

On March 17, the US, UK, EU, Canada, Australia and Japan formed a Task Force to target prominent Russian individuals in the context of sanctions against Russia for the invasion of Ukraine. The following table includes the top-13 Russian billionaires designated by these countries. The table also includes the date when the relevant regulation was passed. The top-13 Russian billionaires were identified on the basis of the [Forbes Real Time Billionaires list](#). Please note that Forbes's net worth estimates of billionaires' wealth change every day and several times during the day. The ranking below is based on data collected on August 19, 2022.

Andrey Melnichenko (US \$27.2B)	Asset Freeze August 2	Asset Freeze March 9	Asset Freeze March 15			Asset Freeze April 6
Vladimir Potanin (US \$26.3B)			Asset Freeze June 29	Asset Freeze April 5		Asset Freeze April 6
Vladimir Lisin (US \$25.3B)						Asset Freeze March 14
Leonid Mikhelson (US \$24.2B)			Asset Freeze April 6	Asset Freeze April 5		
Vagit Alekperov (US \$20.9B)			Asset Freeze April 13	Asset Freeze May 3		Asset Freeze (2020)
Gennady Timchenko (US \$20.6B)	Asset Freeze (March 24, 2014)	Asset Freeze February 28	Asset Freeze February 22	Asset Freeze (2014)	Asset Freeze March 8	Asset Freeze (2014)
Alexey Mordashov (US \$18.3B)	Asset Freeze June 2	Asset Freeze February 28	Asset Freeze March 15		Asset Freeze March 25	Asset Freeze March 14
Alisher Usmanov (US \$14.7B)	Asset Freeze March 3	Asset Freeze February 28	Asset Freeze March 3	Asset Freeze March 10	Asset Freeze March 8	Asset Freeze March 14
Mikhail Fridman (US \$13.2B)		Asset Freeze February 28	Asset Freeze March 15	Asset Freeze April 14		Asset Freeze March 14
Viatcheslav Kantor (US \$13B)		Asset Freeze April 8	Asset Freeze April 6	Asset Freeze March 10		
Suleiman Kerimov (US \$12.4B**)	Asset Freeze (2018)	Asset Freeze March 15	Asset Freeze March 15	Asset Freeze March 21	Asset Freeze March 18	Asset Freeze April 6
Andrei Guriev (US \$11.5B**)	Asset Freeze August 2		Asset Freeze March 15			
Viktor Rashnikov (US \$10.4B)	Asset Freeze August 2	Asset Freeze March 15	Asset Freeze March 15	Asset Freeze May 3		Asset Freeze April 6

* Gennady Timchenko was initially designated in March 2014 pursuant to Executive Order 13661. He was re-designated under Executive Order 14024 on March 24 for being or having been a leader, official, senior executive officer, or member of the board of directors of OOO Volga Group, itself designated for operating or having operated in the financial services sector of the Russian Federation economy.

** Andrei Guriev and Suleiman Kerimov's wealth is partially held by their respective family members.

- The US and the UK have issued **general licences** for some businesses owned by designated Russian billionaires; on March 3, the US Office of Foreign Assets Control (OFAC) issued **general licence 15** to authorize all transactions with entities owned 50% or more by Alisher Usmanov, unless explicitly blocked. On March 10, the UK Office of Financial Sanctions Implementation (OFSI) issued general licence **INT/2022/1327076**, authorizing certain activities by Chelsea Football Club, owned by Roman Abramovich. Further licences and exceptions may be available for the private sector, please refer to the original regulations for further information. On August 2, OFAC issued general licence 49 authorizing the wind-down of transactions involving a Turkish subsidiary of MMK (MMK had been designated alongside its majority owner Viktor Rashnikov). A day later, OFAC, issued general licences 47A and 48A authorizing, respectively, the wind-down of transactions and the divestment/transfer of debt or equity of, and the wind-down of related derivative contracts involving MMK.
- Switzerland and Monaco** implemented EU sanctions against Russian billionaires respectively on **March 4** and **February 28**, 2022. Switzerland imposed an asset freeze on Gennady Timchenko, Alisher Usmanov, Alexey Mordashov and Mikhail Fridman on March 4, 2022. Kerimov and Melnichenko were added to Switzerland's sanctions list on March 16, 2022 while Kantor and Rashnikov were sanctioned by the Swiss government on April 13, 2022.
- Some countries have imposed sanctions also on **family members** of designated Russian billionaires. The table below illustrates that despite increased coordination among G7 countries and Australia through the establishment of a dedicated Task Force, there are still major discrepancies in the sanctions imposed by different sanctions regimes.

Designated Individual	Family Member	US	EU	UK	Canada	Japan	Australia
Arkady Romanovich Rotenberg (US \$2.3B)	Igor Arkadyevich Rotenberg (son)	Asset Freeze 2018	Asset Freeze April 8	Asset Freeze February 22	Asset Freeze 2019	Asset Freeze March 8	Asset Freeze February 26
	Liliya Arkadiyevna Rotenberg (daughter)	Asset Freeze March 3		Asset Freeze March 15	Asset Freeze February 24	Asset Freeze March 25	Asset Freeze March 14
	Pavel Arkadyevich Rotenberg (son)	Asset Freeze March 3		Asset Freeze March 15	Asset Freeze February 24	Asset Freeze March 25	Asset Freeze March 14
	Boris Romanovich Rotenberg (brother)	Asset Freeze 2014	Asset Freeze April 8	Asset Freeze February 22	Asset Freeze 2014	Asset Freeze 8 March	Asset Freeze 2020
	Karina Yurevna Rotenberg (sister-in-law)	Asset Freeze March 3		Asset Freeze March 15	Asset Freeze February 24	Asset Freeze March 25	Asset Freeze March 14
	Boris Borisovich Rotenberg (nephew)	Asset Freeze March 3		Asset Freeze April 6	Asset Freeze February 24	Asset Freeze March 25	
	Roman Borisovich Rotenberg (nephew)	Asset Freeze 2015		Asset Freeze March 15	Asset Freeze February 24	Asset Freeze March 8	Asset Freeze March 14
Andrei Grigoryevich Guriev	Andrey Andreevich Guryev (son)	Asset Freeze August 2	Asset Freeze March 9	Asset Freeze March 15	Asset Freeze May 3		Asset Freeze April 6
Gennady Timchenko	Elena Petrovna Timchenko (wife)	Asset Freeze March 24	Asset Freeze April 8	Asset Freeze April 13	Asset Freeze May 16	Asset Freeze May 10	
	Natalia Timchenko Browning (daughter)	Asset Freeze March 24		Asset Freeze May 4	Asset Freeze May 16	Asset Freeze May 10	
	Ksenia Timchenko Frank (daughter)	Asset Freeze March 24			Asset Freeze May 16	Asset Freeze May 10	
Mikhail Fridman	Olga Ayziman (ex-wife)		Asset Freeze April 8		Asset Freeze May 30		
	Larissa Fridman (daughter)				Asset Freeze May 30		
	Ekaterina Fridman (daughter)				Asset Freeze May 30		
Suleiman Kerimov	Said Kerimov (son)		Asset Freeze April 8	Asset Freeze April 13			
Alisher Usmanov	Saodat Narzieva (sister)		Asset Freeze April 8	Asset Freeze April 13			
	Gulbakhor Ismailova (sister)		Asset Freeze April 8	Asset Freeze April 13			
Andrey Melnichenko	Aleksandra Melnichenko (wife)		Asset Freeze June 3				
Alexey Mordashov	Marina Mordashova (wife)	Asset Freeze June 2	Asset Freeze June 3			Asset Freeze July 5	
	Kirilla Mordashov (son)	Asset Freeze June 2				Asset Freeze July 5	
	Nikita Mordashov (son)	Asset Freeze June 2				Asset Freeze July 5	

For further information visit our Ukraine Crisis rapid response hub
www.acams.org/en/ukraine-crisis-rapid-response-resources

This information has been reviewed, but it must be stressed that the situation is evolving quickly, and new sanctions are likely to be implemented in the near future. The content contained herein is for general information purposes only, and it is neither legal nor business advice. You should consult your own legal and business advisors for advice that applies to your particular situation.