

546. In section 10(a)(2)(A) of SSIDES, are persons “subject to sanctions imposed by the United States with respect to the Russian Federation” limited to persons listed on OFAC’s Specially Designated Nationals and Blocked Persons (SDN) List, or does it include persons identified on the Sectoral Sanctions Identifications (SSI) List as well?

For purposes of implementing section 10(a)(2)(A) of SSIDES, OFAC will interpret the phrase “subject to sanctions imposed by the United States with respect to the Russian Federation” to be persons subject to sanctions under SSIDES, as amended, UFGA, as amended, provisions of CAATSA with respect to the Russian Federation, and any covered Executive order as defined in Section 10(f)(1) of SSIDES. Persons “subject to sanctions imposed by the United States with respect to the Russian Federation” include persons listed on either the SDN or SSI List, as well as persons subject to sanctions pursuant to [OFAC’s 50 percent rule](#). [03-15-2018]