



**U.S. DEPARTMENT OF THE TREASURY  
OFFICE OF FOREIGN ASSETS CONTROL**



**Enforcement Release: January 16, 2025**

**Family International Realty LLC and its Owner Settle with OFAC for \$1,076,923 Related to Apparent Violations of Ukraine-/Russia-Related Sanctions**

Miami, Florida-based real estate company Family International Realty LLC (the “Company”) and its natural U.S. person owner (“U.S. Person-1”) have agreed to pay \$1,076,923 to settle their potential civil liability for 73 apparent violations of OFAC’s Ukraine-/Russia-related sanctions. Between 2018 and 2023, U.S. Person-1 and the Company engaged in a willful scheme to evade OFAC sanctions by transferring nominal ownership of three luxury condominiums owned by two sanctioned Russian oligarchs, Valeri Abramov and Viktor Perevalov, to their non-sanctioned family members and to shell companies owned by those family members. The Company earned approximately \$182,442 in commission fees and reimbursements through rentals of two of the properties to third parties on behalf of Perevalov and the sale of the third property on behalf of Abramov.

The settlement amount reflects OFAC’s determination that the apparent violations were egregious and not voluntarily self-disclosed. The settlement amount also reflects U.S. Person-1’s resolution of criminal charges with the Department of Justice related to a subset of the apparent violations.

**Description of the Apparent Violations**

On January 26, 2018, OFAC designated and added Abramov and Perevalov to the Specially Designated Nationals and Blocked Persons List (SDN List) pursuant to Executive Order 13685.<sup>1</sup> OFAC designated the two oligarchs for having acted or purported to act for or on behalf of, directly or indirectly, VAD, AO, a Russian construction company they co-founded that was hired to build transportation infrastructure for the so-called “Republic of Crimea” following Russia’s illegal annexation and occupation of the Crimea region of Ukraine in 2014.

U.S. Person-1 maintained longstanding financial ties to both Abramov and Perevalov prior to their designations, including by: providing property management services for Abramov’s and Perevalov’s respective South Florida condominiums; exercising power of attorney over Perevalov’s bank account; and acting as the “care of” party for at least three bank accounts that were jointly owned by Abramov and Abramov’s spouse. Prior to, and at the time of the OFAC designations, U.S. Person-1 had been renting out as luxury hotel rooms two condominium units jointly owned by Perevalov and his spouse and was attempting to broker the sale of another condominium unit jointly owned by Abramov and his spouse.

Shortly after learning of OFAC’s designations of Abramov and Perevalov, U.S. Person-1 initiated a scheme on their behalf to transfer nominal ownership of their properties into the names of their non-

---

<sup>1</sup> U.S. Department of the Treasury, “[Treasury Sanctions Additional Individuals and Entities in Connection with the Conflict in Ukraine and Russia’s Occupation of Crimea](#)” (Jan. 26, 2018).

sanctioned family members. U.S. Person-1 understood or had reason to know that OFAC's designations meant that transactions involving Abramov's and Perevalov's properties were prohibited, and therefore sought to conceal their ownership interests. The objective of the scheme was to remove Abramov's and Perevalov's names from their respective property titles in order to obscure their ownership interests and facilitate the rental and potential future sale of the properties. U.S. Person-1 stood to earn a commission on these transactions through U.S. Person-1's ownership and management of the Company, which U.S. Person-1 used to further the scheme.

#### Apparent Violations Involving Abramov

Text message communications between U.S. Person-1 and Abramov immediately following Abramov's designation demonstrate U.S. Person-1's knowledge of Abramov's sanctioned status and the attendant consequences. Just hours after Abramov was designated, U.S. Person-1 warned Abramov via text message that "it will soon be forbidden to deal with you...I talked with people who know [about this issue] here." Nevertheless, U.S. Person-1 continued contacting potential buyers in an attempt to prevent OFAC's sanctions designation from impeding a future sale.

After U.S. Person-1 failed to find a buyer, U.S. Person-1 and Abramov pursued a plan to transfer ownership of Abramov's condominium from joint marital property to Abramov's spouse alone, with the intent of concealing Abramov's continued property interest. U.S. Person-1 worked together with a law firm to deed the property, valued at over \$1 million, to Abramov's spouse for \$100 in consideration in June 2018, as provided in the text of the transfer deed.

Additional text communications between U.S. Person-1 and an interlocutor for Abramov around this time show that U.S. Person-1 understood these efforts to be an evasion scheme. As U.S. Person-1 relayed to the interlocutor, "Abramov understands that without this [plan], all his money and apartment will be taken away from him!"

U.S. Person-1 attempted to sell Abramov's condominium unit in late June 2018 for \$1.1 million, but the sale ultimately did not come to fruition. Following a new cash offer for the unit by third parties in January 2019, U.S. Person-1 hired a new attorney to complete the sale. U.S. Person-1 and the attorney facilitated the sale of Abramov's property to the third parties in March 2019 for \$1.2 million. The Company earned a commission on the transaction and reimbursement for expenses previously incurred by U.S. Person-1 to maintain the property.

#### Apparent Violations Involving Perevalov

Shortly after Perevalov's designation, U.S. Person-1 called Perevalov to inform him of his sanctioned status. Soon thereafter, U.S. Person-1 agreed to act on Perevalov's instructions to conceal Perevalov's ownership interest in his two South Florida condominium units by removing Perevalov's name from the property title in order to continue to generate revenue from them and potentially facilitate their future sale.

In furtherance of this scheme, U.S. Person-1 worked with the first law firm to incorporate a Delaware shell company and transfer nominal ownership of Perevalov's condominium units. The shell company was owned by one of Perevalov's non-sanctioned minor children and was managed

in part by U.S. Person-1. Perevalov and his spouse transferred nominal ownership of their properties without consideration to the shell company in June 2018.

Following this transfer—and with Perevalov’s interest now concealed—the Company and U.S. Person-1 continued to rent out the properties as luxury hotel rooms until 2023. From March 21, 2018, to March 29, 2023, the Company and U.S. Person-1 rented or attempted to rent the properties on 64 occasions, generating or attempting to generate approximately \$840,254 in rental payment revenue for the shell company. The Company earned a commission on each completed transaction.

The conduct described above resulted in 73 apparent violations of prohibitions in §§ 2(a), 5(a), and 6(a) of Executive Order 13685.

### **Penalty Calculations and General Factors Analysis**

The statutory maximum civil monetary penalty applicable in this matter is \$30,080,709. OFAC determined that the Company and U.S. Person-1 did not voluntarily self-disclose the apparent violations and that the apparent violations constitute an egregious case. Accordingly, under OFAC’s Economic Sanctions Enforcement Guidelines (“Enforcement Guidelines”), 31 CFR part 501, app. A., the base civil monetary penalty applicable in this matter equals the statutory maximum of \$30,080,709.

The Company and U.S. Person-1’s obligation to pay \$182,442 of the settlement amount shall be deemed satisfied up to an equal amount by their payment to the Department of Justice in satisfaction of any criminal forfeiture order imposed in connection with the conduct at issue.

The total settlement amount of \$1,076,923 reflects OFAC’s consideration of the General Factors under the Enforcement Guidelines.

OFAC determined the following to be **aggravating factors**:

- (1) The Company and U.S. Person-1 executed a willful, sophisticated sanctions evasion scheme on behalf of two sanctioned oligarchs with knowledge that the underlying conduct constituted, or likely constituted, a violation of U.S. law.
- (2) The Company and U.S. Person-1 at all times had actual knowledge of the apparently violative conduct in which they were engaged; they also enlisted the help of others in furtherance of these efforts.
- (3) The Company and U.S. Person-1’s scheme spanned more than five years and produced approximately \$2.1 million in actual proceeds from dealings in blocked property for their purported owners, as well as a further \$1.1 million in expected proceeds from attempted dealings in blocked property. The Company earned approximately \$182,442 in commission and expense reimbursements from the dealings. The Company and U.S. Person-1 substantially undermined the objectives of OFAC’s Ukraine-/Russia-related sanctions by helping two sanctioned oligarchs to blunt the impact of OFAC’s designations and continue dealing in, and profiting from, their U.S. real property holdings.

OFAC determined the following to be **mitigating factors**:

- (1) U.S. Person-1's settlement is part of a comprehensive resolution with both OFAC and the Department of Justice. As part of the resolution with Department of Justice, U.S. Person-1 has pleaded guilty to a criminal charge relating to the same underlying conduct. The plea carries a statutory maximum sentence of five years in prison and a criminal forfeiture figure of \$182,442.
- (2) The Company and U.S. Person-1 cooperated with OFAC to resolve this matter.
- (3) Based on the financial condition of the Company and U.S. Person-1, OFAC determined mitigation from the base penalty to be warranted.

### **Compliance Considerations**

The conduct at issue in this case highlights the role that gatekeepers—including realtors, investment advisers, attorneys, and trust and corporate services providers—can play in enabling sanctions evasion. Such professionals possess unique expertise and technical know-how that enables them to provide critical business services. However, as demonstrated in this case and other recent actions,<sup>2</sup> these services can also be misused to conceal a sanctioned party's interest or evade sanctions compliance controls. In doing so, gatekeepers not only risk violating sanctions themselves, but also expose others to liability. Accordingly, gatekeepers should remain vigilant of the risk that unscrupulous actors, including sanctioned parties or their proxies, may seek to use professional services to conceal a property interest or otherwise evade OFAC sanctions. Financial institutions that deal with gatekeepers should conduct sufficient due diligence to ensure that gatekeepers are not acting as proxies for sanctioned parties. Financial institutions and other service providers should also apply heightened scrutiny when a gatekeeper may represent or purport to represent a close family member, agent, or associate of a sanctioned person.

This action also underscores the sanctions risks associated with commercial or residential real estate transactions. In recent years, the Department of the Treasury has highlighted these potential risks in an effort to arm individuals with the knowledge needed to identify sanctions evasion and to avoid dealing in blocked property. In particular, the Financial Crimes Enforcement Network (FinCEN) and the multilateral Russian Elites, Proxies, and Oligarchs (REPO) Task Force have published numerous alerts including specific red flags associated with sanctions evasion,<sup>3</sup> several of which were present in this case. Additionally, FinCEN announced in August 2024 a final rule designed to combat and deter money laundering by increasing transparency in the U.S. residential real estate

---

<sup>2</sup> See, e.g., U.S. Department of the Treasury, "[U.S. Treasury Blocks Over \\$1 Billion in Suleiman Kerimov Trust](#)" (Jun. 30, 2022), and U.S. Department of the Treasury, "[Corporate Officer Settles with OFAC for \\$45.179 Related to Six Apparent Violations of the Global Magnitsky Sanctions Regulations](#)" (Dec. 18, 2024).

<sup>3</sup> See, e.g., Financial Crimes Enforcement Network, "[FinCEN Advises Increased Vigilance for Potential Russian Sanctions Evasion Attempts](#)" (Mar. 7, 2022); Financial Crimes Enforcement Network, "[FinCEN Alert on Potential U.S. Commercial Real Estate Investments by Sanctioned Russian Elites, Oligarchs, and Their Proxies](#)" (Jan. 25, 2023); Russian Elites, Proxies, and Oligarchs Task Force, "[Global Advisory on Russian Sanctions Evasion Issued Jointly by the Multilateral REPO Task Force](#)" (Mar. 9, 2023).

sector.<sup>4</sup> As this case shows, sanctioned Russian elites, their family members, and their proxies may seek to exploit U.S. residential real estate to evade sanctions; FinCEN’s rule aims to counter a broad range of illicit activity that includes such efforts.

Lastly, this case demonstrates that the property interests of blocked persons are generally not extinguished by sham transfers of title or surreptitious efforts to obscure their connection. The broad definition of “property interest” under OFAC’s regulations may result in the blocking of a wide range of SDN-controlled property. OFAC’s regulations generally provide that sham transfers of title and similar attempts are null and void and without legal effect. Parties who attempt to evade OFAC sanctions through such post-designation arrangements, including by substituting family members or third parties as the owners of property in which blocked persons retain an interest, may find their efforts futile.

### **OFAC Enforcement and Compliance Resources**

On May 2, 2019, OFAC published [A Framework for OFAC Compliance Commitments](#) in order to provide organizations subject to U.S. jurisdiction, as well as foreign entities that conduct business in or with the United States or U.S. persons, or that use goods or services exported from the United States, with OFAC’s perspective on the essential components of a sanctions compliance program. The *Framework* also outlines how OFAC may incorporate these components into its evaluation of apparent violations and resolution of investigations resulting in settlements. The *Framework* includes an appendix that offers a brief analysis of some of the root causes of apparent violations of U.S. economic and trade sanctions programs OFAC has identified during its investigative process.

OFAC makes available on its website a variety of resources designed to assist with sanctions implementation and compliance, including [industry-specific guidance](#), [instructive videos](#), [answers to frequently asked questions](#), and [tools for searching OFAC’s sanctions lists](#).

Information concerning the civil penalties process can be found in the OFAC regulations governing each sanctions program; the Reporting, Procedures, and Penalties Regulations, 31 C.F.R. part 501; and the Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, app. A. These references, as well as recent civil penalties and enforcement information, can be found on OFAC’s website at <https://ofac.treasury.gov/civil-penalties-and-enforcement-information>.

### **Sanctions Whistleblower Program**

The U.S. Department of the Treasury’s Financial Crimes Enforcement Network (FinCEN) maintains a whistleblower incentive program for violations of OFAC-administered sanctions, in addition to other violations of the International Emergency Economic Powers Act and violations of the Bank Secrecy Act. Individuals located in the United States or abroad who provide information may be eligible for awards, if the information they provide leads to a successful enforcement action that results in monetary penalties exceeding \$1,000,000 and the statutory requirements in 31 U.S.C. 5323 are otherwise met. The incentive program is available for whistleblowers providing

---

<sup>4</sup> See Financial Crimes Enforcement Network, “[FinCEN Issues Final Rules to Safeguard Residential Real Estate, Investment Adviser Sectors from Illicit Finance](#)” (Aug. 28, 2024). The final rule will take effect on December 1, 2025.

information relating to potential violations at any type of enterprise in any commercial sector. FinCEN is currently accepting whistleblower tips.

For more information regarding OFAC regulations, please visit: <https://ofac.treasury.gov>.