

Russian Procurement Tactics, Techniques, and Procedures



FinCEN and the U.S. Department of Commerce's Bureau of Industry and Security Urge Increased Vigilance for Potential Russian and Belarusian Export Control Evasion Attempts

Decreased ability to acquire U.S. items has led Russia to circumvent U.S. export controls

Red Flags

- Using consolidators or reshippers which are owned/directed by Russians.
- Layering procurements through third party countries to obfuscate the end user, an example of which is the use of numerous 3rd country freight forwarders and shippers on a single transaction.
- Freight forwarding firm is listed as the product's final destination.
- Making payments from entities located in third countries not otherwise involved with the transactions.
- Removing government/military affiliation from website.
- Consolidating shipments/shippers in the United States may be more likely to provide applicable cover for the exports of luxury goods.
- Procuring items below control thresholds while claiming civil end use.

Commodities of Concern

Aircraft Parts and Equipment Antennas Cameras GPS Systems Inertial Measurement Units Integrated Circuits Sonar Systems Spectrophotometers Test Equipment Thrusters Underwater Communications Vacuum Pumps Wafer Fabrication Equipment/Substrates Oil Field Equipment

Transshipment Countries of Concern

Armenia, Brazil, China, Georgia, India, Israel, Kazakhstan, Kyrgyzstan, Mexico, Nicaragua, Serbia, Singapore, South Africa, Taiwan, Tajikistan, Turkey, United Arab Emirates, and Uzbekistan.

Naming Nomenclature

- RAO (Rossiyskaya Aktsionernaya Kompaniya), which designates a Russian joint stock company
- FGUP/FSUE (Federal'noye Gosudarstvennoye Unitarnoye Predpriyatiye), which designates a Russian Federal State Unitary Enterprise
- GK (Gorsudarstvennaya Korporatsiya), which designates a Russian State Corporation
- SPRE/NIPP (Nauchno-Issledovatel'skoye Proizvodstvennoye Predpriyatiye), which designates a Russian Scientific Research Production Enterprise
- NPO/GNPO (Gosudarstvennyy Nauchno-Proizvodstvennyy Tsentr), which designates a Russian State Research and Production Center