## Treasury Sanctions Actors Supporting Kremlin-Directed Malign Influence Efforts

March 20, 2024

WASHINGTON — Today, the Department of the Treasury's Office of Foreign Assets Control (OFAC) designated two individuals and two entities for services they provided the Government of the Russian Federation (GoR) in connection with a foreign malign influence campaign, including attempting to impersonate legitimate media outlets.

"We are committed to exposing Russia's extensive campaigns of government-directed deception, which are intended to mislead voters and undermine trust in democratic institutions in the United States and around the world," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "The United States, along with our allies and partners, remains steadfast in defending our democratic principles and the credibility of our elections."

## RUSSIAN FOREIGN MALIGN INFLUENCE

Moscow employs an array of tools, including malign influence campaigns and illicit cyber activities, to undermine the interests of the United States and its allies and partners, including in Latin America, the Middle East, and Europe. Russia routinely uses its intelligence services, proxies, and influence tools in these efforts. Russia's influence actors have increasingly adapted their methods to hide their involvement by developing a vast ecosystem of Russian proxy websites, personas, and organizations which give the false appearance of being independent news sources.

Today's designations follow prior OFAC actions that have highlighted and disrupted Russia's global malign influence campaigns, which have included U.S. election interference, efforts to subvert democracy in Moldova, destabilization activities in Ukraine, and the operation of outlets controlled by Russian intelligence services, among others.

## RUSSIAN AGENTS IMPLEMENTING THE KREMLIN'S DIRECTIVES TO DECEIVE AUDIENCES

Ilya Andreevich Gambashidze (Gambashidze), the founder of the Moscow-based company Social Design Agency (SDA), together with Nikolai Aleksandrovich Tupikin (Tupikin), the CEO and current owner of Russia-based Company Group Structura LLC (Structura), were involved in a persistent foreign malign influence campaign at the direction of the Russian Presidential Administration. SDA and Structura have been identified as key actors of the campaign, responsible for providing GoR with a variety of services, including the creation of websites designed to impersonate government organizations and legitimate media outlets in Europe.

Leading into Fall 2022, **Tupikin** and **Gambashidze** implemented a campaign that impersonated news websites, staged videos, and fake social media accounts. Specifically, **Tupikin** and **Gambashidze**, via **SDA** and **Structura**, have implemented, on behalf of GoR, a sprawling network of over 60 websites that impersonated legitimate news organizations, and which used misleading social media accounts to amplify the content of the spoofed websites. The fake websites appeared to have been built to carefully mimic the appearance of legitimate news websites. The fake websites included embedded images and working links to legitimate sites and even used the impersonated site's cookie acceptance page.

Today, OFAC designated **SDA** and **Structura** 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, GoR.

OFAC designated **Gambashidze** and **Tupikin** pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of **SDA** and **Structura**, respectively, persons whose property and interests in property are blocked pursuant to E.O. 14024.

## **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.

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

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