundering and embezzlement charges related to the 2014 theft of \$1 billion from Moldovan banks.

In advance of the 2021 Moldovan elections, Russia planned to undermine Moldovan president Maia Sandu and return Moldova to Russia's sphere of influence. To support this effort, Shor worked with Russian individuals to create a political alliance to control Moldova's parliament, which would then support several pieces of legislation in the interests of the Russian Federation. As of June 2022, Shor had received Russian support and the Shor Party was coordinating with representatives of other oligarchs to create political unrest in Moldova. In June 2022, Shor worked with Moscow-based entities to undermine Moldova's EU bid as the vote for candidate status was underway.

Shor's wife is the Russian pop singer **Sara Lvovna Shor**, who was decorated by Putin as an honored artist of Russia.

OFAC is designating Ilan Mironovich Shor pursuant to E.O. 14024 for being responsible for or complicit in, or for having directly or indirectly engaged or attempted to engage in interference in a United States or other foreign government election for or on behalf of, or for the benefit of, directly or indirectly, the Government of the Russian Federation.

OFAC is designating the Shor Party 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, Shor, a person designated pursuant to E.O. 14024.

OFAC is designating Sara Lvovna Shor pursuant to E.O. 14024 for being the spouse of Shor, a person designated pursuant to E.O. 14024.

In advance of the 2021 Moldovan elections, **Igor Yuryevich Chayka** (Chayka), in conjunction with Kremlin Press Secretary Dmitry Peskov, developed detailed plans to undermine Moldovan president Maia Sandu and return Moldova to Russia's sphere of influence. Chayka is the son of Yuriy Chayka, a member of Russia's Security Council who was designated pursuant to E.O. 14024 on April 6, 2022. Chayka used his father's connections and influence to amass and secure his business empire.

Chayka brokered an alliance between supporters of Ilan Shor and the Moldovan Socialist Pa (PSRM), represented by Igor Dodon (Dodon), the former President of Moldova who was recently indicted for corruption by Moldovan authorities. In exchange for the promise of Russian support in the election, Chayka obtained backing for legislation preferred by the Kremlin, including a law to strip Moldova's president of control of the country's intelligence agency. The GoR used Chayka's companies as a front to funnel money to the collaborating political parties in Moldova. Some of these illicit campaign funds were earmarked for bribes and electoral fraud.

OFAC designated Chayka pursuant to E.O. 14024 for being responsible for or complicit in, or for having directly or indirectly engaged or attempted to engage in interference in a United States or other foreign government election for or on behalf of, or for the benefit of, directly or indirectly, the Government of the Russian Federation. OFAC also designated Chayka pursuant to E.O. 14024 for being the adult child of Yuriy Chayka, a person designated pursuant to E.O. 14024.

Chayka owns various Russia-located enterprises: **OOO Aqua Solid**, **OOO Ekogrupp**, **OOO Inzhiniring.rf**, and **OOO Inovatsii Sveta**. OOO Ekogrupp owns **OOO Khartiya**, which in turn owns **Proekt-Ekologiya**, **OOO Region-Comfort**, and **OOO Mezhmunitsipalnoe Avtotransportnoyoe Predpreyatie**. OFAC designated these entities pursuant to E.O. 14024 for being owned by a person designated pursuant to E.O. 14024.

Chayka Associates

Ivan Alesksandrovich Zavorotnyi (Zavorotnyi), a Russian national, is an associate of Chayka who serves on the board of many of Chayka's companies. OFAC designated Zavorotnyi for being or having been a senior executive officer of OOO Inovatsii Sveta. OFAC designated OOO **Agro-Region** and **OOO Zolotoi Vek** for being owned by Zavorotnyi.

Yuriy Igorevich Gudilin (Gudilin), a political technologist and former Russian Federal Security Service (FSB) officer, coordinated efforts in 2020 and 2021 to influence the outcome of Moldova's elections. Gudilin worked closely with Russian nationals **Olga Yurievna Grak** (Grak) and **Leonid Mikhailovich Gonin** (Gonin) on these efforts.

Gudilin, Grak, and Gonin worked as advisors to former Moldovan President Igor Dodon during the 2020 Moldovan presidential election. During the course of the campaign, the Russian consultants also met with a large number of members of the PSRM, which at the time was led by Dodon. In these meetings, Gudilin and Grak pressured senior PSRM members to accept their assistance and guidance by promising they would weigh in favorably with the Russian Presidential Administration with regard to Moldovan government requests for assistance. In 2020, Gudilin also facilitated the setup of a payment channel using the Tether cryptocurrency likely for funding election influence operations. In 2021, FSB-linked political advisors propo

using the Russian Ministry of the Interior to locate Moldovan citizens living in Russia and convince them to vote. In addition, Russian mass media would promote messages useful to Dodon's campaign to Moldovan citizens living in Russia.

Also in 2021, an FSB associate strategized with Chayka regarding production of propaganda videos intended to influence the Moldovan electorate. The intent was likely to decrease the voting participation of the Moldovan diaspora and of pro-European voters, and to increase the voting participation of pro-Russian voters. The FSB associate planned to travel to Moldova with Gudilin, likely in connection with production of the videos.

Although its efforts to influence Moldova's 2020 and 2021 elections failed, the Kremlin continues to organize efforts to return a pro-Russian government to power. Recognizing the loss of popular support for Moldova's old pro-Russia political elite, Gudilin's team offered support to an opposition political group, the National Alternative Movement (NAM). These influence efforts are closely coordinated with Moscow's use of energy as a political weapon against the Moldovan government. Among its efforts to undermine the government, Gudilin's team planned to hire a permanent team to post comments on social media and online broadcasts. Gudilin worked with a manager for the U.S.-sanctioned Internet Research Agency to set up this "troll factory."

One example of Russia's increasingly desperate measures to prevent further erosion of its influence is that, as part of one scheme proposed to Gudilin, pro-Russian actors would stage a series of vehicle break-ins in Moldova, which pro-Russian disinformation outlets would falsely blame on Ukrainian refugees.

OFAC designated Gudilin, Grak, and Gonin pursuant to E.O. 14024 for being responsible for or complicit in, or for having directly or indirectly engaged or attempted to engage in, interference in a United States or other foreign government election for or on behalf of, or for the benefit of, directly or indirectly, the Government of the Russian Federation.

ENTITIES SUPPORTING RUSSIAN INTELLIGENCE OPERATIONS

In addition to his role in the GoR's efforts to influence elections in Moldova and undermine the country's current pro-Western government, Igor Chayka also has connections to Russian cybercriminals. In 2018, Chayka and his associate **Aleksei Valeryevich Troshin** (Troshin), a Russian national, invested millions of dollars to set up the **National Engineering Corporation** (NIK) – ostensibly, an engineering firm working on technological projects for Russian busine

and state enterprises. However, U.S.-designated cybercriminal Maksim Yakubets (Yakubets) was involved in setting up the NIK offices and its hiring practices. Yakubets' employment at NIK provided cover for his ongoing criminal activities linked to the hacking group known as Evil Corp. Yakubets and Evil Corp were designated in December of 2019.

As part of his activity at NIK, Yakubets continued his work on behalf of the Russian intelligence services. Yakubets was previously designated by OFAC for providing support to the FSB. Yakubets has since developed a relationship with all three major Russian intelligence services, including personally meeting with SVR Director Sergey Naryshkin.

OFAC designated NIK pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy. OFAC designated Troshin pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of NIK.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the designated persons described 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, individually or in the aggregate, 50 percent or more by one or more blocked persons are also blocked. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit 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. In addition, financial institutions and other persons that engage in certain transactions or activities with the sanctioned entities and individuals may expose themselves to sanctions or be subject to an enforcement action. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any designated person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

The power and integrity of OFAC sanctions derive not only from OFAC's ability to designate and add persons to the SDN List, but also from its willingness to remove persons from the SDN List consistent with the law. The ultimate goal of sanctions is not to punish, but to bring about a positive change in behavior. For information concerning the process for seeking removal from an OFAC list, including the SDN List, please refer to OFAC's Frequently Asked Question 897 here.

For detailed information on the process to submit a request for removal from an OFAC sanctions list, please click here.

GLOBAL MAGNITSKY

Building upon the Global Magnitsky Human Rights Accountability Act, E.O. 13818 was issued on December 20, 2017, in recognition that the prevalence of human rights abuse and corruption that have their source, in whole or in substantial part, outside the United States, had reached such scope and gravity as to threaten the stability of international political and economic systems. Human rights abuse and corruption undermine the values that form an essential foundation of stable, secure, and functioning societies; have devastating impacts on individuals; weaken democratic institutions; degrade the rule of law; perpetuate violent conflicts; facilitate the activities of dangerous persons; and undermine economic markets. The United States seeks to impose tangible and significant consequences on those who commit serious human rights abuse or engage in corruption, as well as to protect the financial system of the United States from abuse by these same persons.

Click here for more information on the individuals and entities designated today.

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