

SANCTIONS: TWO WEEKS OVERVIEW

EU

ECJ denies compensation to A. Pumpyanskiy

On 09.03.2022, sanctions were imposed on A. Pumpyanskiy. The ECJ subsequently annulled the extensions of the sanctions as of September 2022 (see digests of [04.12.2023](#) and [17.04.2025](#)). In separate proceedings, A. Pumpyanskiy sought compensation for lost profits due to the loss of income and the inability to rent out real estate in France, for actual damages in the form of legal expenses in Switzerland and France, as well as for moral damages.

On 10.12.2025, the ECJ fully [dismissed](#) the claim, finding that a significant part of the evidence (e.g., an expert opinion) was inadmissible because it was submitted during the second, rather than the first, round of written submissions. The ECJ then relied only on the remaining evidence (also submitted in the second round) and selectively referred to the excluded materials. As a result, the ECJ concluded that the claimant had not proven any damages or moral harm.

On questions of law, the ECJ noted that its November 2023 judgment had already denied compensation for moral damages for the period from September 2022 to March 2024. The amendment of the sanctions reasoning by the EU Council in March 2024 removes the question of whether the Council sought to circumvent the ECJ's judgment of November 2023. Finally, part of the facts and evidence related to the application of Swiss sanctions rather than EU sanctions.

USA

Sanctions violations related to April 2018 sanctions

OFAC [fined](#) Gracetown \$7.14 million. The company had been established to manage real estate and was considered linked to O. Deripaska. After sanctions were imposed on the businessman, the company received a direct prior notice from OFAC about the need to comply with sanctions. Despite this, the company failed to report blocked assets and received 24 payments totalling \$31,000 from other entities associated with O. Deripaska.

In another case, OFAC [fined](#) the Chicago-based investment company IPI Partners \$11.5 million. Liability was based on the company's failure to block previously received funds and its acceptance of additional funds after April 2018 (amounting to \$50 million) from a source that OFAC determined to be linked to S. Kerimov. The legal opinion on which the company relied was deemed insufficient due to incomplete information provided to the lawyers and the lack of an assessment of indirect links to

a designated person in the opinion itself. The penalty was reduced because the company began cooperating with OFAC after hiring a new legal adviser.

OFAC also [fined](#) an American attorney \$1.1 million for 122 episodes of acting as trustee until 2022 for a trust whose settlor was a relative of a person designated in April 2018 and who had no independent income. The trustee obtained a legal opinion in 2018 and later sought legal support to comply with sanctions. However, liability was based on the involvement of a proxy acting on behalf of the designated person in matters of the trust. OFAC considered this sufficient to demonstrate the designated person's control, which in turn indicated an ownership interest in the trust's assets. The fine was reduced due to cooperation with OFAC, including waiving reliance on statutes of limitations.

Further extension of Lukoil licenses

OFAC issued two general licenses:

- [128B](#), extending until 29.04.2026 the authorization for transactions related to the servicing and operation of Lukoil gas stations located outside Russia (aligned with License 130) (see [digest](#) of 17.11.2025);
- [131A](#), extending authorizations for transactions necessary for negotiations on the sale of Lukoil's Austrian subsidiary until 17.01.2026 (see [digest](#) of 17.11.2025).

SDN list removals

On 09.12.2025, Nikita Sobolev (former director of a Maltese company supplying dual-use goods to Russia) and Kirill Astrahan (former vice-president of Kaspersky Lab) were [removed](#) from the SDN List. No reasons for the delistings were provided.

UNITED KINGDOM

Updates to sanctions listings

On 04.05.2022, sanctions were imposed on S. Mikhaylov, the head of TASS. On 05.07.2023, he resigned from the agency. On 28.11.2025, OFSI [updated](#) the designation grounds, noting the resignation, and kept the sanctions against him in force.

On 09.12.2025, sanctions were [imposed](#) on A. Dugin, M. Zvinchuk and LLC "Rybar," among others.

WHAT TO EXPECT IN THE NEXT TWO WEEKS:

- ECJ decisions on the Timchenko spouses', I. Rotenberg cases.