

June 17, 2014

Dear Sirs,

We would like to draw your attention to the important changes in the legal status of persons having foreign citizenship along with Russian one. Relevant law (hereinafter - the "Law") was approved by the State Duma and the Federation Council of the Russian Federation, signed by the President and officially issued on June 6, 2014. The Law will come into force on August 4, 2014.

*Overview of legal developments*

In accordance with the provisions of the Law the citizen of the Russian Federation is obliged to inform the state authorities of the Russian Federation about the fact that he/she has:

- another citizenship; or residence permit or other valid document confirming the right of permanent residence in a foreign country (collectively - "Document confirming the right of permanent residence in a foreign country").

Russian citizen is obliged to file a notification about either already existing citizenship or Documents confirming the right of permanent residence in a foreign country, or each subsequent acquisition of any of the above.

This obligation does not apply to citizens of the Russian Federation residing outside the Russian Federation. At the same time we can not exclude the possibility that for the purposes of interpreting the Law the citizens of the Russian Federation will be considered permanently residing abroad only if they have cancelled their registration in the Ministry of Internal Affairs of the Russian Federation. Registration in a consulate of the Russian Federation in a foreign country may be treated as additional criteria for qualification of the place of permanent residence abroad.

The notification should be submitted by the Russian citizen in person or mailed to the regional office of the Federal Migration Service in the place of residence of the person in the Russian Federation, in the absence thereof - in his/her place of temporary residence, and in the absence of a place of residence or temporary residence in Russian Federation – at the place of actual location of the person in the Russian Federation.

The deadline for notification is sixty days from the date of acquisition of another citizenship or obtaining Document confirming the right of permanent residence in a foreign country, or in case citizenship or Document confirming the right of permanent residence in a foreign country was acquired before the Law came into force - sixty days from the date of entry of the Law into force.

If a citizen is a minor or limited in legal capacity, the notification shall be submitted by his/her legal representative.

In accordance with the Law, the Federal Migration Service is to issue regulations and instructions about the form and order of the notification. At the date of issuing of this letter such acts do not exist, but we will be glad to inform you of their development.

It is important to point out that the Law also introduces amendments to the Criminal Code of the Russian Federation (hereinafter - the "Criminal Code") and the Code of Administrative Offences of the Russian Federation (hereinafter - the "Code of Administrative Offences") and establishes liability for failure to file or improper filing of the notification.

New Article 330<sup>2</sup> of the Criminal Code establishes criminal liability for breach of duty to file a notification about the citizenship of a foreign state or the Document confirming the right of permanent residence in a foreign country. Failure to perform this duty will entail a fine in the amount up to two hundred thousand rubles or in the amount of wages or other income of the convicted person for the period up to one year, or compulsory works for the term of up to four hundred hours.

New Article 19.8<sup>3</sup> of the Code of Administrative Offences establishes responsibility for violation of the procedure of the notification, e.g. for late filing of such notification, provision of incomplete or deliberately false information. This offense entails imposition of an administrative fine in the amount of five hundred to one thousand rubles.

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For more information please visit our web-site [www.alrud.com](http://www.alrud.com) or contact directly our Senior Partner Maxim Alekseyev, [malekseyev@alrud.com](mailto:malekseyev@alrud.com).

Kind regards,

**ALRUD Law Firm**

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