

The War in Ukraine: Russian Sanctions & Sanctions Avoidance

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Middlebury Institute of International Studies

19 May 2022

The west has been steadily increasing its use of sanctions

Number of active sanctions



4/6/2022,

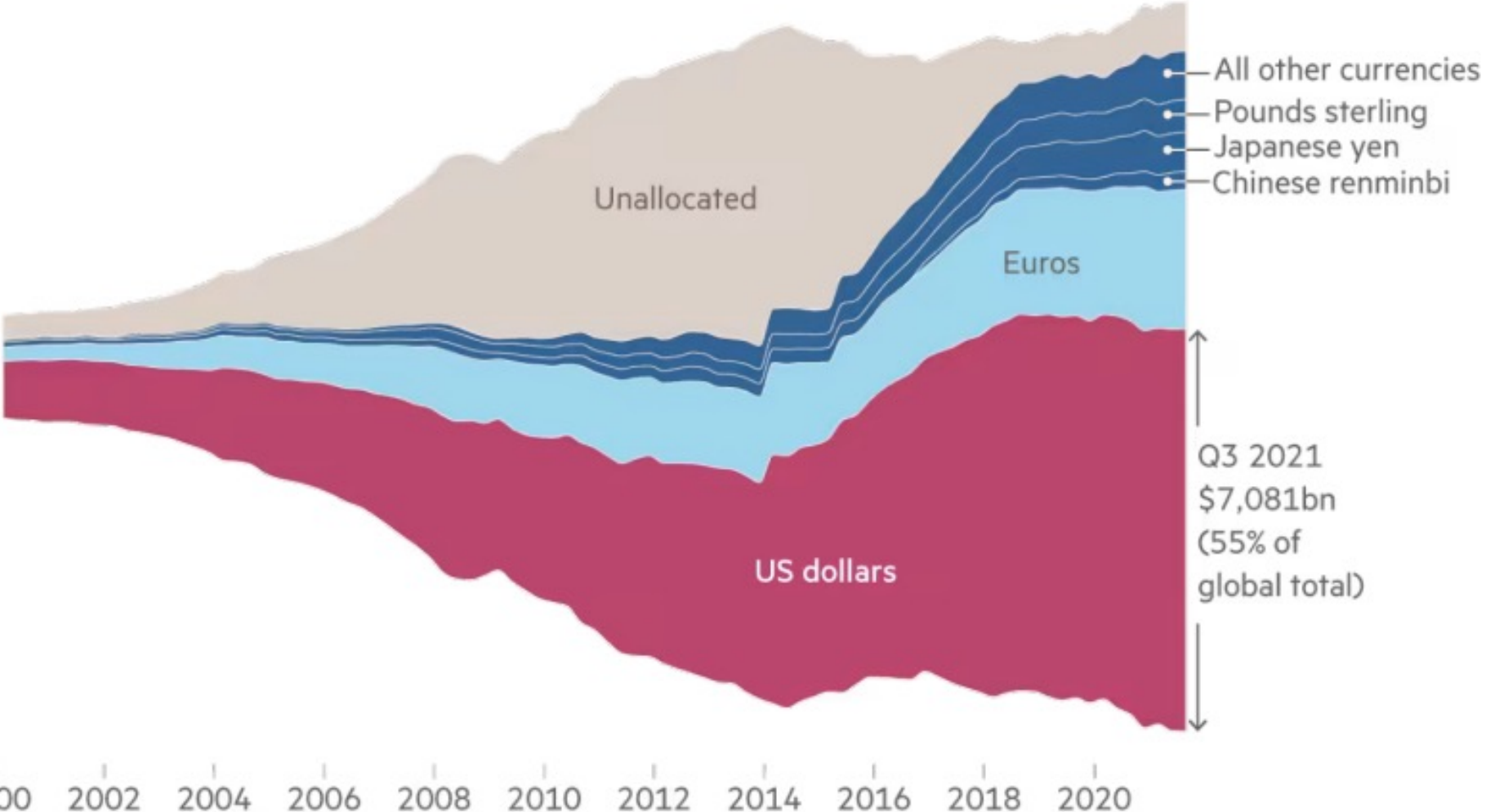
: how the west unleashed 'shock and awe' on R...

<https://www.ft.com/content/5b397d6b-bde4-4a8c-b9a4-0804>

1950 1955 1960 1965 1970 1975 1980 1985 1990 1995 2000 2005 2010 2015 2020

The dollar continues to play the role of the world's reserve currency

Composition of official foreign currency reserves



Source: IMF
© FT

U.S. escalates sanctions with a freeze on Russian central bank assets.



Feb. 28, 2022
Alan Rappeport

March 2, 2022
3:06 PM PST
Last Updated a month ago

Finance

US to target banks and crypto exchanges that aid sanctioned Russian oligarchs

Justice department says institutions allowing illicit money movements will be in 'crosshairs'

EU bars 7 Russian banks from SWIFT, but spares those in energy

By Philip Blenkinsop

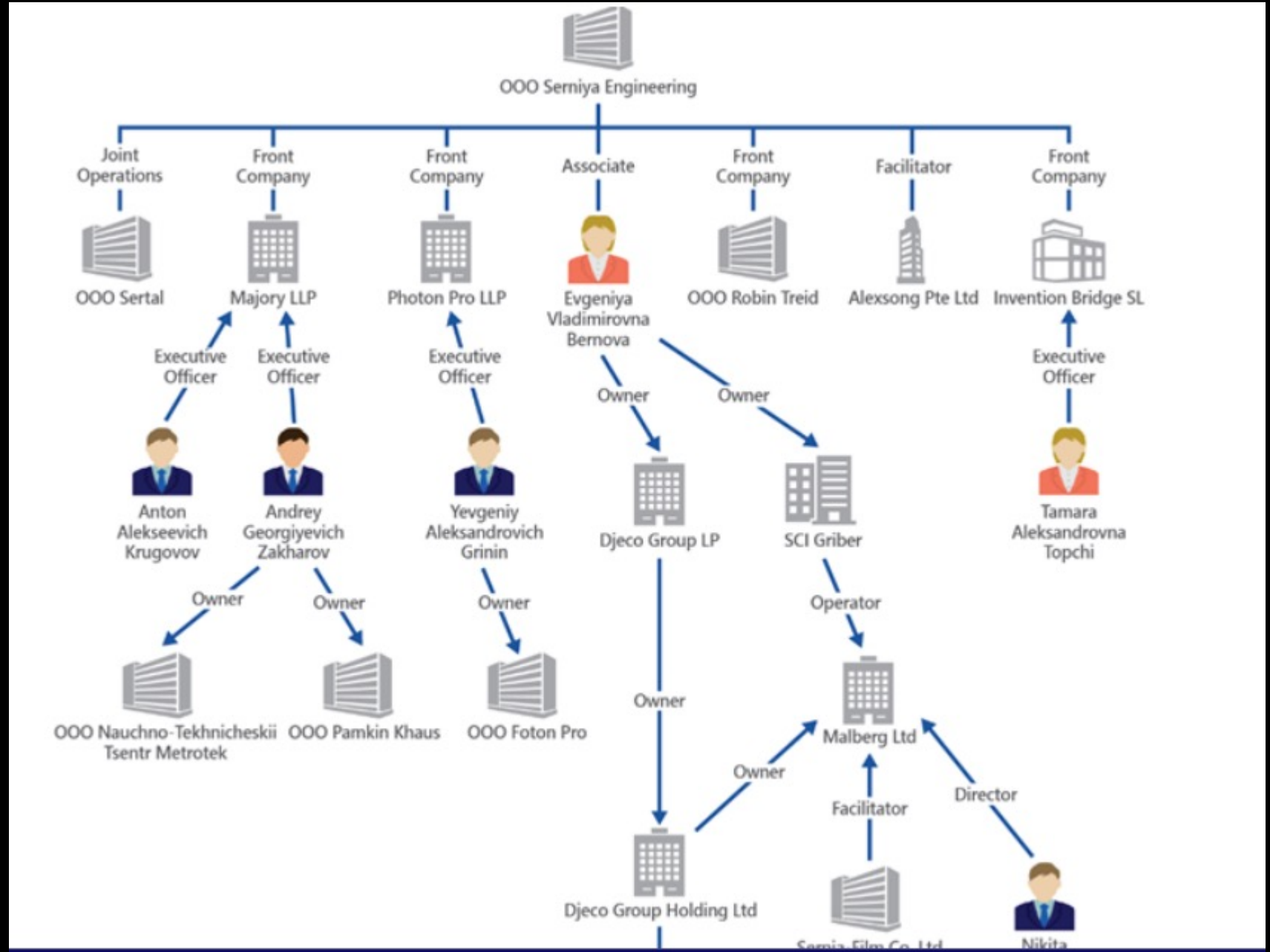
U.S. Sanctions Head of Sberbank, Russia's Biggest Bank

By Bill Alpert [Follow](#) March 24, 2022 7:27 pm ET

Treasury Targets Sanctions Evasion Networks and Russian Technology Companies Enabling Putin's War



March 31, 2022



Piercing the Corporate Veil



SHELL COMPANY

VS.



FRONT COMPANY

SHELF COMPANY

Wyoming Corporate
Services Inc.



Aged Shelf Companies

Aged Shelf Companies

Here is a partial list of the aged shelf companies and aged shelf corporations that we currently have for sale.

These corporation buying lists change without notice. Unless otherwise noted, these aged corporations were incorporated by us and put on the shelf. These aged shelf companies come with Certificates Of Good Standing from the state, Certified Articles of Incorporation from the state, the corporate binder

Clear Environmental Corporation

Intermarketing Systems Inc

Information Technology Development, LLC

Online Investment Solutions, Inc.

Capital View Funding, LLC (Close)

Amazing Virtual Adventures, Inc.

Innovative Health Services, LLC

USA Industrial Associates, Inc.

Midwest Asset Management, Inc.

Best Financial Consulting, LLC

SaleCo, LLC (CLOSE)

Merchant Supply Trucking & Dist. CO.

Media Quest Inc. (Close)

Capital Financial Group, LLC

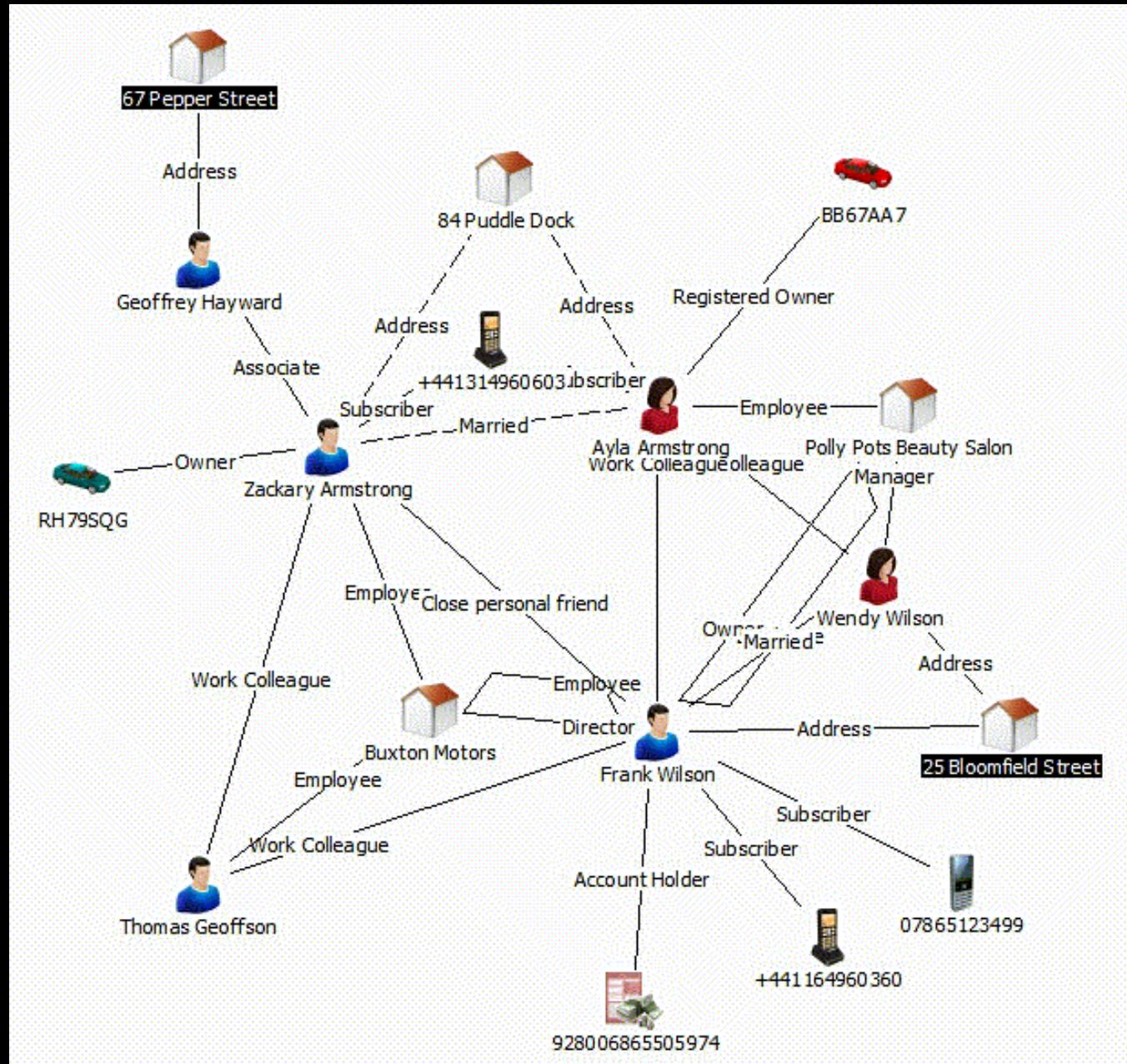
Unique Marketing Concepts, LLC

Associated Business Funding, Inc.

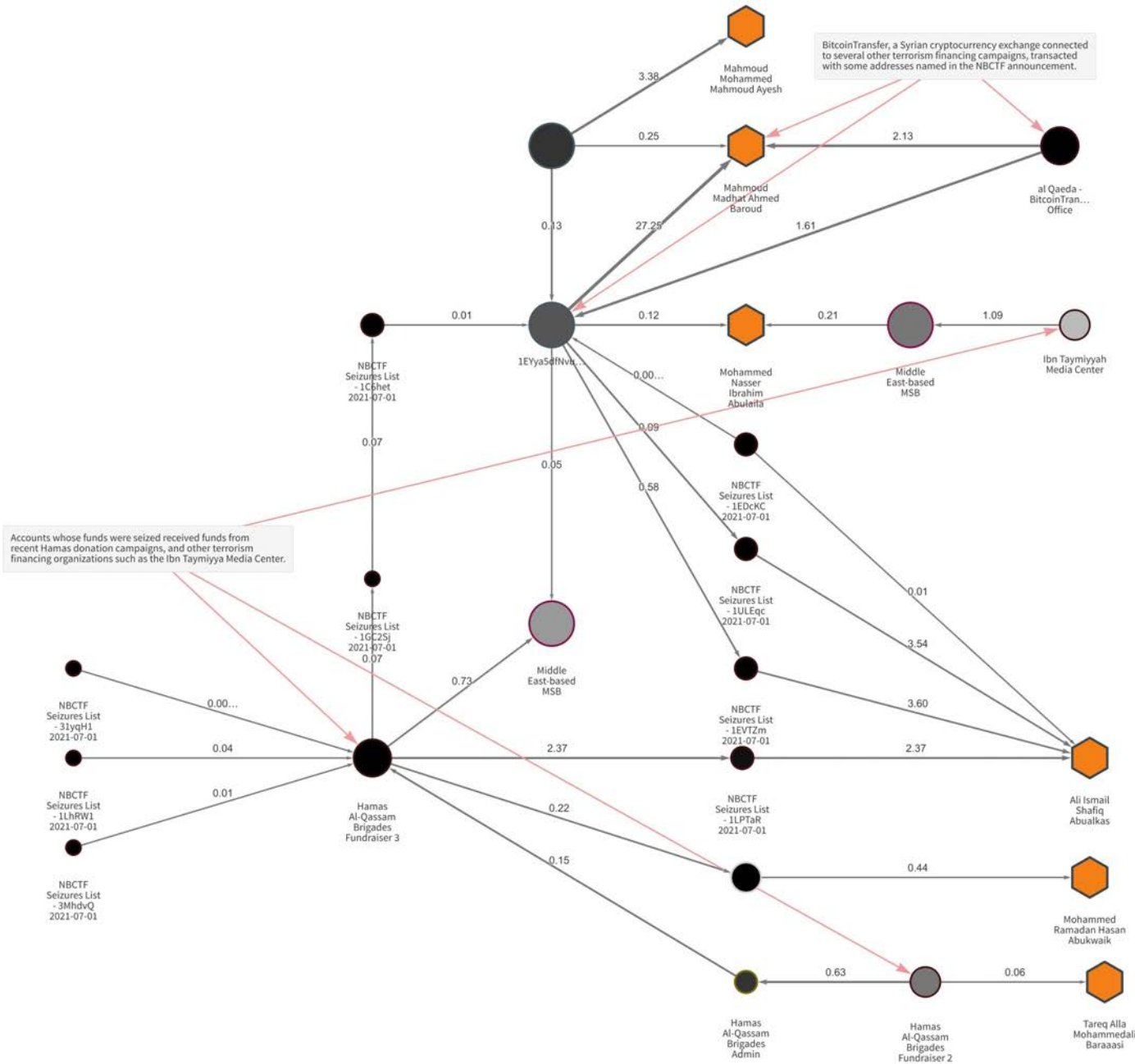
Sanctions Enforcement

- “Listing”
- Detecting

Link Diagrams



Blockchain analytics



Apple pays \$467,000 settlement for accidental U.S. sanctions violation

with sanctioned Slovenian software company

SIS DOO vs. SIS d.o.o.

KARNER Steroid Trafficking Network February 2015

Companies and Registration Information



KARNER D.O.O. LJUBLJANA
No. 5621208 (Slovenia)



SIS D.O.O.
No. 5919070 (Slovenia)



PALEA D.O.O.
No. 2227843 (Slovenia)

MERIDEIS D.O.O.
No. 71071784 (Slovenia)

VELINVESTMENT D.O.O.
No. 2333970 (Slovenia)

SAGAX INVESTMENT
GROUP LTD.
(Belize)

NORTH GROUP
HOLDING CORP.

PABAS HOLDING CORP.
RUC #1428011-1-633523



Mihael KARNER
DOB 13 Mar 1975
POB Ljubljana, Slovenia
Previously Designated on May 31, 2013



Indictment
District Court of Massachusetts
March 2010

U.S. Department of the Treasury Office of Foreign Assets Control Foreign Narcotics Kingpin Designation Act



Key Associates



Uros SLIVNIK
DOB 05 May 1979
Residence: Slovenia



“You f—king Americans. Who are you to tell us, the rest of the world, that we’re not going to deal with Iranians?”

Richard Meddings, Std Chartered’s finance director in 2006



U.S. Department of Justice

Office of Public Affairs

(202) 514-2007/TDD (202) 514-1888



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June 30, 2014

BNP Paribas Agrees to Plead Guilty and to Pay \$8.9 Billion for Illegally Processing Financial Transactions for Countries Subject to U.S. Economic Sanctions

WASHINGTON—According to court documents submitted today, BNP Paribas S.A. (BNPP), a global financial institution headquartered in Paris, agreed to enter a guilty plea to conspiring to violate the International Emergency Economic Powers Act (IEEPA) and the Trading with the Enemy

NAME FREQUENCY RUSSIA

NAME	NUMBER	FREQUENCY %
Aleksandr	21151	6.52
Sergey	19084	5.89
Vladimir	13182	4.07
Andrey	11435	3.53
Aleksey	11321	3.49
Dmitriy	9123	2.81
Yelena	8222	2.54
Nikolay	7098	2.19
Tatyana	7064	2.18
Yevgeniy	7020	2.17
Yuriy	6536	2.02

A Russian oligarch with 3 passports who now resides in France

English:

Сергей Викторович Пугачёв

Russian:

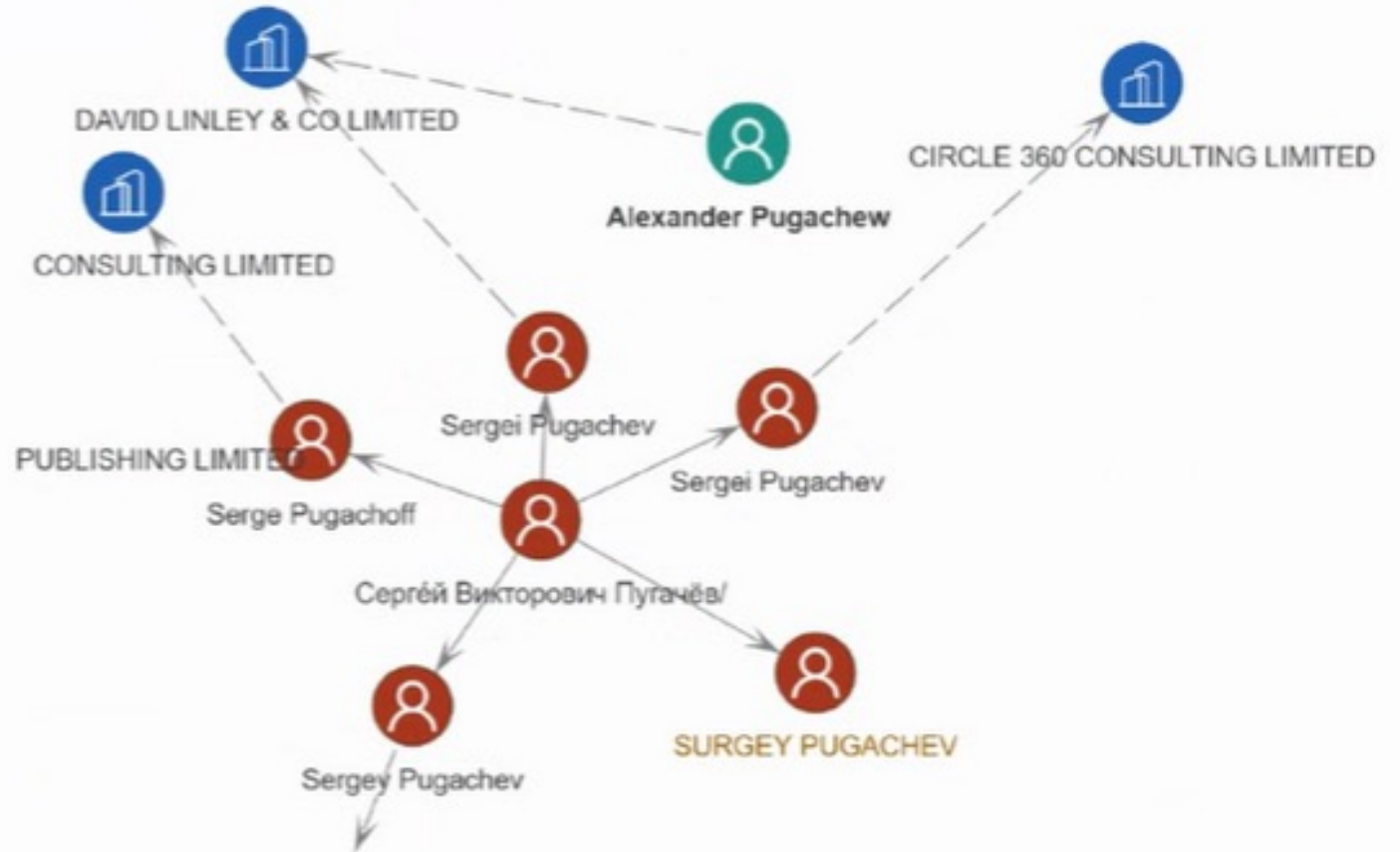
Sergei Viktorovich Pugachev

French:

Serge Pugachoff, Sergueï Pougatchev

English:

Sergei Pugachev, Surgey Pugachev,
Sergey Pugachev, Sergey Pugachew



Sanctions Enforcement

- “Listing”
- Detecting
- Freezing
- Seizing
- Confiscation

FREEZING



SEIZING



CONFISCATION = FORFEITURE

Behind The \$23-Million Auction Of Teodorin Obiang's Confiscated Supercars In Switzerland





Sanctions Evasion with Virtual Assets

- North Korean attacks on cryptocurrency exchanges and ransomware attacks (>\$3 billion stolen so far)
- Venezuelan airport taxes from foreign airlines

