

**CLIENT ALERT: OFAC TARGETS MARINE  
SECTOR IN LATEST RUSSIA DETERMINATION**

**March 31, 2022**

On March 31, 2022, the Office of Foreign Assets Control (“OFAC”) issued a “Determination Pursuant to Section 1(a)(i) of Executive Order 14024.” This Determination permits the Department of Treasury, in conjunction with the Secretary of State, to sanction any person who operates in the electronic, aerospace and marine sectors of the Russian economy. In pertinent part, the Determination provides as follows:

*“...I hereby determine that section 1(a)(i) shall apply to the aerospace, electronics, and marine sectors of the Russian Federation economy. Any person that I or my designee, in consultation with the Secretary of State or the Secretary of State’s designee, or the Secretary of State or the Secretary of State’s designee, in consultation with me or my designee, subsequently determine operates or has operated in such sectors shall be subject to sanctions pursuant to section 1(a)(i).”*

While OFAC has not yet issued guidance on the scope of the term “marine sector,” we are closely monitoring for further developments. A full copy of the Determination can be found here: [https://home.treasury.gov/system/files/126/russia\\_harmful\\_determination\\_20220331.pdf](https://home.treasury.gov/system/files/126/russia_harmful_determination_20220331.pdf).

If you have any questions about the contents of this alert or would like further information regarding U.S. sanctions, please feel free to contact the authors, Bill Pallas at [pallas@freehill.com](mailto:pallas@freehill.com), or Mike Dehart at [dehart@freehill.com](mailto:dehart@freehill.com).

*This Client Alert is only a general summary for informational purposes. It and its content are not intended to be and should not be used or construed as legal advice. Readers should seek specific legal advice before acting with regard to the subjects mentioned herein.*

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