

中華民國證券投資信託暨顧問商業同業公會 函

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受文者：

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速別：普通件

密等及解密條件或保密期限：

附件：如文

主旨：函轉金融監督管理委員會檢送美方提供新增涉及俄羅斯制裁名單（CAATSA Section 231 List of Specified Persons）及美國財政部指定制裁名單（SDN List）如附件，請查照。

說明：依金融監督管理委員會107年10月8日金管證券字第1070337341號函辦理。

正本：本公會各投信會員公司、本公會各投顧會員公司

副本：

理事長 張錫

檔 號：

保存年限：

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附件：如主旨(第一件 A45020000DORGUNIT107100803373410A1B337341.PDF)

主旨：檢送美方提供新增涉及俄羅斯制裁名單（CAATSA Section 231 List of Specified Persons）及美國財政部指定制裁名單（SDN List）如附件，請轉知所屬會員依說明辦理，請查照。

說明：旨揭制裁名單係美國國務院官網公開資訊（網址為：<https://www.state.gov/t/isn/caatsa/index.htm>），如發現案關帳戶及交易，且認定有疑似洗錢或資恐者，應依洗錢防制法規定向法務部調查局申報，並注意該等交易之風險。

正本：中華民國證券商業同業公會、中華民國證券投資信託暨顧問商業同業公會、中華民國期貨業商業同業公會、中華民國會計師公會全國聯合會

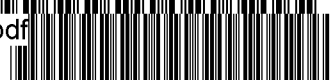
副本：臺灣證券交易所股份有限公司、臺灣期貨交易所股份有限公司、財團法人中華民國證券櫃檯買賣中心、臺灣集中保管結算所股份有限公司、元大證券金融股份有限公司、環華證券金融股份有限公司

107/10/08
15:43:50

授權單位主管決行並鈐印

中華民國證券投資信託暨顧問商業同業公會

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-- On September 20, 2018, the United States took additional steps to enforce the Countering American Adversaries Through Sanctions Act (CAATSA) in our continuing response to Russian interference in U.S. elections and other malign activities.

-- First, the Secretary of State added 33 additional persons – both entities and individuals – to the CAATSA section 231 List of Specified Persons (LSP) for being a part of, or operating for or on behalf of, the defense or intelligence sectors of the Government of the Russian Federation. Henceforth, any person who is determined to have knowingly engaged in a significant transaction with any of the listed persons will be subject to mandatory sanctions under CAATSA section 231. The LSP can be found in its entirety at www.state.gov/t/isn/caatsa/index.htm.
The added persons are as follows:

RUSSIAN DEFENSE-SECTOR ADDITIONS TO THE LSP

PMC Wagner
Oboronlogistika, OOO
Komsomolsk-na-Amur Aviation Production Organization (KNAAPO)

RUSSIAN INTELLIGENCE-SECTOR ADDITIONS TO THE LSP

Internet Research Agency LLC
Concord Management and Consulting LLC
Concord Catering
Yevgeniy Viktorovich Prigozhin
Mikhail Ivanovich Bystrov
Mikhail Leonidovich Burchik
Aleksandra Yuryevna Krylova
Anna Vladislavovna Bogacheva
Sergey Pavlovich Polozov
Maria Anatolyrvna Bovda
Robert Sergetevich Bovda
Dzheykhun Nasimi Ogly Aslanov
Vadim Vladimirovich Podkopaev
Gleb Igorevich Vasilchenko
Irina Viktorovna Kaverzina
Vladimir Venkov
Viktor Borisovich Netyksho
Boris Alekseyevich Antonov
Dmitriy Sergeyevich Badin
Ivan Sergeyevich Yermakov
Aleksey Viktorovich Lukashev
Sergey Aleksandrovich Morgachev
Nikolay Yuryevich Kozachek
Pavel Vyacheslavovich Yershov
Artem Andreyevich Malyshev

Aleksandr Vladimirovich Osadchuk
Aleksey Aleksandrovich Potemkin
Anatoliy Sergeyevich Kovalev
Igor Valentinovich Korobov
Sergey Aleksandrovich Gizunov

-- Second, the Secretary of State, in consultation with the Secretary of the Treasury, imposed sanctions pursuant to section 231 of CAATSA on the Chinese military entity Equipment Development Department (EDD) (including sanctions on its director, Li Shangfu) for engaging in significant transactions with Rosoboronexport, Russia's main arms export entity, which is on the LSP. EDD is the main procurement entity of the Chinese People's Liberation Army.

-- These significant transactions involved Russia's delivery to China of 10 Su-35 combat aircraft in 2017 and S-400 surface-to-air missile system-related equipment in 2018, among the newest and most high-value major weapons systems that Russia offers for export.

-- Section 231 of CAATSA requires that at least five of the twelve sanctions described in CAATSA section 235 be imposed on any individual or entity determined to have knowingly engaged in a significant transaction with a person that is a part of, or operates for or on behalf of, the defense or intelligence sectors of the Government of the Russian Federation. The sanctions being imposed on EDD are as follows:

- Denial of U.S. export licenses;
- A prohibition on foreign exchange transactions under U.S. jurisdiction;
- A prohibition on transactions with the U.S. financial system;
- Blocking of all property or interests in property within U.S. jurisdiction;
- The imposition of sanctions on the EDD principal executive officer, its director Li Shangfu, which include a prohibition on foreign exchange transactions under U.S. jurisdiction, a prohibition on transactions with the U.S. financial system, blocking of all property or interests in property within U.S. jurisdiction, and a visa ban.

-- As a result of this action, EDD and Li Shangfu will be placed on the Department of the Treasury's Specially-Designated Nationals and Blocked Persons (SDN) list, and all of their transactions with the U.S. financial system will be blocked.

-- As this action demonstrates, the United States is continuing to respond strongly to counter Russia's malign activities, including through the full implementation of CAATSA section 231 sanctions on those who knowingly engage in a significant transaction with Russia's defense or intelligence sectors.

-- Such significant transactions with the Russian defense or intelligence sectors will tie your country's security to a Russian economy that is increasingly isolated, and could place your

government agencies, businesses, and/or financial institutions, or related individuals, at risk of U.S. sanctions themselves.

-- We strongly urge all partners and allies to avoid major new arms transactions with Russia, including those that involve weapons systems such as the S-400 or Su-35. We draw your attention to the fact that we have added the Komsomolsk-na-Amur Aviation Production Organization (KNAAPO), which produces the Su-35 (as well as other items) in Russia, to the LSP. Henceforth, knowingly engaging in any significant transaction with KNAAPO will result in the imposition of CAATSA section 231 sanctions.

-- As we have stated since the beginning of our implementation of CAATSA section 231, our goal is not to undermine the military capabilities or readiness of our partners and allies. However, significant transactions that provide large amounts of revenue to Russia enable Moscow's malign activities, including those aimed at the United States and our partners and allies. Curbing these revenue flows is essential to imposing costs on the Russian Government as long as it refuses to alter its behavior.

-- In addition, Moscow's malign behavior and the increasing sanctions being imposed on its defense sector mean that continuing to rely on Russia for new armaments raises serious national security risks for countries who choose to do so.

-- We remain committed to engaging with allies and partner states to help them identify potentially sanctionable transactions before sanctions are imposed and urge them to avoid such transactions. We therefore strongly encourage you to consult with the Department of State via the U.S. Embassy prior to pursuing any major transactions involving Russia-based entities or individuals, especially listed persons.

