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**BUREAU OF INDUSTRY AND SECURITY**

Office of Congressional and Public Affairs

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**BIS ISSUES TEMPORARY DENIAL ORDER IN SUPPORT OF STRIKE FORCE CASE AGAINST RUSSIAN NATIONAL FOR ILLEGALLY EXPORTING SENSITIVE U.S.-SOURCED MICRO-ELECTRONICS WITH MILITARY APPLICATIONS TO RUSSIA**

WASHINGTON, D.C. – Today, the U.S. Commerce Department’s Bureau of Industry and Security (BIS) issued a Temporary Denial Order (TDO) suspending the export privileges of three individuals - Arthur Petrov, Zhanna Soldatenkova, and Ruslan Almetov - and four companies - Astraferos Technokosmos LTD, Ultra Trade Service LLC, Juzhoi Electronic LLC, and LLC Electrocom VPK - all of which are part of a Russia-based illicit procurement network that supplies the Russian military. Today’s actions, coordinated through the Disruptive Technology Strike Force co-led by the U.S. Departments of Justice and Commerce, also involve the unsealing of a criminal complaint in the Southern District of New York against Petrov. Petrov was arrested on August 26, 2023 and remains in custody. Today’s actions build on the criminal complaint by denying his company, Astraferos Technokosmos LTD, as well as Electrocom VPK, Ultra Trade Service LLC, and Juzhoi Electronic LLC, access to U.S. exports. The TDO is available online [here](#).

“Those who evade our export control restrictions to support Putin’s brutal war machine will be held accountable,” **said Assistant Secretary of Commerce for Export Enforcement Matthew S. Axelrod.** “In conjunction with today’s criminal action, we have issued a Temporary Denial Order to shutter this alleged illicit procurement network’s access to the type of U.S. micro-electronics embedded in Russian missiles and drones that have been used in its unprovoked war against the Ukrainian people.”

TDOs are some of the most significant civil sanctions BIS can issue, cutting off not only the right to export items subject to the Export Administration Regulations (EAR) from the United States, but also to receive or participate in exports from the United States or reexports of items subject to the EAR. The TDO 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. The order was issued for a renewable 180-day period.

***Case Background***

Following Russia’s 2022 invasion of Ukraine, Arthur Petrov, Zhanna Soldatenkova, and Ruslan Almetov fraudulently procured large quantities of U.S.-manufactured microelectronics subject to U.S. export controls on behalf of Electrocom VPK, a Russia-based supplier of critical electronics components to the Russian military. To carry out the scheme, the individuals used shell companies and other deceptive means to conceal that the electronics components were destined for Russia. The technologies that the defendants have procured in violation of U.S export controls during the course of the conspiracy have significant military applications and include various types of electronics

components that have been recovered in Russian military hardware on the battlefield in Ukraine, such as Russian guided missiles, drones, and electronic warfare and communications devices.

The investigation by BIS's Office of Export Enforcement (OEE) and the Federal Bureau of Investigation (FBI) has revealed that the procurement network extends to multiple co-conspirators, like Arthur Petrov, Zhanna Soldatenkova, and Ruslan Almetov.

- Arthur Petrov is an operator of Astraferos Technokosmos LTD, a shell company registered in Cyprus to procure U.S.-manufactured micro-electronics for transshipment to Russia; and also works for Electrocom VPK, located in Russia and which is a critical supplier for the Russian military.
- Zhanna Soldatenkova is a Russian national residing in Russia, who works for Electrocom VPK and transships U.S. electronics to Electrocom VPK in Russia through Ultra Trade Service, a Latvian third-party distributor.
- Ruslan Almetov is a Russian national residing in Russia, who is the co-founder and General Director of Electrocom VPK. Ruslan Almetov also operates Juzhoi Electronic, a shell company registered and based in Tajikistan, to transship U.S.-sourced electronics procured by Arthur Petrov and Astraferos in Cyprus to Electrocom VPK.

To perpetrate the scheme, Arthur Petrov acquired controlled microelectronics from U.S.-based electronics exporters using Astraferos. Petrov falsely represented to the U.S. exporters that Astraferos was purchasing the items for fire security systems and that the ultimate end users and destinations of the electronics were companies in Cyprus, Latvia, or Tajikistan when in fact the components were destined for Electrocom VPK in Russia, which supplies the Russian military. These microelectronics included, among other things, microcontrollers and integrated circuits that are on BIS's Commerce Control List and cannot lawfully be exported or reexported to Russia without a license. These types of microcontrollers and integrated circuits have significant military applications and have been recovered in Russian missiles, drones, and other military hardware in Ukraine.

To evade U.S. export controls, Arthur Petrov, Zhanna Soldatenkova, and Ruslan Almetov worked together to transship the controlled items using pass-through entities in third countries. In particular, after fraudulently procuring the electronics components from the U.S. distributors, Arthur Petrov shipped the controlled items to Ultra Trade Service or to Juzhoi. Zhanna Soldatenkova and Ruslan Almetov then caused the items to be shipped, sometimes through yet another third country such as Lithuania, to Electrocom VPK in Saint Petersburg, Russia. At all times, the defendants concealed from the U.S. distributors that they were procuring the controlled electronic components on behalf of Electrocom VPK - a key supplier for the Russian military and that the items were destined not for Cyprus, Latvia, or Tajikistan, but rather for Russia.

Over the course of the conspiracy, Arthur Petrov, Zhanna Soldatenkova, and Ruslan Almetov have procured and shipped to Russia more than \$225,000 worth of controlled U.S.-manufactured electronic components with military applications. None of the individuals, nor the entities used to perpetrate the scheme, has ever applied for an export license from BIS.

In a related action, on August 11, 2023, the U.S. Department of Justice issued a criminal complaint

in the Southern District of New York charging Arthur Petrov with export control violations, smuggling, wire fraud, and money laundering offenses. Arthur Petrov was arrested in the Republic of Cyprus on August 26, 2023, and currently remains in custody pending the resolution of extradition proceedings.

This case is a joint investigation between OEE's New York Field Office and the FBI's New York Field Office and today's actions were coordinated through the Disruptive Technology Strike Force. The Strike Force is an interagency law enforcement effort co-led by the Departments of Justice and Commerce to target illicit actors, protect supply chains, and prevent critical technology from being acquired by authoritarian regimes and hostile nation-states. Under the leadership of the Assistant Attorney General for National Security and the Assistant Secretary of Commerce for Export Enforcement, the Strike Force leverages tools and authorities across the U.S. Government to enhance the criminal and administrative enforcement of export control laws.

***Authorities and Export Enforcement Contact:***

These BIS actions were taken under the authority of the Export Control Reform Act of 2018 and its implementing regulations, the EAR.

BIS controls exports, reexports, and in-country transfers of dual-use commodities, technology and software for reasons of national security, missile technology, nuclear non-proliferation, chemical and biological non-proliferation, crime control and regional stability. Criminal and administrative sanctions can be imposed for violations of the EAR. For more information, please visit: <https://www.bis.doc.gov/index.php/enforcement>.

Report suspected export control violations through the BIS [online tip portal](#). You can also call the Enforcement Hotline at 1-800-424-2980 or email [EELead@bis.doc.gov](mailto:EELead@bis.doc.gov).

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