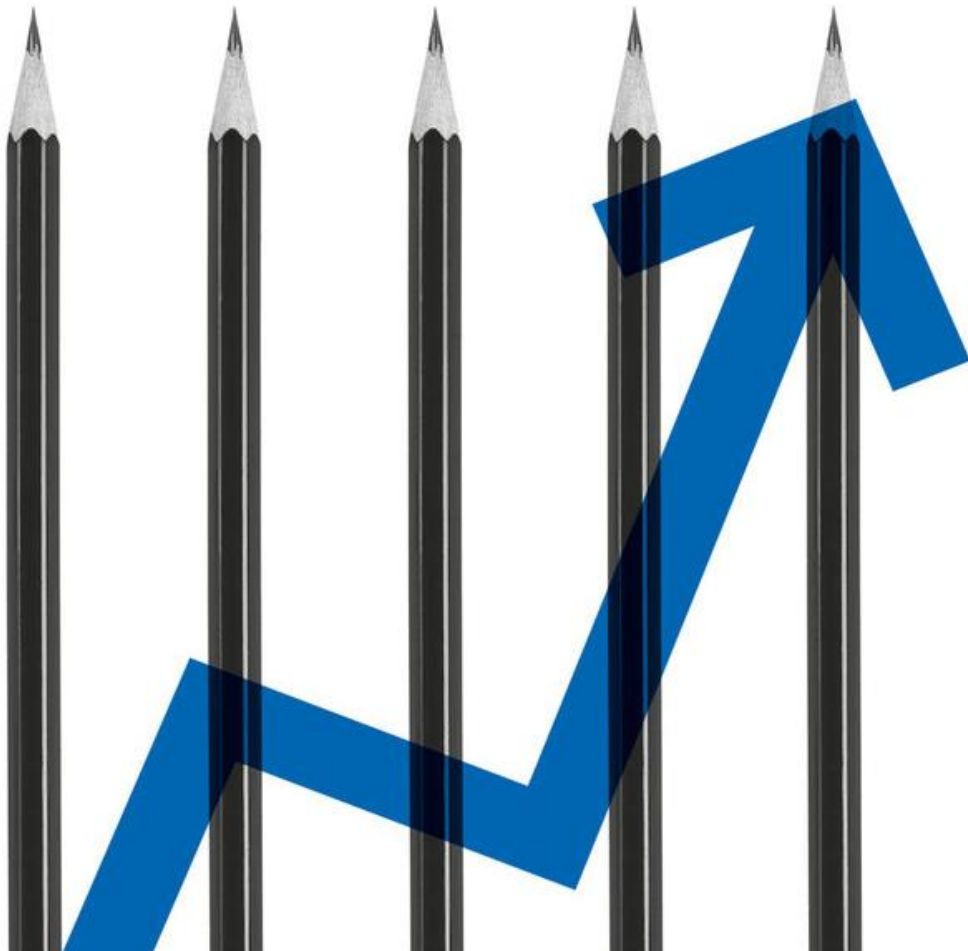


**Keeping you up to speed**  
Russia and Belarus sanctions update

25 July 2022



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# Introduction

Following the invasion of Ukraine by Russia, the UK, EU and US have all responded by announcing significant sanctions in respect of Russia and Belarus.

This briefing summarises the key developments since 1 July 2022 and supplements our previous briefings on:

- [23 February 2022](#)
- [25 February 2022](#)
- [28 February 2022](#)
- [3 March 2022](#)
- [9 March 2022](#)
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- [25 April 2022](#)
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- [8 June 2022](#)
- [1 July 2022](#)



## United Kingdom

The update below sets out recent updates with respect to Russia and Belarus. In addition to the below, we note that the NCA (in conjunction with OFSI and JMLIT) issued a Red Alert on financial sanctions evasion typologies by Russian elites and enablers. Our briefing on this can be found [here](#).

### **Russia regime updates**

#### Asset freezes

On 4 and 5 July 2022, the UK Government imposed asset freezes with respect to:

- 8 individuals, who are all reportedly involved in the spread of disinformation with respect to Ukraine and Russia's invasion; and
- 1 entity (namely United World International) which is an online news site which promotes pro-Russian disinformation.

#### General Licences

On 7 July 2022, OFSI issued General Licence [INT/2022/1947936](#) under Regulation 64 of the Russia (Sanctions) (EU Exit) Regulations 2019.

The general licence authorises the United Nations, its agencies, funds, programmes and appeal partners as well as other named humanitarian, aid and relief agencies, as well as their employees, partners, contractors etc to undertake humanitarian activity in relation to the conflict in Ukraine. It also authorises regulated entities to carry out activity necessary to give effect to permissions authorised by the licence.

There are conditions which apply, including the fact that no funds owned, held or controlled by a Designated Person can be used for the purposes of the activity authorised under the licence (although note that funds controlled by a Designated Financial Institution (i.e. which are held in a bank account with a designated bank) are not caught by this restriction).

On 19 July 2022, OFSI also issued General Licence [INT/2022/2002560](#). This general licence allows for a 7-day wind down period in respect of the outward investment ban outlined in the Amendment 12 Regulations referred to below and expires on 26 July 2022.



Furthermore, OFSI issued [General Licence INT/2022/2009156](#) on 22 July 2022. This general licence applies to multiple sanctions regimes as listed under Annex I of the general licence.

The general licence allows individuals or entities designated under the UK sanctions regimes specified to make payments to UK insurers for insurance premiums and broker commissions relating to the provision of building and engineering insurance cover provided to UK properties.

The general licence also permits UK insurers to make payments to UK designated persons due as a result of a successful claim made against an insurance policy provided by the UK insurer or refunds due as a result of any over payments made pursuant to this licence.

#### Legislative updates

There have been a series of updates in UK legislation, particularly within the last 7-10 days. We summarise the key points below.

The **Russia (Sanctions) (EU Exit) (Amendment) (No. 11) Regulations 2022** were introduced on 15 July 2022 and, while not making substantive or far reaching changes to the regulatory framework, do make minor amendments in respect of the trade restrictions introduced in the Russia (Sanctions) (EU Exit) (Amendment) (No. 10) Regulations 2022 (for which see our briefing dated 1 July 2022).

On 18 July 2022, the UK Regulations were further amended by way of the **Russia (Sanctions) (EU Exit) (Amendment) (No. 13) Regulations 2022**. By way of summary this makes the following changes:

- Amends the designation criteria (regulation 6) which is used for the purposes of imposing asset freezes, namely by:
  - making miscellaneous amendments to the definition of being “involved in obtaining a benefit from or supporting the Government of Russia”;
  - expands the definition of a person being involved in “destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine” and adds a definition of a person “obtaining a benefit from or supporting the Government of Russia” if they work for the Government of Russia in certain roles as defined in the regulation;
  - expanding the definition of a person “associated with” an involved person. As such a person who is an “immediate family member” of a person who meets the designation





criteria can now be made subject to an asset freeze purely on the basis that they are associated with a person who meets the designation criteria

An immediate family member is defined as:

- spouse or civil partner;
  - (step) parent;
  - (step) child;
  - (step) sibling;
  - niece and nephew;
  - aunt or uncle;
  - grandparent; and
  - grandchild.
- Introduces a new exception to trade restrictions imposed on the non-government controlled areas of the Donetsk and Luhansk oblasts, whereby a person will not be deemed to have contravened prohibitions against:
- trade in relation to non-government controlled Ukrainian territory;
  - infrastructure-related services relating to non-government controlled Ukrainian territory; or
  - certain brokering services relating to infrastructure-related goods and goods from non-government controlled Ukrainian territory;

provided that such person is carrying out activities which are “necessary to ensure the timely delivery of humanitarian assistance activity in non-government controlled areas of the Donetsk and Luhansk oblasts”. This exception applies only if such person believes that carrying out the relevant activity is necessary, and there is no reasonable cause for them to suspect otherwise; and



- introduces minor miscellaneous amendments relating to (i) the ownership of ships and aircraft; and (ii) the records required to be kept in relation to general trade licences.

On 19 July 2022, the UK Regulations were further amended by way of the **Russia (Sanctions) (EU Exit) (Amendment) (No. 12) Regulations 2022**. By way of summary this makes the following changes:

- **adds a new prohibition at regulation 18B** relating to investments in Russia. This new restriction prohibits the following activity, if a person knows or suspects that they are carrying on such activity:
  1. directly acquiring any ownership interest in land located in Russia;
  2. directly acquiring any ownership interest in or control over a person other than an individual connected with Russia;
  3. indirectly acquiring an interest described at 1 and 2 above, for the purpose of making funds or economic resources available (directly or indirectly) to, or for the benefit of, a person connected with Russia
  4. directly or indirectly acquiring any ownership interest or control over an entity which has a place of business located in Russia but which is not a person connected with Russia for the purpose of making funds or economic resources available (directly or indirectly) to, or for the benefit of, a person connected with Russia;
  5. directly or indirectly establishing any joint venture with a person connected with Russia;
  6. opening a representative office or establishing a branch or subsidiary located in Russia; and
  7. providing investment services directly related to any of 1-6 above.

References to “acquiring any ownership interest” is defined as acquiring any share, voting rights, the right to appoint or remove the majority of the board of directors or acquiring the means of ensuring that the affairs of the person are conducted in accordance with the acquiring person’s wishes.

By way of reminder a person is regarded as “connected with Russia” if the person is:



- a person, other than an individual, which is incorporated or constituted under the law of Russia;
  - a person, other than an individual which is domiciled in Russia;
  - an individual who is, or an association or combination of individuals who are, ordinarily resident in Russia; or
  - an individual who is, or an association or combination of individuals who are, located in Russia.
- **Adds new exceptions** relating to the new regulation 18B restriction as detailed above. Specifically, the exemptions at regulation 60ZZA provide for:
    - a prior obligations exemption where a contract was concluded prior to 19 July 2022 as long as notification is made no later than 5 working days before the date on which the act is carried out;
    - exemptions relating to certain types of securities which were issued to trading on a regulated market or multilateral trading facility prior to 19 July 2022 (albeit restrictions within regulation 16 regarding transferrable securities and money market instruments need to continue to be considered); and
    - exemptions relating to certain types of securities (including shares (and their equivalent), bonds and other forms of securitised debt) issued by an entity which has a place of business located in Russia but which is not a person connected with Russia.
  - **Adds grounds for licensing** relating to the new regulation 18B restriction.

On 21 July 2022, the UK Regulations were further amended by way of the **Russia (Sanctions) (EU Exit) (Amendment) (No. 14) Regulations 2022**. By way of summary this makes the following changes:

- **adds a new prohibition at regulation 54B and 54C** relating to the provision of accounting, business and management consulting, and PR services to persons connected with Russia (see definition above). The services are defined as follows:





- accounting services means accounting review services, compilation of financial statements services from information provided by a client, other accounting services (such as attestations, valuations, preparation services of pro-forma statements), and bookkeeping services (excluding those related to tax returns);
- business and management consulting services means advisory, guidance and operational assistance services provided for business policy and strategy and the overall planning, structuring and control of an organisation, which includes (but is not limited to):
  - management auditing
  - market management
  - human resources
  - production management
  - project management consulting
- PR services means services provided to improve the image of a client and their relationship with the public and other institutions, but excludes planning and creating services for advertising or public opinion polling services.

It is a defence if a person can show they did not know or have reasonable cause to suspect that the person to whom services were being provided was connected with Russia.

The following exceptions are set out in regulation 60DA:

- obligations to provide such services to a person connected with Russia where those services are in relation to the discharge or compliance with UK statutory or regulatory obligations (not arising under contract).
- services can be provided if the contract to provide them was concluded prior to 20 July 2022, provided that the services are carried out before the end of the period of 1 month beginning on 21 July 2022 and notification is provided to the Secretary of State no later than 10 working days before the date on which the service is provided.



- exemptions relating to diplomatic missions or consular posts in Russia or of an international organisation enjoying immunities under international law

– **new restrictions on trade**, including:

- amendments to Regulations 40-46, expanding the prohibitions on the export, making available, and supply or delivery of energy-related goods as well as prohibitions on the provision of related technical assistance, financial services, funds, and brokering services (certain exceptions apply);
- introduction of Chapter 4H, prohibiting the export and making available of items listed on the G7 Dependency and Further Goods List to, or for use in, Russia, in addition to prohibitions on the supply or delivery of such items from a third country to a place in Russia as well as prohibitions on the provision of related technical assistance, financial services, funds, and brokering services (certain exceptions apply, and the items are listed by reference to commodity codes);
- introduction of Chapter 4I, creating a future prohibition (with effect from 31 December 2022) on the import, acquisition and supply or delivery of oil and oil products originating in or consigned from Russia, as well as prohibitions on the provision of related technical assistance, financial services, funds, and brokering services in relation to such products (certain exceptions apply, and the items are listed by reference to commodity codes);
- introduction of Chapter 4J, prohibiting the import, acquisition and supply or delivery of gold originating in Russia as well as prohibitions on the provision of related technical assistance, financial services, funds, and brokering services (certain exceptions apply, and the items are listed by reference to commodity codes);
- introduction of Chapter 4K, creating a future prohibition (with effect from 10 August 2022) on the import, acquisition and supply or delivery of coal and coal products originating in or consigned from Russia, as well as prohibitions on the provision of related technical assistance, financial services, funds, and brokering services in relation to such products (certain exceptions apply, and the items are listed by reference to commodity codes).



## OFSI Guidance

OFSI updated its [Russia Guidance](#) on 19 July 2022 which in particular has a new section on investments in Russia and updated FAQs.

### Financial sanctions reporting obligations

As of 30 August 2022, the definition of 'relevant firms' that have financial sanctions reporting obligations will be extended to include crypto-asset exchange providers and custodian wallet providers.

This is a change that will affect all UK sanctions regimes as a result of amendments made by The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 and The Sanctions (EU Exit) (Miscellaneous Amendments) (No.2) Regulations 2022. However, this is of particular note with regards to the Russia sanctions regime given the focus on crypto-currency with regards to Russia since their invasion of Ukraine.

## **Belarus regime updates**

### Legislative changes

On 5 July 2022, the Republic of Belarus (Sanctions) (EU Exit) (Amendment) Regulations 2022 came into effect and:

- implement a new urgent procedure for applying designations. This mirrors the urgent procedure legislated for previously for the Russia regime;
- expands the definition of an "involved person" to whom asset freezes can be imposed by including the following additional categories:
  - a person who is or has been involved in "*conduct destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine*", in particular by providing logistical support to the Russian army and by spreading disinformation about the Russian invasion;
  - a person who is or has been involved in "*other actions undermining or threatening peace, security or stability in Europe*"; and





- a person who is or has obtained a benefit from or who has supported the Government of Belarus by carrying on certain business activities on behalf of the Government of Belarus.
- widens capital market restrictions by including a new restriction on dealing with transferable securities and money market instruments issued after 5 July 2022 if issued by Belarus, a Belarusian Authority, any entity wholly owned by Belarus or a Belarusian authority, any credit or financial institution majority owned by Belarus or a Belarusian authority. Equally the restriction applies if the transferable security/money market instrument is issued by a person connected with Belarus.
- revises and expands the restriction on providing certain loans and credit arrangements as well as amends the exceptions application to these restrictions;
- prohibits UK persons from providing financial services in relation to foreign exchange reserve and asset management to the National Bank of Belarus, the Ministry of Finance of Belarus and any person owned or controlled by the same (directly or indirectly) or any person acting on their behalf;
- prohibits the export of certain goods and technology relating to critical industry, luxury goods, oil refining and advanced technology such as quantum computing, and expands existing restrictions on dual-use goods and technology;
- prohibits the of certain Belarusian products including iron and steel;
- introduces new prohibitions in relation to enabling or facilitating military activities, including prohibitions against the direct or indirect provision of (i) technical assistance; (ii) armed personnel; (iii) financial services or funds; and/or (iv) brokering services in relation to (i)-(iii) above; and
- expands existing prohibitions on the provision of technical assistance to designated persons by introducing a prohibition against the provision of technical assistance in relation to ships.

### General Licences

On 5 July 2022, OFSI issued two new General Licences to coincide with the legislative changes detailed above.

[General Licence INT/2022/1976232](#) allows for a person to provide financial services for the purpose of winding down any derivatives, repurchase, and reverse repurchase transactions entered into prior to 5





July 2022 involving certain named entities, including (but not limited to) the National Bank of Belarus and the Ministry of Finance of Belarus.

This wind down period ends on 4 August 2022.

[General Licence INT/2022/1976332](#) allowed for a 7-day wind down period in respect of certain loans, transferable securities and money market instruments. This general licence expired on 12 July 2022.



## European Union

On 21 July 2022, the EU [announced](#) a series of further sanctions described as a “maintenance and alignment” package.

### **Asset freezes**

On 21 July 2022, Council Regulations (EU) 2022/1274 and 2022/1270, amending Council Regulation 269/2014, imposed an asset freeze on various entities and individuals including (but not limited to):

- Sberbank;
- Al-Sayyad Company for Guarding and Protection Services Ltd (aka “ISIS Hunters”) – a private security company active in the recruitment of mercenaries in Syria to both Libya and Ukraine;
- 6 individuals also involved in mercenary activity relating to Ukraine;
- Members of the National Guard of the Russian Federation and members of the armed forces;
- Individuals believed to have co-operated with Russian forces in the capture of key Ukrainian cities and individuals involved with the provisional administrations for certain areas in Ukraine;
- family members and close associates of various oligarchs previously designated;
- members of the nationalist motorcycle club, Nightwolves MC as well as the club itself;
- Andrey Removich Belousov – first deputy prime minister of the Russian Federation;
- Andrey Anatolyevich Kozitsyn – co-founder and CEO of Ural Mining Metallurgical Company;
- members of various legislative assemblies of Russian regions;
- Russian actors involved in the spread of Russian propaganda and who support Russia’s war in Ukraine;
- AVLITA Stevedoring Company – provides services relating to the loading of grain onto ships in Crimea;





- The Alexander Gorchakov Public Diplomacy Fund – which grants funding to think tanks;
- Russkiy Mir Foundation – financed by the Government of Russia and used by the Kremlin to promote a Russia centric agenda in post-USSR states;
- FORSS Group of Companies – provides engineering services to the ship building industry; and
- the All-Russia “Young Army” Military Patriotic Social Movement – a Russian paramilitary organisation.

### **Legislative changes**

On 21 July 2022, Council Regulation (EU) 2022/1273, amending Council Regulation 269/2014, made the following amendments:

- provides power to competent authorities to authorise the (1) release of certain frozen funds or economic resources belonging to **Sberbank** or (2) the making available of funds or economic resources to **Sberbank**, where it is determined that:
  - o it is necessary for the termination by 22 August 2023 of operations, contracts, or other agreements (including correspondent banking arrangements) concluded with that entity prior to 21 July 2022; or
  - o it is necessary for the completion, by 31 October 2022, of an ongoing sale and transfer of proprietary rights directly or indirectly owned by that entity in any legal person/entity within the EU.
- provides power to competent authorities to authorise the (1) release of certain frozen funds or economic resources or (2) the making available of funds or economic resources to any designated person pursuant to Regulation 269/2014 (as amended) where those funds or economic resources are necessary for the sale and transfer by 31 December 2022, or within 6 months of the listing of the Designated Person, (whichever is latest) of proprietary rights in a legal person/entity established in the EU where those proprietary rights are directly or indirectly owned by a Designated Person. Note the proceeds of such sale and transfer must remain frozen.
- provides for competent authorities to be able to authorise the release of certain frozen economic resources where it determines that it is necessary for the “urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment and the proceeds resulting from the release are frozen.





- enables competent authorities to authorise the release of certain frozen funds or economic resources belonging to certain Designated Persons (or the making available of funds or economic resources to such persons) having determined that it is necessary for the purchase, import or transport of agricultural and food products, including wheat and fertilisers. The Designated Persons this applies to are:
  - o Bank Rossiya;
  - o Promsvyazbank;
  - o Vnesheconombank (“VEB” or “VEB.RF”);
  - o Otkritie FC Bank;
  - o Novikombank;
  - o Sovcombank;
  - o VTB Bank; and
  - o Sberbank.
- expands reporting obligations to require persons to supply information to competent authorities about frozen funds/economic resources but also to supply information about any funds or economic resources within the EU which are held, owned or controlled by designated persons which have not been frozen but which should be.
- creates an obligation on Designated Persons to report to competent authorities before 1 September 2022, or within 6 weeks of their listing, (whichever is latest) any funds or economic resources owned, held or controlled by them within the jurisdiction of the member state. Failure to do so will constitute circumvention, although it is not entirely apparent how this will be enforced within member states should designated persons fail to do so. Member States are required to notify the Commission of reports received from Designated Persons.

The European Commission has also released guidance in which it confirms that the transit of sanctioned goods by road with Russian operators is prohibited under the EU measures. The guidance notes that no such similar prohibition exists for rail transport, however it confirms that the transit of sanctioned military and dual use goods and technology is fully prohibited regardless of the mode of transport.





Also on 21 July 2022, Council Regulation (EU) 2022/1269, amending Council Regulation 833/2014, made the following amendments (please note this is not an exhaustive list):

- a **new prohibition** on the purchase, importation or transfer, directly or indirectly, of gold (including jewellery) which originates in Russia or which has been exported from Russia;
- **extending the list of controlled goods/technology** which may contribute to Russia’s military and technological enhancement as well as adding additional derogations relating to cyber-security for natural and legal persons in Russia (except for those controlled by the Government);
- amendments to port restrictions;
- **miscellaneous amendments** particularly to the scope of potential derogations for various restrictions;
- **amends exemptions with respect to article 5aa** (which was previously enacted to prohibit any transactions with entities listed in Annex XIX) and in particular adds new exemptions relating to transactions necessary for the purchase etc of pharmaceutical, medical, agricultural and food products, including wheat and fertilisers;
- an **extension of the EUR 100,000 deposit restriction** (at article 5b) to companies established in third countries which are majority owned (more than 50%) by Russian nationals or natural persons residing in Russia;
- an **amendment to article 5j** which now prohibits the provision of credit rating services to or on any Russian national, person resident in Russia or any entity established in Russia; and
- **expansion of exemptions** to cover individuals who have temporary or permanent residence permits in an EEA country or Switzerland, for article 5m (prohibition on trust services) and article 5n (prohibition on accounting, auditing and business and management consulting services).





## United States

On July 7, 2022, the US Department of the Treasury Office of Foreign Assets Control ("OFAC") [revised](#) the Specially Designated Nationals and Blocked Persons ("SDN") List entry for **Belarusian Oil Trade House** by adding more aliases.

On July 14, 2022, OFAC:

- issued Russia-related:
  - o General License ("GL") [6B](#), replacing and expanding GL6 to authorize ongoing clinical trials and other medical research activities;
  - o [GL 25C](#), amending and replacing GL 25B by adding New Eastern Outlook and Oriental Review to the list of entities to which GL 25C does not apply;
  - o [GL 30A](#), amending and replacing GL 30 by changing "Gazprom Germania GmbH" to "SEFE Securing Energy for Europe GmbH (formally known as Gazprom Germania GmbH)" and extending the authorization until December 16, 2022; and
  - o [GL 44](#), authorizing all transactions ordinarily incident and necessary to the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a US person, of tax preparation or filing services to any individual who is a US person located in the Russian Federation that are prohibited by EO 14071.
  
- published three [amended FAQs](#) reflecting amended GLs 6B and 25C; and
  
- removed **Subsidiary Bank Alfa-Bank JSC** from the SDN List.

On July 14, OFAC also [issued](#) a "Food Security Fact Sheet: Russia Sanctions and Agricultural Trade" to further clarify that the United States has not imposed sanctions on the production, manufacturing, sale, or transport of agricultural commodities (including fertilizer), agricultural equipment, or medicine relating to Russia.





On July 22, OFAC:

- [revised](#) the SDN List entry for **Joint Stock Company North Western Regional Center of Almaz Antey Concern Obukhovskiy Plant** by adding aliases;
- issued [GL 45](#), authorizing through 12:01 am EDT October 20, 2022, all transactions prohibited by section 1(a)(i) of EO 14071 that are ordinarily incident and necessary to the wind down of financial contracts or other agreements that were entered into on or before June 6, 2022 and involve, or are linked to, debt or equity issued by an entity in Russia;
- issued [GL 46](#), authorizing all transactions related to the establishment, administration, participation in, and execution of an auction process as announced by the EMEA Credit Derivatives Determination Committee to settle credit derivative transactions with a reference entity of "the Russian Federation" and prohibited by section 1(a)(i) of EO 14071; and
- published [two new FAQs](#) and [two amended FAQs](#) relating to new GL 45 and GL46

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