





























**Table 1: EU asset freezes on Ukrainian targets**

05.03.14 <sup>i</sup>	14.04.14 <sup>ii</sup>	Note	05.03.15 <sup>iii</sup>	05.06.15 <sup>iv</sup>	Note	05.10.15 <sup>v</sup>	04.03.16 <sup>vi</sup>	Note	03.03.17 <sup>vii</sup>	05.03.18 <sup>viii</sup>	Note
AZAROV M.	→	 ix	✓	-	 x	-	→		→	✓✓	
AZAROV O.	→	 xi	→								
BOHATYROVA	→		✓	-		-					
KALININ	→		→								
KLYUYEV A.	→	 xii	✓	-		-	→		→	→	 xiii
KLYUYEV S.	→	 xiv	✓	✓✓		✓✓	→		→		 xv
KURCHENKO	→	 xvi	✓	-		-	→		→	✓✓	
LUKASH	→		✓	✓✓		-	✓✓	 xvii	→		
PORTNOV	→	 xviii	→								
PSHONKA A.	→	 xix	✓	-		-	→		→	→	
PSHONKA V.	→	 xx	✓	-		-	→		→	→	
RATUSHNIAK	→		✓	-		-	→		→	→	
TABACHNYK	→		✓	✓✓		-	✓✓		→	→	
YAKYMENKO	→		→								
YANUKOVYCH O.	→	 xxi	✓	-		-	→		→	✓✓	
YANUKOVYCH V.	→	 xxii	✓	-		-	→		→	→	
YANUKOVYCH V. (Jr.)	→		✓	✗				 xxiii			
ZAKHARCHENKO	→		✓	-		-	✓✓		→	→	
	ARBUZOV		✓	-	 xxiv	-	→		→	→	
	IVANYUSHCHENKO		✓	-		-	→	 xxv			
	KLYMENKO	 xxvi	✓	-	 xxvii	-	→		→	→	
	STAVYTSKYI	 xxviii	✓	-		-	→		→	→	 xxix

✓ Listing → Renewal 📄 De-listing 🚶 De-listing due to court ruling ✗ Deceased 🏠 Annulment 🏗️ Partially admission  
🚫 Action against previous decision/s dismissed ⚖️ Judicial action aborted ⚖️ Appeal dismissed ✓✓ Revised statement of reasons

<sup>i</sup> EU Council (2014) “Decision No 208/2014 concerning restrictive measures directed against certain persons, entities and bodies in view of the situation in Ukraine”, 5th March 2014, available at: <<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2014:066:0001:0010:EN:PDF>>

<sup>ii</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32014D0216>>

<sup>iii</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015D0364&from=EN>>

<sup>iv</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32015D0876>>

<sup>v</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32015D1781>>

<sup>vi</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016D0318>>

<sup>vii</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D0381&from=EN>>

<sup>viii</sup> <[https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=uriserv:OJ.L\\_.2018.063.01.0005.01.ENG](https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=uriserv:OJ.L_.2018.063.01.0005.01.ENG)>

<sup>ix</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TJ0331>>

<sup>x</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62015TJ0215>>

<sup>xi</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62014TA0332>>

<sup>xii</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TJ0340>>

<sup>xiii</sup> <<http://curia.europa.eu/juris/document/document.jsf?text=&docid=203924&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=555807>>

<sup>xiv</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TJ0341>>

<sup>xv</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1540632697492&uri=CELEX:62015TJ0731>>

<sup>xvi</sup> <[https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TO0339\(03\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TO0339(03))>

<sup>xvii</sup> <<http://curia.europa.eu/juris/document/document.jsf?text=LUKASH&docid=204154&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=478106#ctx1>>

<sup>xviii</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TJ0290>>

<sup>xix</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62014TB0380>>

<sup>xx</sup> <[https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TO0381\(03\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TO0381(03))>

<sup>xxi</sup> <[https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=uriserv%3AOJ.C\\_.2016.402.01.0036.01.ENG](https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=uriserv%3AOJ.C_.2016.402.01.0036.01.ENG)>

<sup>xxii</sup> <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TJ0346>>

<sup>xxiii</sup> <[https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TO0347\(02\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TO0347(02))>

<sup>xxiv</sup> <<https://publications.europa.eu/en/publication-detail/-/publication/8c88da5b-863f-11e7-b5c6-01aa75ed71a1/language-en>>

<sup>xxv</sup> <<http://curia.europa.eu/juris/document/document.jsf?text=&docid=196427&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=1673251>>

<sup>xxvi</sup> <[https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TO0494\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62014TO0494(01))>

<sup>xxvii</sup> <<http://curia.europa.eu/juris/document/document.jsf?text=&docid=196428&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=1697291>>

<sup>xxviii</sup> <<https://eur-lex.europa.eu/legal-content/EN/SUM/?uri=CELEX:62014TJ0486>>

<sup>xxix</sup> <<https://eur-lex.europa.eu/legal-content/EN/SUM/?uri=CELEX:62016TJ0242>>

**Table 2: Swiss asset freezes on Ukrainian targets**

<u>26.02.2014<sup>i</sup></u>	10.03.2014	13.01.15	01.04.15	01.07.15	28.03.16	25.05.16 <sup>i</sup>	27.07.16	21.12.16	20.12.17	16.01.18 <sup>ii</sup>
ARBUZOV	✓	✓	✓	✓	✓	✓	→	→	→	✗
AZAROV M.	✓	✓	✓	✓	✓	✓	→	→	→	→
BOHATYROVA	✓	✓	✓	✓	✗					
DOBKIN	✓	✓	✓	✓	✓	✓	→	✗		
IVANYUSHCHENKO	✓	✓	✓	✓	✓	✓	→	→	→	→
KERNES	✓	✗								
KLYMENKO	✓	✓	✓	✓	✓	✓	→	→	→	→
KLYUYEV A.	✓	✓	✓	✓	✓	✓	→	→	→	→
KLYUYEV S.	✓	✓	✓	✓	✓	✓	→	→	→	→
KOLESNIKOV	✓	✓	✓	✓	✓	✓	→	→	→	✗
KOLOBOV	✓	✓	✓	✓	✓	✓	→	✗		
KOZAK	✓	✓	✓	✓	✓	✓	→	→	→	→
LUKASH	✓	✓	✓	✓	✓	✓	→	→	→	→
PRYSYAZHNYUK	✓	✓	✓	✓	✓	✓	✗			
PSHONKA V.	✓	✓	✓	✓	✓	✓	→	→	→	→
STAVYTSKY	✓	✓	✓	✓	✓	✓	→	→	→	→
YANUKOVYCH O.	✓	✓	✓	✓	✓	✓	→	→	→	→
YANUKOVYCH V.	✓	✓	✓	✓	✓	✓	→	→	→	→
YEFREMOV	✓	✓	✓	✓	✓	✓	→	→	→	→
ZAKHARCHENKO	✓	✓	✓	✓	✓	✓	→	→	→	→
	AZAROV O.	✓	✓	✓	✓	✓	→	→	→	→
	KALININ	✓	✗							
	KURCHENKO	✓	✓	✓	✓	✓	→	→	→	→
	PORTNOV	✓	✗							
	PSHONKA A.	✓	✓	✓	✓	✓	→	→	→	→

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	<b>RATUSHNIAK</b>	✓	✓	✓	✓	✓	→	→	→	→
	<b>TABACHNYK</b>	✓	✓	✓	✓	✓	→	→	→	→
	<b>YAKYMENKO</b>	✓	✘							
	<b>YANUKOVYCH V. (Jr.)</b>	✓	✓	✘						

✓ Listing      → Renewal      ✘ De-listed due to court ruling      ✘ Deceased

<sup>i</sup> Le Conseil fédéral suisse (2014) Ordonnance instituant des mesures à l'encontre de certaines personnes originaires de l'Ukraine, 26 février 2014, available at: <<https://www.admin.ch/opc/fr/classified-compilation/20140488/index.html>>

<sup>ii</sup> Le Conseil fédéral suisse (2014) Ordonnance de blocage de valeurs patrimoniales dans le contexte de l'Ukraine, 25 mai 2016, available at: <<https://www.admin.ch/opc/fr/classified-compilation/20160294/index.html>>

<sup>iii</sup> La durée de validité de la présente ordonnance est prolongée jusqu'au 27 février 2019.

**Table 3: EU asset freezes on Tunisian targets**

<u>31.01.2011<sup>i</sup></u>	04.02.2011 <sup>ii</sup>	27.01.12 <sup>iii</sup>	31.01.13 <sup>iv</sup>	CID 30.07.13 <sup>v</sup>	30.01.14 <sup>vi</sup>	30.01.15 <sup>vii</sup>	28.01.16 <sup>viii</sup>	27.01.17 <sup>ix</sup>	29.01.18 <sup>x</sup>
Zine El Abidine Ben Haj Hamda Ben Haj Hassen BEN ALI	✓	→	→	→	✓	→	✓	→	→
Leila Bent Mohamed Ben Rhouma TRABELSI	✓	→	→	→	✓	→	✓	→	→
	Moncef Ben Mohamed Ben Rhouma TRABELSI	→	→	→	✓	✓	✓	→	→
	Mohamed Ben Moncef Ben Mohamed TRABELSI	→	→	✓	✓	→	✓	→	→
	Fahd Mohamed Sakher Ben Moncef Ben Mohamed Hfaiez MATERI	→	→	✓	✓	→	✓	→	✓
	Nesrine Bent Zine El Abidine Ben Haj Hamda BEN ALI	→	→	→	✓	→	✓	→	→
	Halima Bent Zine El Abidine Ben Haj Hamda BEN ALI	→	→	→	✓	→	✓	→	→
	Belhassen Ben Mohamed Ben Rhouma TRABELSI	→	→	→	✓	→	✓	→	→
	Mohamed Naceur Ben Mohamed Ben Rhouma TRABELSI	→	→	→	✓	→	✓	→	→
	Jalila Bent Mohamed Ben Rhouma TRABELSI	→	→	→	✓	→	✓	→	→
	Mohamed Imed Ben Mohamed	→	→	→	✓	→	✓	→	→

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	<b>Naceur Ben Mohamed TRABELSI</b>								
	<b>Mohamed Adel Ben Mohamed Ben Rehouma TRABELSI</b>	→	→	→	✓	✓	✓	→	→
	<b>Mohamed Mourad Ben Mohamed Ben Rehouma TRABELSI</b>	→	→	→	✓	→	✓	→	→
	<b>Samira Bent Mohamed Ben Rhouma TRABELSI</b>	→	→	→	✓	→	✓	→	→
	<b>Mohamed Montassar Ben Kbaier Ben Mohamed MEHERZI</b>	→	→	→	✓	→	✓	→	→
	<b>Nefissa Bent Mohamed Ben Rhouma TRABELSI</b>	→	→	→	✓	→	✓	→	→
	<b>Habib Ben Kaddour Ben Mustapha BEN ZAKIR</b>	→	→	→	✓	→	✓	→	→
	<b>Moez Ben Moncef Ben Mohamed TRABELSI</b>	→	→	→	✓	→	✓	→	→
	<b>Lilia Bent Noureddine Ben Ahmed NACEF</b>	→	→	→	✓	→	✓	→	→
	<b>Mourad Ben Hédi Ben Ali MEHDOUI</b>	→	→	→	✓	→	✓	→	→
	<b>Housseem Ben Mohamed Naceur Ben Mohamed TRABELSI</b>	→	→	→	✓	→	✓	→	→

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	<b>Bouthaina Bent Moncef Ben Mohamed TRABELSI</b>	→	→	→	✓	→	✓	→	→
	<b>Nabil Ben Abderrazek Ben Mohamed TRABELSI</b>	→	→	→	✓	→	✓	→	→
	<b>Mehdi Ben Ridha Ben Mohamed BEN GAIED</b>	→	→	→	✓	→	✓	→	→
	<b>Mohamed Slim Ben Mohamed Hassen Ben Salah CHIBOUB</b>	→	→	✓	✓	→	✓	→	→
	<b>Dorsaf Bent Zine El Abidine Ben Haj Hamda BEN ALI</b>	→	→	→	✓	→	✓	→	→
	<b>Sirine Bent Zine El Abidine Ben Haj Hamda BEN ALI</b>	→	→	→	✓	→	✓	✓	→
	<b>Mohamed Marouen Ben Ali Ben Mohamed MABROUK</b>	→	→	→	✓	→	✓	✓	→
	<b>Ghazoua Bent Zine El Abidine Ben Haj Hamda BEN ALI</b>	→	→	→	✓	→	✓	→	→
	<b>Slim Ben Mohamed Salah Ben Ahmed ZARROUK</b>	→	→	→	✓	→	✓	→	→
	<b>Farid Ben Haj Hamda Ben Haj Hassen BEN ALI</b>	→	→	→	✓	→	✓	→	→
	<b>Faouzi Ben Haj Hamda Ben Haj Hassen BEN ALI</b>	→	→	→	✓	✓	✓	→	→

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	Hayet Bent Haj Hamda Ben Haj Hassen BEN ALI	→	→	→	✓	→	✓	→	→
	Najet Bent Haj Hamda Ben Raj Hassen BEN ALI	→	→	→	✓	→	✓	→	→
	Slaheddine Ben Haj Hamda Ben Haj Hassen BEN ALI	→	→	→	✓	→	✓	→	→
	Kaïs Ben Slaheddine Ben Haj Hamda BEN ALI	→	→	→	✓	→	✓	→	→
	Hamda Ben Slaheddine Ben Haj Hamda BEN ALI	→	→	→	✓	→	✓	→	→
	Najmeddine Ben Slaheddine Ben Haj Hamda BEN ALI	→	→	→	✓	→	✓	→	→
	Najet Bent Slaheddine Ben Haj Hamda BEN ALI	→	→	→	✓	→	✓	→	→
	Douraied Ben Hamed Ben Taher BOUAOUINA	→	→	→	✓	→	✓	→	→
	Akrem Ben Hamed Ben Taher BOUAOUINA	→	→	→	✓	→	✓	→	→
	Ghazoua Bent Hamed Ben Taher BOUAOUINA	→	→	→	✓	→	✓	→	→
	Imed Ben Habib Ben Bouali LTAIEF	→	→	→	✓	→	✓	→	→
	Naoufel Ben Habib Ben Bouali LTAIEF	→	→	→	✓	→	✓	→	→
	Montassar Ben Habib Ben Bouali LTAIEF	→	→	→	✓	→	✓	→	→



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	<b>Mehdi Ben Tijani Ben Haj Hamda Ben Haj Hassen BEN ALI</b>	→	→	→	✓	→	✓	→	→
	<b>Slim Ben Tijani Ben Haj Hamda BEN ALI</b>	→	→	→	✓	→	✓	→	→
	<b>Sofiene Ben Habib Ben Haj Hamda BEN ALI</b>	→	→	→	✓	→	✓	→	→

✓ Listing      → Renewal

- <sup>i</sup> <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:028:0062:0064:EN:PDF>  
<sup>ii</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011D0079&from=EN>  
<sup>iii</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012D0050&from=EN>  
<sup>iv</sup> <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:032:0020:0020:EN:PDF>  
<sup>v</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D0409&from=EN>  
<sup>vi</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014D0049>  
<sup>vii</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015D0157&from=EN>  
<sup>viii</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016D0119&from=CS>  
<sup>ix</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D0153>  
<sup>x</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018D0141&from=EN>

**Table 4: Swiss asset freezes on Tunisian targets**

19.01.2011 <sup>i</sup>	28.01.2011 <sup>ii</sup>	04.02.2011 <sup>iii</sup>	19.01.2014 <sup>iv</sup>	25.05.2016 <sup>v</sup>
Zine El Abidine ben Hadj Hamda ben Hadj Hassen BEN ALI	-	✓	✓	✓
Leïla Bent Mohamed ben Rhouma TRABELSI	-	✓	✓	✓
	Moncef Ben Mohamed ben Rhouma TRABELSI	✓	✓	✓
Fahd Mohamed Sakher Ben Moncef ben Mohamed Hafiz MATERI	-	✓	✓	✓
Nesrine Bent Zine El Abidine ben Hadj Hamda BEN ALI	-	✓	✓	✓
Halima Bent Zine El Abidine Ben Hadj Hamda BEN ALI	-	✓	✓	✓
Belhassen Ben Mohamed ben Rhouma TRABELSI	-	✓	✓	✓
	Mohamed Ennacer Ben Mohamed ben Rhouma TRABELSI	✓	✓	✓
	Jalila bent Mohamed ben Rhouma TRABELSI	✓	✓	✓
Mohamed Imed Ben Mohamed Ennacer Ben Mohamed TRABELSI	-	✓	✓	✓
	Mohamed Adel Ben Mohamed TRABELSI	✓	✓	✓
Mohamed Mourad Ben Mohamed Ben Rhouma TRABELSI	-	✓	✓	✓
Samira Bent Mohamed Ben Rhouma TRABELSI	-	✓	✓	✓
	Moez Ben Moncef ben Mohamed TRABELSI	✓	✓	✓
	Housseem Ben Mohamed Ennacer ben Mohamed TRABELSI	✓	✓	✓
Mehdi Trabelsi <sup>vi</sup>				
Mohamed Slim ben Mohamed Hassen ben Salah CHIBOUB	-	✓	✓	✓

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Dorsaf bent Zine El Abidine ben Hadj Hamda BEN ALI	-	✓	✓	✓
Sirine bent Zine El Abidine ben Hadj Hamda BEN ALI	-	✓	✓	✓
Mohamed Marouane ben Ali ben Mohamed MABROUK	-	✓	✓	✓
Ghazoua bent Zine El Abidine ben Hadj Hamda BEN ALI	-	✓	✓	✓
Slim ben Mohamed Salah ben Ahmed ZARROUK	-	✓	✓	✓
Kaies Ben Slaheddine ben Hadj Hamda BEN ALI	-	✓	✓	✓
Sofiane ben Habib ben Hadj Hamda BEN ALI	-	✓	✓	✓
Hayet bent Hadj Hamda ben Hadj Hassen BEN ALI	-	✓	✓	✓
Djalila BEN ALI	.			
Moncef BEN ALI	-			
Marouane MABROUK	-			
Ismâïl MABROUK				
Moncef el MATERI	-			
Tahar el MATERI	-			
Afif CHIBOUB	-			
Alya ABDALLAH	-			
Abdelwahab ABDALLAH	-			
Hédi JILANI	-			
Driss GUIGA	-			

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<b>Kais GUIGA</b>	-			
<b>Taoufikb CHAÏBI</b>	-			
<b>Bassam LOUKIL</b>	-			
<b>Mohamed BEN JEMÂA</b>	-			
<b>Moncef MZABI</b>	-			
<b>Aziz MILED</b>	-			
<b>Brahim BEN YEDDER</b>	✓✓			
<b>Béchir BEN YEDDER</b>	✓✓			
<b>Rachid BEN YEDDER</b>	✓✓			
<b>GROUPE AMEN<sup>vii</sup></b>	✓✓			
		<b>Najet Bent Slaheddine ben Hadj Hamda BEN ALI</b>	✓	✓
		<b>Mohamed Ben Moncef ben Mohamed TRABELSI</b>	✓	✓
		<b>Mohamed Montassar Ben kebaier Ben Mohamed MEHREZI</b>	✓	✓
		<b>Nefissa Bent Mohamed Ben Rhouma TRABELSI</b>	✓	✓
		<b>Habib ben Gaddour ben Mustapha BEN ZAKIZ</b>	✓	✓
		<b>Lilia bent Noureddine ben Ahmed NACEF</b>	✓	✓
		<b>Mourad ben Hédi ben Ali MAHDOUI</b>	✓	✓
		<b>Bouthaïna bent Moncef ben Mohamed TRABELSI</b>	✓	✓
		<b>Nabil ben Abderrazzak ben Mohamed TRABELSI</b>	✓	✓

		Mehdi ben Ridha ben Mohamed BEN GAÏED	✓	✓
		Farid ben Hadj Hamda ben Hadj Hassen BEN ALI	✓	✓
		Faouzi ben Hadj Hamda ben Hadj Hassen BEN ALI	✓	✓
		Slaheddine ben Haj Hamda ben Hadj Hassen BEN ALI	✓	✓
		Hamda Ben Slaheddine ben Hadj Hamda BEN ALI	✓	✓
		Nejmeddine Ben Slaheddine ben Hadj Hamda BEN ALI	✓	✓
		Douraïd Ben Hamed Ben Taher BOUAOUINA	✓	✓
		Akram ben Hamed ben Taher BOUAOUINA	✓	✓
		Ghazoua bent Hamed ben Taher BOUAOUINA	✓	✓
		Imed ben Habib ben Bou-Ali LETAÏEF	✓	✓
		Naoufel ben Habib ben Bou-Ali LETAÏEF	✓	✓
		Montassar ben Habib ben Bou-Ali LETAÏEF	✓	✓
		Mehdi ben Tijani ben Hadj Hamda ben Hadj Hassen BEN ALI	✓	✓
		Slim ben Tijani ben Hadj Hamda BEN ALI	✓	✓

✓ New listing    ✓✓ Modification    🚶 De-listing

<sup>i</sup> <https://www.admin.ch/opc/fr/official-compilation/2011/461.pdf>

<sup>ii</sup> <https://www.admin.ch/opc/fr/official-compilation/2011/507.pdf>

<sup>iii</sup> <https://www.admin.ch/opc/fr/official-compilation/2011/567.pdf>

<sup>iv</sup> <https://www.admin.ch/opc/fr/classified-compilation/20110123/201401190000/946.231.175.8.pdf>

<sup>v</sup> <https://www.admin.ch/opc/fr/official-compilation/2016/1821.pdf>

<sup>vi</sup> Fils de Belhassen, représentant de Lacoste.

<sup>vii</sup> Groupe Amen, fondé au début du siècle par Brahim Ben Yedder, a été développé par ses fils Béchir Ben Yedder et Rachid Ben Yedder. Finance (Amen Bank, Amen Invest), Assurances (Comar et Hayett), santé (Clinique El Amen, Clinique la Marsa), agroalimentaire (café, huilerie, négoce), hôtellerie (hôtel Magestic, hôtel Dar Saïd et le restaurant Dar Zarrouk à Sidi Bou Saïd, hôtel Palace au centre ville), Biens d'équipement (Parenin concessionnaire de Caterpillar, Atlas Copco et John Deere).





**Table 6: Swiss asset freezes on Egyptian targets**

11.02.2011 <sup>i</sup>	11.02.2011	06.09.2012 <sup>ii</sup>	11.02.2014 <sup>iii</sup>	25.05.2016 <sup>iv</sup>
Mohamed Hosni Elsayed Mubarak	✓	✓	✓	✓
Suzanne Saleh Thabet	✓	✓	✓	✓
Mounir Thabet	✓	✓	✓	✓
Alaa Mohamed Hosni Elsayed Mubarak	✓	✓	✓	✓
Heidy Mahmoud Magdy Hussein Rasekh	✓	✓	✓	✓
Gamal Mohamed Hosni Elsayed Mubarak	✓	✓	✓	✓
Mohamed Zoheir Mohamed Wahid Garana	✓	✓	✓	✓
Khadiga Mahmoud El Gammal	✓	✓	✓	✓
Ahmed Abdelaziz Ezz	✓		✓	✓
Ahmed Alaeldin Amin Abdelmaksoud Elmaghraby	✓	✓	✓	✓
Rachid Mohamed Rachid Hussein	✓	✓	✓	✓
Habib Ibrahim Habib Eladli	✓	✓	✓	✓
		Elham Sayed Salem Sharshar	✓	✓
		Sherif Habib Ibrahim El Adli	✓	✓
		Hussein Kamal El Din Ibrahim Salem	✓	✓
		Nazima Abdel Hamid Ismail Mohamed	✓	✓
		Khaled Hussein Kamal El Din Ibrahim Salem	✓	✓
		Ain Al Hayah Abbas Mosaad Alhamamy	✓	✓
		Mohamed Ibrahim Ibrahim Soliman	✓	✓
		Mona Salah El Din El Monayeri	✓	✓
		Yassin Ibrahim Lotfy Mansour	✓	✓
		Sherin Mohamed Kamel Moustafa Kamel	✓	✓
		Gamal Eddin Abdel Aziz Amin Rashid	✓	✓



SANCTIONING KLEPTOCRATS  
AN ASSESSMENT OF EU MISAPPROPRIATION SANCTIONS



		<b>Magda Abdel Fattah Elbendary</b>	✓	✓
		<b>Ahmed Mahmoud Nazief</b>	✓	✓
		<b>Atef Mohamed Mohamed Ebid</b>	✓	✓
		<b>Nagd Mohamed Khames Hemedah</b>	✓	✓
		<b>Amin Sameh Samir Fahmy</b>	✓	✓
		<b>Nahed Tewfik Mahmoud Saad</b>	✓	✓
		<b>Mohamed Magdy Hussein Rasikh</b>	✓	✓
		<b>Mervat Abd El Kader Saleh Eid</b>	✓	✓

✓ Mention (to be applied with/without amendments)

<sup>i</sup> <https://www.admin.ch/dam/gov/fr/Bundesrecht/Ausserordentliche-Veroeffentlichungen/2011/Aegypten.2011.02.11.pdf.download.pdf/Aegypten.2011.02.11.pdf>

<sup>ii</sup> <https://www.admin.ch/opc/fr/classified-compilation/20110329/201209060000/946.231.132.1.pdf>

<sup>iii</sup> <https://www.admin.ch/opc/fr/classified-compilation/20110329/201402110000/946.231.132.1.pdf>

<sup>iv</sup> <https://www.admin.ch/opc/fr/official-compilation/2016/1817.pdf>