

# Treasury Targets Russian Defense Procurement Network

December 5, 2023

*Concurrent Treasury sanctions, DOJ indictments, and Commerce listings hold to account procurement network supplying Russia with critical military technology*

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is targeting a network led by Belgium-based Hans De Geetere that is involved in procuring electronics with military applications for Russian end-users. The network consists of nine entities and five individuals based in Russia, Belgium, Cyprus, Sweden, Hong Kong, and the Netherlands.

Concurrent with OFAC's action, the U.S. Department of Justice (DOJ) [unsealed two separate indictments](#) against Hans De Geetere related to his years-long scheme to unlawfully export sensitive, military-grade technology from the United States to end users located in the People's Republic of China (PRC) and the Russian Federation. The U.S. Department of Commerce is also concurrently adding Hans De Geetere and five entities to the [Bureau of Industry and Security \(BIS\) Entity List](#). Additionally, Belgian authorities took action against De Geetere on charges related to his global illicit procurement scheme.

"Today's coordinated action reflects our collective commitment to enforcing our sanctions and export controls, including holding accountable those who seek to evade these measures," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "The United States and our allies remain focused on disrupting any attempts by Russia or its trusted agents to gain access to the critical inputs and technologies necessary to support Moscow's defense industry and facilitate its brutal war in Ukraine."

## HANS DE GEETERE AND COMPANIES

**Hans De Geetere (De Geetere)** is a Belgian businessman and long-time procurement agent for Russia who serves as the director of several companies in Belgium, Cyprus, and the Netherlands. De Geetere has coordinated the procurement of electronics for Russian customers, including field programmable gate arrays (FPGA)—high priority semiconductor devices sought by Russia for its weapons programs.

De Geetere operates Belgium-based **Knokke Heist Support Corporation Management (Knokke Heist)**, Cyprus-based **Eriner Limited (Eriner)**, Cyprus-based **The Mother Ark Ltd (The Mother Ark)**, and Netherlands-based **European Trading Technology B.V. (European Trading Technology)**.

De Geetere is being designated pursuant to E.O. 14024 for operating or having operated in the defense and related materiel sector of the Russian Federation economy. Knokke Heist, Eriner, The Mother Ark, and European Trading Technology are being designated pursuant to E.O. 14024 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, De Geetere.

## COMPANIES LINKED TO ERINER AND THE MOTHER ARK

In some cases, De Geetere and his network have attempted to ship electronics to Russia via transshipment points in Hong Kong, China, and Türkiye. The De Geetere-led company Eriner has repeatedly conducted business with the Hong Kong-based company **M and S Trading**, and coordinated electronics orders for Russia, including orders for integrated circuits of the same model as those identified in Russian-made unmanned aerial vehicles (UAV) recovered in Ukraine.

The Cyprus-based entity **Lar Vorto Services Limited (Lar Vorto)** is on the board of multiple De Geetere-led firms. Lar Vorto is responsible for the position of Secretary at Eriner and The Mother Ark, as well as a third firm, **Ahetei Limited (Ahetei)**, which was led by De Geetere at the time of its establishment. Ahetei has attempted to obtain U.S.-origin accelerometers, which are dual-use devices with aerospace and military applications. The Netherlands-based company **Hasa Nederland B.V. (Hasa Nederland)**, registered in both Belgium and the Netherlands, is a subsidiary of The Mother Ark and [shares an address with European Trading Technology](#).

M and S Trading is being designated 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, De Geetere. Lar Vorto is being designated 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, Eriner. Ahetei is being designated pursuant to E.O. 14024 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Lar Vorto. Hasa Nederland is being designated pursuant to E.O. 14024

for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, The Mother Ark.

## INDIVIDUALS AND COMPANIES LINKED TO THE DE GEETERE NETWORK

In addition to the companies that he formally directs, De Geetere's network includes the Belgium-based company **European Technical Trading (ETT)**, founded and led by his brother, **Tom De Geetere (Tom De Geetere)**. De Geetere has leveraged the ETT brand in attempted purchases from U.S. and European companies. In addition to his role as the founder and Director of ETT, Tom De Geetere has coordinated with his brother to procure UAV engines.

ETT is being designated 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, De Geetere. Tom De Geetere is being designated pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of ETT.

De Geetere has involved the Russian national **Vladimir Kulemekov (Kulemekov)** in multiple business dealings, including coordinating electronics orders for Russian entities. Kulemekov was previously employed by De Geetere and has been identified as a member of the previously designated Main Intelligence Directorate of the Russian General Staff (GRU).

Kulemekov's associate, **Sergey Skvortsov (Skvortsov)**, has served as the director of a Kulemekov-owned electronics company founded to facilitate Sweden-based contracts between China and Russia. Skvortsov simultaneously led a separate import-export company that tested electronic components in production. Skvortsov has also procured electronics for Russian Government entities.

**Kimberley Beun (Beun)** is a Belgium-based Dutch citizen who has provided assistance handling financial affairs on behalf of Eriner. Beun has also served on the board of directors of De Geetere-linked companies, including Hasa Nederland.

Kulemekov is being designated 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, De Geetere. Skvortsov is being designated pursuant to E.O. 14024 for operating or having operated in the defense and related materiel sector of the Russian

Federation economy. Beun is being designated pursuant to E.O. 14024 for having acted or purported to act for or on behalf of, directly or indirectly, Eriner.

## SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the 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 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.

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](#).

[For identifying information on the individuals and entities sanctioned today, click here.](#)

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