



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

Case No. RUSSIA-EO14024-2025-23

Russia

Attn: Alexander

Dear Sir or Madam:

This letter responds to your request of [REDACTED], to the Office of Foreign Assets Control (OFAC) requesting the release of the following blocked funds transfer:

Originator: [REDACTED] LLC
Originating Bank: Gazprom PJSC
Value Date: 08/06/20[REDACTED]
Amount: \$282,100
Beneficiary Bank: [REDACTED]
Beneficiary: [REDACTED]

Citibank, N.A. properly blocked this transfer pursuant to U.S. sanctions administered by OFAC. In accordance with 31 C.F.R., Ch. V and/or applicable Executive orders, all property in which a sanctions target has an interest and that comes within the possession or control of a U.S. person is blocked. Copies of the relevant regulations and Executive orders are available at OFAC's website at <https://ofac.treasury.gov>, or upon written request to OFAC.

Under these regulations and Executive orders, a U.S. financial institution is required to block all wire transfers in which a sanctions target has an interest and that come within the institution's possession or control, even if the institution is an intermediary and the underlying transaction does not otherwise involve a U.S. person. An interest in property sufficient to require blocking may be an interest of any nature whatsoever, direct or indirect.

A blocked wire transfer is generally placed into an interest-bearing account, and the holder is prohibited from engaging in any transaction in such property or from exercising any rights, powers, or privileges with respect to such property, absent authorization from OFAC.

Once a wire transfer has been blocked, OFAC does not recognize attempts to extinguish the interest of the sanctions target in the transfer by, for example, canceling the original payment instructions or effecting a second payment to the beneficiary.

Upon review of your application and the information otherwise available to OFAC, OFAC has determined that the application does not establish sufficient grounds for authorizing the release of the blocked funds. The information indicates that sanctions-related violations remain ongoing, that the underlying commercial or trading operations have not been suspended, and that the transaction continues to present a direct or indirect nexus to sanctioned persons or entities.

OFAC's policy is to authorize the release of blocked property only in limited circumstances, most of which do not involve ongoing commercial activity or unresolved sanctions concerns. The circumstances described in your application do not fall within those limited circumstances.

As reflected by your application or by information otherwise available to OFAC, the blocked funds transfer in question involves an interest of a sanctions target designated pursuant to Russian Harmful Foreign Activities Sanctions Regulations, 31 C.F.R. Part 587; specifically, **Gazprom PJSC**. It is OFAC's policy to license the release of blocked property only in limited circumstances, most of which do not involve commercial activity. Upon review, OFAC has determined that this blocked funds transfer does not fall within those limited circumstances.

Accordingly, licensing the release of the blocked funds would be inconsistent with OFAC policy, and your request is denied. You may request reconsideration of this decision and provide additional information as described on OFAC's website at <https://ofac.treasury.gov/ofac-license-application-page>.

Sincerely,

Kelly M. Falconi

Digitally signed by Kelly M. Falconi
Date: 2026.07.27 10:00:00 -0400

Kelly M. Falconi
Chief, Licensing Division
Office of Foreign Assets Control

Date