

## SANCTIONS: MONTHLY OVERVIEW

### EU

#### ECJ: Alisher Usmanov [meets](#) Criterion (g)

Alisher Usmanov was sanctioned on 28.02.2022 as a "leading businessperson." The extension of sanctions in September 2023 was challenged on 24.11.2023. Subsequently, the subject of the lawsuit included extensions in March and September 2024. The ECJ rejected the lawsuit on 03.09.2025.

Among other things, the ECJ stated that even in the absence of control over USM Holdings or Mr. Usmanov's participation in business management, the size of his shareholding makes him a "leading businessperson" falling under criterion (g).

Regarding the challenge to the legality of criterion (g) itself, as a general act, the ECJ noted that the burden of proof regarding the absence of interdependence between Russian leading businesspersons [as a whole](#) and the Russian Government should be shifted to the applicants.

The ECJ found no procedural violations in the fact that neither the EU ambassadors to the Council, nor the foreign ministers, nor the heads of state consider the extension of sanctions individually and do not examine the evidence submitted by applicants during the review process. Even though the EU Council delegated these tasks to two working groups, the final decision-making power remains with the EU Council itself, acting through its ambassadors or ministers.

#### EU Court Rules Extension of Sanctions Against Boguslayev [Unjustified](#)

On 12.09.2023, Boguslayev, owner and director of Motor Sich, was sanctioned for supplying engines to the Russian Federation, as well as for paying taxes and duties in the DNR.

On 04.06.2025, the ECJ overturned the extension of sanctions from March 2024. On 03.09.2025, the ECJ overturned subsequent extensions of sanctions, including the most recent one until 15.09.2025.

In granting the claim, the ECJ pointed out that the EU Council, in extending the sanctions, violated its obligation to assess the relevance of previous grounds. The EU Council is correct that the general reason for the sanctions – Russia's actions – has not disappeared. But the radical change in the applicant's personal circumstances, in particular, his detention and resignation from the company, as well as the nationalization of the latter, led to the disappearance of the grounds for maintaining the sanctions.

The Court took a similar position in the Ovsyannikov case,

where the applicant resigned from public service and moved to the UK (see case [T-714/20](#)). As in that case, in the Boguslayev case, the Court did not provide general clarifications as to whether a change in personal circumstances eliminating the basis for sanctions is possible without leaving the business (see, for example, [the digest](#) of 15.07.2024 regarding the Mazepin case).

#### ECJ Rules Extension of Sanctions Against Tokareva [Unjustified](#)

On 21.07.2022, Maya Tokareva, daughter of Nikolay Tokarev, head of Transneft, was sanctioned as an "associated person" with her father.

On 11.09.2024, the court overturned the extension of sanctions from September 2022, March and September 2023, and on 26.02.2025 – the extension of sanctions from March and September 2024.

On 02.09.2025, the Court, without holding a hearing, overturned the latest extension of sanctions dated 14.03.2025 (on a claim from 08.05.2025), *i.e.* 13 days before the new extension of sanctions on 15.09.2025.

The Court reiterated that the EU Council had failed to prove that Tokareva received economic benefit from her father (see [the digest](#) of 05.03.2025). The economic benefit must remain as of the date of decisions to impose and extend sanctions – the EU Council is obliged to assess the relevance of previously used grounds.

Earlier, on 23.07.2025, the Court rejected granting interim measures in the form of suspending the extension of sanctions from March 2025.

### UNITED KINGDOM

#### New Regulator – OTSI – Lists «Red Flags»

On 04.08.2025, OTSI published updated guidance for businesses on preventing sanctions violations, which lists 57 indicators of violations ("red flags") that should trigger enhanced due diligence. In addition, OTSI provides a list of 4 recommended services for checking counterparties (War Sanctions, Open Sanctions, Trade Integrity Project (TIP), SelfSanctions and LeaveRussia).

#### WHAT TO EXPECT IN THE NEXT TWO WEEKS:

- EU Court decisions in the cases of A. Yanukovych, R. Abramovich, T. Khudaverdyan, D. Pumpyansky, Positiv Group.
- Extension of EU sanctions – 15.09.2025.