

# Treasury Targets Belarusian Sanctions Evasion Networks and Cogs in Russia's War Machine

April 15, 2024

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is designating 12 entities and 10 individuals pursuant to Executive Order (E.O.) 14038. This action builds on U.S. sanctions imposed in response to Belarus's fraudulent August 2020 election, as well as President Alyaksandr Lukashenka's (Lukashenka) support for Russia's illegal full-scale invasion of Ukraine. Today's action sustains U.S. financial pressure on the Lukashenka regime for its continuing support for Russia's war against Ukraine and the financial benefit it derives from this activity.

The individuals and entities OFAC is targeting today include six revenue-generating state-owned enterprises (SOEs) and one entity and five individuals involved in facilitating transactions for a U.S.-designated major Belarusian defense sector enterprise. OFAC is additionally targeting five entities and five individuals involved in a global arms network doing business with a U.S.-designated Belarusian defense firm.

"The authoritarian Lukashenka regime continues to rely on revenue from its SOEs to fund its violent suppression of its citizens and to circumvent U.S. sanctions," said Under Secretary of the Treasury for Terrorism and Financial Intelligence, Brian E. Nelson. "We will continue to leverage our broad suite of tools to target Belarus's extensive illicit facilitation networks and hold the regime accountable for its complicity in, and profiteering from, Russia's unjust war in Ukraine."

Included in today's designations is a coordinated action with the Department of Justice and Federal Bureau of Investigation. Concurrent with today's actions by Treasury, the Department of Justice charged two principals of the now-designated Iraq-based arms company Black Shield Company for General Trading LLC, the now-designated Mohamad Deiry and Samer Rayya, with conspiring to unlawfully export weapons and ammunition from the United States to Sudan. The case was unsealed today in the Southern District of Florida. Deiry and Rayya remain at large and wanted by the Federal Bureau of Investigation.

Today's designations also coincide with a separate sanctions action against Belarus by the Government of Canada. This coordination is demonstrative of the sustained commitment amongst partners to amplify the Lukashenka regime's continued anti-democratic governance in Belarus.

## REVENUE GENERATING STATE-OWNED ENTERPRISES

**OJSC Stankogomel (Stankogomel)** is a machine tool building SOE based in Gomel, Belarus that regularly collaborates across various Belarusian and Russian industries. In 2023, Stankogomel signed contracts with U.S.-designated Russian defense firms Kalashnikov Concern and Almaz-Antey to provide material support to their operations.

OFAC is designating Stankogomel pursuant to E.O. 14038 for being owned or controlled by the Government of Belarus (GoB).

**OJSC AGAT-Control Systems-Managing Company of Geoinformation Control Systems Holding (AGAT)** is an SOE that sells control systems for the Belarusian Armed Forces, industrial computers, navigation, and video surveillance systems. It is one of the largest enterprises of State Authority for Military Industry of the Republic of Belarus (SAMI)—designated by OFAC on [February 24, 2022](#), pursuant to E.O. 14038 for being a political subdivision, agency, or instrumentality of the GoB—and had an operating revenue of \$40 million in 2022. AGAT is licensed to conduct foreign trade activities in relation to special goods, holding patents in Belarus, the Russian Federation, and the Eurasian Patent Organization. AGAT is listed on the U.S. Department of Commerce Bureau of Industry and Security's Entity List and was designated by Canada for a grave breach of international peace and security.

OFAC is designating AGAT pursuant to E.O. 14038 for being owned or controlled by the GoB.

**AGAT** is the management company for four additional entities located in Belarus that OFAC is also designating: **JSC NIIEVM**, **JSC Communication Equipment**, **JSC AGAT-System**, and **LLC InnoTech Solutions**.

- **JSC NIIEVM** is a developer and producer of dual-use computer equipment and specializes in the modernization and repair of weapons systems and military and special equipment. In cooperation with SAMI and partner enterprises in Russia, JSC NIIEVM is involved in air defense radio-technical facilities, air defense missile systems, mobile systems of electromagnetic warfare, reconnaissance control, and radio jamming systems.

- **JSC Communication Equipment** specializes in the production of modern radio communication and telecommunication equipment, including products for uniformed services, and HF and VHF transceivers for civil and military use.
- **JSC AGAT-System** is a leading organization for creation and development of means of special radio and wired communication in the Belarusian market. JSC AGAT-System is listed on the U.S. Department of Commerce Bureau of Industry and Security's Entity List and was designated by Canada for a grave breach of international peace and security.
- **LLC InnoTech Solutions** is a software development company with a special permit from the GoB for technical and/or cryptographic information protection and design, creation, and audit of information security systems of critical informatization objects. LLC InnoTech Solutions' operating revenue was \$6.51 million in 2022.

OFAC is designating JSC NIIEVM, JSC Communication Equipment, JSC AGAT-System, and LLC InnoTech Solutions pursuant to E.O. 14038 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, AGAT, a person whose property and interests are blocked pursuant to E.O. 14038. OFAC previously designated AGAT subsidiary AGAT Electromechanical Plant OJSC on [December 2, 2021](#), pursuant to E.O. 14308 for being owned or controlled by, or having acted for or on behalf of, directly or indirectly, the GoB.

## PELENG FACILITATION NETWORK

U.S.-designated Belarusian SOE Peleng JSC (Peleng) is a leading design enterprise in the Belarusian optoelectronic industry and is one of Russia's most important industrial suppliers in Belarus. OFAC designated Peleng on [December 2, 2021](#), pursuant to E.O. 14038 for operating or having operated in the defense and related materiel sector of the economy of Belarus and for operating or having operated in the security sector of the economy of Belarus. Peleng is the exclusive supplier of fire-control systems for major lines of Russian tanks and is a developer of sights with thermal imagers. Peleng produces sights for BTR-82A military vehicles and supplies airfield automated meteorological systems and, in partnership with U.S.- designated Russian defense entity Joint Stock Company All-Russian Research Institute Signal (Signal), will be engaged in the production of a complex for artillery units. On June 28, 2022, the Department of State designated Signal pursuant to E.O. 14024 for operating or having operated in the defense and related materiel sector of the Russian Federation economy.

**Shenzhen 5G High-Tech Innovation Co., Limited (Shenzhen 5G)** is a People's Republic of China (PRC)-based entity that serves as an intermediary for Peleng. Shenzhen 5G and Peleng operate under a framework agreement that authorizes Shenzhen 5G to engage with Chinese manufacturing entities on Peleng's behalf. Peleng tasks Shenzhen 5G with soliciting proposals for the specifications and quantities of various components, which are ultimately sourced to Peleng. Shenzhen 5G oversees the relationship with the manufacturer and coordinates the final delivery of goods to Peleng.

OFAC is designating Shenzhen 5G pursuant to E.O. 14038 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Peleng, a person whose property and interests are blocked pursuant to E.O. 14038.

**Oleg Yurchik (Yurchik)** is a Belarusian national and the General Director of Shenzhen 5G. OFAC is designating Yurchik pursuant to E.O. 14038 for being or having been a leader, official, senior executive officer, or member of the board of directors of Shenzhen 5G, an entity whose property and interests are blocked pursuant to E.O. 14038.

**Aliaksandra Aksianchuk (Aksianchuk)** is a Belarusian national and the Production Director of Shenzhen 5G. OFAC is designating Aksianchuk pursuant to E.O. 14038 for being or having been a leader, official, senior executive officer, or member of the board of directors of Shenzhen 5G, an entity whose property and interests are blocked pursuant to E.O. 14038.

**Dmitry Braim (Braim)** is a Belarusian national and the Deputy Director General for Production of Peleng. OFAC is designating Braim pursuant to E.O. 14038 for being or having been a leader, official, senior executive officer, or member of the board of directors of Peleng, an entity whose property and interests are blocked pursuant to E.O. 14038.

**Siarhai Charheika (Charheika)** is a Belarusian national and the Head of the Planning and Dispatch Department of Peleng. OFAC is designating Charheika pursuant to E.O. 14038 for having acted or purported to act for or on behalf of, directly or indirectly, Peleng, a person whose property and interests are blocked pursuant to E.O. 14038.

**Dzmitry Mikhaltsov (Mikhaltsov)** is a Belarusian national and the Technical Director of U.S.-designated JSC Minsk Mechanical Plant Named After S.I. Vavilov Management Company of BelOMO Holding (BelOMO). Mikhaltsov signed an agreement with Yurchik of Shenzhen 5G for casting molds and press molds. On [December 5, 2023](#), OFAC designated BelOMO pursuant to E.O. 14038 for being owned or controlled by, or having acted or purported to act for or on

behalf of, directly or indirectly, the GoB, and for operating in the defense and related materiel sector of the Belarus economy. OFAC is designating Mikhaltsov pursuant to E.O. 14038 for being or having been a leader, official, senior executive officer, or member of the board of directors of BelOMO, an entity whose property and interests are blocked pursuant to E.O. 14038.

## **BELARUS-SUPPLIED GRAY ARMS NETWORK**

Since at least 2015, **Black Shield Company for General Trading LLC (Black Shield)**, an ostensibly Iraq-based arms company led by Lebanon-based **Samer Rayya (Rayya)** and Syrian **Mohamad Majd Deiry (Deiry)**, has acquired and sold arms used in conflicts around the world, including from key Belarusian defense company Kidma Tech OJSC, an entity designated by OFAC on [December 2, 2021](#). Rayya and Black Shield have a long history with Kidma Tech OJSC, from procuring vehicles to be shipped to the Middle East, to discussions on setting up companies in third countries to facilitate arms deals. In addition, Rayya and Deiry, through Black Shield, have brokered weapons deals and offered air transport services in the Middle East and Africa for individuals, nonstate actors, and government customers, including from Russian arms companies. Black Shield and Deiry maintained relationships with individuals allegedly linked to the Syrian government and engaged in business activity on behalf of the Iranian regime.

The Black Shield network specializes in buying and selling weapons and materiel, ranging from ammunition, small arms, specialized sniper equipment and silencers, to armored vehicles, tanks, military helicopters, artillery, surface to air missiles and anti-tank missiles. This also includes specialized military technology like night vision equipment. The network uses intermediary and front companies such as **Centuronic Ltd (Centuronic)** and **S. Group Airlines Ltd**, both located in Cyprus, and **Rayya Danişmanlik Hizmetleri Limited Şirketi (Rayya Danismanlik)**, located in Türkiye, to conduct their business. **Tatyana Protopovich (Protopovich)** is a director of Centuronic Ltd, and as CEO of Rayya Danismanlik, **Nora Yagmur (Yagmur)** has participated in attempts to procure arms. Additionally, **Alhatham Al Ali (Alhatham)** is a Slovak citizen and arms dealer who has acted as a middleman for Black Shield in its arms deals with a European armaments firm. Alhatham specifically worked to assist Black Shield broker an arms deal between the European firm and an African country, coordinating a contract for millions of rounds of ammunition, tens of thousands of rifles and pistols, rocket propelled grenades, and indirect fire systems. **Phoenix Lines S.R.O.** is a Slovakia-based company fully owned by Alhatham.

OFAC is designating Black Shield pursuant to E.O. 14038 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Kidma Tech OJSC, a person whose property and interests are blocked pursuant to E.O. 14038.

OFAC is designating Rayya and Deiry pursuant to E.O. 14038 for being or having been leaders, officials, senior executive officers, or members of the board of directors of Black Shield, an entity whose property and interests are blocked pursuant to E.O. 14038.

OFAC is designating Alhatham pursuant to E.O. 14038 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Black Shield, a person whose property and interests are blocked pursuant to E.O. 14038.

OFAC is designating Phoenix Lines S.R.O. pursuant to E.O. 14038 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Alhatham, a person whose property and interests are blocked pursuant to E.O. 14038.

OFAC is designating Centuronic, S. Group Airlines Ltd, and Rayya Danismanlik pursuant to E.O. 14038 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Rayya, a person whose property and interests are blocked pursuant to E.O. 14038.

OFAC is designating Protopovich pursuant to E.O. 14038 for being or having been a leader, official, senior executive officer, or member of the board of directors of Centuronic, an entity whose property and interests are blocked pursuant to E.O. 14038.

OFAC is designating Yagmur pursuant to E.O. 14038 for being or having been a leader, official, senior executive officer, or member of the board of directors of Rayya Danismanlik, an entity whose property and interests are blocked pursuant to E.O. 14038.

## **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 Specially Designated and Blocked Persons List (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 [FAQ 897](#).

[Click here for more information on the individuals and entities sanctioned today.](#)

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