

# ANTI-CORRUPTION FOUNDATION



**The Anti-Corruption Foundation.** Non-profit Organization  
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January 29, 2020

The Honorable Joseph R. Biden  
President  
United States of America  
The White House  
Washington, DC 20500

Dear President Biden:

I am writing to you to encourage the United States to sanction corrupt Russian allies of President Putin as part of your overall approach to Russia. I was encouraged by your initial call with Mr. Putin and your recognition that Alexey Navalny's arrest was unwarranted and an unjust attempt to silence Russia's most prominent opposition leader.

I've worked with Navalny since 2010 and served as Executive Director of his Anti-Corruption Foundation, which exposed staggering corruption within the Putin regime. Before Navalny's arrest, our team prepared a video that exposed Putin's wealth and hubris. The video focuses on a \$1.3 billion palace that Putin's allies -- businessmen and heads of large state-owned companies who owe their positions to Putin -- built for him personally. A string of investigations shows that the same oligarchs who built Putin's palace also supply his mistresses and their parents, and Putin's children, with yachts, apartments and multi-million dollar-a-year-jobs at the companies they control. Navalny's video expose has been watched over 100 million times. That's more than half the population of Russia. This helps explain why so many Russians -- young and old alike -- have taken to the streets to protest the regime. Everyone understands that as long as Putin's kleptocratic regime controls Russia, the people of Russia have no future.

For years, Alexey Navalny has advocated sanctions against individuals who play key roles in aiding and abetting Putin and who take the lead in the persecution of those who seek to express their opinions freely and expose corruption in the system. Existing sanctions don't reach enough of the right people. The West must sanction the decisions makers who have made it national policy to rig elections, steal from the budget, and poison. It must also sanction

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the people who hold their money. Anything less will fail to make the regime change its behavior.

Before Navalny returned to Russia, we made a list of 35 Russian individuals that I am sharing with you and your administration. We have concluded that each of these individuals actively participates in the oppression and corruption of Putin's regime. Sanctioning these individuals -- freezing their assets, barring them from entering the U.S. and from doing business with American companies -- would create a substantial cost for their actions and serve as a deterrent to other members of the political and business elite. It would be a powerful way to encourage change.

We divided our list into three groups in the attached enclosure:

- *Oligarchs upon whom Putin has bestowed wealth and power, and who wield it on behalf of the regime;*
- *Human rights abusers and those who suppress fundamental civil and political freedoms;*
- *Individuals specifically involved in persecution of Navalny and our organization.*

The top eight people on the list are of particular priority as we discussed them with Alexey shortly before he boarded the plane to Moscow. We would be grateful if the United States would take concrete policy and sanction actions to limit corruption and abuse of human rights. These are common goals. Thank you for your time and attention to this matter.

Sincerely,



Vladimir Ashurkov  
Executive Director  
Anti-Corruption Foundation

Enclosure:  
Recommended List of Individuals for Sanctioning

Distribution:  
Department of State  
Department of the Treasury  
Director of National Intelligence



## Recommended List of Individuals for Sanctioning

### *Priority Shortlist*

- 1. Roman Abramovich** Billionaire businessman with a wide portfolio of holdings in Russia and globally, one of the key enablers and beneficiaries of the Kremlin's kleptocracy, with significant ties to, and assets in the West.
- 2. Denis Bortnikov** Deputy President and Chairman of VTB Bank Management Board. He is the son of Alexander Bortnikov, FSB director and a key ally of Vladimir Putin, who acts as a "wallet" for his father's ill-gotten gains to hide their true beneficiary and avoid existing sanctions.
- 3. Andrey Kostin** President and Chairman of the Management Board of state-owned VTB Bank, a key facilitator of corrupt money flows related to the operation of the Russian government and security services and the personal fortunes of many senior Russian officials.
- 4. Mikhail Murashko** Minister of Health, responsible for covering up Alexey Navalny's poisoning and hindering efforts to evacuate him to Germany for medical treatment.
- 5. Dmitry Patrushev** Minister of Agriculture. He is the son of Nikolai Patrushev, director of the Security Council of Russia and a key ally of Vladimir Putin's, who acts as a "wallet" for his father's ill-gotten gains to hide their true beneficiary and avoid existing sanctions.
- 6. Igor Shuvalov** Former First Deputy Prime Minister and Chairman of the State Development Corporation VEB.RF, with significant assets abroad. Shuvalov was instrumental in creating the system of state corruption, which has come to dominate the country's institutions.
- 7. Vladimir Solovyev** A high-profile Russian state media personality, one of the primary mouthpieces of authoritarian propaganda, who has both defended and advocated the extrajudicial treatment of Alexey Navalny and other opposition figures.



8. **Alisher Usmanov** Billionaire businessman with a wide portfolio of holdings in Russia and globally, and significant ties to the West, one of the key enablers and beneficiaries of the Kremlin's kleptocracy.

## *Persecution of Alexey Navalny*

9. **Alexander Bastrykin** Head of the Investigative Committee, the primary agency behind numerous fabricated and illegal cases against numerous journalists, activists and opposition figures.
10. **Alexander Bortnikov** Director of the Federal Security Service (FSB), the main political police agency, responsible inter alia for the attempted poisoning of Alexey Navalny.
11. **Konstantin Ernst** CEO of the state-owned Channel One TV station, a primary source of state propaganda vilifying civil society and opposition activities and encouraging extra-judicial repression.
12. **Victor Gavrilov** Head of the Department of Transport of the Economic Security Service within the Federal Security Bureau (FSB). He was responsible for coordinating various agencies during the arrival of Alexey Navalny's flight to Moscow, including its diversion to Sheremetyevo, where he was arrested.
13. **Dmitry Ivanov** Head of Chelyabinsk FSB. Head of Tomsk FSB when Alexey Navalny was poisoned there by an FSB team.
14. **Alexander Kalashnikov** Director of the Federal Penitentiary Service (FSIN), who has overseen continued human rights abuses in the penal system, and also engineered the illegal arrest of Alexey Navalny on his return to Moscow.
15. **Sergei Kirienko** First Deputy Head of the Presidential Administration, with special responsibility for domestic politics, including efforts to prevent Alexey Navalny's "smart voting" campaign and exclude opposition candidates.
16. **Elena Morozova** Judge of Khimki District Court, who presided over the illegal, ad hoc court inside a local police station and sentenced Alexey Navalny to 30 days in prison without bail to allow for his further trial.
17. **Denis Popov** Chief Prosecutor of Moscow, whose office has spearheaded a campaign against Navalny's team through investigations and the courts.



18. **Margarita Simonyan** Editor-in-Chief of state media network RT, a key mouthpiece of state propaganda abroad, who herself has boasted that RT is capable of “conducting an information war against the whole Western world”.
19. **Igor Yanchuk** Head of the Khimki Police Department, responsible for Alexey Navalny’s arrest on his return to Russia and arranging his illegal, ad hoc trial in a local police station.
20. **Victor Zolotov** Director of the National Guard, the agency primarily responsible for the violent suppression of opposition activity on the streets, and one of Putin’s most loyal supporters. Zolotov also challenged Navalny to a duel and threatened to “make mincemeat” of him.

## *Wallets and Cronies*

21. **Oleg Deripaska** Billionaire businessman with a wide portfolio of holdings in Russia and globally, one of the key enablers and beneficiaries of the Kremlin’s kleptocracy, with significant ties to, and assets in the West.
22. **Alexei Miller** Chairman of the Management Committee of Gazprom, the state-controlled gas corporation, and a significant instrument of covert Russian influence abroad. Miller is one of the key enablers and beneficiaries of the Kremlin’s kleptocracy.
23. **Igor Sechin** Chairman of the Management Board of Rosneft and close and long-term ally of Vladimir Putin. He is one of the key enablers and beneficiaries of the Kremlin’s kleptocracy and also the driving force behind policies such as support for the Maduro regime in Venezuela.
24. **Gennady Timchenko** Billionaire businessman with a wide portfolio of holdings in Russia and globally, a close Putin ally and reported “wallet” of the president, with significant ties to and assets in the West.
25. **Nikolai Tokarev** Chairman of Transneft, one of the enablers and beneficiaries of the Kremlin’s kleptocracy, including the construction of Putin’s palace in Gelendzhik.

## *Abuse of Freedoms*

26. **Alexander Beglov** Governor of St Petersburg, close ally of Vladimir Putin’s, whose corrupt activities were highlighted by a Navalny investigation, and

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who has since been supportive of measures to limit freedom of protest and assembly.

27. **Yuri Chaika** Presidential representative to the Caucasus Region, but until 2020, Prosecutor General and responsible for the Kremlin's sustained campaign of persecution of civil society.
28. **Andrei Kartapolov** Deputy Defence Minister and Chief of Main Directorate for Political-Military Affairs, responsible for using conscription as a means of persecuting activists, and reportedly involved in the downing of Malaysian airliner MH17 in 2014.
29. **Pavel Krashenninikov** Parliamentarian and former Justice Minister, Krashenninikov personally drafted or supported numerous recent authoritarian laws, including a recent proposal that would make it even harder to prosecute former presidents on corruption charges.
30. **Mikhail Mishustin** Prime Minister of Russia, and as such the chief executor of Vladimir Putin's policies.
31. **Ella Pamfilova** Head of Central Electoral Commission, who has endorsed and legitimized the Kremlin's unfree and unfair elections and consultative votes on a systematic basis.
32. **Dmitry Peskov** Presidential Press Secretary, the primary spokesman for the Russian government, who has denied any illegal campaign against Navalny and, indeed, any Russian malign activities at home or abroad.
33. **Sergei Sobyanin** Mayor of Moscow, and the primary executor of Russian government policy in the capital, including vote rigging and facilitating criminal activity through corrupt municipal projects.
34. **Anton Vaino** Head of the Presidential Administration, arguably the most powerful institution in Russia and the primary coordinating body for the Kremlin's policies at home and abroad.
35. **Andrey Vorobyev** Governor of the Moscow Region, whose corrupt activities Navalny has revealed.

## ***Persons listed above who are already on US sanctions lists***

**Alexander Bastrykin** SDN – Magnitsky Act, 2017.

**Oleg Deripaska** SDN – Ukraine (EO13661, EO13662).

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<b>Andrey Kostin</b>	SDN – Ukraine (EO13661).
<b>Alexei Miller</b>	SDN – Ukraine (EO13661).
<b>Igor Sechin</b>	SDN – Ukraine (EO13661).
<b>Gennady Timchenko</b>	SDN – Ukraine (EO13661).
<b>Victor Zolotov</b>	SDN – Ukraine (EO13661)