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BIS ISSUES TEMPORARY DENIAL ORDER AGAINST 7 PERSONS AND 3 COMPANIES FOR ILLEGALLY EXPORTING ELECTRONICS WITH MILITARY APPLICATIONS TO RUSSIA

WASHINGTON, D.C. – Today, Matthew S. Axelrod, Assistant Secretary for Export Enforcement at the U.S. Commerce Department's Bureau of Industry and Security (BIS), issued a Temporary Denial Order (TDO) suspending the export privileges of seven persons and three companies – Nikolay Goltsev, Salimdzhon Nasriddinov, Kristina Puzyreva, Oleg Zenchenko, Yekaterina Vetoshkina, Pavel Chernikov, Vladimir Bochkarev, SH Brothers Group Inc. (SH Brothers), SN Electronics, Inc. (SN Electronics), and Suntronic F.Z.E. (Suntronic). These ten parties are alleged to be part of a sophisticated global procurement scheme that unlawfully sourced and purchased millions of dollars in dual-use electronics for end-users in Russia, including companies affiliated with the Russian military. The TDO is available online here-end-users in Russia, including companies affiliated with the Russian military.

"By cutting off access to U.S. items, today's temporary denial order prevents a global Russian procurement ring of brokers and companies, including two storefronts in Brooklyn, from supporting the Russian war machine," said **Assistant Secretary of Commerce for Export Enforcement Matthew S. Axelrod**. "We will continue to focus our enforcement efforts against the highest priority items needed by Russia to prosecute its unprovoked full-scale invasion of Ukraine, including electronic components used in drones, missiles, and tanks."

"Today's action is the product of strong coordination and focus between BIS's Export Enforcement and our federal law enforcement partners," said Director for Export Enforcement John D. Sonderman. "We will continue to work tirelessly to enforce U.S. export controls and prevent sensitive items from being obtained by the Russians to continue their brutal war against Ukraine."

Today's actions are related to an indictment returned yesterday in the Eastern District of New York and are the result of coordination by the Disruptive Technology Strike Force co-led by the Departments of Justice and Commerce and Task Force KleptoCapture. Goltsev, Nasriddinov, Puzyreva, Zenchenko, Vetoshkina, Chernikov, and Bochkarev were indicted in the Eastern District of New York on multiple charges, including conspiracy to violate the Export Control Reform Act. Goltsev, Nasriddinov and Puzyreva were previously arrested on October 31, 2023, pursuant to a criminal complaint. Today's actions by the Department of Commerce build on the Tindictment by blocking SH Brothers, SN Electronics, and Suntronic, along with the other parties to the TDO, from access to U.S. origin items and technologies.

TDOs are significant protective administrative measures issued by BIS that cut off not only the right to export items subject to the Export Administration Regulations (EAR) from the U.S., but also the ability to receive or participate in exports from the United States or reexports of items subject to the EAR. The Assistant Secretary's order denies all of the export privileges described in part 764 of the EAR, which include (but are not limited to) applying for, obtaining, or using any license, license exception, or export control document, or engaging in or benefitting from such transactions, in order to prevent imminent violations of the EAR.

Case Background

As alleged in the indictment, the defendants used two corporate entities registered in Brooklyn, SH Brothers and SN Electronics, to facilitate the scheme. Through these entities, the defendants unlawfully sourced, purchased, and shipped millions of dollars in dual-use electronics from U.S. manufacturers and distributors to sanctioned end-users in Russia, including through third countries. Many of the electronic components shipped by the defendants through SH Brothers were, according to the Department of Commerce, "of the highest concern due to their critical role in the production of advanced Russian precision-guided weapons systems, Russia's lack of domestic production, and limited global manufacturers." As described in court filings, some of the electronic components with the same make, model and part number shipped by the defendants through SH Brothers have been found in seized Russian weapons platforms and signals intelligence equipment in Ukraine, including the Torn-MDM radio reconnaissance complex, the RB-301B "Borisoglebsk-2" electronic warfare complex, the Izdeliye 305E light multi-purpose guided missile, the Vitebsk L370 airborne counter missile system, Ka-52 helicopters, Orlan-10 unmanned aerial vehicles (UAVs) and T-72B3 battle tanks. During the time period charged in the indictment, SH Brothers made hundreds of shipments valued at over \$7 million to Russia.

According to the indictment, Goltsev and Nasriddinov sourced and purchased U.S.-origin electronics at the direction of Russian procurement agents, including Bochkarev, Chernikov, Vetoshkina, and Zenchenko. Nasriddinov and Goltsev purchased electronic components from U.S. manufacturers and distributors under the auspices of SH Brothers and SN Electronics and arranged for the items to be sent to various locations in Brooklyn. Nasriddinov and Goltsev then unlawfully shipped the items to a variety of intermediary corporations located in other countries, including Turkey, India, China and the United Arab Emirates, where they were rerouted to Russia. One such intermediary was Suntronic, a front company used by Bochkarev for multiple procurement operations. Puzyreva operated numerous bank accounts and conducted financial transactions in furtherance of the scheme.

This case is part of a joint investigation between OEE's New York Field Office, Homeland Security Investigations New York Field Office, and the Federal Bureau of Investigation's New York Field Office. It was coordinated by the Disruptive Technology Strike Force and Task Force KleptoCapture. The Disruptive Technology Strike Force is an interagency law enforcement strike force co-led by the Departments of Justice and Commerce designed to target illicit actors, protect supply chains, and prevent critical technology from being acquired by authoritarian regimes and hostile nation states. Task Force KleptoCapture is an interagency law enforcement task force dedicated to enforcing the sweeping sanctions, export restrictions and economic countermeasures that the United States has imposed, along with its allies and partners, in response to Russia's unprovoked military invasion of Ukraine.

Report suspected export control violations through the BIS <u>online tip portal</u>. You can also call the Enforcement Hotline at 1-800-424-2980 or email <u>EELead@bis.doc.gov</u>.

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