March 16, 2022

The Alaska Division of Banking and Securities ("Division") wants to ensure that the financial institutions and industries that it regulates are monitoring current events in Ukraine and Europe. In response to Russia's invasion of Ukraine, the United States and other countries have imposed economic sanctions on Russian individuals and entities. The Russian invasion of Ukraine poses significant cybersecurity risks for the U.S. financial sector and raises the possibility that Russia may attack critical U.S. infrastructure in retaliation for sanctions or other steps taken by the United States.

The U.S. Treasury Department has issued the following notices:

- U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs | U.S. Department of the Treasury
- U.S. Treasury Targets Belarusian Support for Russian Invasion of Ukraine | U.S. Department of the Treasury
- Ukraine-/Russia-related Sanctions | U.S. Department of the Treasury

The Division encourages all organizations regardless of size to review your cybersecurity policies and initial and ongoing due diligence related to the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") searches and sanctions. The Division also encourages you to consider enhancing these policies and procedures if weaknesses are identified.

Cybersecurity Links

Please consult the following links from the Department of Homeland Security's Cybersecurity & Infrastructure Security Agency ("CISA") for controls and other best practices in cyber risk mitigation.

a. Shields Up | CISA
This page consolidates CISA's published resources on cyber threats related to the current geopolitical tensions. It is designed to help critical infrastructure owners and operators mitigate possible cyber threats and strengthen their cybersecurity posture.

b. **Alert (AA22-047A): Russian State-Sponsored Cyber Actors Target Cleared Defense Contractor Networks to Obtain Sensitive U.S. Defense Information and Technology** **https://www.cisa.gov/uscert/ncas/alerts/aa22-047a** (February 2022) – A joint cybersecurity advisory with the FBI and the NSA about Russian state-sponsored cyber actors targeting cleared defense contractors in the United States; includes detection and mitigation recommendations to reduce the risk of data exfiltration.

c. **CISA Insights: Implement Cybersecurity Measures Now to Protect Against Potential Critical Threats** **https://www.cisa.gov/sites/default/files/publications/CISA_Insights-Implement_Cybersecurity_Measures_Now_to_Protect_Against_Critical_Threats_508C.pdf** (January 2022) – An executive-level product that recommends urgent, near-term steps to reduce the likelihood and impact of a potentially damaging compromise.

d. **Alert (AA22-011A): Understanding and Mitigating Russian State-Sponsored Cyber Threats to U.S. Critical Infrastructure**
https://www.cisa.gov/uscert/ncas/alerts/aa22-011a (January 2022) – A joint cybersecurity advisory with the FBI and NSA about the Russian threat to critical infrastructure, including specific tactics, techniques, and procedures associated with Russian actors.

U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) Links
Management should assess the applicability and impact of sanctions on their firm and customers, including on their foreign branches and overseas offices and subsidiaries. Firms are encouraged to engage with their legal counsel or contact OFAC for additional guidance related to these sanctions and any future sanctions. Financial institutions can reach OFAC through its telephone hotline at (800) 540-6322 or by email at OFAC_Feedback@treasury.gov.

a. **https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information/ukraine-russia-related-sanctions**
b. **https://home.treasury.gov/news/press-releases/jy0628**

We appreciate your work to serve and protect Alaska consumers. If you have questions about cybersecurity, please consult with an information technology (IT) security expert.

Sincerely,

Robert H. Schmidt, Director
Alaska Division of Banking and Securities
dbsc@alaska.gov
Phone: 907-269-8140