

SANCTIONS: TWO WEEKS OVERVIEW

ECJ DECISIONS

ECJ [Annulled](#) Extension of Sanctions Against D. Pumpyanskiy

On 09.03.2022, D. Pumpyanskiy was added to the sanctions as a "leading businessperson." On 26.06.2024, the Court annulled the extensions of sanctions from September 2022 to March 2024, and on 02.04.2025, the extension of sanctions until September 2024.

On 10.09.2025, the Court annulled subsequent extensions of sanctions up to 15.09.2025. The EU Council failed to prove the applicant's status as a "leading businessperson" after his resignation from TMK and Sinara and failed to refute the applicant's claim that his participation in events with officials was related to his positions outside of business. Similarly, the EU Council did not prove the fact that the applicant's company, created to manage funds received from the sale of shares in TMK and Sinara, invested in the Russian Federation (the applicant explained to the Court that the company ultimately did not receive the funds).

Hearings were held on 18.06.2025, but the Article 3(1b) of Regulation 269 (see [digest](#) of 19.03.2025) concerning the rule of shifting of the burden of proof onto "leading businesspersons" regarding leaving the business was not yet applied, because by the time the rule was introduced, the written part of the process had already been completed.

ECJ [Partially Annulled](#) Sanctions Against T. Khudaverdyan from September 2024 to March 2025

On 15.03.2022, sanctions were imposed on T. Khudaverdyan, who held the position of CEO of Yandex. After the imposition of sanctions, T. Khudaverdyan left the position of CEO and moved to a consultant position, which became the basis for the ECJ's refusal of 10.09.2025 to annul the sanctions and their extension from September 2023 to September 2024.

At the same time, the ECJ considered T. Khudaverdyan's resignation on 08.07.2024 from his position as consultant at Yandex and the fact that the claimant no longer holds positions in the company's new structures, and annulled the extension of sanctions from September 2024. Consequently, the EU Council did not prove the status of "leading businessperson" at the time of the sanctions extension.

However, on 15.09.2025, the EU Council extended sanctions against the applicant.

ECJ [Did Not Lift](#) Sanctions Against "Positive Group"

On 23.06.2023, sanctions were imposed on PJSC "Positive Group" based on holding a license for the development of

encryption technology issued by the FSB of Russia (criterion (i) of Regulation 269/2014). On 10.09.2025, the Court refused to annul the sanctions.

Among other things, the Court noted that the presence of an FSB license to work with cryptographic means indicates cooperation with the authority and that it is not required to prove the facts of participation of the company holding the relevant license in the "information warfare".

The Government of the Netherlands also participated in the case, presenting conclusions on the participation of companies with an FSB license in destructive activities and maintaining the Russian cyber defense complex.

EU SANCTIONS

EU Council [Extended Sanctions for Six Months and Clarified Their Grounds](#)

On 15.09.2025, [acts were published](#) extending blocking sanctions until 15.03.2026.

The EU Council annulled sanctions against P. Ezubov as a person associated with one of the sanctioned "leading businesspersons." Previously, the ECJ had retroactively annulled sanctions against him twice (11.09.2024 and 25.06.2025).

Meanwhile, the EU Council maintained sanctions against M. Tokareva, another associated person. She had previously won three cases in the ECJ (11.09.2024, 26.02.2025 and 02.09.2025), with the EU Council waived hearings in the last case. The grounds for the sanctions were not changed upon extension.

The grounds for sanctions against the Pumpyanskiy family (father, mother, and son) were amended. Regarding D. Pumpyanskiy, the mention of the company created for investing funds from the sale of shares in TMK and Sinara was removed (see note about the ECJ's decision above). Regarding A. Pumpyanskiy (son), facts were added about the transfer of assets in the company to a closely related person (see [digest](#) of 29.12.2023) and about synchronous resignations with his father from TMK and Sinara. Regarding the mother, a mention of her position in a charitable organization was added.

The grounds for sanctions for a number of businessmen were also clarified. In particular, mentions were added of O. Deripaska's membership in the APEC Business Advisory Council, A. Kuzmichev's membership in the Russian International Affairs Council, and G. Timchenko's membership in the Russian-Chinese Business Council.

WHAT TO EXPECT IN THE NEXT TWO WEEKS:

- Preparation of the 19th sanctions package.
- ECJ decision in the M. Bazhaev case.