



საქართველოს სტრატეგიისა და საერთაშორისო ურთიერთობების კვლევის ფონდი
GEORGIAN FOUNDATION FOR STRATEGIC AND INTERNATIONAL STUDIES

Security Review

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**International Practice of Sanction Evasion and
Circumvention Possibilities for Russia**

2022

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Introduction

Sanctions play a special role in the economic and political life of the world. Historically, despite their various forms of use, sanctions have acquired an essentially functional substance in the 20th century. The goal of the sanctions is primarily to ensure global peace. In case of violation of market principles, military aggression, or disregard for the rules established between nations, the violator is sanctioned by specific countries and/or groups of states, who, in doing so, aim to bring it back to the norms of international law.

Sanctions increase political and economic pressure on the target country, which are reflected in various dimensions and quantitative figures. Consequently, the country loses some of its political leverage and experiences tangible economic regress.

For the sake of universal peace and global security, the policy of sanctions has not lost its relevance in the 21st century. As a result of Russia's aggressive military intervention in Ukraine, the world community has applied an unprecedented package of sanctions against the aggressor, which has spread to almost every industry of the country and is still being added to. In this regard, Russia broke the anti-record and surpassed countries such as North Korea, Iran, Syria, and Venezuela.

Over the decades, sanctioned countries have accumulated extensive experience on how to circumvent the imposed sanctions, so as to at least partially help the country overcome the economic difficulties. It is interesting which ways and schemes such countries use to circumvent the restrictions, and based on that experience, what opportunities there are for the Russian Federation to do the same and evade the sanctions imposed on it, a move which will not only limit but also further pave the way for its aggressive foreign policy and threaten world peace.

Sanction Evasion Schemes for Oil Exporting Countries

For energy-rich sanctioned countries, the money accumulated from their energy carriers is a major source of budget revenue. Consequently, they try with all means to bypass the existing restrictions and, despite the greatest risks, sell their oil products. Since shipping is one of the main sources of transportation for them, manipulative actions are also related to this type of transport.

Manipulation of Tanker Automatic Identification Systems

Manipulating automatic identification systems is a fairly common practice in oil-rich, sanctioned countries. The purpose of this system is to prevent collisions between ships during transportation, for which it transmits data such its unique identification number, position, route, and speed, for which it uses high-frequency radio waves. According to the "International Convention for the Safety of Life at Sea", all types of passenger ship and cargo ships with a capacity of more than 300 tons that sail in international waters are required to have an automatic identification system, with certain exceptions related to navigation protection, security and/or other purposes. Tankers transporting oil products from sanctioned countries usually switch this system off in congested areas to ensure their secrecy (Karagyozova, 2021).

Although the automatic identification system is not designed to track ships, its data is actively used by satellites and ground receivers. For example, the Iranian government has been actively using this manipulation tool to supply oil to partner countries. Iran successfully used this method before signing the "Joint Comprehensive Action Plan". In addition, the number of satellites in the world has increased significantly in recent years and, consequently, their capabilities, which has made the maritime space a difficult place to hide in. Millions of images of the Earth have been taken by these satellites, which are also provided with information from automatic identification systems, ultimately allowing them to draw a detailed picture of where a ship is located and what it looks like. Nowadays, technologies are so advanced that it is even possible to determine when a ship is loaded, when it is empty, and what its route is (Karagyoza, 2021).

Venezuela, the richest country with oil reserves in the world, has also used the automatic identification system manipulation method. In 2020, up to 150 Venezuelan tankers were identified, carrying oil to Asia. Along with Venezuela, an Indonesian oil refinery was also suspected of supposedly receiving sanctioned vessels (Rapoza, 2022).

Frequent Change of Tanker Names

Another technique to prevent the detection and identification of vessels is to change the name of the ships. It can be a legitimate measure when a ship has a new owner, but it can also be a sign that they are trying to hide the ship's past movements and imposed sanctions. For instance, in August 2019, the US Treasury Department's Office of Foreign Assets Control seized a ship trying to smuggle Iranian oil into Syria. In July of the following year, the same ship, which had since changed its name several times, was seized by the British authorities under disputed circumstances, according to which the ship was carrying Iranian oil to Syria, so bypassing EU sanctions. Venezuela has repeatedly used the same method, and the country has changed the names and owners of its ships several times (Karagyoza, 2021).

Ship-to-Ship Operations in Water

To disguise a ship, in addition to changing the name, some countries use offshore ship-to-ship operations, a practice of transferring crude oil, petroleum products, liquid chemicals, and liquefied natural gas between offshore vessels. More precisely, it means moving cargo from the sanctioned tanker to another on the high seas, allowing them to hide their own identity, cargo, and direction. Iran has also actively used this practice. It is not easy to detect such manipulation because, during the process, the ships turn their automatic identification systems off, and, along with other acts, the fact that two ships are located very close to each other is hidden, which would otherwise raise logical doubts about possible manipulation. The same method was used by Venezuela, which tried to supply oil to Asian countries via the Straits of Malacca (between Indonesia and Malaysia) (Northam, 2020).

The above-mentioned cases prove that sanctioned countries are ready to pursue their economic interests at any cost, and will do so as long as they have other sanctioned countries as allies, as well

as partners who want to trade with them, despite the existing risks. That is why there is quite successful cooperation between Iran, Syria, and Venezuela, even during the sanction period.

Cryptocurrency

Along with the development of modern technologies, digital money is gaining special significance. Since its control mechanism is practically non-existent and the risks of manipulative impacts are completely low, it is assumed that sanctioned countries benefit quite a bit from this, which allows them to reduce the financial losses resulting from sanctions.

Over the decades, Iran has developed fairly good immunity in dealing with the effects of sanctions, and has not lagged behind modern technologies. Thus, Iran is making actively use of cryptocurrency, and specifically bitcoin miners, to reduce the negative effects of the sanctions on it. It is reported that about 4.5% of Bitcoin's global mining comes from Iran, which allows the country to mobilize hundreds of millions of dollars. The mining process requires the electricity that Iran has in abundance and quite cheaply. The country also acknowledged that bitcoin mining is an attractive opportunity for a sanctioned economy that is experiencing a cash shortage. In addition to cryptocurrency trading, Bitcoin allows Iran to pay for imported products in a way that circumvents sanctions against Iranian financial institutions (Robinson, 2021).

The Iranian government is interested in engaging in international trade using cryptocurrencies, bypassing traditional banking systems, and when Iran is disconnected from the “Society of Worldwide Interbank Financial Telecommunication” (SWIFT), we may see rational goals in its efforts. In numerous interviews, Iranians talk about the fact that cryptocurrency is one of the most effective ways to take money out of the country. Iran's active involvement in the crypto industry is also confirmed by a 2019 survey in which 1650 citizens took part. 25% of respondents say that they can earn between 500 and 3,000 US dollars a month through crypto mining. Although the situation in the country has been tense several times due to the misuse of cheap electricity, in August 2019, the Cabinet of Ministers of Iran issued a decree recognizing mining as a legal sector of the economy (Al-awsat, 2020). Interestingly, Iran has also attracted the attention of other countries that want to cooperate with it through blockchain platforms.

In 2017, Venezuelan President Nicolas Maduro announced that the country would create a cryptocurrency "Petro" to strengthen its financial sovereignty, carry out transactions and overcome problems caused by financial blockades. He outlined that the national cryptocurrency would be backed by gold, gas, oil, and diamond reserves. The cryptocurrency was indeed created, in February 2018, but it does not seem to have had tangible results for the country regarding sanction evasion (Barreto, 2017).

Shell Companies

To avoid sanctions, countries, as well as various business entities, easily register and use shell companies. A shell company means an organization without active business operations or significant assets. Typically, such organizations exist only on paper, hence they have no office and no staff.

Shell companies are used to provide financial resources to sanctioned countries and organizations, as well as to purchase consumer products. These types of companies grant certain levels of anonymity to sanctioned countries, organizations, and individuals. This allows them to carry cash flows in the short term, making it quite difficult for federal agencies to detect them. Further, sanctioned state-owned enterprises and sanctioned individuals often use networks of shell companies located in neighboring states or in "tax haven" countries. Without complex and comprehensive investigation, it is thus difficult for investigators to identify the ultimate owners of shell companies; they have difficulty obtaining information on the transactions of sanctioned organizations and individuals, as well as the directions of goods and their movement (Hanna, Popova, Zlotnick, 2019). For example, an American machinery manufacturer sells a particular machine and is waiting for a money transfer from a foreign company before shipping it. This manufacturing company receives compensation from a shell company registered in an offshore zone, with a name and visual identity that bears a strong resemblance to the name of a legitimate buyer. The equipment produced by the American company may then be redirected to a sanctioned organization or country, and this means of payment may be a way of disguising the origin of the money (Hanna, Popova, Zlotnick, 2019).

According to the British media group "The Guardian", three shell companies were discovered in Syria which were registered on the same day in October last year and had direct links with the Syrian president and his sanctioned allies. These companies were backed by the Damascus regime representatives and third-party companies to indirectly control various entities and trade processes. This was done through the granting of partial ownership (Fox, Shaar, 2022).

As is known, shell companies are also actively used by North Korea to reduce the negative economic impacts caused by sanctions. For example, a shell company was established in China to conduct commercial operations with North Korea. North Korea sold coal to China, the proceeds of which remained in China on the balance of this company. North Korea can import the desired items or products from China in exchange for this amount of money (Shapiro, Ruggiero, 2017).

Trade-Financial Manipulations

Another way for sanctioned countries and/or organizations to circumvent restrictions is through trade-financial manipulation. This can be reflected in the fact that they do not produce the necessary documentation for transactions, as their main purpose is to move money imperceptibly. In many cases, such entities produce falsified documents that change the routes of the departure of vessels, the names of ships and their registration dates, as well as the price and quantity of sanctioned products. It is quite difficult to fight such a scheme, as falsified documents make it difficult for investigative bodies to identify guilty companies and individuals (Hanna, Popova, Zlotnick, 2019).

Correspondent Banking

These schemes usually start with the fact that the government and/or organizations of the sanctioned country hold accounts in foreign banks on behalf of the corporation and use the

correspondent account of a foreign financial institution to carry out its activities in US dollars. Such accounts reduce the level of potential interest in their activities and the likelihood of being checked by the investigative authorities. The corporate entities of the sanctioned country carry out financial transactions in US dollars through the correspondent account of foreign financial institutions, thus granting them access to the international financial system. The accounts of these corporate entities do not have complete information about the final beneficiary, hence the purpose of the transactions is unknown. Due to such lack of information, investigative agencies may find it difficult to monitor transactions processed by foreign subsidiaries - or to determine whether the client of a foreign subsidiary is a sanctioned entity, or resides in a sanctioned country. As such, relying on "clean" banks in dubious transactions and using them as intermediaries for suspicious transactions is a way for sanctioned countries to gain access to the global financial system (Hanna, Popova, Zlotnick, 2019).

In February 2008, the US Treasury Department launched an investigation against the Central Bank of Iran, which was accused of supporting Iranian financial institutions in circumventing US sanctions. More specifically, the Central Bank of Iran carried out dollar transactions on behalf of Iranian private banks that had already been blacklisted by the US government, which also included supporting dollar-denominated letters of credit. The Central Bank of Iran depended on the leaders of its organization, who were personally involved in transaction operations, to export hard currency from the country and carry out certain activities in the Middle East. Accordingly, in May 2018, the Office of Foreign Assets Control blacklisted these individuals accused of involvement in the transfer of 10 million USD from Iran to Iraq (Karagyozyova, 2021).

To transfer funds abroad, the Central Bank of Iran also used "Exchange Houses." These are institutions that can trade in licensed foreign currency and transfer cash flows on behalf of individuals and businesses. Frequently, Exchange Houses do not have their own US dollar accounts and rely on correspondent accounts in their regional banks to access the US financial system. Thus, the Central Bank of Iran delivers currency to the Exchange Houses outside the country via couriers, after which the currency is converted into US dollars and sent to its final recipient.

Additionally, the leaders of the Central Bank of Iran were actively involved in the process of circumventing restrictions on oil exports, seeing official individuals transferring funds to another Iranian company, which then transferred the funds to foreign financial institutions. Then the funds were sent to a foreign company that organized the shipment of Iranian oil to allied countries, such as Syria (Karagyozyova, 2021).

Various Means of Sanction Evasion

Special Purpose Vehicle (SPV)

In September 2018, the EU set up a Special Purpose Vehicle (SPV) to enable European companies to conduct trade operations with Iran which would be strictly circumscribed within the framework of EU law. The system operates in such a way that transactions are carried out through the SPV system, which bypasses US sanctions that prohibit payments under the regular tax system. This system works as follows: For instance, if a European energy company buys oil and/or gas from Iran, the amount paid to it is reflected in the SPV system as a deposit. As a result, Iran can purchase goods

worth the amount reflected in this system from Europe, an act which is not prohibited by law (Regencia, 2018).

Networking Schemes

The Venezuelan government was actively cooperating with both neighboring and regional countries, particularly with Mexico and Colombia, to help it sell crude oil and evade the sanctions. In this case, shell companies set up on the territory of a third country were used alongside various fraudulent schemes. Networks were set up on a regional scale, according to which they tried to sell oil products from a sanctioned country. This process was mostly carried out between the government of the sanctioned country and the business representatives of the partner countries involved. Nevertheless, the Office of Foreign Assets Control was able to identify most of the violators and sanction them (Leanez, 2021).

Cyberattacks

Cyberattacks have a notable place in this digital era, and with the development of cryptocurrency, they have become more and more widespread. Sanctioned countries have successfully exploited hacker groups and tried to replenish funds lost as a result of restrictions. As is officially known, in 2017-2018, North Korea accumulated 571 million USD as a result of cyberattacks on cryptocurrency trading markets, though this may in fact be a lower figure than the reality (Lyngaas, 2019).

Sanction Evasion Possibilities for Russia

Russia's military intervention in Ukraine was followed by unprecedentedly large scale sanctions put on the aggressor by the international community. However, there is a reasonable assumption that with the enactment of the sanctions, Russia will inevitably try to bypass these restrictions. That is why high-ranking officials of leading countries and organizations have outlined that it is important not so much to sanction, as to control the enforcement of said sanctions. It is interesting to see what real opportunities the Russian Federation has to at least partially circumvent the restrictions imposed on it, to some extent protect its already shaky economy from colossal losses.

On March 7 this year, the Financial Crime Enforcement Network (FinCEN) warned banks and other financial institutions about Russian operations which might be employed to evade the sanctions. These steps included, the use of unsanctioned banks operating in Russia, which have access to the international financial system, and convertible virtual currencies known as cryptocurrencies, such as Bitcoin. The sanctions primarily affected Russia's two main banks, Sber Bank and VTB Bank, which together account for more than half of Russia's banking assets, denominated in US dollars. Therefore, reasonable suspicions appeared that Russia would use cryptocurrency, digital money operated in an unregulated, decentralized blockchain system, managed by pseudo-users using a digital wallet and address, in order to hide the identity of the sender and recipient without additional complications. It has been reported that since February 24, when Russia invaded Ukraine, the consumption of cryptocurrency in Russia has increased by 300% (Ramakrishnan, 2022).

Earlier this year, the Central Bank of Russia launched a national digital currency, the so-called "Digital Ruble", which it hoped to use for indirect trade with other countries that want to receive

money without converting it into dollars, bypassing the international banking system. As far back as October last year, the officials of the Central Bank of Russia said that the “Digital Ruble” would make the country less dependent on the United States and allow the country's economy to be more resilient against potential sanctions from the West.

After the imposition of large-scale sanctions, demand from Russian companies increased to open accounts at the Moscow branch of the Bank of China, this being only one of their moves to try and bypass the sanctions imposed on them. Further, Russia has its own bank transfer system “MIR”. The country started creating this system in response to Western sanctions imposed after the annexation of Crimea in 2014. Since late 2021, the Russian government has been using only its own banking system to allocate budget funds. The pensions and salaries of public servants are also considered here. In addition to Russia, “MIR” operates in Belarus, Armenia, Turkey, Vietnam, Tajikistan, Kazakhstan, Kyrgyzstan, Uzbekistan, and the occupied territories of Georgia. Russia may try to expand its banking system to other countries, which will somewhat alleviate the economic consequences of the sanctions. Along with its efforts to expand its banking system, it may also try to cooperate with China in this direction. China has had its own “UnionPay” banking card system since 2002, which can be used in more than 170 countries. If Russian citizens have access to Chinese cards, they can use them in any country, for varying purposes.

A very interesting scheme is "Ransomware", which may also be used more actively by Russia to mitigate the effects of the sanctions. Ransomware is a virus program that blocks all files, data, or information from entering a computer and compels the owner to pay for the removal of the blockage. Typically, the virus penetrates an electronic device through the opening of an unauthentic email or link of unknown origin. According to the blockchain company "Chainalysis", last year, about 74% of global Ransomware revenue, more than 400 million USD in cash, was related to companies affiliated with Russia (Chainalysis, 2022). This systemic virus first appeared in Russia in 2005.

Another way that cash flows into Russia is through the black trading web market “Hydra”, which managed to trade more than 1 billion US dollars in 2020. The platform has strict rules - users are required to convert cryptocurrency into money only through certain regional exchanges, which are used in trading operations. Naturally, this platform is not large enough to handle the full volume of transactions that Russia needs to avoid the sanctions, but in terms of the entry of black money into the country and its further development, it should certainly be taken into account (Flitter, Yaffe-Bellany, 2022).

There are several ways for companies operating in Russia, or individuals engaged in commercial activities, to bypass the sanctions. First of all, it should be noted that universal trade with Russia, as such, is not prohibited. Countries can carry out these operations at their discretion, except when related to prohibited products or services that have become subject to international sanctions. Consequently, third countries assisting Russia to evade the sanctions will be considered in official violation only if they help it to import banned products. For example, Airbus has banned the supply of its aircraft parts to Russia, and, if another country supplies them to Russia, it would be a direct violation of the sanctions. In this case, the bigger problem is related to money transfers and finding international partners who are willing to cooperate with Russia. Of course, there are some ways around the sanctions here too. Such steps cannot be implemented at the state governmental level,

but a circle of individual businessmen may see some financial benefits from such activities. Bank transactions may be replaced by cash, a practice seen in many countries, with specific entities paying in cash to supply products. These transactions take place between neighboring or nearby countries and the money is delivered by land, using cars. It is also possible to use partner countries to buy sanctioned products. For example, after the Crimea annexation in 2014, Russia was banned from purchasing seafood from the EU, but still found a solution: Products embargoed for Russia were sent to Belarus, where a Belarusian label was reprinted on the goods which were then exported to Russia. A similar scheme can be used for production in the partner country. For instance, a business operating in Russia can buy land in a neighboring, partner, country, or build a small enterprise with low capacity. Then, it can import products made for sale in Russia, and produce and export them under the label of a partner country as a product of that state.

As for the international travel of Russian citizens, although the European Union has closed its airspace to Russia, this does not mean that Russian citizens will not be able to leave the country or board international flights: They can simply enter an unsanctioned neighboring country by land and travel in any direction by air. Some Russian airlines are considering various ways to bypass the sanctions. Since several Russian airlines are owned by Turkish tour operators, there is the supposition that re-registering these aircraft under Turkish jurisdiction may be one way to evade the sanctions. However, there are risks here as well that the West will re-sanction or simply impose restrictions on all airlines operating in Russia. Also, worth keeping in mind is that the largest manufacturers of aircraft parts in Russia have refused to supply products to the country, so in the absence of other alternatives, the safety of both domestic and international flights will not be guaranteed.

In the case of Russia, the issue of transportation of energy products is particularly relevant, as the cash flows received from it, even under sanctions, are the mainstay of the Russian economy. Following the military intervention in Ukraine and the imposition of sanctions by the West, Russia has resorted to practices well-proven by other sanctioned countries, such as disabling the automatic identification system of oil tankers and conducting ship-to-ship operations under the radar of law enforcement agencies. Since the sanctions came into force, the number of Russia-linked ships trying to move imperceptibly in international waters has risen sharply. According to the "Windward" company operating in Israel, which carries out a maritime risk analysis with the help of artificial intelligence, before the invasion of Ukraine, there were 2-3 cases a day when a Russian tanker loaded with crude oil tried to move unostentatiously by turning off its automatic identification system. Following the enactment of sanctions, this number increased to 20 a day. There is no doubt that Russia will continue to ship oil by sea, and at the same time will use all means of manipulation to help it to bypass the international sanctions (Garver, 2022). On March 23, the President of Russia announced to "unfriendly states" that they would be required to pay for gas in rubles, which would most likely allow Russia to circumvent some sanctions. This means that importers have to look for banks that will convert dollars and euros into rubles, or open double accounts. This amount must then be transferred to a Russian bank that is not disconnected from the SWIFT system, or to a bank that is exceptionally allowed to receive energy bills. Paying fees in the Russian currency would slightly help the country to avoid the financial sanctions, strengthen the national currency, and more or less protect the economy.

Finally, whose help is Russia hoping for? The fact is that without partners and allies, it is virtually impossible to avoid sanctions and reduce the severe economic effects. Despite strong warnings from the United States to the world, and especially China, not to help Russia disregard the international sanctions, there will still be countries that, at some risk, will try to offer alternative ways for Russia to do just that. First of all, the countries of the Persian Gulf - Saudi Arabia, Iran, and the United Arab Emirates - should be considered here. The focus of the West is on these countries and their financial institutions. In the short and medium-term, if these countries are spotted carrying out illegal operations, appropriate action will be taken by the West.

It should be remembered that in the Organization of the Petroleum Exporting Countries (OPEC), Saudi Arabia and Russia are allies, so the deterioration of bilateral relations is not in their national interests, while Iran will seek to deepen relations with Russia to gain mutual benefits. The Russian side even demanded a written guarantee from the United States that Western sanctions would not affect Russian-Iranian relations. Russia also appeals to Iran for cooperation in the field of aviation.

It is interesting what position China will take in this regard. As yet, it has refrained from taking a specific position, appealing to the parties to de-escalate the situation and resolve the issue through negotiations. A country that has seen an irreversible pace of development in recent decades and wants to become the world's number one economy is unlikely to publicly support Russia, including in circumventing sanctions, and thus inflict a major blow to its economy, especially against the backdrop of a strong warning from the West that with any kind of support, the consequences will be dire. Likely, to some extent, it will try to help Russia, for which China is a major trading partner, although this will be done secretly and in a form that will be difficult for the West to detect.

In this regard, another major player is India, which has not directly criticized Russia for its invasion of Ukraine. It is unlikely that India will go against Russia, first of all, because Russia is India's largest supply partner of military weapons, including the provision of missile defense equipment. There was a time when India was 70% dependent on Russian armaments, but now that stands at around 50%. The bilateral cooperation also includes the energy sector. After the start of the war, Russia even offered India its oil at a discount. However, India would not want to spoil relations with the West either, because US-India relations have gradually deepened in line with China's regional dominance. It is likely that India will also try to help Russia in secret ways, so as not to be criticized by the West.

Thus, Russia will actively use the experience accumulated over the years by various sanctioned countries and hope for help from its partners. The fact is that no country sanctioned so far has had the economic scale and natural resources as Russia has. However, they have managed to avoid restrictions in different ways, which is surely no easy task. Let's see what paths the Russian Federation will choose to try and evade the sanctions, considering the already difficult economic situation it is experiencing, who will give it a hand, and what steps the West will take with regards to controlling the implementation of those sanctions.

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