

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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CAYMAN ISLANDS

Financial Sanctions Notice

22/05/2019

Syria

Introduction

1. Council Regulation (EU) 36/2012 (“the Regulation”) imposing financial sanctions against Syria has been amended.

Notice summary (Full details are provided in the Annex to this Notice)

2. 9 entries (detailed in the Annex to this Notice) have been removed from the consolidated list and are no longer subject to an asset freeze.
3. 29 entries (detailed in the Annex to this Notice) have been amended and are still subject to an asset freeze:

What you must do

4. You must:
 - i. check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the Annex to this Notice;
 - ii. freeze such accounts, and other funds or economic resources;
 - iii. refrain from dealing with the funds or assets or making them available (directly or indirectly) to such persons unless licensed by the Governor;
 - iv. report any findings to the FRA at financialreportingauthority@gov.ky, together with any additional information that would facilitate compliance with the Regulation;
 - v. Provide any information concerning the frozen assets of designated persons to the FRA at financialreportingauthority@gov.ky by completing and submitting a TF/PF Asset Freeze Report Form. Information reported to FRA may be passed on to other regulatory authorities or law enforcement.
5. Where a relevant institution has already reported details of accounts, other funds or economic resources held frozen for designated persons, they are not required to report these details again.
6. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

Legislative details

7. On 20 May 2019 Council Implementing Regulation (EU) 2019/798 (“the Amending Regulation”) was published in the Official Journal of the European Union (O.J. L 132, 20.5.2019, p.1) by the Council of the European Union.
8. The Amending Regulation amended Annex II to the Regulation with effect from 21 May 2019.

Further Information

9. A copy of the Amending Regulation can be obtained from the website of the Official Journal of the European Union:
<https://eurlex.europa.eu/legalcontent/EN/TXT/PDF/?uri=CELEX:32019R0798&from=EN>
10. Copies of recent Notices, certain EU Regulations and UK legislation can be obtained from the Syria financial sanctions page on the GOV.UK website:

<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>

11. Please note there are also import and export restrictions on Syria. Further guidance on export and trade sanctions is available from the GOV.UK website:

<https://www.gov.uk/sanctions-embargoes-and-restrictions>.

12. For more information please see OFSI's guide to financial sanctions:

<https://www.gov.uk/government/publications/financial-sanctions-fags>

Enquiries

13. Enquiries regarding this Financial Sanctions Notice should be addressed to:

The Sanctions Coordinator
Financial Reporting Authority
P.O. BOX 1054
Grand Cayman KY1-1102
Cayman Islands
financialreportingauthority@gov.ky

ANNEX TO NOTICE

FINANCIAL SANCTIONS: SYRIA

COUNCIL IMPLEMENTING REGULATION (EU) 2019/798

AMENDING ANNEX II TO COUNCIL REGULATION (EU) 36/2012

DELISTINGS

Individuals

1. AL-JASSIM Fahid

Title: Lt. General **a.k.a:** AL-JASSIM, Fahd **Position:** Chief of Staff **Other Information:** Military official involved in the violence in Homs **Listed on:** 02/12/2011 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 12414

2. JARAD Ahmed Yousef

Title: Brigadier General **a.k.a:** (1) JARAD, Ahmad, Yousef (2) JARAD, Ahmad, Youssef (3) JARAD, Ahmed, Youssef (4) JARRAD, Ahmad, Yousef (5) JARRAD, Ahmad, Youssef (6) JARRAD, Ahmed, Yousef (7) JARRAD, Ahmed, Youssef **Position:** Commander of 132nd Brigade **Listed on:** 24/01/2012 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 12464.

3. MAKHLOUF Mohsin

Title: Brigadier General **Listed on:** 24/01/2012 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 12473.

4. HASSAN Suheil Salman

Title: Major General **a.k.a:** HASSAN, Suhail, Salman **Position:** Commander of 5th Division **Listed on:** 24/01/2012 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 12476.

5. AL ZU'BI Omran Ahed

DOB: 27/09/1959. **POB:** Damascus **a.k.a:** (1) AL ZO'BI, Omran, Ahed (2) AL ZOU'BI, Omran, Ahed (3) AL ZOUBI, Omran, Ahed **Other Information:** Former Minister of Information **Listed on:** 16/10/2012 **Last Updated:** ~~07/06/2017~~ 22/05/2019 **Group ID:** 12780.

6. AL SAYED Mohammed Turki

Position: Former Minister of Industry **Listed on:** 16/10/2012 **Last Updated:** ~~30/05/2014~~ 22/05/2019 **Group ID:** 12786.

7. AL-DIN Isam Zahr

Title: Brigadier General **DOB:** --/--/1961. **POB:** Tarba, As-Suwayda province Syria **a.k.a:** (1) AL-DEEN, Issam , Zaher (2) AL-DIN, Isam, Zuhair (3) ASSADLLAH, Nafed (4) ZAHREDDINE, Issam (5) ZAHRUDDIN, Essam (6) ZAHRUDDIN, Issam (7) ZOHRUDDIN, Isam **Other Information:** Holds the rank of Brigadier General, a senior officer in the Republican Guard, in post after May 2011. **Listed on:** 18/07/2017 **Last Updated:** ~~27/09/2017~~ 22/05/2019 **Group ID:** 13500.

Entities

1. DREX TECHNOLOGIES HOLDING S.A.

Address: 17 rue Beaumont, Luxembourg (previous address), L-1219. **Other Information:** Registered in Luxembourg under number B77616. Beneficial owner is Rami Makhlof **Listed on:** 17/08/2012 **Last Updated:** ~~17/08/2012~~ 22/05/2019 **Group ID:** 12736.

2. DK GROUP

a.k.a: (1) DK Group Sarl (2) DK Middle- East & Africa Regional Office **Address:** (1) Azarieh Building, Block 03, 5th Floor Azarieh Street, Solidere Downtown, PO Box 11-503, Beirut, Lebanon.(2) DK Middle-East & Africa Regional Office, Peres Lazaristes Center, No. 3, 5th Floor, Emir Bachir Street, Beirut Central District, Bachoura Sector, Beirut, Lebanon.**Other Information:** DK Group supplies new banknotes to the Central Bank of Syria. **Listed on:** 09/03/2015 **Last Updated:** ~~09/03/2015~~ 22/05/2019 **Group ID:** 13240.

AMENDMENTS

Deleted information appears in strikethrough. Additional information appears in italics and is underlined.

Individuals

1. ZAYTUN Muhammad Dib

DOB: 20/05/1951. **POB:** Jubba, Damascus province, Syria **a.k.a:** (1) ZEITOUN, Mohammed, Dib (2) ZEITUN, Mohamed, Dib **Passport Details:** D000001300

(Diplomatic) **Position:** Head of General Security Directorate **Listed on:** 10/05/2011 **Last Updated:** ~~02/06/2015~~ 22/05/2019 **Group ID:** 11907.

2. **ABBAS Amjad**

a.k.a: AL-ABBAS, Amjad **Position:** Head of Political Security in Banyas **Other Information:** *Former Head of Political Security in Banyas* **Listed on:** 10/05/2011 **Last Updated:** ~~04/07/2018~~ 22/05/2019 **Group ID:** 11912.

3. **HASSAN Jamil**

Title: Major General **DOB:** ~~--/1953~~ 07/07/1953 **POB:** *Quasayr, Homs province, Syria*
a.k.a: (1) AL-HASSAN, Jamil (2) HASSAN, Jameel **Position:** Head of Syrian Air Force Intelligence **Other Information:** Major-General in the Syrian Air Force. **Listed on:** 10/05/2011 **Last Updated:** ~~04/10/2016~~ 22/05/2019 **Group ID:** 11906.

4. **BILAL Mohammed**

Title: ~~Colonel~~ Brigadier General **a.k.a:** BILAL, Lieutenant Colonel, Muhammad **Position:** Senior officer in the Air Force Intelligence Service of Syria **Other Information:** He is associated with the listed Scientific Studies Research Centre (SSRC). **Listed on:** 22/10/2014 **Last Updated:** ~~22/10/2014~~ 22/05/2019 **Group ID:** 13162.

5. **AL HASSAN Bassam**

DOB: ~~--/1953~~ **a.k.a:** AL HASAN, Bassam **Position:** Presidential Advisor for Strategic Affairs **Listed on:** 24/05/2011 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 11935.

6. **YOUNES Tawfiq**

Title: Major General **a.k.a:** (1) YOUNES, Tawfik (2) YUNES, Tawfig (3) YUNES, Tawfik
Position: Head of the Department for Internal Security of the General Intelligence Directorate **Other Information:** *Former Head of the Department for Internal Security of the General Intelligence Directorate* **Listed on:** 02/08/2011 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 12025.

7. **AL-ALI Lu'ai**

Title: Colonel *POB: Jablah, Latakia Province* **a.k.a:** (1) AL-ALI, Loai (2) AL-ALI, Louay
Position: Head of Syrian Military Intelligence, Dara'a Branch **Listed on:** 15/11/2011 **Last Updated:** ~~02/06/2015~~ 22/05/2019 **Group ID:** 12210.

8. **BARAKAT Ali**

Title: ~~Brigadier~~ *Major General* **Position:** 103rd Brigade of the Republican Guard Division.
Listed on: 02/12/2011 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 12417.

9. **MAKHLUF Talal**

Title: Major General **a.k.a:** MAKHLOUF, Talal **Position:** ~~Current commander general of the Republican Guards.~~ *Commander of the 2nd Corps.* **Other Information:** Former commander of the 105th Brigade of the Republican Guards. *Former commander general of the Republican Guards.* **Listed on:** 02/12/2011 **Last Updated:** ~~04/07/2018~~ 22/05/2019 **Group ID:** 12418.

10. **KHADDOR Mohamed**

Title: ~~Brigadier~~ *Major General* **a.k.a:** (1) KHADDOR, Mohammad (2) KHADDOR, Mohammed (3) KHADDOR, Muhammad (4) KHADDOUR, Mohamed (5) KHADDOUR, Mohammad (6) KHADDOUR, Mohammed (7) KHADDOUR, Muhammad (8) KHADDUR, Mohamed (9) KHADDUR, Mohammad (10) KHADDUR, Mohammed (11) KHADDUR, Muhammad (12) KHADOUR, Mohamed (13) KHADOUR, Mohammad (14) KHADOUR, Mohammed (15) KHADOUR, Muhammad (16) KHUDOUR, Mohamed (17) KHUDOUR, Mohammad (18) KHUDOUR, Mohammed (19) KHUDOUR, Muhammad **Position:** Commander of the 106th Brigade, Presidential Guard **Listed on:** 24/01/2012 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 12475.

11. **IBRAHIM Mohamed Heikmat**

a.k.a: (1) IBRAHIM, Mohamed, Hekmat (2) IBRAHIM, Mohamed, Hikmat (3) IBRAHIM, Mohammad, Heikmat (4) IBRAHIM, Mohammad, Hekmat (5) IBRAHIM, Mohammad, Hikmat (6) IBRAHIM, Mohammed, Heikmat (7) IBRAHIM, Mohammed, Hekmat (8) IBRAHIM, Mohammed, Hikmat (9) IBRAHIM, Muhammad, Heikmat (10) IBRAHIM, Muhammad, Hekmat (11) IBRAHIM, Muhammad, Hikmat **Position:** ~~Head of Operations Branch (Political Security Directorate)~~ *Former Head of Operations*

Branch (Political Security Directorate) **Listed on:** 24/01/2012 **Last Updated:** 31/05/2013
22/05/2019 **Group ID:** 12480.

12. **QADOUR Burhan**

Title: Brigadier General **a.k.a:** (1) QADDOUR, Burhan (2) QADDUR, Burhan **Position:** Head of Branch 291 (Damascus) of the army's intelligence service. **Other Information:** Former Head of Branch 291 (Damascus) of the army's intelligence service. **Listed on:** 24/07/2012 **Last Updated:** 31/05/2013 22/05/2019 **Group ID:** 12706.

13. **AL-ABDULLAH Suhail**

Title: Colonel Brigadier General **a.k.a:** (1) AL-ABDALLAH, Suhail (2) AL-ABDALLAH, Suheil (3) AL-ABDULLAH, Suheil **Position:** Head of the Latakia Branch of the air force's intelligence service. **Listed on:** 24/07/2012 **Last Updated:** 31/05/2013 22/05/2019 **Group ID:** 12714.

14. **LUQA Hussam**

Title: Brigadier Major General **DOB:** --/--/1964 **POB:** Damascus **a.k.a:** (1) LOUCA, Housam (2) LOUCA, Houssam (3) LOUCA, Husam (4) LOUCA, Hussam (5) LOUKA, Housam (6) LOUKA, Houssam (7) LOUKA, Husam (8) LOUKA, Hussam (9) LOUQA, Housam (10) LOUQA, Houssam (11) LOUQA, Husam (12) LOUQA, Hussam (13) LUKA, Housam (14) LUKA, Houssam (15) LUKA, Husam (16) LUKA, Hussam (17) LUQA, Housam (18) LUQA, Houssam (19) LUQA, Husam **Position:** ~~Head of the Homs branch of the Political Security Directorate~~ **Other Information:** Former Head of the Homs branch of the Political Security Directorate **Listed on:** 24/07/2012 **Last Updated:** 31/05/2013 22/05/2019 **Group ID:** 12718.

15. **AL-JARROUCHEH Ahmed**

DOB: --/--/1957. **a.k.a:** (1) AL-JAROUCHEH, Ahmad (2) AL-JARROUCHEH, Ahmed (3) AL-JARROUCHEH, Ahmad (4) AL-JARROUCHEH, Ahmed (5) AL-JARROUCHEH, Ahmad (6) AL-JARROUCHEH, Ahmed (7) AL-JARROUCHEH, Ahmad (8) AL-JARROUCHEH, Ahmed (9) AL-JARROUCHEH, Ahmad (10) AL-JARROUCHEH, Ahmed (11) AL-JARROUCHEH, Ahmad **Position:** ~~Head of the foreign branch of General Intelligence (branch 279)~~ **Other Information:** Responsible for General Intelligence arrangements in Syrian embassies

Former Head of the foreign branch of General Intelligence (branch 279) **Listed on:** 24/07/2012 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 12724.

16. **AL WEZ Hazwan**

Title: Dr. **a.k.a:** AL WAZZ, Hazwan **Position:** ~~Minister of Education~~ **Other Information:** Former Minister of Education **Listed on:** 16/10/2012 **Last Updated:** ~~31/05/2013~~ 22/05/2019 **Group ID:** 12772.

17. **AL-SABBAN Bishr**

DOB: --/--/1966 **POB:** Damascus, Syria **a.k.a:** (1) AL-SABBAN, Bishr, Mazin (2) AL-SABBAN, Mohammed Bishr **Other Information:** Former Governor of Damascus, who was appointed by, and is associated with, Bashar al-Assad. Supports the regime and is responsible for the violent repression against the civilian population in Syria, including engaging in discriminatory practices against Sunni communities within the capital. **Listed on:** 28/10/2016 **Last Updated:** ~~05/03/2019~~ 22/05/2019 **Group ID:** 13386.

18. **ABDUL-QADER Ahmad Sheik**

a.k.a: (1) ABDULQUADER, Ahmad, al-Sheik (2) QADIR, Ahmad, Sheikh, Abdul **Other Information:** Former Governor of Quneitra. Previously Governor of Latakia. **Listed on:** 28/10/2016 **Last Updated:** ~~28/10/2016~~ 22/05/2019 **Group ID:** 13387.

19. **KHALAF Ghassan Omar**

Title: Dr **Other Information:** Former Governor of Hama and closely associated with members of a regime-affiliated militia in Hama known as the Hama Brigade. **Listed on:** 28/10/2016 **Last Updated:** ~~28/10/2016~~ 22/05/2019 **Group ID:** 13388.

20. **AL-SAYYED Khayr Al-Din**

a.k.a: (1) AL-SAYYED, Khairuddin (2) AL-SAYYED, Khayr, al-Din, Abdul-Sattar (3) AL-SAYYED, Kheir, Eddin (4) AL-SAYYED, Kheredden (5) AL-SAYYED, Mohamed, Khair (6) ASAYED, Kheir, Eddib (7) AS-SAYYED, Khairuddin **Other Information:** Former Governor of Idlib. Associated with the regime's Minister of Awqaf, Dr Mohammad Abdul-Satar al-Sayyed, who is his brother. **Listed on:** 28/10/2016 **Last Updated:** ~~28/10/2016~~ 22/05/2019 **Group ID:** 13389.

21. **AL-HASAN Nabil**

DOB: --/--/1963. **POB:** Aleppo **a.k.a:** AL-HASSAN, Nabil **Position:** Minister of Water Resources ~~Resources~~ **Other Information:** Former Minister of Water Resources **Listed on:** 14/11/2016 **Last Updated:** ~~45/11/2016~~ 22/05/2019 **Group ID:** 13405.

22. **AL-GHARBI Abdullah**

DOB: --/--/1962. **POB:** Damascus **a.k.a:** AL-QIRBI, Abdullah **Position:** Minister of Internal Trade and Consumer Protection ~~Internal Trade and Consumer Protection~~ **Other Information:** Former Minister of Internal Trade and Consumer Protection **Listed on:** 14/11/2016 **Last Updated:** ~~45/11/2016~~ 22/05/2019 **Group ID:** 13407.

23. **DURGHAM Duraid**

Position: Governor of the Central Bank of Syria ~~Governor of the Central Bank of Syria~~ **Other Information:** Former Governor of the Central Bank of Syria **Listed on:** 14/11/2016 **Last Updated:** ~~45/11/2016~~ 22/05/2019 **Group ID:** 13413.

24. **WANUS Ali**

Title: Brigadier Major General **DOB:** 05/02/1964. **a.k.a:** WANNOUS, Ali **Other Information:** Holds the rank of Brigadier Major General, in post after May 2011. He is associated with the Syrian Scientific Studies and Research Centre. **Listed on:** 18/07/2017 **Last Updated:** ~~48/07/2017~~ 22/05/2019 **Group ID:** 13494.

25. **YOUSEF Mohamed Mazen Ali**

DOB: 17/05/1969. **POB:** Damascus Countryside, Syria **Position:** Minister of Industry ~~Minister of Industry~~ **Other Information:** Former Minister of Industry. Appointed in January 2018. **Listed on:** 27/02/2018 **Last Updated:** ~~27/02/2018~~ 22/05/2019 **Group ID:** 13613.

26. **JAMALEDDINE Nazir Ahmad NAZER Jamal Eddin Mohammed**

DOB: ~~---/1962~~ 02/01/1962 **POB:** Damascus, Syria **a.k.a:** (1) JAMALEDDINE, Nazir, Ahmad, Mohammed (2) NAZIR, Ahmad **Nationality:** Syrian **Passport Details:** N 011612445, issue no. 002-17-L022286 (place of issue: Syrian Arab Republic) **National Identification no:** 010-3028342 (Place of issue: Syrian Arab Republic) **Position:** Cofounder and majority shareholder of Apex Development and Projects LLC and founder of A'ayan Company for Projects and Equipment **Other Information:** Leading

businessperson operating in Syria with significant investments in the construction industry, including a controlling 90 % stake in Apex Development and Projects LLC, which has entered into a USD 34.8 million joint venture for the construction of Marota City, a regime-backed luxury residential and commercial development. Through his participation in the Marota City development, ~~Nazir Ahmad JamalEddine~~ Jamal Eddin Mohammed Nazer benefits from and/or supports the Syrian regime. **Listed on:** 22/01/2019 **Last Updated:** ~~22/01/2019~~ 22/05/2019 **Group ID:** 13753.

27. ~~QADDOUR Hayan Mohammad Nazem~~ KADDOUR Hayan

DOB: ~~--/--/1970~~. (1) 14/07/1970 (2) 24/07/1970 **POB:** Damascus, Syria **a.k.a:** (1) NAZEM, Hayyan, Kaddour, bin, Mohammed (2) QADDOUR Hayan Mohammad Nazem **Nationality:** Syrian **Nationality:** (1) Syrian (2) Swiss **Passport Details:** X4662433 (place of issue: Switzerland); N 004599905 (place of issue: Syrian Arab Republic) **Position:** Primary Shareholder of Exceed Development and Investment Company **Other Information:** Leading businessperson operating in Syria, who holds a 67 % stake in Exceed Development and Investment, which has entered into a USD 17.7 million joint venture for the construction of Marota City, a regime-backed luxury residential and commercial development. Through his participation in the Marota City development, Hayan Mohammad Nazem Qaddour benefits from and/or supports the Syrian regime. **Listed on:** 22/01/2019 **Last Updated:** ~~22/01/2019~~ 22/05/2019 **Group ID:** 13761.

28. **AL-AZAB Imad Muwaffaq**

DOB: ~~--/--/1970~~. **POB:** Damascus Countryside **Position:** Minister of Information **Listed on:** 04/03/2019 **Last Updated:** ~~04/03/2019~~ 22/05/2019 **Group ID:** 13773.

29. **IBRAHIM Bassam Bashir**

DOB: ~~--/--/1960~~. **POB:** Hama **Other Information:** Minister of Higher Education. Appointed in November 2018. **Listed on:** 04/03/2019 **Last Updated:** ~~04/03/2019~~ 22/05/2019 **Group ID:** 13774.

Financial Reporting Authority

Portfolio of Legal Affairs

22/05/2019

PROCEDURE FOR REMOVING PERSONS FROM THE CONSOLIDATED LIST AND UN-FREEZING ASSETS:

On receipt of the Financial Sanction Notices where an entry has been removed from the consolidated list and is no longer subject to any assets freeze:

“You must immediately on receipt of the Financial Sanction Notice advising of removal of person and/or entity from the Consolidated List –

- i. Check whether you have frozen assets of any person or entity removed from the Consolidated List and verify that the person or entity is no longer subject to an asset freeze.
- ii. Remove the person or entity from your institution’s list of persons or entities subject to financial sanction;
- iii. Un-freeze the assets of the person or entity and where necessary re-activate all relevant accounts;
- iv. Send advice to person or entity that the assets are no longer subject to an asset freeze;
- v. Advise the FRA at financialreportingauthority@gov.ky of the actions taken.

Financial Reporting Authority
P.O. BOX 1054
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Cayman Islands
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