

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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CAYMAN ISLANDS

Financial Sanctions Notice

20/08/2021

Chemical Weapons

Introduction

1. The Chemical Weapons (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/618) were made under the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act) and provide for the freezing of funds and economic resources of certain persons, entities or bodies involved in the proliferation and use of chemical weapons.
2. On 20 August 2021 the Foreign, Commonwealth and Development Office updated the UK Sanctions List on GOV.UK. This list provides details of those designated under regulations made under the Sanctions Act. A link to the UK Sanctions List can be found below.
3. Following the publication of the UK Sanctions List, information on the Consolidated List has been updated.

Notice summary

4. The following entries have been added to the consolidated list and are now subject to an asset freeze.
 - Alexey ALEXANDROV (Group ID: 14132)
 - Vladimir PANYAEV (Group ID: 14133)

- Ivan Vladimirovich OSIPOV (Group ID: 14134)
- Vladimir Mikhailovich BOGDANOV (Group ID: 14135)
- Kirill VASILYEV (Group ID: 14136)
- Stanislav Valentinovich MAKSHAKOV (Group ID: 14137)
- Alexei Semenovich SEDOV (Group ID: 14138)

What you must do

5. 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 and any funds which are owned or controlled by persons set out in the Annex to the Notice;
 - 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 financialsanctions@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 financialsanctions@gov.ky by completing and submitting a Compliance Reporting Form (CRF). Information reported to FRA may be passed on to other regulatory authorities or law enforcement.
6. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

Further Information

7. Copies of recent notices, UK legislation and relevant guidance can be found obtained from the Chemical Weapons financial sanctions page on the Gov.UK website:

<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>
8. The Consolidated List can be found here:

<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>
9. The UK Sanctions List can be found here:

<https://www.gov.uk/government/publications/the-uk-sanctions-list>

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

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

11. For general information on financial sanctions please see our Financial Sanctions Guidance

[http://fra.gov.ky/app/webroot/files/2020-02-21%20FRA%20Financial%20Sanctions%20Guidance%20\(Final\).pdf](http://fra.gov.ky/app/webroot/files/2020-02-21%20FRA%20Financial%20Sanctions%20Guidance%20(Final).pdf)

12. **Enquiries**

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
financialsanctions@gov.ky

ANNEX TO NOTICE

FINANCIAL SANCTIONS: CHEMICAL WEAPONS

THE CHEMICAL WEAPONS (SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I. 2019/618)

ADDITIONS

Individuals

1. **ALEXANDROV, Alexey**

DOB: 16/06/1981. **a.k.a:** FROLOV, Alexey **Position:** FSB Operative attached to Criminalistics Institute **Other Information:** (UK Sanctions List Ref):CHW0018 (UK Statement of Reasons):Alexey Alexandrov is an FSB operative in the Criminalistics Institute - Military Unit 34435. Evidence including phone and travel records suggest that Alexey Alexandrov was one of the operatives involved in the use of a chemical weapon in the attempted assassination of Russian opposition leader Alexey Navalny during his August 2020 visit to Siberia. A chemical weapon - a toxic nerve agent of the Novichok group - was used. Alexandrov was an operative of the Criminalistics Unit present in Tomsk where Navalny was poisoned. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny is a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. There are reasonable grounds to suspect that Alexey Alexandrov in his capacity as an operative in the Federal Security Service of the Russian Federation, was present in Tomsk at the time of the poisoning and was one of the key operatives responsible for the preparation and use of a toxic nerve agent of the Novichok group in the attempted assassination of Alexey Navalny. **Listed on:** 20/08/2021 **Last Updated:** 20/08/2021 **Group ID:** 14132.

2. **PANYAEV, Vladimir**

DOB: 25/11/1980. **POB:** Serdobsksk **Position:** FSB member **Other Information:** (UK Sanctions List Ref):CHW0019 (UK Statement of Reasons):Vladimir Panyaev is a member of the FSB. Evidence including phone and travel records suggest that Vladimir Panyaev was present during the use of a chemical weapon in the attempted assassination of Russian opposition leader Alexey Navalny during his August 2020 visit to Siberia. A chemical weapon - a toxic nerve agent of the Novichok group - was used. Vladimir Panyaev was an FSB member who was present in Tomsk where Navalny was poisoned. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely

that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny is a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. There are reasonable grounds to suspect that Vladimir Panyayev in his capacity as a member of the Federal Security Service of the Russian Federation, was present in Tomsk at the time of the poisoning and was one of the key figures responsible for the preparation and use of a toxic nerve agent of the Novichok group in the attempted assassination of Alexey Navalny. **Listed on:** 20/08/2021 **Last Updated:** 20/08/2021 **Group ID:** 14133.

3. OSIPOV, Ivan Vladimirovich

DOB: 21/08/1976. **a.k.a:** SPIRIDONOV, Ivan **Position:** FSB Operative attached to Criminalistics Institute **Other Information:** (UK Sanctions List Ref):CHW0020 (UK Statement of Reasons):Ivan Osipov is an FSB operative in the Criminalistics Institute - Military Unit 34435. Evidence including phone and travel records suggest that Ivan Osipov was one of the operatives involved in the use of a chemical weapon in the attempted assassination of Russian opposition leader Alexey Navalny during his August 2020 visit to Siberia. A chemical weapon - a toxic nerve agent of the Novichok group - was used. Osipov was an operative of the Criminalistics Unit present in Tomsk where Navalny was poisoned. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny is a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. There are reasonable grounds to suspect that Ivan Osipov, in his capacity as an operative in the Federal Security Service of the Russian Federation, was present in Tomsk at the time of the poisoning and was one of the key operatives responsible for the preparation and use of a toxic nerve agent of the Novichok group in the attempted assassination of Alexey Navalny. **Listed on:** 20/08/2021 **Last Updated:** 20/08/2021 **Group ID:** 14134.

4. BOGDANOV, Vladimir Mikhailovich

Title: Major-General **Position:** Head of FSB Special Technology Centre (parent entity of Criminalistics Institute), former Director of Criminalistics Institute **Other Information:** (UK Sanctions List Ref):CHW0021 (UK Statement of Reasons):Vladimir Bogdanov is the head of the FSB's 'Special Technology Centre' (the parent entity of the FSB's Criminalistics Institute - Military Unit 34435). There are reasonable grounds to suspect that the Federal

Security Service of the Russian Federation was involved in the attempted assassination of Alexey Navalny using a toxic nerve agent and as head of the FSB's 'Special Technology Centre' Bogdanov has responsibility for, provided support for, or promoted the actions of the operatives who carried out the operation. Alternatively, he is associated with those who carried out the operation. Evidence suggests that Vladimir Bogdanov was in close contact with Stanislav Makshakov, the commander of the team of operatives involved in the use of a chemical weapon in the attempted assassination of Alexey Navalny. This designation is part of a further package of designations targeting the FSB operatives directly involved in carrying out the operation. Russian opposition leader Alexey Navalny was the victim of an attempted assassination during his August 2020 visit to Siberia, in which a chemical weapon - a toxic nerve agent of the Novichok group - was used. The activities and movements of Alexey Navalny during his journey to Siberia, from where he intended to return to Moscow on 20th August 2020, were closely monitored by the Federal Security Service of the Russian Federation. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny is a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. **Listed on:** 20/08/2021 **Last Updated:** 20/08/2021 **Group ID:** 14135.

5. VASILYEV, Kirill

Title: General **Position:** Director of Criminalistics Institute, FSB **Other Information:** (UK Sanctions List Ref):CHW0022 (UK Statement of Reasons):Kirill Vasilyev is the Director of the Criminalistics Institute of the FSB - Military Unit 34435. There are reasonable grounds to suspect that the Federal Security Service of the Russian Federation was involved in the attempted assassination of Alexey Navalny using a toxic nerve agent. Evidence demonstrates that the Criminalistics Institute were the unit responsible for, provided support for and involved in the use of chemical weapon in the attempted assassination of Alexey Navalny. As Director for the Criminalistics Institute Vasilyev was responsible for the actions of the unit responsible. Alternatively, he is associated with the operatives who did. This designation is part of a further package of designations targeting the FSB operatives directly involved in carrying out the operation. Russian opposition leader Alexey Navalny was the victim of an attempted assassination during his August 2020 visit to Siberia, in which a chemical weapon - a toxic nerve agent of the Novichok group - was used. The activities and movements of Alexey Navalny during his journey to Siberia, from where he intended to return to Moscow on 20th August 2020, were closely monitored by the Federal Security Service of the Russian Federation. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the

attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny is a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. **Listed on:** 20/08/2021 **Last Updated:** 20/08/2021 **Group ID:** 14136.

6. MAKSHAKOV, Stanislav Valentinovich

Title: Colonel **DOB:** --/--/1966. **Position:** Deputy Director, Criminalistics Institute, FSB **Other Information:** (UK Sanctions List Ref):CHW0023 (UK Statement of Reasons):Stanislav Makshakov is a deputy director in the FSB's Criminalistics Institute - Military Unit 34435. There are reasonable grounds to suspect that the Federal Security Service of the Russian Federation was involved in the attempted assassination of Alexey Navalny using a toxic nerve agent. Evidence including phone records suggest that Stanislav Makshakov was the commander of the team of operatives involved in the use of chemical weapon in the attempted assassination of Alexey Navalny. As Deputy Director he is responsible for and/or engaged in, provided support for or promoted the activities conducted by this unit in the FSB. Alternatively, he is associated with those who did. This designation is part of a package of designations targeting the FSB team involved. Russian opposition leader Alexey Navalny was the victim of an attempted assassination during his August 2020 visit to Siberia, in which a chemical weapon - a toxic nerve agent of the Novichok group - was used. The activities and movements of Alexey Navalny during his journey to Siberia, from where he intended to return to Moscow on 20th August 2020, were closely monitored by the Federal Security Service of the Russian Federation. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny is a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. **Listed on:** 20/08/2021 **Last Updated:** 20/08/2021 **Group ID:** 14137.

7. SEDOV, Alexei Semenovich

DOB: --/--/1954. **Position:** Head of FSB 2nd Service **Other Information:** (UK Sanctions List Ref):CHW0024 (UK Statement of Reasons):Alexei Sedov is the Head of the "2nd Service" Unit in the Federal Security of the Russian Federation (FSB). There is reasonable grounds to suspect that the Federal Security Service of the Russian Federation was involved in the attempted assassination of Alexey Navalny using a toxic nerve agent. As Head of the "2nd Service" Unit, Sedov is responsible for, engaged in, provided support for, or promoted the activities conducted by this unit in the FSB. Alternatively, he is associated with those who did. This designation is part of a further package of designations targeting the FSB operatives directly involved in carrying out the operation.

Russian opposition leader Alexey Navalny was the victim of an attempted assassination during his August 2020 visit to Siberia, in which a chemical weapon - a toxic nerve agent of the Novichok group - was used. The activities and movements of Alexey Navalny during his journey to Siberia, from where he intended to return to Moscow on 20th August 2020, were closely monitored by the Federal Security Service of the Russian Federation. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny is a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. **Listed on:** 20/08/2021 **Last Updated:** 20/08/2021 **Group ID:** 14138.

Financial Reporting Authority

Portfolio of Legal Affairs

20/08/2021