

# CJEU Rulings on Restrictive EU Measures against Russia (May – October 2025)



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News

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This news item summarises rulings by the Court of Justice of the European Union (CJEU), i.e. the General Court (GC) and the Court of Justice (ECJ), between May 2025 and October 2025 in relation to EU sanctions against Russia in response to the war in Ukraine. For previous developments → [eu-crim 1/2025, 6-7](#).

- **4 June 2025:** The [GC rejects](#) an action by Alfa-Bank JSC, a major Russian private bank, challenging its inclusion on the EU sanctions list tied to Russia's war in Ukraine. The Court holds that the Council lawfully applied criterion (g) of Decision 2014/145/CFSP, targeting legal persons involved in sectors generating substantial revenue for the Russian state, and that the listing of Alfa-Bank properly relied on its status as the largest private bank in Russia and its operation in a key sector of the Russian economy ([Case T-271/23](#)). The GC dismisses Alfa-Bank's claims, finding that the Council's evidence was sufficiently specific and consistent, and that the reasoning given – linking the bank's systemic importance and role in the Russian financial system to the criterion – was adequate to enable the applicant to understand the decision and to permit judicial review. The GC also holds that, even though the Council did not directly notify the bank at first, delivery via its authorised lawyer satisfied the requirement that the bank have access to reasons and evidence.
- **25 June 2025:** The [GC annuls](#) the EU Council's decision to retain *Pavel Ezubov*, cousin of Russian oligarch *Oleg Deripaska*, on the sanctions list. It found that the Council had not sufficiently established that Mr *Ezubov* "benefitted from a leading businessperson operating in Russia" ([Case T-273/24](#)). The Council had justified the listing by alleging that Mr *Deripaska* had transferred significant assets to his cousin, including a luxury hotel in Lech (Austria), several properties in France, and a number of companies. The GC rejects the Council's argument that Mr *Ezubov*, as an "immediate family member," was benefitting from Mr *Deripaska*'s business empire: the "benefitting" criterion must be interpreted in light of its purpose, i.e., preventing the circumvention of sanctions and increasing pressure on the Russian government, and thus requires proof of a non-negligible financial or non-financial advantage that still existed when the measures were adopted. According to the GC, a family relationship alone does not constitute sufficient evidence of this type of benefit.
- **23 July 2025:** The [GC upholds](#) the listing of a person anonymised as "OT" under the EU's Russia–Ukraine sanctions framework, rejecting his challenge to the Council's acts of September 2023 and March 2024, which maintained him on the restrictive-measures lists ([Case T-1095/23](#)). The Council had argued that OT was a major shareholder in Alfa Group, and that subsidiaries and associated

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entities had financial ties to Russian authorities and their operations in occupied Ukrainian territories. OT alleged violations of his rights of defence, including failure to provide critical evidence before the decision, and errors in assessing whether he met the listing criteria. The GC acknowledges that the evidence file was delivered too late, but holds that OT had not shown that earlier disclosure would have altered the outcome. Thus, the procedural breach did not justify annulling the listing. On substance, the GC determines that the Council's evidence was sufficiently specific, consistent, and reliable to support the conclusion that OT qualified as a "leading businessperson operating in Russia" and as a businessperson in sectors providing substantial revenue to the Russian state.

- **1 August 2025:** The [ECJ dismisses](#) the appeal in *C-703/23 P, Timchenko v Council*, and upholds the GC's judgment of 6 September 2023 ([Case T-361/22](#)) confirming EU sanctions imposed on *Elena Petrovna Timchenko*. The dispute turned on the scope of the "associated persons" ground in Decision 2014/145/CFSP (Art. 1(1), in fine), mirrored in Regulation No 269/2014), i.e., whether a person may be listed purely by virtue of a family tie to a sanctioned individual (in this case, her husband, *Gennady Timchenko*), and what "association" means in that context. The ECJ endorses the GC's approach: "association" requires objectively common interests that go beyond the mere family relationship; it need not take the form of a business venture or a formal legal structure and must be read broadly in light of the regime's objective to prevent circumvention of primary listings. According to the ECJ, the GC correctly applied this standard by finding that Ms and Mr *Timchenko* co-founded and played an active, empowered role in the Timchenko Foundation, with direct links to its operational activities. On a textual point, it corrects the GC's reading of the adverb "indûment" in recital 7 of the April 2022 acts, holding that it does not impose a subjective element (such as the family member's awareness that a benefit derives from a person meeting a listing criterion); requiring proof of such knowledge would undermine the anti-circumvention purpose. That interpretive error, however, did not affect the outcome, because the listing was justified on the broader, correct understanding of "association." The ECJ also rejects the appellant's contention that the Council had to prove a specific link between her own activities (e.g., within the foundation) and Russia's invasion of Ukraine. Under the framework, her listing rested on being associated with a person already validly listed under criterion (a); the Council was not required to establish a separate causal nexus between her individual conduct and the underlying geopolitical actions.
- **3 September 2025:** The [GC dismisses](#) *Alisher Usmanov's* challenge to his inclusion on the EU Russia-related sanctions lists, ruling that the Council had a sufficiently solid factual basis to treat him as a "leading businessperson operating in Russia" under the post-2023 version of criterion (g) ([Case T-1117/23](#)). The GC finds that Mr *Usmanov's* significant stakes and role linked to USM Holding – with interests including Metalloinvest (metals) and Megafon (telecoms) – demonstrated the requisite economic weight to meet the listing criterion. The GC also stresses that one valid ground suffices to uphold a listing, so alternative sub-criteria need not be assessed. It reiterates that, in sanctions cases, the Council may rely on publicly available sources (including press reports) provided they form a specific, precise, and consistent body of evidence, and notes the Council's wide discretion in Common Foreign and Security Policy (CFSP) matters.
- **10 September 2025:** The [GC annuls](#) the 2024 and 2025 Council acts maintaining *Dmitry Alexandrovich Pumpyanskiy*, former chairman of the steel group TMK and president of Group Sinara, on the EU Russia-related sanctions list ([Case T-541/24](#)). The GC finds that the Council had failed to substantiate his continued classification as a "leading businessperson operating in Russia" or as a person "supporting or benefitting from" the Russian government. Mr *Pumpyanskiy* had argued that he had resigned from his corporate roles in March 2022, sold his shares, and no longer played any part in the Russian economy, and that the Council had not produced a "specific, precise, and consistent body of evidence", as required under Art. 47 of the Charter of Fundamental Rights and the CJEU case law (including *Kadi II*). Referring to its earlier rulings in relation to Mr *Pumpyanskiy's* listing ([T-740/22](#) and

T-272/24), the GC holds that the Council's evidence – press articles, company registry excerpts, and references to Mr *Pumpyanskiy's* presence at official events – indeed did not establish ongoing economic or political influence. His former positions at said companies, his membership in the Russian Union of Industrialists and Entrepreneurs (RSPP), and his attendance at meetings with Russia's President *Vladimir Putin* could not, without additional evidence, prove that he still operated as a “leading businessperson” or contributed to sectors generating state revenue. Since the Council based its decision entirely on past activities, it had erred in assessment and failed to show that the criteria of Arts. 2(1)(f) or (g) remained satisfied.

- **10 September 2025:** The GC dismisses the action brought by *Positive Group PAO*, a Russian IT company, against its inclusion on the EU sanctions list, confirming that the Council acted within its CFSP discretion and respected the company's rights under EU law. The case (T-573/23) concerned the validity of Council Decision (CFSP) 2023/1218, which introduced a new listing criterion targeting Russian IT entities holding licences issued by the Federal Security Service (FSB) or relating to weapons or military equipment on the basis that such entities contribute to Russia's aggression against Ukraine. Positive Group sought annulment under Art. 263 TFEU, arguing that the criterion was vague, unforeseeable, and disproportionate, infringing its freedom to conduct business (Art. 16 of the Charter of Fundamental Rights) and its right to effective judicial protection (Art. 47 of the Charter). The GC rejects all pleas, holding that the new listing criterion was sufficiently clear and foreseeable and pursues the legitimate objective of protecting EU security and public policy. Given the crucial role of the Russian IT sector in cyber operations and information warfare, the Court finds the measure proportionate. It further rules that the Council's statement of reasons allowed the applicant to understand the basis for its listing and to challenge it effectively.
- **11 September 2025:** The ECJ rules that entities whose assets are frozen under the EU's Ukraine-related sanctions regime may obtain authorisation to release limited funds in order to pay the court fees required to challenge national measures implementing those sanctions (Case C-384/24). The referring Council of State, Belgium, sought guidance on the interpretation of derogations made under Council Regulation (EU) No 269/2014 as amended in 2022. The Regulation formed the basis for the freezing of funds of the *Russisch-Kirgizisch Ontwikkelingsfonds (RKDF)* at the Belgian Euroclear Bank. RKDF applied for authorisation to transfer funds to pay the roll fee and a flat-rate contribution required to lodge an appeal. Belgian authorities refused, arguing that such payments were not covered by the derogations in Art. 4(1) of the Regulation. The ECJ holds that Art. 4(1)(a) of Regulation 269/2014 (funds/economic resources necessary to satisfy the “basic needs”), read in light of Art. 47 CFR, permits the release of frozen funds to cover the national court fees and mandatory contributions required to bring an action against a national measure implementing the sanctions. Such payments constitute “taxes” necessary to satisfy basic needs, as they ensure access to justice and thus the effective exercise of the right to a fair trial. By contrast, the ECJ finds that Art. 4(1)(b), which covers expenses for legal services, does not apply to court fees, since they are paid to public authorities, rather than legal professionals.
- **24 September 2025:** The GC dismisses the action brought by Serbian businessman and politician *Bogoljub Karić* against his continued inclusion on the EU sanctions list related to Belarus, holding that the Council respected his procedural rights and that the restrictive measures were based on a sufficiently solid factual foundation (Case T-238/24). The GC finds in particular that the Council's statement of reasons met the requirements of Art. 296 TFEU, explicitly referring to Arts. 3(1)(b) and 4(1)(b) of Decision 2012/642/CFSP, namely that Mr *Karić* benefited from and supported the *Lukashenko* regime. The GC also sees no violation of Mr *Karić's* right to effective judicial protection under Art. 47 of the Charter given that the decision's reasoning – detailing his network of real-estate companies in Belarus, his family's close contacts with President *Lukashenko* and his entourage, and the preferential treatment those companies received - was sufficiently specific and contextual to enable him to

understand the measure and contest it. The GC also emphasises that EU law does not require the Council to provide exhaustive factual detail and that CFSP sanctions are preventive, not punitive, so the Council may rely on earlier evidence so long as the relevant circumstances have not changed. Lastly, the GC rules that "support" within the meaning of the sanctions framework is not limited to direct financial assistance but may also cover commercial activity that legitimises or strengthens the regime.

- **15 October 2025:** The GC **annuls** the March 2025 acts maintaining *Galina Evgenyevna Pumpyanskaya* on the EU Russia-related sanctions lists (**Case T-235/25**). The Council extended the listing of Ms *Pumpyanskaya* on the ground that she was an "immediate family member benefitting from" her husband, *Dmitry A. Pumpyanskiy*, characterised as a "leading businessperson operating in Russia." According to the GC, this foundation collapses in light of its judgment of 10 September 2025 in T-541/24, *Pumpyanskiy v Council* (see above), which found the Council to have wrongly classified Mr *Pumpyanskiy* as a "leading businessperson operating in Russia". Because Ms *Pumpyanskaya's* 2025 maintenance rested exclusively on the premise that she benefited from someone who met that status, the Council's assessment was vitiated.
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