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Office of Foreign Assets Control  
U.S. Department of the Treasury  
Treasury Annex  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

September 11, 2020

**RE: Request to investigate the alleged violation of the OFAC sanctions by Viktor Medvedchuk and legal entities under his effective control**

Dear Colleagues,

The Anti-corruption Action Centre, Ukrainian civil society organization aimed at tackling grand political corruption, would like to express to you our sincere respect in your work towards sanctioning individuals and legal entities posing a threat to the democratic institutions in Ukraine and facilitating Russian interests to destabilize our country. With this letter we would like to request the investigation of alleged violation of sanctions regime committed by Viktor Medvedchuk and companies under his effective control.

On September 26, 2018 we have already submitted to you the request presenting you facts of business activity of Viktor Medvedchuk in extraction of oil in Russia (the copy of the letter is attached). On September 3, 2020, the journalists of Schemes investigative reporting project (Radio Free Europe/Radio Liberty) reported that in violation of the sanction regime imposed over Viktor Medvedchuk, companies associated with his family sell oil products to the U.S. corporation ExxonMobil. Estimated annual income of such operations is approx. \$150 mln. Thus, we would like to raise your awareness of the below mentioned facts.

## Sale of goods to the US company

(1) On March 6, 2014 the US imposed sanctions on Viktor Medvedchuk for *"his role in actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine"* as well as his role in *"actions or policies that undermine democratic processes or institutions in Ukraine"*. *"Medvedchuk is also being designated because he has materially assisted, sponsored, or provided financial, material, or technological support to Yanukovych and because he is a leader of an entity that has, or whose members have, engaged in actions or policies that undermine democratic processes or institutions in Ukraine and actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine."*<sup>1</sup> *"Viktor Medvedchuk is the leader of Ukrainian Choice, a group through which he has been stirring conflict in Kherson, a province just north of Crimea, through advertising campaigns designed to pit supporters and foes of Russia's attempt to annex Crimea against one another. A long-time proxy and close personal friend of Russian President Vladimir Putin, he acted as a liaison between Yanukovych and Putin. Medvedchuk and Andriy Kluyev, the former Secretary of National Security and Defense Council of Ukraine, were involved in the development of the scenario that led to clashes outside the Presidential Administration in Kyiv on December 1, 2013"*.

(2) In March 2016, Viktor Medvechuk transferred all ownership rights of his business entities to his wife Oksana Marchenko. Among such entities there is a chain of companies registered in Cyprus, Malta, United Kingdom, Russia, and Ukraine. On September 18, 2018 Viktor Medvedchuk in his comment to Radio Free Europe<sup>2</sup> told: *"My wife is not doing business, she is owning business, while I am managing it. Why I can not own business? Because my "beloved" americans imposed sanctions on me in March 2014. This caused peculiarities to business, which now belongs to my family"*. This comment followed the journalistic investigation "Oil for Putin's Crony" released by Schemes investigative reporting project on September 6, 2018<sup>3</sup>.

(3) Oksana Marchenko had a long career of TV show presenter. Specifically, in 2009-2014 she was presenter of "Ukraine has a talent" TV show at STB channel, in 2010-2016 she worked as presenter of "X-factor" TV project, since December 2017 she became host and team leader of reality show "Time to build" at Inter TV channel. Thus, Oksana Marchenko does not have professional skills to run and/or control complex business chains, including those engaged in extraction of oil in Russia.

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<sup>1</sup> <https://www.treasury.gov/press-center/press-releases/Pages/jl2326.aspx>

<sup>2</sup> <https://www.radiosvoboda.org/a/news-schemes-medvedchuk-druzhyzna-bisnes-rosia/29495846.html>

<sup>3</sup> <https://antac.org.ua/en/publications/oil-for-putin-s-godmother-oksana-marchenko-journalistic-investigation/>

(6) In August 2019, Viktor Medvedchuk became the Member of Parliament of Ukraine representing the pro-Russia party Opposition Platform for Life. In compliance with Ukrainian legislation on disclosure of assets of public officials, in May 2020, Medvedchuk submitted electronic asset declaration for 2019<sup>4</sup>, where among other assets were indicated millions in cash and in bank accounts, almost 20 land plots, collections of paintings and icons, dozens of antique books. The declaration also revealed that Oksana Marchenko is the beneficial owner of almost one hundred companies registered in different parts of the world, namely in Ukraine, Russia and Bulgaria as well as offshores of Malta, the Marshall Islands and St. Kitts and Nevis (the detailed list of the companies is available in Annex 1). Information on banking accounts officially opened by Viktor Medvedchuk and Oksana Marchenko is available in Annex 2.

(7) According to Viktor Medvedchuk's asset declaration, Oksana Marchenko is the ultimate beneficial owner of Novoshakhtinsk Oil Refinery JSC. The journalists report that during 2020 the oil products (like aromatic petroleum oil) produced by Novoshakhtinsk Oil Refinery JSC were supplied to ExxonMobil Sales&Supply LLC, which is a subsidiary of the American corporation ExxonMobil. The goods were delivered directly from the Black Sea neutral waters to the port of Houston.

(8) According to the available customs data, in the period of January-April 2020 alone, six tankers (Kalahari, Artemis, NS Captain, Patmos Warrior, Clio, and Nordorchid) delivered to Houston at least 443,000 tons of oil products of Novoshakhtinsk Oil Refinery JSC. The oil products were loaded in the Black Sea neutral waters from three tankers (Sanar-7, Sanar-8, and Boray), the tankers are owned by the Russian company Rosewood Shipping LLC, which is beneficially owned by Oksana Marchenko.

(9) ExxonMobil Sales&Supply LLC purchased the oil products from Swiss company Newcoal Trading AG. Beneficial owners of the latter are not publicly disclosed. However, according to journalists it is widely believed that Swiss company is linked to the family of Gleb Khor, a member of the Russian State Duma for the "United Russia" party through company Rutek holding.

(10) Journalists estimate that oil products produced by Novoshakhtinsk Oil Refinery JSC constitute one third of all oil exported by Russian companies to the U.S. from November 2019 to June 2020. Estimated income received by Viktor Medvedchuk for these operations is \$150 mln.

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<sup>4</sup> [https://declarations.com.ua/en/declaration/nacp\\_294babb4-0db7-4692-bd0f-ad9f2f031ba6](https://declarations.com.ua/en/declaration/nacp_294babb4-0db7-4692-bd0f-ad9f2f031ba6)

## Questionable assets

(11) In 2019, Viktor Medvedchuk declared receiving significant income from companies, where Oksana Marchenko is indicated as a beneficial owner, specifically:

- Investment Company “Harmony” LLC, Ukraine - 4,768,967 UAH (approx. \$180,000) salary (apparently it was official place of work of Viktor Medvedchuk before he entered parliament in August 2019)
- VENTOLOR HOLDING LIMITED, Cyprus - 21,942,076 UAH (approx. \$848,000) payment according to service contract ; 33,417,861 UAH (approx. \$1,292,000) UAH bonuses ( it is unclear what kind of bonuses Medvedchuk received from the company as he didn't work there)

(12) Total income Viktor Medvedchuk received from Harmony and Ventolor in 2019 is 60,128,904 UAH (approx. \$2,325,000). The total income he declared from all other sources including his official salary as a member of parliament is 34 times less: 1,719,885 UAH (approx. \$66,500).

(13) In 2019, Oksana Marchenko received 258,665,375 UAH (approx. \$10,008,000) dividends from Tumillon Investments LTD, Cyprus, another Western holding company of Viktor Medvedchuk. Tumillon Investments Ltd and Ventolor Holding Limited are 2 Cyprus parent companies for the Russian oil business of Viktor Medvedchuk, specifically Novoshakhtinsk Oil Processing Refinery Company mentioned above.

(14) Viktor Medvedchuk owns significant assets outside Ukraine through his network of offshore companies. Those assets have not been disclosed in his official asset declaration. Among others they include yacht Royal Romance with estimated value of 200 million EUR (owned through Fregata Marine Ltd registered at Marshall Islands), real estate in Bulgaria with estimated value of 20 million EUR, 6-thousand-square-meter estate in the occupied Crimea.

(15) In 2019, Viktor Medvedchuk declared in 2019 direct spendings on his NGO “Ukrainski Vybir” totaling 3 776 768 UAH (approx. \$146,000) and his political party Opposition Platform “Za Zhyttia” totaling 2 301 600 (approx. \$89,000).

(16) NGO “Ukrainski Vybir” as well as the political party political party Opposition Platform “Za Zhyttia” are advocating for federalization of Ukraine, opposing the course of Ukraine towards integration with the European Union and NATO, blackmail pro-Western and pro-reform Ukrainian politicians and civil society activists, advocate for Ukraine getting under full geopolitical control and influence of Russia, targeting to harm

Ukrainian cooperation with the IMF and the World Bank. All these activities directly contradict the geopolitical security interests of the United States, moreover they are meant to spread anti-USA rhetoric in Ukraine.

(17) There is a high likelihood that income Viktor Medvedchuk generates from selling Russian oil to the American market through the chain of shell companies nominally owned by his wife in violation of American sanctions is directly contributing to the destructive anti-American and anti-Western activities of NGO “Ukrainski Vybir” and political party “Opposition Platform “Za Zhyttia”.

### **Request**

The companies controlled by Viktor Medvedchuk knowingly bypassed the sanctions imposed by the US Government in March 2014. By doing this they not only gained significant profits, but also undermined the authority of the US sanctions regime showing that the sanctions are not an obstacle for successful running business and conducting successful operation with US entities.

As of September 2020, Viktor Medvedchuk continues to be a threat to the sovereignty of Ukraine. He uses his position as Member of Parliament of Ukraine, his business profits (which are significantly backed by Russian government) and his control over several media outlets in Ukraine as mean to spread anti-US narrative and policies as well as to advance the pro-Russian agenda.

Therefore, we request the following:

1. The US Treasury Department: to investigate and penalize the violation of sanctions regime by the companies controlled by Viktor Medvedchuk.
2. The US Treasury Department: to investigate the alleged violation of sanctions regime by the US company ExxonMobil Sales&Supply LLC, subsidiary of ExxonMobil.
3. The US Treasury Department: to investigate the alleged violation of sanctions regime by the Swiss company Newcoal Trading AG.
4. The US Treasury Department: to designate into the OFAC list Marchenko Oksana Mykhailivna, born on April 28, 1973, the wife of Viktor Medvedchuk.

5. The US Treasury Department to block all the property and interests in property of the legal entities listed in the annex #1 as those controlled by or act directly or indirectly for or on behalf of Viktor Medvedchuk under Executive Order No. 136660 of March 6, 2014, designate those legal entities into the OFAC list.
6. The US Treasury Department: to advise financial institutions and financial markets to stop operations of the legal entities listed in the Annex 1 and block their assets.

Sincerely,



Daria Kaleniuk,  
Executive Director of AntAC  
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## Annex #1

List of legal entities, beneficially owned by Oksana Marchenko has been disclosed by Viktor Medvedchuk himself in his annual asset declaration of 2019. The official public version of the declaration is available at

<https://public.nazk.gov.ua/declaration/294babb4-0db7-4692-bd0f-ad9f2f031ba6>. The

English translation of the declaration is available at

[https://declarations.com.ua/en/declaration/nacp\\_294babb4-0db7-4692-bd0f-ad9f2f031ba6](https://declarations.com.ua/en/declaration/nacp_294babb4-0db7-4692-bd0f-ad9f2f031ba6)

1. Limited Liability Company "Investment Company "Harmony", 36520188, Ukraine
2. BEREYCYNTHIO INVESTMENTS LTD, HE292554, Republic of Cyprus
3. FREGATA MARINE, 47443, Republic of the Marshall Islands
4. NASENTIA INVESTMENTS LTD, 1590876, British Virgin Islands
5. TOMINERSA INVESTMENTS, HE319355, Republic of Cyprus
6. LENDRINO COMMERCIAL LIMITED, HE126071, Republic of Cyprus
7. BENTIANO INVESTMENTS LTD, HE308373, Republic of Cyprus
8. MELBON INVESTMENTS LTD, 1627795, British Virgin Islands
9. KIRENA HOLDINGS LTD, HE2679196 Republic of Cyprus
10. INTORIAN ENTERPRISES LTD, HE194392, Republic of Cyprus
11. ANAPTIKSIS DEVELOPMENT EOOD, 175296870, Bulgaria
12. MILOSER INVESTMENTS LTD, HE196050, Republic of Cyprus
13. ESKAFEAS CONSTRUCTIONS EOOD, 175294289, Bulgaria
14. SALTENIO HOLDINGS LTD, HE196026, Republic of Cyprus
15. POLITIMI GI PROPERTIES, 175292579, Bulgaria
16. LERONZOR TRADING LTD, HE266980, Republic of Cyprus

17. STAPRELA HOLDINGS LTD, HE300980, Republic of Cyprus
18. FOILS OVERSEAS LTD, C24004, Kits and Nevis
19. BREVISA HOLDINGS LTD, HE308384, Republic of Cyprus
20. GERTIZ VENTURES LTD, HE265706, Republic of Cyprus
21. RUBRUM COMMERCIAL, HE293069, Republic of Cyprus
22. PERMERIS INVESTMENTS LIMITED, HE158086, Republic of Cyprus
23. LARIDGE INVESTMENTS LIMITED, 4596644, United Kingdom
24. DYNALOM ENTERPRISES LIMITED, HE158743, Republic of Cyprus
25. INTERMAY MANAGEMENT LTD, 4445610, United Kingdom
26. MIOSARIA COMMERCIAL LTD, HE242638, Republic of Cyprus
27. ZOCATINI ENTERPRISES LTD, HE240876, Republic of Cyprus
28. GENRETO COMMERCIAL LIMITED, HE135370, Republic of Cyprus
29. VICTOREX LIMITED, HE140740, Republic of Cyprus
30. DORMOON TRADING LIMITED, HE135719, Republic of Cyprus
31. KERELIO COMMERCIAL LIMITED, HE138181, Republic of Cyprus
32. VARDCOM TRADING LIMITED, HE136534, Republic of Cyprus
33. MARGAROZA COMMERCIAL LIMITED, HE138799, Republic of Cyprus
34. SUNFOL COMMERCIAL LIMITED, HE135951, Limassol, Republic of Cyprus
35. LEX PERFECTA LIMITED, HE140113, Republic of Cyprus
36. CRASCODA HOLDINGS LIMITED, HE153278, Republic of Cyprus
37. BILLCAST HOLDINGS, 46813, Belize
38. VISTORMIA HOLDINGS LTD, HE334750, Republic of Cyprus
39. GAZARO LTD, HE330133, Republic of Cyprus



40. LEDISALIO HOLDINGS LTD, HE335524, Republic of Cyprus
41. BOUNDRYCO LTD, HE334198, Republic of Cyprus
42. AQUILA AVIATION A.V.V., 41669.0, Aruba
43. TUMILLON INVESTMENTS LTD, HE292471, Republic of Cyprus
44. LAROMA VENTURES LTD, 1563000, British Virgin Islands
45. BOLVIK VENTURES LTD, 1541006, British Virgin Islands
46. CELKORIVIA VENTURES LTD, 1795618, British Virgin Island
47. CRIMARE INVESTMENTS LTD, 570070, British Virgin Islands
48. ORMELON DEVELOPMENT LTD, HE286635, Republic of Cyprus
49. ATTOLAM VENTURES LTD, 642790, British Virgin Islands
50. WALLTRON LIMITED, HE134271, Republic of Cyprus
51. BAIKEENS INVESTMENTS LTD, 642098, British Virgin Island
52. SOLTEX LIMITED, HE134349, Republic of Cyprus
53. SELDON VENTURES LTD, 642083, British Virgin Islands
54. MATRIMAX LIMITED, HE134273, Republic of Cyprus
55. GEIORA MANAGEMENT LTD, 642784, British Virgin Islands
56. TAPESTA LIMITED, HE134282, Republic of Cyprus
57. BROSTA ENTERPRISES LIMITED, HE163694, Republic of Cyprus
58. PERPLEX INVESTMENTS LTD, 60,589, Belize
59. PERFECT LAND PROPERTIES EOOD, 175296920, Bulgaria
60. THESPESIO INVESTMENTS LTD, HE197413, Republic of Cyprus
61. CHR. ATHANASIOU CONSTRUCTIONS & DEVELOPMENTS, 147124881, Bulgaria
62. SOURCAL DEVELOPMENT LTD, HE195970, Republic of Cyprus

63. RENAISSANCE Joint-stock company, 1197746219120, Russian Federation
64. SOUTH ENERGY LIMITED LIABILITY COMPANY, 1066167034955, Russian Federation
65. Novoshakhtink Oil Refinery JOINT STOCK COMPANY, 1046151001071, Russian Federation
66. ROSWOOD SHIPPING LIMITED LIABILITY COMPANY, 1066167034944, Russian Federation
67. NRNP TRADING HOUSE LIMITED LIABILITY COMPANY, 1156196053001 Russian Federation
68. TAVRIYA-NORTH INVESTMENT COMPANY LIMITED LIABILITY COMPANY, 1177746683938, Russian Federation
69. NRNP TRADE LIMITED LIABILITY COMPANY, 1096195005037, Russian Federation
70. INVESTMENT PROPOSALS JOINT STOCK COMPANY, 1197746450648, Russian Federation
71. THE BASICS OF INVESTMENT JOINT STOCK COMPANY, 11977464458966 Russian Federation
72. TREND OPTIMA LIMITED LIABILITY COMPANY, 5167746293248, Russian Federation
73. LIMITED LIABILITY COMPANY TAVRIA-INVEST, 1157746283221, Russian Federation (occupied Republic of Crimea)
74. FIRM UKRSNAB LIMITED LIABILITY COMPANY, 1149102027953, Russian Federation (occupied Republic of Crimea)
75. SUNOR LTD, C 59280, Malta
76. VENTOLOR HOLDING LIMITED, HE327492, Republic of Cyprus
77. Private agricultural enterprise "Oscar", 31774096, Ukraine
78. Private enterprise "Galychyna-Organik", 36649303, Ukraine
79. VENTOLOR INVESTMENTS LIMITED, HE327502, Republic of Cyprus

80. Private Agricultural Enterprise KOLOS, 30155993, Ukraine
81. LLC Landras-Agro, 35172594, Ukraine
82. OKSANA MARCHENKO CHARITABLE FOUNDATION CHARITABLE ORGANIZATION, 42649903, Ukraine
83. Private enterprise "Omega-tv", 31243163, Ukraine
84. Limited Liability Company "Investment company "Sport-Tour", 33447980, Ukraine
85. Limited Liability Company "mbk agrotehnika", 36083830, Ukraine
86. Limited Liability Company "Investment Company "Ukrcapital", 32706734, Ukraine
87. Limited Liability Company "Scientific and Production Firm "Geophysics-21", 38062440, Ukraine
88. Limited Liability Company "Forpostinvest", 35775224, Ukraine
89. LLC Geophysics-777, 38388438, Ukraine
90. Limited Liability Company "Investment company "Terra-Invest", 33102745, Ukraine
91. CHERIVO DEVELOPMENT LTD, HE298246, Republic of Cyprus
92. FOILS OVERSEAS LTD, 11149, United Arab Emirates
93. TRUSTCORE OVERSEAS LTD, C 24002, Kits and Nevis
94. Salaminia Commercial Limited, 468658, British Virgin Islands
95. FELIANES ENTERPRISES LTD, 222407, Republic of Cyprus
96. UKRAINIAN INVESTMENT AND CONSTRUCTION COMPANY UKRSPORTBUDINVEST LIMITED LIABILITY COMPANY, 35981755, Ukraine
97. PROTOGEMS INVESTMENTS LIMITED, HE274646, Republic of Cyprus

## Annex #2

List of banks where Viktor Medvedchuk and Oksansa Marchenko opened accounts disclosed by Viktor Medvedchuk himself in his annual asset declaration of 2019. The official public version of the declaration is available at

<https://public.nazk.gov.ua/declaration/294babb4-0db7-4692-bd0f-ad9f2f031ba6>. The

English translation of the declaration is available at

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1. Ukrbudinvestbank JSC, 26547581, Ukraine
2. Privatbank JSC, 14360570, Ukraine
3. Absolutbank K CJSC, 100331707, Belarus (Victor Medvedchuk holds 850,033 EUR, Oksana Marchenko holds 4,012,487 EUR)
4. Moscow Credit Bank PJSC, 7734202860, Russian Federation
5. MINBank PJSC, 7725039953, Russian Federation