

COUNTRY	AMOUNT OF PRIVATE ASSETS FROZEN UNDER RUSSIAN SANCTIONS SINCE MARCH 2022	EXISTENCE OF LEGISLATION OR POLICY CONNECTING SANCTIONS TO THE OPENING OF INVESTIGATIONS	KNOWN INVESTIGATIONS INTO SANCTIONED WEALTH OF POTENTIALLY ILLICIT ORIGIN (FOR MONEY LAUNDERING AND RELATED CRIMES)	KNOWN INVESTIGATIONS INTO POTENTIAL SANCTIONS EVASION	EXISTENCE OF SANCTIONS (INTER)AGENCY TASK FORCE	REPO TASK FORCE MEMBERSHIP
Canada	USD 90 million ¹	No	0 2 opened confiscation cases under the C-19 Budget Implementation Act which did not require investigation ²	0	Yes, focus on coordinating sanctions implementation ³	Yes
France	Unknown (more than EUR 100,000 seized) ⁴	Yes, Circular published by the Ministry of Justice ⁵	17, including an indictment of Alexei Kouzmitchev ⁶	Case linked to Viktor Rashnikov's villa, sold shortly after the Russian invasion of Ukraine ⁷	Yes, focus on the identification, freezing and the potential seizure of sanctioned assets ⁸	Yes
Germany	EUR 4.48 billion, including central bank deposits. Unclear how much relates solely to targeted asset freezes ⁹	No	1 unsuccessful case on charges of money laundering, tax fraud and sanctions violation ¹⁰	150 cases under investigation for alleged violations of EU sanctions against Russia and Belarus ¹¹	Yes, focus on coordinating sanctions implementation and enforcement ¹²	Yes

Italy	Approximately EUR 2 billion ¹³	No	0	1 case linked to two yachts owned by Dmitry and Nikita Mazepin ¹⁴	Yes, pre-existing Financial Committee coordinating sanctions implementation and enforcement ¹⁵	Yes
Spain	More than EUR 1 billion ¹⁶	No	0	0	No	Yes
Switzerland	EUR 7,7 billion (CHF 7,5 billion) ¹⁷	Only under the FIAA legislation ¹⁸ applicable to failed regimes, not regarding Russian sanctions or asset-freezing sanctions in general	0	130 investigations, of which 29 triggered criminal proceedings. From these, half are already concluded. ¹⁹	Yes, focus on sanctions policy and implementation (Sanctions Policy Coordination Group) The creation of a specialised task force that would also focus on investigations was debated in the parliament but rejected ²⁰	No
UK	EUR 20,7 billion (GBP 18 billion) ²¹	No, but a task force created with a mandate to investigate corrupt elites, including those sanctioned ²²	0	Two publicised cases concerning Petr Aven and Mikhail Fridman ²³	Yes, includes focus on asset tracing and confiscation (Combatting Kleptocracy Cell) ²⁴	Yes

US	Unknown amount of frozen assets, USD 500 million (EUR 458 million) seized, forfeited or restrained ²⁵	No, but a task force created with a mandate to coordinate tracing and potential confiscation of assets ²⁶	Indicted over 30 individuals and 2 corporate entities accused of sanctions evasion, export control violations, money laundering, and other crimes ²⁷	Indicted over 30 individuals and 2 corporate entities accused of sanctions evasion, export control violations, money laundering, and other crimes Sanctions violation case linked to Konstantin Malofeyev resulted in USD 5.4 million confiscated and transferred to Ukraine ²⁸	Yes, includes focus on asset tracing and confiscation (Task Force Kleptocapture) ²⁹	Yes
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Table 1: Cross-country comparison of legislation, policy and practice supporting investigations linked to Russian asset-freezing sanctions.

¹ Cusack, John. “Where Are the Sanctioned Russian Assets Frozen in the West and How Much Is Actually Frozen?” Financial Crime News, February 23, 2023. <http://thefinancialcrimenews.com/where-are-the-sanctioned-russian-assets-frozen-in-the-west-and-how-much-is-actually-frozen/>.

² Government of Canada, “Canada starts first process to seize and pursue the forfeiture of assets of sanctioned Russian oligarch”, December 19, 2022. <https://www.canada.ca/en/global-affairs/news/2022/12/canada-starts-first-process-to-seize-and-pursue-the-forfeiture-of-assets-of-sanctioned-russian-oligarch.html>;
Government of Canada. Order Respecting the Seizure of Property Situated in Canada (Volga-Dnepr Airlines or Volga-Dnepr Group) SOR/2023-120. 2023. <https://www.gazette.gc.ca/rp-pr/p2/2023/2023-06-21/html/sor-dors120-eng.html>

³ Government of Canada. Order Respecting the Seizure of Property Situated in Canada (Volga-Dnepr Airlines or Volga-Dnepr Group) SOR/2023-120. 2023. <https://www.gazette.gc.ca/rp-pr/p2/2023/2023-06-21/html/sor-dors120-eng.html>

⁴ El Idrissi, Abdelhak. “Enquêtes Contre Les Oligarques Russes : La Justice Saisit Près de 60 Millions d’euros.” *Le Monde*, October 20, 2023. https://www.lemonde.fr/les-decodeurs/article/2023/10/20/enquetes-contre-les-oligarques-russes-la-justice-saisit-pres-de-60-millions-d-euros_6195535_4355770.html.

⁵ French Ministry of Justice. (2022). Le garde des Sceaux, ministre de la Justice. Accessed 9th of August 2023 from: <https://www.justice.gouv.fr/sites/default/files/migrations/portail/bo/2022/20220331/JUSD2207443C.pdf>

⁶ Le Monde. (2022). Russian oligarchs' assets targeted in new complaint. Published on May 25, 2022. Paris, France. Accessed 9th of August 2023 from: https://www.lemonde.fr/en/police-and-justice/article/2022/05/25/russian-oligarchs-assets-targeted-in-new-complaint_5984586_105.html; El Idrissi, Abdelhak. “L’oligarque Russe Alexei Kouzmitchev Mis En Examen En France Pour Blanchiment de Fraude Fiscale.” *Le Monde*, November 1, 2023. https://www.lemonde.fr/les-decodeurs/article/2023/11/01/l-oligarque-russe-alexei-kouzmitchev-mis-en-examen-en-france-pour-blanchiment-de-fraude-fiscale_6197730_4355770.html.

⁷ Le Monde. (2023). One villa seized and multiple investigations opened: French sanctions against Russian oligarchs begin to bear fruit. Published on March 1, 2023. Paris, France. Accessed 9th of August 2023 from: https://www.lemonde.fr/en/les-decodeurs/article/2023/03/01/one-villa-seized-and-17-investigations-opened-french-sanctions-against-russian-oligarchs-begin-to-bear-fruit_6017803_8.html

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- ⁸ Fauvelle, Marc. „Interview de M. Bruno Le Maire, ministre de l'économie, des finances et de la relance.“ *Vie-public*, March 1, 2022. <https://www.vie-publique.fr/discours/284205-bruno-le-maire-01032022-ukraine>
- ⁹ Reuters. “Some 4.48 Bln Euros of Russian Assets Frozen in Germany - FinMin.” June 15, 2022, sec. European Markets. <https://www.reuters.com/markets/europe/some-448-bln-euros-russian-assets-frozen-germany-finmin-2022-06-15/>.
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- ¹² Federal Ministry of Finance. “Implementation of the Sanctions on Russia – Overview.” Bundesministerium der Finanzen, March 18, 2022. <https://www.bundesfinanzministerium.de/Content/EN/Standardartikel/Topics/Europe/War-in-Ukraine/implementation-of-the-sanctions-on-russia.html>.
- ¹³ Vergine, Stefano. “Ecco il tesoro italiano degli oligarchi di Putin,” July 4, 2023. <https://www.editorialedomani.it/fatti/tesoro-italiano-oligarchi-di-putin-ivcg1o5k>.
- ¹⁴ L'Unione Sarda. “Olbia Fined One and a Half Million for Violating Sanctions against Russia,” December 6, 2022. <https://www.unionesarda.it/en/sardinia/olbia-fined-one-and-a-half-million-for-violating-sanctions-against-russia-m8ee6b5z>.
- ¹⁵ The Italian Ministry of Economy and Finance (*Ministero dell'economia e delle finanze*). *Comitato di sicurezza finanziaria* (Csf). https://www.dt.mef.gov.it/attivita_istituzionali/prevenzione_reati_finanziari/comitato_sicurezza_finanziaria
- ¹⁶ Ramírez, Begoña P. “España ha embargado yates, mansiones y cuentas de oligarcas rusos por 1.023 millones de euros.” *infolibre*, June 26, 2023. https://www.infolibre.es/economia/espana-embargado-yates-mansiones-cuentas-bancarias-oligarcas-rusos-1-023-millones-euros_1_1532691.html.
- ¹⁷ Canetg, Fabio. “Swiss Official Rejects Criticism of Russia Sanctions.” *SWI swissinfo.ch*, September 5, 2023. <https://www.swissinfo.ch/eng/politics/swiss-official-rejects-criticism-of-russia-sanctions/48786464>.
- ¹⁸ Federal Act on the Freezing and the Restitution of Illicit Assets held by Foreign Politically Exposed Persons (Foreign Illicit Assets Act, FIAA), 2015. <https://www.fedlex.admin.ch/eli/cc/2016/322/en>
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- ²⁰ Swiss parliament. “Schaffung Einer Taskforce Für Die Sperrung Der Vermögenswerte Russischer Und Belarussischer Oligarchinnen Und Oligarchen,” March 17, 2022. <https://www.parlament.ch/de/ratsbetrieb/suche-curia-vista/geschaefft?AffairId=20223214>.
- ²¹ Reuters. “Britain has frozen 18 billion pounds worth of Russian assets.” November 11, 2022. <https://www.reuters.com/world/uk/britain-says-it-has-frozen-18-billion-pounds-worth-russian-assets-2022-11-10/>
- ²² UK Government. “New Measures to Tackle Corrupt Elites and Dirty Money Become Law.” *GOV.UK*, March 15, 2022. <https://www.gov.uk/government/news/new-measures-to-tackle-corrupt-elites-and-dirty-money-become-law>.
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- ²⁵ U.S. Department of Justice. “FACT SHEET: Justice Department Efforts in Response to Russia’s February 2022 Invasion of Ukraine,” 2023. <https://www.justice.gov/opa/press-release/file/1569776/download>
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- ²⁷ Indicted over 30 individuals and 2 corporate entities accused of sanctions evasion, export control violations, money laundering, and other crimes. See U.S. Department of Justice. “FACT SHEET: Justice Department Efforts in Response to Russia’s February 2022 Invasion of Ukraine,” 2023. <https://www.justice.gov/opa/press-release/file/1569776/download>

²⁸ *Reuters*. “U.S. Attorney General OKs Transfer of Forfeited Funds from Russia Oligarch for Use in Ukraine.” May 10, 2023, sec. Europe.

<https://www.reuters.com/world/europe/us-attorney-general-oks-transfer-forfeited-funds-russia-oligarch-use-ukraine-2023-05-10/>.

²⁹ U.S. Department of Justice. “Attorney General Merrick B. Garland Announces Launch of Task Force KleptoCapture,” March 2, 2022. <https://www.justice.gov/opa/pr/attorney-general-merrick-b-garland-announces-launch-task-force-kleptocapture>.