

## Russian Procurement Tactics, Techniques, and Procedures



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FinCEN and the U.S. Department of Commerce's Bureau of Industry and Security Urge Increased Vigilance for Potential Russian and Belarusian Export Control Evasion Attempts

# Decreased ability to acquire U.S. items has led Russia to circumvent U.S. export controls

#### **Red Flags**

- Using consolidators or reshippers which are owned/directed by Russians.
- Layering procurements through third party countries to obfuscate the end user, an example of which is the use of numerous 3<sup>rd</sup> country freight forwarders and shippers on a single transaction.
- Freight forwarding firm is listed as the product's final destination.
- Making payments from entities located in third countries not otherwise involved with the transactions.
- Removing government/military affiliation from website.
- Consolidating shipments/shippers in the United States may be more likely to provide applicable cover for the exports of luxury goods.
- Procuring items below control thresholds while claiming civil end use.

#### **Commodities of Concern**

Aircraft Parts and Equipment

Antennas

Cameras

**GPS Systems** 

Inertial Measurement Units

**Integrated Circuits** 

Sonar Systems

Spectrophotometers

Test Equipment

Thrusters

**Underwater Communications** 

Vacuum Pumps

Wafer Fabrication Equipment/Substrates
Oil Field Equipment

### **Transshipment Countries of Concern**

Armenia, Brazil, China, Georgia, India, Israel, Kazakhstan, Kyrgyzstan, Mexico, Nicaragua, Serbia, Singapore, South Africa, Taiwan, Tajikistan, Turkey, United Arab Emirates, and Uzbekistan.

#### Naming Nomenclature

- RAO (Rossiyskaya Aktsionernaya Kompaniya), which designates a Russian joint stock company
- FGUP/FSUE (Federal'noye Gosudarstvennoye Unitarnoye Predpriyatiye), which designates a Russian Federal State Unitary Enterprise
- GK (Gorsudarstvennaya Korporatsiya), which designates a Russian State Corporation
- SPRE/NIPP (Nauchno-Issledovatel'skoye Proizvodstvennoye Predpriyatiye), which designates a Russian Scientific Research Production Enterprise
- NPO/GNPO (Gosudarstvennyy Nauchno-Proizvodstvennyy Tsentr), which designates a Russian State Research and Production Center