

Treasury Sanctions Destabilizing Actors and Financial Enablers in Republika Srpska

Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is designating five individuals and one entity that facilitate Republika Srpska (RS) President Milorad Dodik (Dodik) and his family's efforts to enrich themselves at the public's expense. Today's action also targets eight individuals who, at Dodik's direction, organized and executed the commemoration of "Republika Srpska Day" (RS Day) in January 2024, in contravention to the principles of the Dayton Peace Agreement (DPA) and which the Bosnia and Herzegovina (BiH) Constitutional Court (CC) ruled unconstitutional.

In addition, On January 8, 2025, the President issued Executive Order (E.O.) 14140, an amendment to E.O. 14033, which expanded the United States government's ability to curtail activity that undermines, or attempts to undermine, regional peace frameworks and the rule of law in the Western Balkans and efforts to circumvent U.S. sanctions.

SIGNIFICANT ACTORS CONTRIBUTING TO THE DODIK FINANCIAL NETWORK

The Dodiks' efforts to enrich themselves led to OFAC's October 20, 2023, June 18, 2024, November 6, 2024, and December 18, 2024 designations of core parts of the Dodiks' corrupt patronage network, including several entities and individuals under the direct control of Dodik's son, Igor Dodik (Igor). While Igor controls many of the companies in this network, he obfuscates his personal connection to the companies by relying on distinct owners and nominal directors.

BiH and Serbian national **Pavle Corovic** (Corovic) is the husband of Dodik's U.S.-designated daughter, Gorica Dodik (Gorica), and the director of U.S.-designated and RS-based Global Liberty d.o.o. Laktasi (Global Liberty) (both designated on October 20, 2023). Along with other Dodik-affiliated entities, Global Liberty has received lucrative incentives from the RS budget.

BiH-based **Radmila Bojanic** (Bojanic) and **Nemanja Reljin** (Reljin) are the director and owner, respectively, of U.S.-designated Nimbus Innovations d.o.o. Banja Luka (Nimbus) (designated on December 18, 2024). Previously, both Bojanic and Reljin served in the same roles for Sirius 2010 d.o.o. Banja Luka (Sirius) (designated on June 18, 2024) before it formally merged with Nimbus. Both Nimbus and Sirius were designated for being controlled by Igor. Bojanic provided Igor with business updates and solicited Igor's approval before moving forward with business decisions.

To benefit from the businesses both directly and indirectly under his control, Igor relies upon strategic insights from associates responsive to his interests. For example, BiH national **Sinisa Dodik** (Sinisa) has reported to Igor on numerous high-level developments and has advised him on business opportunities. Igor and Serbian national **Marko Gujanicic** (Gujanicic) were publicly identified in a scheme related to media research and public polling in BiH wherein they sought to capitalize on a recent rule change, that was subsequently annulled by a BiH court for being unlawfully restrictive and contrary to the public interest. Both Igor and Gujanicic were involved in the formation of Cyprus-based **SEE Media Research LTD** (SEE Media Research) and local operations in BiH. Igor worked with associates between at least September 2023 and July 2024 to ensure that his preferred company would have a monopoly on measuring

TV viewership. Additionally, Gujanic informed Igor of a strategy to manipulate TV survey responses to further their goals.

ORGANIZERS OF REPUBLIKA SRPSKA DAY

On January 8–10, 2024, the RS government organized celebrations of RS Day in defiance of prior BiH Constitutional Court (CC) decisions that held that the commemoration of January 9 unconstitutional due to its violation of the BiH constitutional obligation of non-discrimination. These events were explicitly organized by the RS government. Specifically, Dodik personally oversaw and directed efforts to organize and commemorate RS Day 2024. In response to these commemorations of January 9, the High Representative stated that the celebration of January 9 as RS Day represented “a clear and direct failure to implement the final and binding decisions of the BiH CC” and noted that such non-compliance with BiH CC rulings constituted a criminal offense under the BiH criminal code. By openly defying the decisions of both the BiH CC and High Representative — two bodies whose authorities are enshrined in the Dayton Peace Agreement (DPA) and are critical to upholding it — the actions undertaken by the RS government, and directed by Dodik, undermine the DPA.

BiH-based RS Minister of Interior **Sinisa Karan** (Karan), Chief of Staff in the Office of the RS President **Danijel Dragicevic** (Dragicevic), Head of the RS Protocol Office **Goran Rakovic** (Rakovic), RS Secretary General **Dalibor Panic** (Panic), Director of Radio Television Republika Srpska **Dijana Milankovic** (Milankovic), President of the RS Constitutional Court **Dzerard Selman** (Selman), President of the RS Academy of Arts and Sciences **Rajko Kuzmanovic** (Kuzmanovic), and Chief of Cabinet to the RS National Assembly (RSNA) Speaker **Goran Filipovic** (Filipovic) — alongside three additional members of the 2024 RS Day Organizing Committee whom the United States designated on March 13, 2024 — proposed, adopted, and implemented the plan of events for the 2024 commemoration of RS Day.

SANCTIONS IMPLICATIONS

As a result of today’s action, all property and interests in property of the designated persons described above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by one or more blocked persons are also blocked.

Dated 17 January, 2025



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