

Sankciju apiešanas riski un to pārvaldība

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Naudas atmazgāšanas novēršanas pārvaldes
vadītājs

02.03.2023.

Sankciju apiešanas riski



Citu jurisdikciju izmantošana (NVS, Turcija, Serbija u.c.)



Patiesā labuma guvēja slēpšana un mainīšana



Citu maksājumu sistēmu izmantošana (kripto valūta, Ķīnas maksājumu sistēmas)

Paaugstināta riska valstu noteikšana

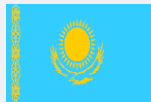


Faktori, kas paaugstina valsts riska līmeni	Informācijas avoti
reduced tax treatment in the country, low accounting and auditing standards	likumi.lv, worldbank.org
inefficiency of supervisory authorities, lack of co-operation with international regulatory organizations, country being listed on the international "black" or "gray" list	fatf-gafi.org, europa.eu, fincen.gov, worldbank.org, baselgovernance.org, oecd.org, knowyourcountry.com, financialsecrecyindex.com
increased level of corruption and political risk, inefficiency of law enforcement institutions	transparency.org, worldbank.org, credendo.com, worldjusticeproject.org
government cooperation with terrorist organizations, terrorist acts in the territory of the country	state.gov, europa.eu
production of drugs in the country, their transit through the territory of the country	whitehouse.gov
international sanctions have been imposed on the country, presence of a peacekeeping contingent in the country	sanctionsmap.eu, bscn.nl, un.org

Paaugstināta sankciju apiešanas riska valstis



NVS valstis



Kazakhstan



Kyrgyzstan



Armenia



Azerbejdzan



Trešās valstis



Turkey



China



United Arab Emirates



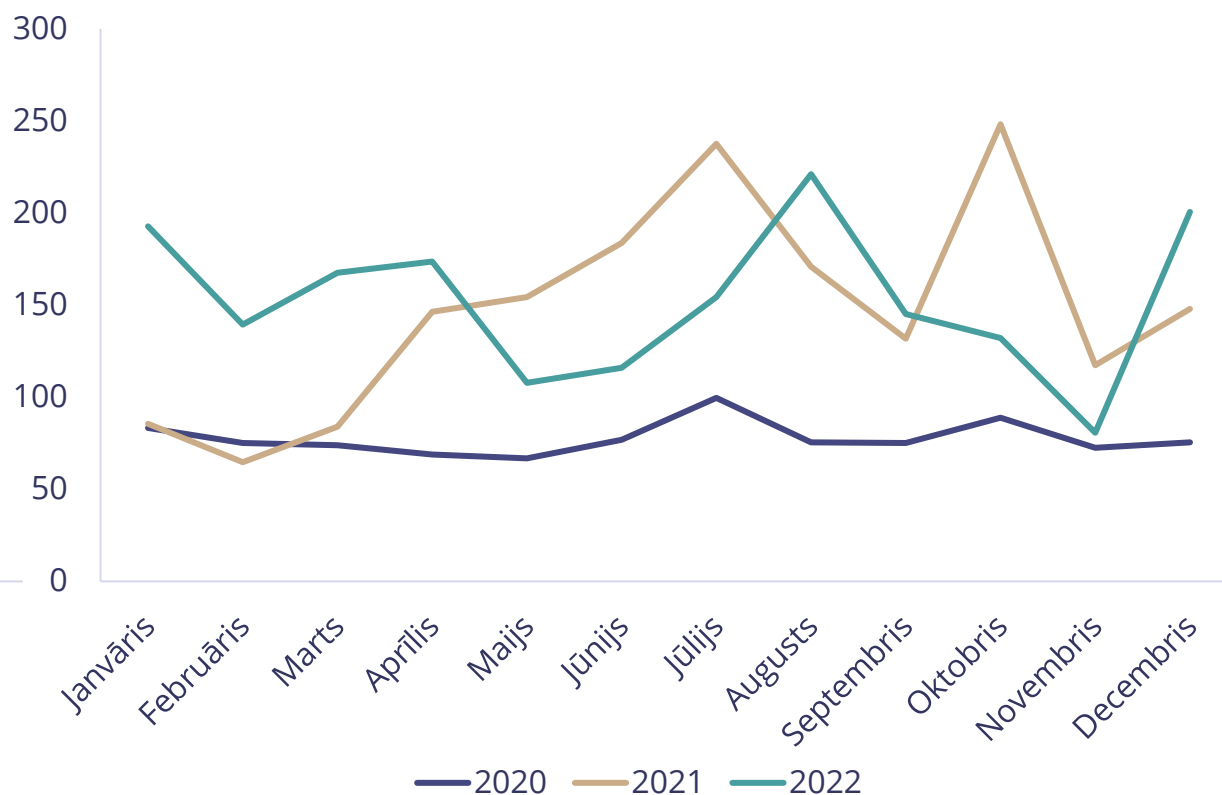
Serbia

Eksporta un importa vērtība saglabājusies iepriekšējo gadu līmenī

Preču eksports uz Krieviju (milj. eiro)



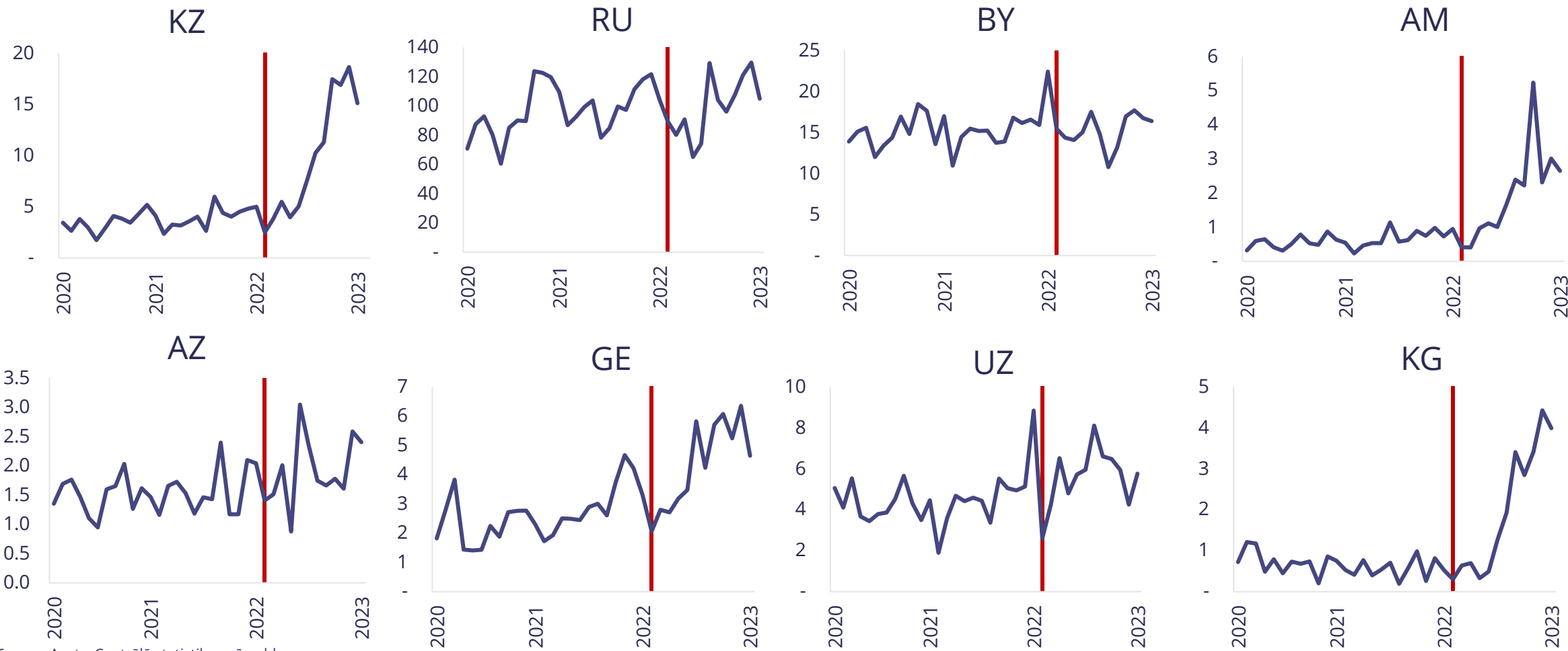
Preču imports no Krievijas (milj. eiro)



Eksports uz Krieviju saglabāties iepriekšējā gada līmenī, vienlaikus krietni pieaudzis eksports uz vairākām NVS valstīm

Preču eksports uz NVS valstīm (milj. eiro)

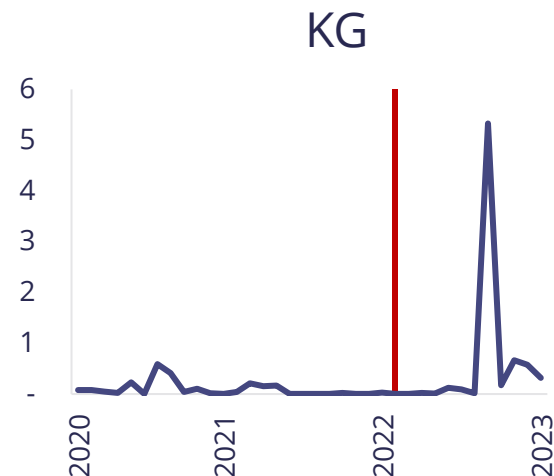
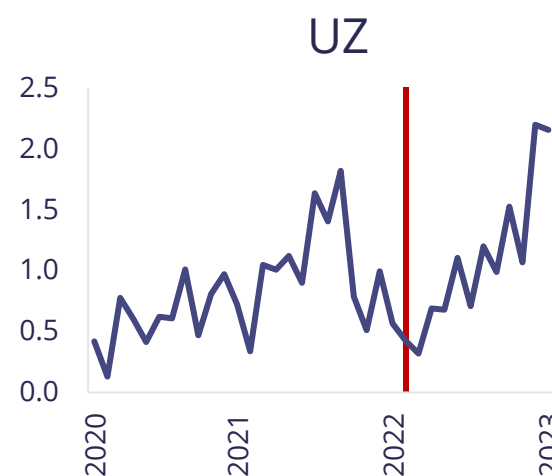
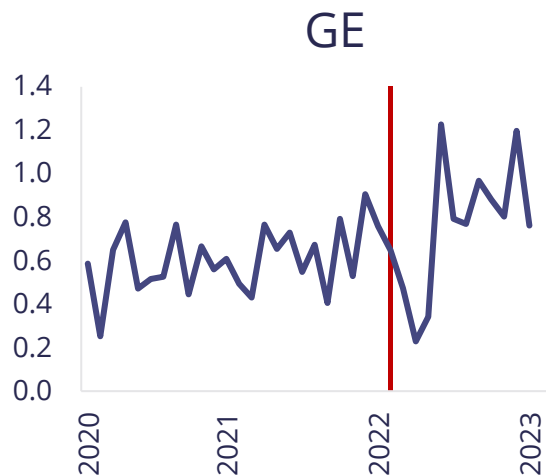
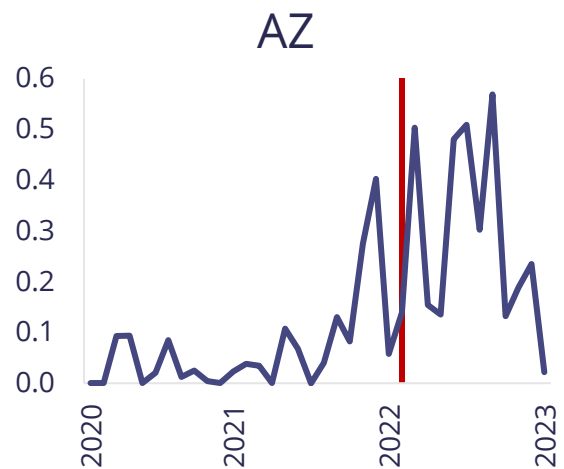
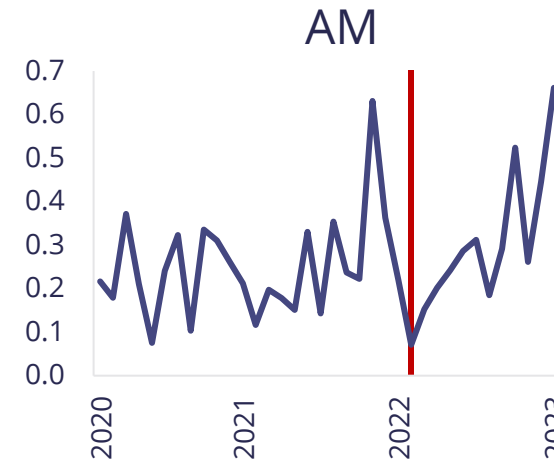
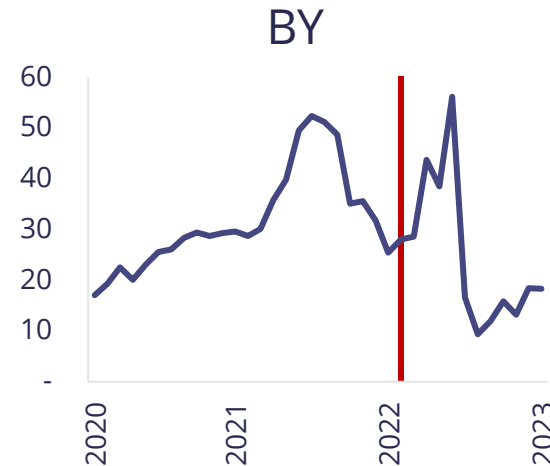
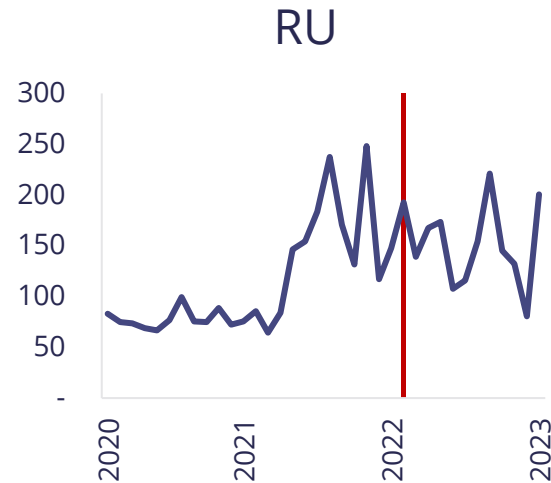
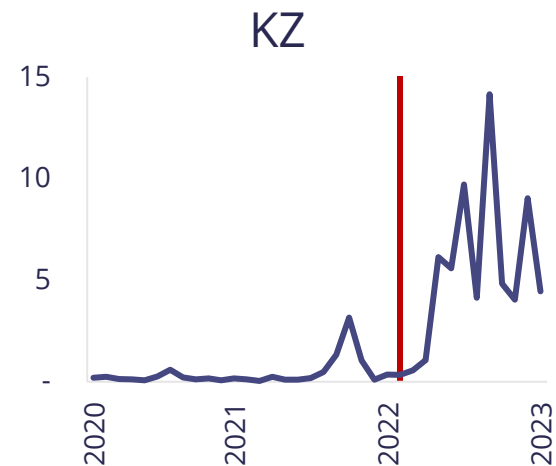
*Sarkanā līnija apzīmē 2022. gada martu – kara sākumu



Arī importā vērojams pieaugums no NVS valstīm pēc kara sākuma

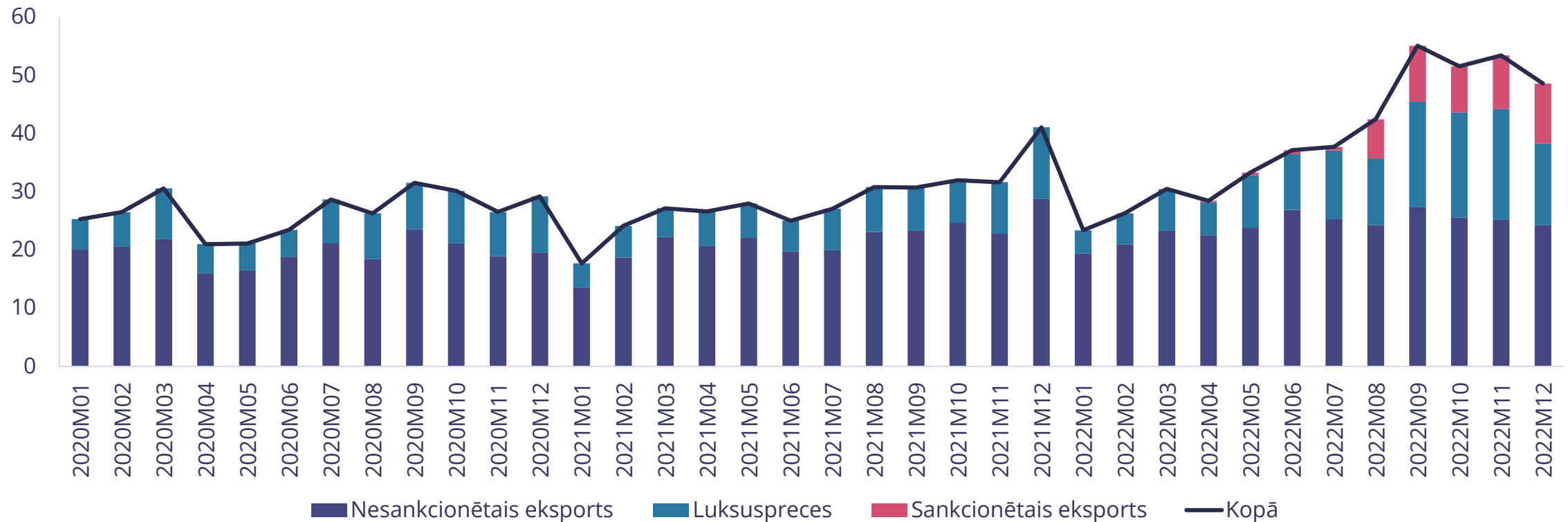
Preču imports no NVS valstīm (milj. eiro)

*Sarkanā līnija apzīmē 2022. gada martu – kara sākumu

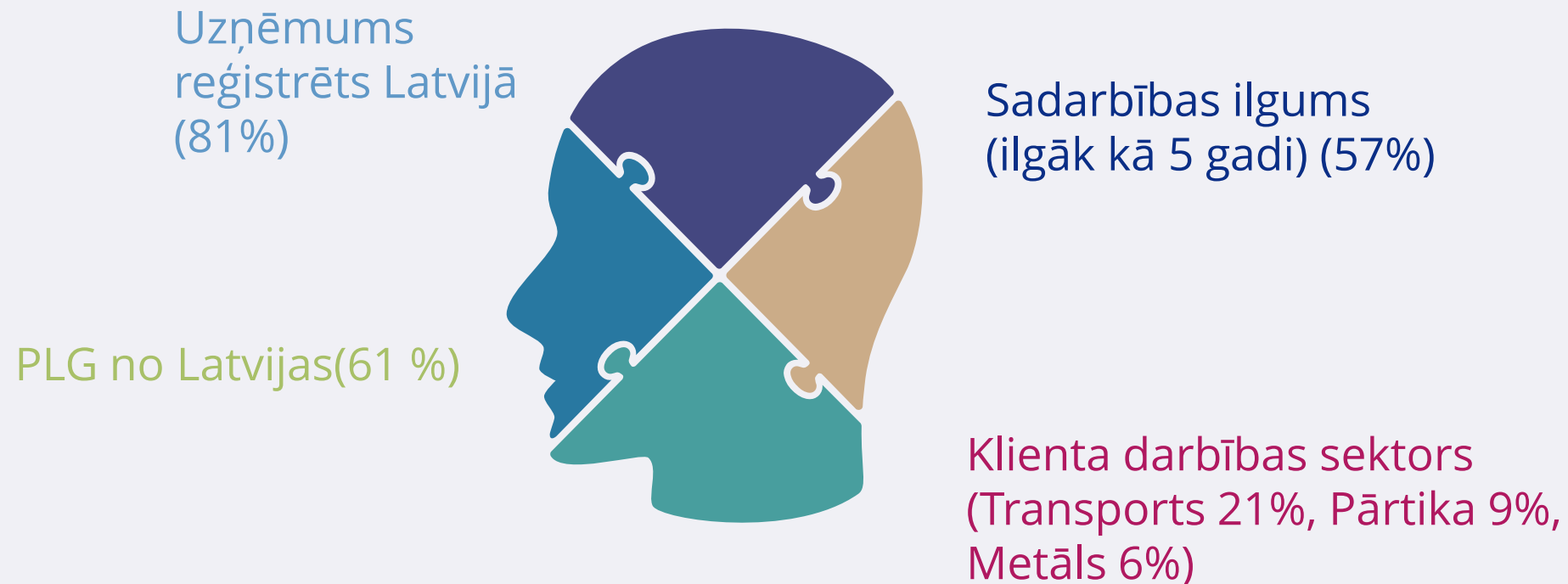


Ekспортā uz Krievijas kaimiņvalstīm pieaugušas sankcionētās un luksus preces; nesankcionēto preču eksportā nav būtiskas izmaiņas

Preču eksports uz Krievijas kaimiņvalstīm (milj. eiro)

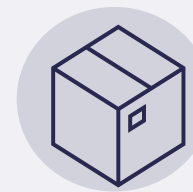


Klienta, kas veic maksājumus ar NVS valstīm, profils

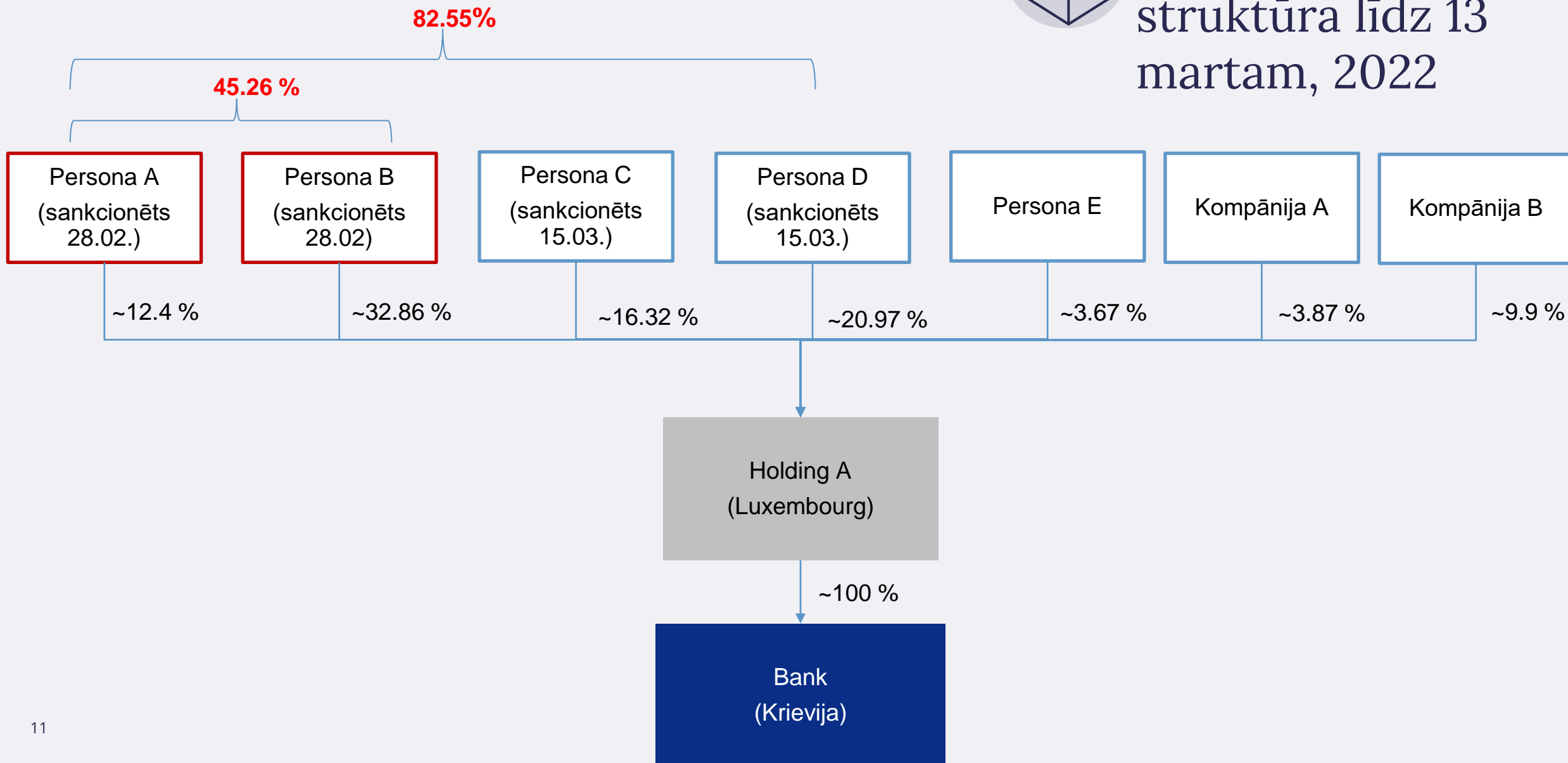


*Populācija 170 klienti

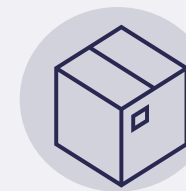
PLG slēpšana un maiņa



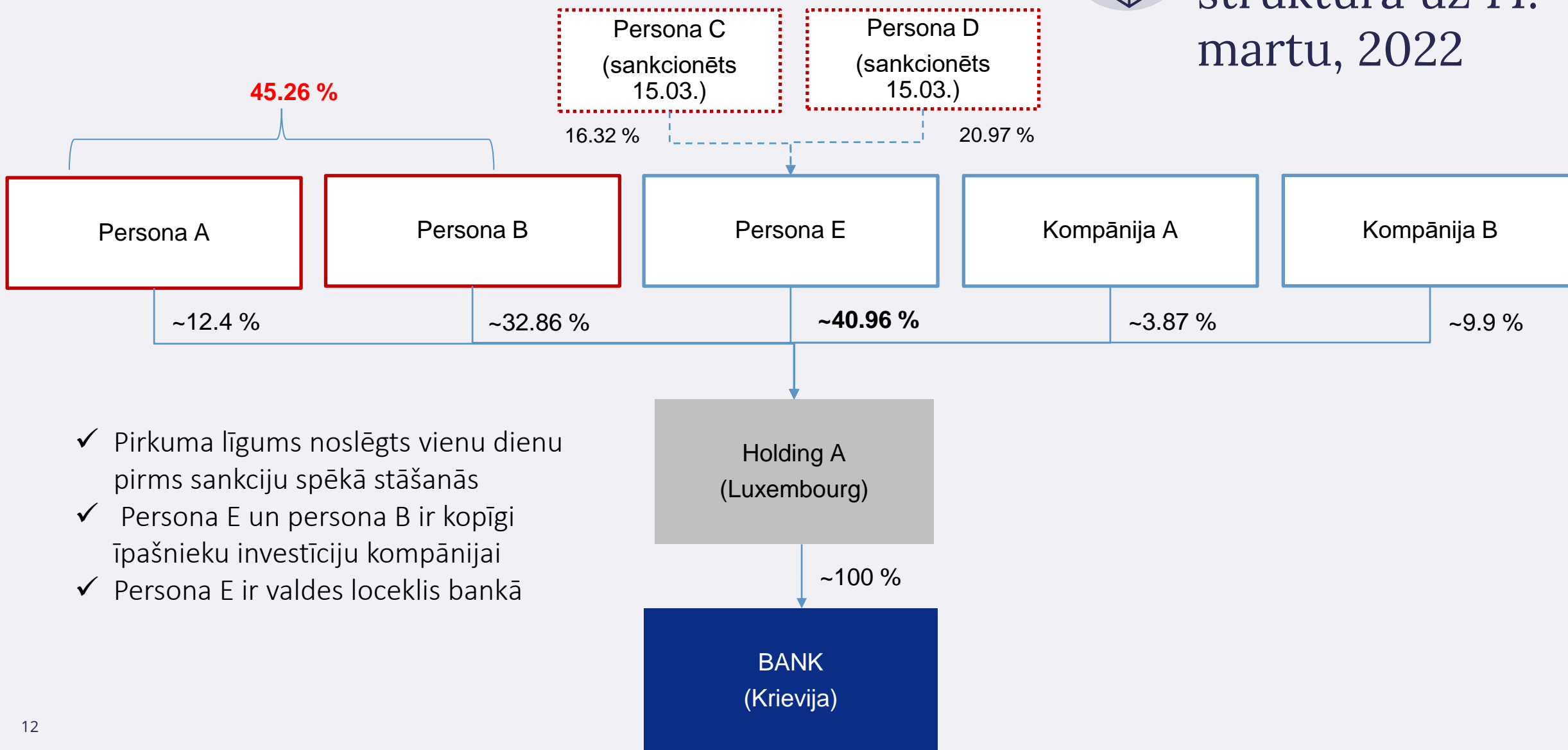
Bankas īpašnieku
struktūra līdz 13
martam, 2022



PLG slēpšana un maiņa



Bankas īpašnieku
struktūra uz 14.
martu, 2022



- ✓ Pirkuma līgums noslēgts vienu dienu pirms sankciju spēkā stāšanās
- ✓ Persona E un persona B ir kopīgi īpašnieku investīciju kompānijai
- ✓ Persona E ir valdes loceklis bankā

Sankciju apiešanas sekas



The screenshot shows the U.S. Department of Justice website. At the top left is the Department of Justice seal and the text "THE UNITED STATES DEPARTMENT OF JUSTICE". To the right is a search bar labeled "Search this site". Below the header is a navigation menu with links: ABOUT, OUR AGENCY, OUR WORK, NEWS, RESOURCES, CAREERS, and CONTACT. The main content area has a breadcrumb trail: "Home » Office of Public Affairs » News" and a "SHARE" button. A black box with the text "JUSTICE NEWS" is present. Below it, the text reads "Department of Justice" and "Office of Public Affairs". A horizontal line separates the header from the main content. Below the line, it says "FOR IMMEDIATE RELEASE" on the left and "Wednesday, October 19, 2022" on the right. The main headline is "Justice Department Announces Charges and Arrests in Two Cases Involving Export Violation Schemes to Aid Russian Military". Below the headline is a sub-headline: "In Two Separate Cases, Charges Filed Against Two Companies and Half a Dozen Individuals Arrested for Alleged Illegal Sale and Export of Powerful Dual-Use Technologies". The sub-headline is followed by the case name: "United States v. Romanyuk et al., District of Connecticut". The main text begins with "According to court documents, beginning in 2018, Eriks Mamonovs, 33, and Vadims Ananics, 46, both citizens of Latvia who operated CNC Weld, a Latvia-based corporation, conspired with Stanislav Romanyuk, 37, a citizen of Ukraine and resident of Estonia who operated Estonia-based BY Trade OU, and others, including Janis Uzbalis, 46, of Latvia and individuals in Russia and a Russia-based company, to violate U.S. export laws and regulations and smuggle a jig grinder that was manufactured in Connecticut to Russia." The text continues with "Mamonovs, Ananics, Romanyuk, Uzbalis, and others are charged with conspiracy to defraud the United States, which carries a maximum penalty of up to five years in prison; violation of the Export Control Reform Act (ECRA), which carries a maximum penalty of up to 20 years in prison; smuggling goods from the United States, an offense that carries a maximum penalty of up to 10 years in prison; and international money laundering conspiracy, an offense that carries a maximum penalty of up to 20 years in prison. Mamonovs is also charged with making false statements to the U.S. Department of Commerce, an offense punishable by up to five years in prison."

Sankciju apiešanas sekas

An official website of the United States Government

Accessibility Languages Contact

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Treasury Targets Global Sanctions Evasion Network Supporting Russia's Military-Industrial Complex

March 1, 2023

Remarks by Under Secretary for Domestic Finance Nellie Liang at the Atlantic Council on the Next Steps in the Future of Money and Payments

Treasury Targets DPRK Actors Illicitly Generating Revenue Abroad

February 28, 2023

Texel F.C.G. Technology 2100 Limited (Texel) has engaged in extensive funds transfers to Asia Trading. Among other projects connected to Russian defense capabilities, Texel and its CEO, Marks Blats, have supplied a Russian company with electro-optic and infrared devices following the start of Russia's full-scale invasion of Ukraine in February 2022. Marks Blats is a high-level Zimenkov network associate and a business partner of sanctioned Belarusian individual Aliaksandr Zaitsau, who was previously designated pursuant to Belarus-related E.O. 14038. In addition, OFAC took action against **Elektrooptika SIA**, which is owned by Marks Blats. Elektrooptika SIA purports to operate in the business services industry.

Today, Texel was designated pursuant to E.O. 14024 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Asia Trading. Marks Blats was designated pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of Texel. Elektrooptika SIA was designated pursuant to E.O. 14024 for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Marks Blats.



Paldies par uzmanību!

