

How do you identify locations subject to the new U.S. embargo on the DNR & LNR?

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The [new U.S. embargo](#) on the breakaway Donetsk People's Republic (DNR) and Luhansk People's Republic (LNR) regions of Ukraine present U.S. companies with the complicated task of determining whether a transaction or account involves a person located within either region.

The situation is similar to the challenge presented by the 2014 Crimea embargo. To comply with the embargo on Crimea, many U.S. companies developed lists of city names and postal codes associated with the Crimea region and added those locations to automated screening programs to identify transactions and customer accounts belonging to persons in or ordinarily resident in Crimea. A similar approach could be deployed to comply with the new embargo, with the added wrinkle that the two self-proclaimed republics each currently control only part of the Donetsk and Luhansk oblasts (administrative regions of Ukraine).

There are variety of tools available online to identify postal codes and cities or towns located in the two oblasts at issue, including those available [here](#), [here](#), and [here](#). Those tools will be over-inclusive based on the current line of contact between Ukrainian forces and the separatists. To determine whether a specific location is subject to separatist control, companies will need to take an additional step and determine whether the location is east of the line of contact. Detailed maps of the current line of contact can be found [here](#) and [here](#).

As noted in our prior post, the territory subject to the embargo could change depending on how the situation develops in Ukraine.