

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:

Eleview International Inc.
Oleg Nayandin
Vitaliy Borisenko
4262 Entre C. Ste K
Chantilly, VA 20151

Respondents

ORDER RELATING TO
ELEVIEW INTERNATIONAL, INC., OLEG NAYANDIN, AND VITALIY
BORISENKO

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Eleview International Inc. (“Eleview”), Oleg Nayandin (“Nayandin”), and Vitaliy Borisenko (“Borisenko”) (collectively, the “Respondents”) of its intention to initiate an administrative proceeding against the Respondents pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”)¹, through the issuance of a Proposed Charging Letter to the Respondents that alleges that the Respondents jointly and severally committed three violations of the Regulations.²

¹ The Regulations are issued under the authority of the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232, 132 Stat. 2208 (“ECRA” 50 U.S.C. §§ 4801-4852).

² The Regulations are currently codified in the Code of Federal Regulations (the “Code”) at 15 C.F.R. Parts 730-774 (2025). The regulations governing the violations at issue, which occurred in 2022-2023, are found in the 2022-2023 versions of the Code (15 C.F.R. Parts 730-774 (2022-2023)). The 2025 Regulations govern the procedures that apply to this matter.

WHEREAS, I have taken into consideration the Plea Agreements between the Respondents and the United States Attorney's Office for the Eastern District of Virginia ("Plea Agreements");

WHEREAS, BIS and the Respondents have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations, whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein;

WHEREAS, the Respondents admit committing the violations described in the Settlement Agreement, specifically:

Charge 1 15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation

1. On multiple occasions from at least on or about February 24, 2022 through on or about June 21, 2023, the Respondents transferred and forwarded items subject to the EAR, including items classified under Export Control Classification Numbers (ECCNs) 3A992.a, 5A991.b, and 5A992.c, to end users in Russia without the required BIS licenses.
2. Beginning with a rulemaking effective February 24, 2022, BIS responded to the further Russian invasion of Ukraine by implementing a series of comprehensive export controls meant to severely restrict Russia's access to technologies and other items that could be used for its military capabilities. At all times during the relevant period, Section 746.5³ of the Regulations imposed a BIS license requirement for export, reexport, or in-country transfer of any item listed under an ECCN on the Commerce Control List (CCL) at Supplement No. 1 to Part 774 of the Regulations.
3. Eleview is a company that, among other services, conducts a freight consolidation and forwarding business out of a warehouse in Chantilly, Virginia. Eleview's website (BuyUSA.ru) allows individuals in Russia to order goods from the United States directly from U.S. retailers, which shipped the products to Eleview for consolidation and shipment to the customer, either directly or through another freight forwarder. Nayandin is the owner, CEO, and President of Eleview. Borisenko is an Eleview employee involved in the day-to-day operations of Eleview's freight forwarding business. Both Nayandin and Borisenko were involved in the export of the prohibited goods.

³ While the applicable license requirement at the time of the violations was found in Section 746.5, the same requirement has since been moved to Section 746.8(a)(1), pursuant to a June 2024 amendment to the EAR. 89 Fed. Reg. 51644 (June 18, 2024).

4. In or about March 2022, the Respondents met with BIS Special Agents at Eleview's warehouse to discuss U.S. export controls on transactions involving Russia. During this meeting, Nayandin stated that Respondents had knowledge of U.S. export controls and that he and Borisenko attended a webinar training on export controls and were familiar with the Department of Commerce's licensing platform. Nayandin also stated that Eleview did not ship items that required a license. BIS Special Agents provided guidance on export control topics such as red flags, reporting export violations, guidance for freight forwarders, lists to check, know your customer, records to be maintained, embargoed nations, and general prohibitions, and followed up with written guidance on these topics. Despite this, the Respondents subsequently coordinated and participated in shipment of goods to Turkey, Finland, and Kazakhstan either knowing or deliberately ignoring red flags that the goods would be thereafter shipped to Russia (*i.e.*, transshipped). Among those items transshipped through these countries to Russia were items the Respondents knew, or had reason to know, required BIS licenses for export, but for which the Respondents neither sought nor obtained licenses.
5. By transferring and forwarding items subject to the EAR with knowledge that a violation of the EAR was intended to occur in connection with the items, the Respondents committed one violation of Section 764.2(e) of the Regulations.

Charge 2 15 C.F.R. § 764.2(g) – Misrepresentation and Concealment of Facts

6. On multiple occasions from on or about February 24, 2022 through on or about June 21, 2023, the Respondents made false and misleading statements of material fact to a U.S.-based freight forwarding company in connection with the submission of an Electronic Export Information (EEI) filing, which collects basic information about items exported and the parties to an export.
7. The Regulations require exporters to file EEI for certain exports, including when an export requires a license application, regardless of value or destination. 15 C.F.R. § 758.2(b)(2). The EEI is an "export control document," as defined in § 772.1 of the Regulations, and furthermore, "is a statement to the United States Government that the transaction occurred as described." *Id.* § 758.1(a).
8. In the course of coordinating and participating in transshipment through Turkey, Finland, and Kazakhstan, the Respondents directed the filing of EEI falsely claiming that the end users of the associated transactions were in Turkey, Finland, or Kazakhstan, when in fact they knew or deliberately ignored red flags suggesting that some or all of the items in some of the shipments were in fact destined for end users in Russia.
9. At all times during the relevant period, the Respondents had a responsibility as the exporter and United States Principal Party in Interest of the transaction to ensure the accuracy of information provided to the freight forwarder for the purpose of effecting the export of items subject to the EAR. The Respondents were not

absolved of their responsibility to ensure the accuracy of such information because of their use of a freight forwarder to effectuate their exports. *See* 15 C.F.R. § 758.3.

10. By submitting false and misleading information in connection with the submission of an EEI on multiple occasions, the Respondents committed one violation of Section 764.2(g) of the Regulations.

Charge 3 15 C.F.R. § 764.2(g) – Misrepresentation and Concealment of Facts

11. On one occasion in or around April 2022, the Respondents made false and misleading statements to BIS in the course of an export subject to the EAR, when they provided false information in a Form BIS-711 “Statement by Ultimate Consignee and Purchaser” and sent it to a BIS Special Agent.
12. Telecommunications switches classified as 5A991.c have an array of potential applications, including use by consumers or use by militaries to create and expand communication networks. In or around February and March 2022, Eleview arranged for a shipment of switches classified under 5A991.c to a telecommunications company in Kazakhstan that Respondents knew was affiliated with a Russian telecommunications company. The Russian telecommunications company was a supplier to Russia’s Federal Security Service in addition to civilian businesses and consumers.
13. Although the Russian telecommunications company had been a client of Eleview for 10 or more years, exports of such items to Russia were no longer permissible without a BIS license under the expanded export controls to Russia. The Respondents listed the Kazakhstan affiliate as the ultimate consignee and Kazakhstan as the country of ultimate destination, when they knew or deliberately ignored red flags that the Russian telecommunications company in Russia was the ultimate consignee.
14. In or around April 2022, Nayandin emailed a BIS Special Agent a Form BIS-711 for this shipment of switches to the Kazakhstan affiliate of the Russian telecommunications company. The BIS-711 contained false information regarding the length of time that Eleview had been in business with the Kazakhstan affiliate. At the time Nayandin sent the certificate, he knew the information in the BIS-711 was false.
15. By making a false and misleading statement to a BIS Special Agent in the course of an export subject to the EAR, the Respondents committed one violation of Section 764.2(g) of the Regulations.

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, Eleview shall be assessed a civil penalty in the amount of \$125,000. Payment of the \$125,000 shall be suspended until Respondent makes payment of the criminal penalty pursuant to the terms of the Plea Agreements, and thereafter such payments shall be credited toward the total \$125,000 penalty amount due under this agreement. If Respondent fails to pay the criminal penalty, then the suspension shall be revoked and the full amount of the suspended penalty shall be imposed and become immediately due.

SECOND, Eleview's officers and employees shall complete export compliance training within three months from the date of this Order, and Eleview's officers and employees shall complete export compliance training annually during the three-year probationary period for a total of three compliance trainings. Before Eleview's officers and employees attend a compliance training course or program, Eleview shall notify the Office of Export Enforcement, Special Agent in Charge of the Washington Field Office, of the course or program they have selected to attend. No later than one month after attending the compliance training course or program, Eleview shall submit a certification of attendance from the training provider to the Office of Export Enforcement, Washington Field Office, 45610 Woodland Road, Suite 425, Sterling, VA 20166.

THIRD, for a period of three (3) years from the date of the Order, Eleview International Inc., with a last known address of 4262 Entre C. Ste K, Chantilly, VA 20151, Nayandin, and Borisenko shall be made subject to a three-year denial of their export privileges under the Regulations ("denial"). As authorized by Section 766.18(c) of the Regulations, such denial as to Eleview shall be suspended during this three-year probationary period and shall thereafter be waived, provided that Eleview has fully and timely paid the civil penalty as set forth above, has complied with the training

requirements as set forth above, has complied with the provisions of the Plea Agreement, and has not committed any violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations. As authorized by Section 766.18(c) of the Regulations, such denial as to Nayandin and Borisenko shall be suspended during this three-year probationary period and shall thereafter be waived, provided that Nayandin and Borisenko have complied with the training requirements as set forth above, have complied with the provisions of their Plea Agreements, and have not committed any violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations. If any Respondent does not fully and timely comply with the training requirements, or commits any violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations during the three-year suspension period under the Order, the suspension of the denial of that Respondent's export privileges may be modified or revoked by BIS pursuant to Section 766.17(c) of the Regulations and a denial order (including a three-year denial period) activated against that Respondent. If the suspension of the denial is modified or revoked, the activation order may also revoke any BIS licenses in which that Respondent has an interest at the time of the activation order.

FOURTH, should the suspension of the denial be modified or revoked pursuant to Section 766.17(c) of the Regulations, and a denial order (including a three-year denial period) be activated against any Respondent, for the duration of such denial order, that Respondent, and when acting for or on that Respondent's behalf, that Respondent's successors, assigns, directors, officers, employees, representatives, or agents (hereinafter collectively referred to as "Denied Person"), may not, directly or indirectly, participate in any way in any transaction involving any commodity, software or technology (hereinafter

collectively referred to as “item”) exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

- A. Applying for, obtaining, or using any license, license exception, or export control document;
- B. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or engaging in any other activity subject to the Regulations; or
- C. Benefitting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or from any other activity subject to the Regulations.

FIFTH, should the suspension of the denial be modified or revoked, and a denial order be activated against any Respondent, for the duration of the denial order, no person may, directly or indirectly, do any of the following:

- A. Export or reexport to or on behalf of the Denied Person any item subject to the Regulations;
- B. Take any action that facilitates the acquisition or attempted acquisition by the Denied Person of the ownership, possession, or control of any item subject to the Regulations that has been or will be exported from the United States, including financing or other support activities related to a

transaction whereby the Denied Person acquires or attempts to acquire such ownership, possession or control;

- C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from the Denied Person of any item subject to the Regulations that has been exported from the United States;
- D. Obtain from the Denied Person in the United States any item subject to the Regulations with knowledge or reason to know that the item will be, or is intended to be, exported from the United States; or
- E. Engage in any transaction to service any item subject to the Regulations that has been or will be exported from the United States and which is owned, possessed or controlled by the Denied Person, or service any item, of whatever origin, that is owned, possessed or controlled by the Denied Person if such service involves the use of any item subject to the Regulations that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

SIXTH. after notice and opportunity for comment as provided in Section 766.23 of the Regulations, any person, firm, corporation, or business organization related to the Denied Person by ownership, control, position of responsibility, affiliation, or other connection in the conduct of trade or business may also be made subject to the provisions of this Order.

SEVENTH, the Proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.

A handwritten signature in black ink, appearing to read 'David Peters', written over a horizontal line.

David Peters
Assistant Secretary of Commerce for Export
Enforcement

Issued this 23rd day of October, 2025.

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:

Eleview International Inc.
Oleg Nayandin
Vitaliy Borisenko
4262 Entre C. Ste K
Chantilly, VA 20151

Respondents

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Eleview International Inc. (“Eleview”), Oleg Nayandin (“Nayandin”), Vitaliy Borisenko (“Borisenko”) (collectively, the “Respondents”), and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”).¹

WHEREAS, BIS has notified the Respondents of its intentions to initiate an administrative proceeding against them pursuant to the Regulations;²

WHEREAS, BIS has issued a Proposed Charging Letter to the Respondents that alleges that they jointly and severally committed three violations of the Regulations, specifically:

¹ The Regulations are issued under the authority of the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232, 132 Stat. 2208 (“ECRA”).

² The Regulations are currently codified in the Code of Federal Regulations (the “Code”) at 15 C.F.R. Parts 730-774 (2025). The regulations governing the violations at issue, which occurred in 2022-2023, are found in the 2022-2023 versions of the Code (15 C.F.R. Parts 730-774 (2022-2023)). The 2025 Regulations govern the procedures that apply to this matter.

Charge 1 15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation

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2. Beginning with a rulemaking effective February 24, 2022, BIS responded to the further Russian invasion of Ukraine by implementing a series of comprehensive export controls meant to severely restrict Russia's access to technologies and other items that could be used for its military capabilities. At all times during the relevant period, Section 746.5³ of the Regulations imposed a BIS license requirement for export, reexport, or in-country transfer of any item listed under an ECCN on the Commerce Control List (CCL) at Supplement No. 1 to Part 774 of the Regulations.
3. Eleview is a company that, among other services, conducts a freight consolidation and forwarding business out of a warehouse in Chantilly, Virginia. Eleview's website (BuyUSA.ru) allows individuals in Russia to order goods from the United States directly from U.S. retailers, which shipped the products to Eleview for consolidation and shipment to the customer, either directly or through another freight forwarder. Nayandin is the owner, CEO, and President of Eleview. Borisenko is an Eleview employee involved in the day-to-day operations of Eleview's freight forwarding business. Both Nayandin and Borisenko were involved in the export of the prohibited goods.
4. In or about March 2022, the Respondents met with BIS Special Agents at Eleview's warehouse to discuss U.S. export controls on transactions involving Russia. During this meeting, Nayandin stated that Respondents had knowledge of U.S. export controls and that he and Borisenko attended a webinar training on export controls and were familiar with the Department of Commerce's licensing platform. Nayandin also stated that Eleview did not ship items that required a license. BIS Special Agents provided guidance on export control topics such as red flags, reporting export violations, guidance for freight forwarders, lists to check, know your customer, records to be maintained, embargoed nations, and general prohibitions, and followed up with written guidance on these topics. Despite this, the Respondents subsequently coordinated and participated in shipment of goods to Turkey, Finland, and Kazakhstan either knowing or deliberately ignoring red flags that the goods would be thereafter shipped to Russia (*i.e.*, transshipped). Among those items transshipped through these countries to Russia were items the

³ While the applicable license requirement at the time of the violations was found in Section 746.5, the same requirement has since been moved to Section 746.8(a)(1), pursuant to a June 2024 amendment to the EAR. 89 Fed. Reg. 51644 (June 18, 2024).

Respondents knew, or had reason to know, required BIS licenses for export, but for which the Respondents neither sought nor obtained licenses.

5. By transferring and forwarding items subject to the EAR with knowledge that a violation of the EAR was intended to occur in connection with the items, the Respondents committed one violation of Section 764.2(e) of the Regulations.

Charge 2 15 C.F.R. § 764.2(g) – Misrepresentation and Concealment of Facts

6. On multiple occasions from on or about February 24, 2022 through on or about June 21, 2023, the Respondents made false and misleading statements of material fact to a U.S.-based freight forwarding company in connection with the submission of an Electronic Export Information (EEI) filing, which collects basic information about items exported and the parties to an export.
7. The Regulations require exporters to file EEI for certain exports, including when an export requires a license application, regardless of value or destination. 15 C.F.R. § 758.2(b)(2). The EEI is an “export control document,” as defined in § 772.1 of the Regulations, and furthermore, “is a statement to the United States Government that the transaction occurred as described.” *Id.* § 758.1(a).
8. In the course of coordinating and participating in transshipment through Turkey, Finland, and Kazakhstan, the Respondents directed the filing of EEI falsely claiming that the end users of the associated transactions were in Turkey, Finland, or Kazakhstan, when in fact they knew or deliberately ignored red flags suggesting that some or all of the items in some of the shipments were in fact destined for end users in Russia.
9. At all times during the relevant period, the Respondents had a responsibility as the exporter and United States Principal Party in Interest of the transaction to ensure the accuracy of information provided to the freight forwarder for the purpose of effecting the export of items subject to the EAR. The Respondents were not absolved of their responsibility to ensure the accuracy of such information because of their use of a freight forwarder to effectuate their exports. *See* 15 C.F.R. § 758.3.
10. By submitting false and misleading information in connection with the submission of an EEI on multiple occasions, the Respondents committed one violation of Section 764.2(g) of the Regulations.

Charge 3 15 C.F.R. § 764.2(g) – Misrepresentation and Concealment of Facts

11. On one occasion in or around April 2022, the Respondents made false and misleading statements to BIS in the course of an export subject to the EAR, when they provided false information in a Form BIS-711 “Statement by Ultimate Consignee and Purchaser” and sent it to a BIS Special Agent.

12. Telecommunications switches classified as 5A991.c have an array of potential applications, including use by consumers or use by militaries to create and expand communication networks. In or around February and March 2022, Eleview arranged for a shipment of switches classified under 5A991.c to a telecommunications company in Kazakhstan that Respondents knew was affiliated with a Russian telecommunications company. The Russian telecommunications company was a supplier to Russia's Federal Security Service in addition to civilian businesses and consumers.
13. Although the Russian telecommunications company had been a client of Eleview for 10 or more years, exports of such items to Russia were no longer permissible without a BIS license under the expanded export controls to Russia. The Respondents listed the Kazakhstan affiliate as the ultimate consignee and Kazakhstan as the country of ultimate destination, when they knew or deliberately ignored red flags that the Russian telecommunications company in Russia was the ultimate consignee.
14. In or around April 2022, Nayandin emailed a BIS Special Agent a Form BIS-711 for this shipment of switches to the Kazakhstan affiliate of the Russian telecommunications company. The BIS-711 contained false information regarding the length of time that Eleview had been in business with the Kazakhstan affiliate. At the time Nayandin sent the certificate, he knew the information in the BIS-711 was false.
15. By making a false and misleading statement to a BIS Special Agent in the course of an export subject to the EAR, the Respondents committed one violation of Section 764.2(g) of the Regulations.

WHEREAS, the Respondents have reviewed the Proposed Charging Letter and are aware of the allegations made against them and the administrative sanctions that could be imposed against them if the allegations are found to be true;

WHEREAS, the Respondents have reviewed, with the assistance of counsel, the terms of this Agreement, the Order ("Order") that the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, will issue if he approves this Agreement as the final resolution of this matter, and the Proposed Charging Letter, and understands the terms of all three documents;

WHEREAS, the Respondents enter into this Agreement voluntarily and with full knowledge of their rights, after having consulted with counsel;

WHEREAS, the Parties enter into this Agreement having taken into consideration the Plea Agreements between the Respondents and the United States Attorney's Office for the Eastern District of Virginia (the "Plea Agreements");

WHEREAS, the Respondents state that no promises or representations have been made to them other than the agreements and considerations herein expressed or expressed in the Plea Agreements;

WHEREAS, the Respondents admit committing the alleged conduct described in paragraphs number 1 through 15, above; and

WHEREAS, the Respondents agree to be bound by the Order, if issued;

NOW THEREFORE, the Parties hereby agree, for purposes of this Agreement, as follows:

1. BIS has jurisdiction over the Respondents, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. The following sanctions shall be imposed against Eleview:

- a. Eleview shall be assessed a civil penalty in the amount of \$125,000.

Payment of the \$125,000 shall be suspended until Respondent makes payment of the criminal penalty pursuant to the terms of the Plea Agreements, and thereafter such payments shall be credited toward the total \$125,000 penalty amount due under this agreement. If Respondent fails to pay the criminal penalty, then the suspension shall be revoked and the full amount of the suspended penalty shall be imposed and become immediately due.

b. Eleview's officers and employees shall complete export compliance training within three months from the date of the Order, and Eleview's officers and employees shall complete export compliance training annually during the three-year probationary period for a total of three compliance trainings. Before Eleview's officers and employees attend a compliance training course or program, Eleview shall notify the Office of Export Enforcement, Special Agent in Charge of the Washington Field Office, of the course or program they have selected to attend. No later than one month after attending the compliance training course or program, Eleview shall submit a certification of attendance from the training provider to the Office of Export Enforcement, Washington Field Office, 45610 Woodland Road, Suite 425, Sterling, VA 20166.

c. For a period of three (3) years from the date of the Order, Eleview shall be made subject to a suspended three-year denial of their export privileges under the Regulations ("denial"). As authorized by Section 766.18(c) of the Regulations, such denial shall be suspended during this three-year probationary period and shall thereafter be waived, provided that:

- i. Eleview has fully and timely paid the civil penalty in accordance with Paragraph 2.a above;
- ii. Eleview have fully and timely complied with the training requirements in accordance with Paragraph 2.b above;
- iii. Eleview have complied with the provisions of the Plea Agreements;

iv. Eleview has not committed another violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations.

d. If Eleview does not fully and timely pay the civil penalty in accordance with Paragraph 2.a, comply with the training requirements in accordance with Paragraph 2.b, or comply with the conditions of the probationary period in accordance with Paragraph 2.c above, the suspension of the denial may be modified or revoked by BIS pursuant to Section 766.17(c) of the Regulations and a denial order (including a three-year denial period) activated against Eleview.

3. The following sanctions shall be imposed against Nayandin:

a. Nayandin shall complete export compliance training within three months from the date of the Order, and shall complete export compliance training annually during the three-year probationary period for a total of three compliance trainings. Before Nayandin attends a compliance training course or program, Nayandin shall notify the Office of Export Enforcement, Special Agent in Charge of the Washington Field Office, of the course or program he has selected to attend. No later than one month after attending the compliance training course or program, Nayandin shall submit a certification of attendance from the training provider to the Office of Export Enforcement, Washington Field Office, 45610 Woodland Road, Suite 425, Sterling, VA 20166.

b. For a period of three (3) years from the date of the Order, Nayandin shall be made subject to a suspended three-year denial of his export privileges under the Regulations ("denial"). As authorized by Section 766.18(c) of the

Regulations, such denial shall be suspended during this three-year probationary period and shall thereafter be waived, provided that:

- i. Nayandin has fully and timely cooperated in Eleview's obligation to pay the civil penalty in accordance with Paragraph 2.a above;
- ii. Nayandin has fully and timely complied with the training requirements in accordance with Paragraph 3.a above;
- iii. Nayandin has complied with the provisions of the Plea Agreements;
- iv. Nayandin has not committed another violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations.

c. If Nayandin does not comply with the training requirements in accordance with Paragraph 3.a above or the conditions of the probationary period in accordance with Paragraph 3.b above, the suspension of the denial may be modified or revoked by BIS pursuant to Section 766.17(c) of the Regulations and a denial order (including a three-year denial period) activated against Nayandin.

4. The following sanctions shall be imposed against Borisenko:

a. Borisenko shall complete export compliance training within three months from the date of the Order, and shall complete export compliance training annually during the three-year probationary period for a total of three compliance trainings. Before Borisenko attends a compliance training course or program,

Borisenko shall notify the Office of Export Enforcement, Special Agent in Charge of the Washington Field Office, of the course or program he has selected to attend. No later than one month after attending the compliance training course or program, Borisenko shall submit a certification of attendance from the training provider to the Office of Export Enforcement, Washington Field Office, 45610 Woodland Road, Suite 425, Sterling, VA 20166.

b. For a period of three (3) years from the date of the Order, Borisenko shall be made subject to a suspended three-year denial of his export privileges under the Regulations ("denial"). As authorized by Section 766.18(c) of the Regulations, such denial shall be suspended during this three-year probationary period and shall thereafter be waived, provided that:

- i. Borisenko has fully and timely complied with the training requirements in accordance with Paragraph 4.a above;
- ii. Borisenko has complied with the provisions of the Plea Agreements;
- iii. Borisenko has not committed another violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations.

c. If Borisenko does not comply with the training requirements in accordance with Paragraph 4.a above or the conditions of the probationary period in accordance with Paragraph 4.b above, the suspension of the denial may be modified or revoked by BIS pursuant to Section 766.17(c) of the Regulations and a denial order (including a three-year denial period) activated against Borisenko.

5. If the suspension of the denial of privileges described in paragraphs 2–4 above is modified or revoked as to any Respondent, the activation order may also revoke any BIS licenses in which that Respondent has an interest at the time of the activation order.⁴ Should the suspension of the denial be modified or revoked pursuant to Section 766.17(c) of the Regulations, and a denial order (including a three-year denial period) be activated against any Respondent, for the duration of such denial order, that Respondent, and when acting for or on that Respondent's behalf, that Respondent's successors, assigns, directors, officers, employees, representatives, or agents (hereinafter collectively referred to as "Denied Person"), may not, directly or indirectly, participate in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

- i. Applying for, obtaining, or using any license, license exception, or export control document;
- ii. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or engaging in any other activity subject to the Regulations; or

⁴ Such a revocation would include licenses existing at the time of the activation order.

iii. Benefitting in any way from any transaction

involving any item exported or to be exported from the United States that is subject to the Regulations, or from any other activity subject to the Regulations.

6. Subject to the approval of this Agreement pursuant to Paragraph 10 hereof, the Respondents hereby waive all rights to further procedural steps in this matter including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; and (b) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. The Respondents also waive and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of the Act or the Regulations arising out of the transactions identified in the Proposed Charging Letter or enforcement of this Agreement and the Order, if issued.

7. BIS agrees that upon successful compliance in full with the terms of this Agreement and the Order, if issued, BIS will not initiate any further administrative proceeding against the Respondents in connection with any violation of the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

8. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

9. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if issued; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

10. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, approves it by issuing the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

11. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

12. Each signatory affirms that he/she has authority to enter into this Agreement and to bind his/her respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND
SECURITY
U.S. DEPARTMENT OF COMMERCE

Jeffrey Levine

Deputy Director (A), OEE
FOR

Digitally signed by JEFFREY
LEVINE

Date: 2025.10.23 08:22:30
-04'00'

Steven Fisher
Acting Director of Export Enforcement

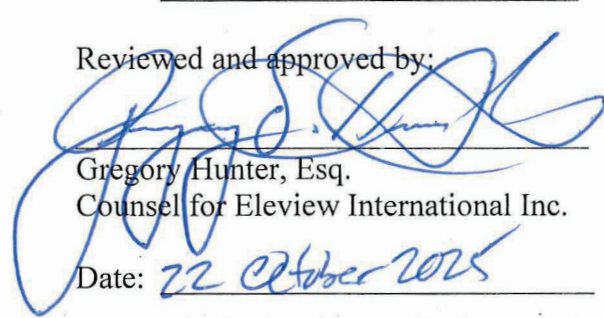
Date: _____

ELEVIEW INTERNATIONAL INC.


Oleg Nayandin
Owner, Chief Executive Officer and President

Date: 10.22.2025

Reviewed and approved by:


Gregory Hunter, Esq.
Counsel for Eleview International Inc.

Date: 22 October 2025

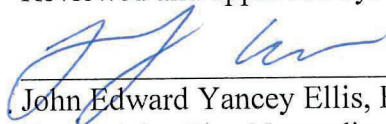
OLEG NAYANDIN



Oleg Nayandin

Date: 10.22.2025

Reviewed and approved by:



John Edward Yancey Ellis, Esq.
Counsel for Oleg Nayandin

Date: 10/22/2025

VITALIY BORISENKO

Vitaliy Borisenko

Date: _____

Reviewed and approved by:

Ann Mason-Rigby, Esq.
Counsel for Vitaliy Borisenko

Date: _____

OLEG NAYANDIN

Oleg Nayandin

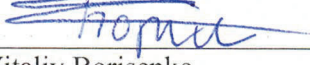
Date: _____

Reviewed and approved by:

John Edward Yancey Ellis, Esq.
Counsel for Oleg Nayandin

Date: _____

VITALIY BORISENKO



Vitaliy Borisenko

Date: 10/21/2025

Reviewed and approved by:



Ann Mason-Rigby, Esq.
Counsel for Vitaliy Borisenko

Date: 10/21/2025



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Industry and Security
Office of Export Enforcement
1401 Constitution Avenue, Suite 4508
Washington, DC 20230

PROPOSED CHARGING LETTER
VIA EXPRESS COURIER & EMAIL

Eleview International Inc.
Oleg Nayandin, President & CEO
Vitality Borisenko, Operations Manager

4262 Entre Court
Suite K
Chantilly, VA 20151

Dear Messrs. Nayandin and Borisenko,

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Eleview International Inc. (“Eleview”), Oleg Nayandin (“Nayandin”), and Vitaliy Borisenko (“Borisenko”) (collectively “Respondents”) have committed three violations of the Export Administration Regulations (the “EAR” or “Regulations”).¹ Specifically, BIS alleges the following violations:

Charge 1 15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation

1. On multiple occasions from at least on or about February 24, 2022 through on or about June 21, 2023, the Respondents acted with knowledge of a violation of the Regulations when they transferred and forwarded items subject to the EAR, including items classified under Export Classification Control Numbers (ECCNs) 3A992.a, 5A991.b, and 5A992.c, to end users in Russia without the required BIS licenses.
2. Beginning with a rulemaking effective February 24, 2022, BIS responded to the further Russian invasion of Ukraine by implementing a series of comprehensive export controls meant to severely restrict Russia’s access to technologies and other items needed to sustain

¹ On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 (“ECRA”). The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2024). The charged violation occurred in 2022. The Regulations governing the violation at issue are found in the 2022 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2022)). The 2024 Regulations set forth the procedures that apply to this matter.



its military capabilities. At all times during the relevant period, Section 746.5² of the Regulations imposed a BIS license requirement for export, reexport, or in-country transfer of any item listed under an ECCN on the Commerce Control List (CCL) at Supplement No. 1. to Part 774 of the Regulations.

3. Eleview is a company that, among other services, conducts a freight consolidation and forwarding business out of a warehouse in Chantilly, Virginia. Eleview's website (BuyUSA.ru) allows individuals in Russia to order goods from the United States directly from U.S. retailers, which shipped the products to Eleview for consolidation and shipment to the customer, either directly or through another freight forwarder. Nayandin is the owner, CEO, and President of Eleview. Borisenko is an Eleview employee involved in the day-to-day operations of Eleview's freight forwarding business. Both Nayandin and Borisenko were involved in the export of the prohibited goods.
4. In or about March 2022, the Respondents met with BIS Special Agents at Eleview's warehouse to discuss U.S. export controls on transactions involving Russia. During this meeting, the Respondents demonstrated their knowledge of the EAR, including by stating their understanding that they could not ship items with an ECCN to Russia without a BIS license. Despite this knowledge of their obligations under the EAR, including the restrictions on exports to Russia, the Respondents subsequently coordinated and participated in three export control evasion schemes involving the illegal export of items from the United States to Russia transshipped through intermediary countries: Turkey, Finland, and Kazakhstan. Among those items transshipped through these countries to Russia were items the Respondents knew required BIS licenses for export, but for which the Respondents neither sought nor obtained licenses.
5. By transferring and forwarding items subject to the EAR with knowledge that a violation of the EAR was intended to occur in connection with the items, the Respondents committed one violation of Section 764.2(e) of the Regulations.

Charge 2 15 C.F.R. § 764.2(g) – Misrepresentation and Concealment of Facts

6. On multiple occasions from on or about February 24, 2022 through on or about June 21, 2023, the Respondents made false and misleading statements and falsified material facts to a U.S.-based freight forwarding company in connection with the submission of an Electronic Export Information (EEI) filing, which collects basic information about items exported and the parties to an export.
7. The Regulations require exporters to file EEI for certain exports, including when an export requires a license application, regardless of value or destination. 15 C.F.R. § 758.2(b)(2). The EEI is an "export control document," as defined in § 772.1 of the Regulations, and furthermore, "is a statement to the United States Government that the transaction occurred as described." *Id.* § 758.1(a).

² While the applicable license requirement at the time of the violations was found in Section 746.5, the same requirement has since been moved to Section 746.8(a)(1), pursuant to a June 2024 amendment to the EAR. 89 Fed. Reg. 51644 (June 18, 2024).

8. In the course of coordinating and participating its transshipment schemes through Turkey, Finland, and Kazakhstan, the Respondents directed the filing of EEI falsely claiming that the end users of the associated transactions were in Turkey, Finland, or Kazakhstan, while knowing that the shipment were in fact destined for end users in Russia.
9. At all times during the relevant period, the Respondents had a responsibility as the exporter and United States Principal Party in Interest of the transaction to ensure the accuracy of information provided to the freight forwarder for the purpose of effecting the export of items subject to the EAR. The Respondents were not absolved of their responsibility to ensure the accuracy of such information because of their use of a freight forwarder to effectuate their exports. *See* 15 C.F.R § 758.3.
10. By submitting false and misleading information in connection with the submission of an EEI on multiple occasions, the Respondents committed one violation of Section 764.2(g) of the Regulations.

Charge 3 15 C.F.R. § 764.2(g) – Misrepresentation and Concealment of Facts

11. On one occasion in or around April 2022, the Respondents made false and misleading statements to BIS in the course of an export subject to the EAR, when they provided false information in a Form BIS-711 “Statement by Ultimate Consignee and Purchaser” and sent it to a BIS Special Agent.
12. In or around February and March 2022, as part of their shipments of telecommunications equipment to a Russian telecommunications company through Turkey, the Respondents exported a “test shipment” of switches, classified under 5A991.c, to the Kazakhstan affiliate of the Russian telecommunications company. The Russian telecommunications company is a major supplier of telecommunications equipment to the Russian government, including Russia’s Federal Security Service, the Russian internal security and intelligence agency. The 5A991.c telecommunications switches have an array of potential applications, including use by consumers or use by militaries to create and expand communication networks.
13. Although the Russian telecommunications company had been a client of Eleview for at least 10 or more years, exports of such items were no longer permissible without a BIS license under the expanded export controls to Russia. The Respondents listed the Kazakhstan affiliate as the ultimate consignee and Kazakhstan as the country of ultimate destination, when in fact they knew or were willfully ignorant of the fact that the Russian telecommunications company in Russia was the ultimate consignee..
14. In or around April 2022, Nayandin emailed a BIS Special Agent a Form BIS-711 for the “test shipment” of switches to the Kazakhstan affiliate of the Russian telecommunications company. The BIS-711 contained false information regarding the length of time that Eleview had been in business with the Kazakhstan affiliate. At the time the Respondents sent the certificate, they knew the information in the BIS-711 was false.

15. By making a false and misleading statement to a BIS Special Agent in the course of an export subject to the EAR, the Respondents committed one violation of Section 764.2(g) of the Regulations.

* * * * *

Accordingly, the Respondents are hereby notified that an administrative proceeding is instituted against them pursuant to Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including, but not limited to, any or all of the following:

- The maximum civil penalty of an amount not to exceed the greater of \$374,474 per violation or an amount that is twice the amount of the transaction that is the basis of the violation with respect to which the penalty is imposed;³
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Respondents fail to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. *See* 15 C.F.R. §§ 766.6(a), 766.7(a). If Respondents default, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to respondents. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter. 15 C.F.R. § 766.7(a).

Respondents are further notified that they are entitled to an agency hearing on the record if they file a written demand for one with any answer. *See* 15 C.F.R. § 766.6. Respondents are also entitled to be represented by counsel or other authorized representative who has power of attorney to represent them. *See* 15 C.F.R. §§ 766.3(a) and 766.4.

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should Respondents have a proposal to settle this case, they should transmit it to the attorneys representing BIS named below.

Respondents are further notified that under the Small Business Regulatory Enforcement Flexibility Act, Respondents may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter. To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, Respondents' answer(s) must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center

³ *See* 50 U.S.C. § 4819 (prescribing civil monetary penalty amount for ECRA violation); 15 C.F.R. §§ 6.3(c)(6), 6.4 (adjusting civil monetary penalty amount for inflation).

40 S. Gay Street
Baltimore, Maryland 21202-4022

In addition, a copy of respondents' answer(s) must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Gregory Michelsen and B. Kathryn Debrason
Room H-3839
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Gregory Michelsen and B. Kathryn Debrason are the attorneys representing BIS in this case; any communications that Respondents may wish to have concerning this matter should occur through them. Mr. Michelsen may be contacted by email at GMichelsen@doc.gov. Ms. Debrason may be contacted by email at KDebrason1@doc.gov.

Sincerely,
Dan Clutch
Director
Office of Export Enforcement