



## U.S. Imposes Additional Targeted Ukraine-related Sanctions

On March 11, 2015, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) imposed new Ukraine-related targeted sanctions on several Russian and Ukrainian individuals and entities in response to Russian violations of the ceasefire brokered in February 2015 between the parties associated with separatist violence in Ukraine. The newest measures add 14 specific individuals and two entities to OFAC's list of Specially Designated Nationals (SDN). The list of newly-designated individuals includes several Ukrainian separatists, and the list of newly-designated entities includes the Russian National Commercial Bank, a Russian bank operating in the Crimea region of Ukraine.

### 1) Description of the New Sanctions

The new U.S. sanctions block the property of 16 specially designated individuals and entities. Such designated individuals and entities have been added to the OFAC SDN List. U.S. persons are prohibited from engaging in all transactions, including donating, contributing, providing, or receiving funds, goods, or services by, to, from, or for the benefit of any designated person. Furthermore, the new measures suspend entry of any designated persons into the United States.

The measures apply to "U.S. persons," meaning U.S. citizens and U.S. permanent residents (wherever located), any entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), and any person in the United States. "U.S. person" for purposes of the Ukraine-related Sanctions does not include non-U.S. subsidiaries of U.S. companies.

The complete list of the newly added SDNs is available at the following link:

<http://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20150311.aspx>.

## 2) How to Comply with the New Measures

Anyone who may be subject to U.S. law should assess, in conjunction with counsel, their existing and proposed international transactions to determine whether they are permissible under U.S. sanctions and export control measures. They may also review and consider enhancing commercial contract terms to provide expressly for termination without penalty if economic sanctions would prohibit performance of the contract. This may help to protect the individual or company doing business with Russian or Ukrainian entities or individuals from contractual claims by a counterparty if one party ceases performance of the contract due to restrictions dictated by economic sanctions.

Based in Washington, D.C., our [Export Controls](#) team advises and represents clients on the full range of international goods, software and technology transfer issues. We have broad experience providing export controls and related regulatory counsel to both U.S. and foreign businesses. Our industry-specific experience includes assisting companies in a wide range of industries such as aerospace, defense, firearms and ammunition, electronics, software and information technology, financial services, food, consumer products, biotechnology, medical device, and engineering services.

This *GT Alert* was prepared by **Renee A. Latour**<sup>‡</sup>, **Cyril T. Brennan** and **Sandra K. Jorgensen**<sup>‡</sup>. Questions about this information can be directed to:

- > [Kara M. Bombach](#) | +1 202.533.2334 | [bombachk@gtlaw.com](mailto:bombachk@gtlaw.com)
- > [Renee A. Latour](#) | +1 202.533.2358 | [latourr@gtlaw.com](mailto:latourr@gtlaw.com)
- > [Michael X. Marinelli](#) | +1 512.320.7236 | [marinellimx@gtlaw.com](mailto:marinellimx@gtlaw.com)
- > [Julia Sorrentino](#) | +1 202.533.2376 | [sorrentinoj@gtlaw.com](mailto:sorrentinoj@gtlaw.com)
- > [Cyril T. Brennan](#) | +1 202.533.2342 | [brennanct@gtlaw.com](mailto:brennanct@gtlaw.com)
- > [Sandra D. Gonzalez](#) | +1 512.320.7234 | [gonzalezsd@gtlaw.com](mailto:gonzalezsd@gtlaw.com)
- > [Sandra K. Jorgensen](#)<sup>‡</sup> | +1 202.331.3100 | [jorgensens@gtlaw.com](mailto:jorgensens@gtlaw.com)
- > Or your [Greenberg Traurig](#) attorney

<sup>‡</sup>Admitted in New York, and not admitted in the District of Columbia.

<sup>‡</sup>Admitted to practice only in Virginia. Practice in the District of Columbia limited to matters and proceedings before federal courts and agencies.

<b>Albany</b> +1 518.689.1400	<b>Denver</b> +1 303.572.6500	<b>New York</b> +1 212.801.9200	<b>Shanghai</b> +86 (21) 6391.6633
<b>Amsterdam</b> + 31 (0) 20 301 7300	<b>Fort Lauderdale</b> +1 954.765.0500	<b>Northern Virginia</b> +1 703.749.1300	<b>Silicon Valley</b> +1 650.328.8500
<b>Atlanta</b> +1 678.553.2100	<b>Houston</b> +1 713.374.3500	<b>Orange County</b> +1 949.732.6500	<b>Tallahassee</b> +1 850.222.6891
<b>Austin</b> +1 512.320.7200	<b>Las Vegas</b> +1 702.792.3773	<b>Orlando</b> +1 407.420.1000	<b>Tampa</b> +1 813.318.5700
<b>Boca Raton</b> +1 561.955.7600	<b>London*</b> +44 (0)203 349 8700	<b>Philadelphia</b> +1 215.988.7800	<b>Tel Aviv^</b> +972 (0) 3 636 6000
<b>Boston</b> +1 617.310.6000	<b>Los Angeles</b> +1 310.586.7700	<b>Phoenix</b> +1 602.445.8000	<b>Tokyo<sup>‡</sup></b> +81 (0)3 3216 7211
<b>Chicago</b> +1 312.456.8400	<b>Mexico City+</b> +52 55 5029.0000	<b>Sacramento</b> +1 916.442.1111	<b>Warsaw~</b> +48 22 690 6100
<b>Dallas</b> +1 214.665.3600	<b>Miami</b> +1 305.579.0500	<b>San Francisco</b> +1 415.655.1300	<b>Washington, D.C.</b> +1 202.331.3100
<b>Delaware</b> +1 302.661.7000	<b>New Jersey</b> +1 973.360.7900	<b>Seoul<sup>∞</sup></b> +82 (0) 2 369 1000	<b>Westchester County</b> +1 914.286.2900
			<b>West Palm Beach</b> +1 561.650.7900

*This Greenberg Traurig Alert is issued for informational purposes only and is not intended to be construed or used as general legal advice nor as a solicitation of any type. Please contact the author(s) or your Greenberg Traurig contact if you have questions regarding the currency of this information. The hiring of a lawyer is an important decision. Before you decide, ask for written information about the lawyer's legal qualifications and experience. Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, P.A. \*Operates as Greenberg Traurig Maher LLP. \*\*Greenberg Traurig is not responsible for any legal or other services rendered by attorneys employed by the strategic alliance firms. +Greenberg Traurig's Mexico City office is operated by Greenberg Traurig, S.C., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ∞Operates as Greenberg Traurig LLP Foreign Legal Consultant Office. ^Greenberg Traurig's Tel Aviv office is a branch of Greenberg Traurig, P.A., Florida, USA. ‡Greenberg Traurig Tokyo Law Offices are operated by Greenberg Traurig Horitsu Jimusho, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ~Greenberg Traurig's Warsaw office is operated by Greenberg Traurig Grzesiak sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. Certain partners in Greenberg Traurig Grzesiak sp.k. are also shareholders in Greenberg Traurig, P.A. Images in this advertisement do not depict Greenberg Traurig attorneys, clients, staff or facilities. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. ©2015 Greenberg Traurig, LLP. All rights reserved.*