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UKRAINE: HEDGE FUND BRIEFING (3.30 P.M. GMT, FRIDAY 21 MARCH 2014)

HEDGE FUNDS

We have seen further targeted measures from the EU and the US in response to the ongoing situation in Crimea. We have summarised these latest measures below.

EU

The Council of the European Union has today implemented Regulation 284/2014 identifying and targeting 12 individuals, in addition to the 21 individuals named on 17 March 2014, who will be subject to a travel ban and a freeze of their assets within the EU. This is a response to "the absence of any steps towards de-escalation". The sanctions came into force today and can be found here.

The individuals concerned are:

- 1. Dmitry Olegovich Rogozin
- 2. Sergey Glazyev
- 3. Valentina Ivanova Matviyenko
- 4. Sergei Evgenevich Naryshkin
- 5. Dmitry Konstantinovich Kiselyov
- 6. Alexander Mihailovich Nosatov
- 7. Valery Vladimirovich Kulikov
- 8. Vladislav Yurievich Surkov
- 9. Mikhail Malyshev
- 10. Valery Medvedev
- 11. Lt. Gen. Igor Turchenyuk
- 12. Elena Borisovna Mizulina

US

Further to Executive Order 13660 of 6 March 2014 and 13661 of 17 March 2014, the US Department of Treasury has extended the Specially Designated Nationals List to include 20 new individuals and 1 bank.

These Executive Orders block all property and interests in property that are in the US, that subsequently come within the US, or that subsequently come within the possession or control of any US person, of certain persons designated in the Executive Order. The latest relevant persons are:

- 1. Evgeni Viktorovich Bushmin
- 2. Vladimir Michailovich Dzhabarov
- 3. Andrei Alexandrovich Fursenko
- 4. Alexei Gromov
- 5. Sergei Ivanov

- 6. Victor Petrovich Ivanov
- 7. Vladimir Igorevich Kozhin
- 8. Yuri Valentinovich Kovalchuk
- 9. Sergei Mikhailovich Mironov
- 10. Sergey Yevgenyevich Naryshkin
- 11. Viktor Alekseevich Ozerov
- 12. Oleg Evgenevich Panteleev
- 13. Arkady Rotenberg
- 14. Boris Rotenberg
- 15. Nikolai Ivanovich Ryzhkov
- 16. Igor Dmitrievich Sergun
- 17. Gennady Timchenko
- 18. Aleksandr Borisovich Totoonov
- 19. Vladimir Yakunin
- 20. Sergei Vladimirovich Zheleznyak

The Order also includes the following entity:

1. Bank Rossiya (f.k.a. Aktsionerny Bank Russian Federation)

In addition, on 20 March 2014 President Obama signed a new Executive Order further expanding the scope of the national emergency declared in Executive Orders 13660 and 13661. Sanctions may be imposed on any persons determined by the Secretary of the Treasury, in consultation with the Secretary of State:

- to operate in such sectors of the Russian Federation economy as may be determined by the Secretary of the Treasury, in consultation with the Secretary of State, such as financial services, energy, metals and mining, engineering, and defence and related materiel;
- to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, any person whose property and interests in property are blocked pursuant to this Order; or
- to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this Order.

Both the EU and the US have stated that more measures may follow.

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This note is intended to provide general information about some recent and anticipated developments which may be of interest.

It is not intended to be comprehensive nor to provide any specific legal advice and should not be acted or relied upon as doing so. Professional advice appropriate to the specific situation should always be obtained.