

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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CAYMAN ISLANDS

Financial Sanctions Notice

07/09/2023

Cyber

Introduction

1. The Cyber (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/597) (“the Regulations”) were made under the Sanctions and Anti-Money Laundering Act 2018 (“the Sanctions Act”) and provide for the imposition of financial sanctions, namely the freezing of funds and economic resources of persons who have been involved in cyber activity which undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom; directly or indirectly causes, or is intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity; undermines, or is intended to undermine, the independence or effective functioning of an international organisations or a nongovernment organisation or forum whose mandate or purposes related to the governance of international sport or the Internet; or otherwise affects a significant number of persons in an indiscriminate manner.
2. On 7 September 2023 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 11 entries have been added to the consolidated list and are now subject to an asset freeze. Further information can be found in the Annex to this Notice.

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 and any entities owned or controlled by them;
 - ii. freeze such accounts, and other funds or economic resources;
 - iii. refrain from dealing with the funds or economic resources or making them available directly or indirectly to or for the benefit of designated persons unless licensed by the Governor or if an exception applies;
 - iv. report any findings to the FRA at financialsanctions@gov.ky, together with the information or other matter on which the knowledge or suspicion is based by completing and submitting a Compliance Reporting Form (CRF). Where the information relates to funds or economic resources, the nature and quantity should also be reported.
6. Information received by the FRA may be disclosed to third parties in accordance with the Regulation and in compliance with applicable data protection laws.
7. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

Ransomware and Sanctions

8. Making or facilitating a ransomware payment risks exposing those involved to civil or criminal penalties where such payments are made to designated persons.
9. OFSI, in partnership with other HM Government organisations has published guidance on sanctions and ransomware, which includes information on the impact of ransomware payments, cyber resilience and HM Government's approach to enforcement.
10. Guidance on ransomware and sanctions can be found here:

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

Further Information

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

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

12. The Consolidated List can be found here:

<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>

13. The UK Sanctions List can be found here:

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

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

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

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

<http://fra.gov.ky/app/webroot/files/FRA%20Financial%20Sanctions%20Guidance%20updated%20December%2029%202021%202.pdf>

Enquiries

16. 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

Financial Reporting Authority

Portfolio of Legal Affairs

07/09/2023

ANNEX TO NOTICE

FINANCIAL SANCTIONS: CYBER

THE CYBER (SANCTIONS) (EU EXIT) REGULATIONS 2020 (S.I. 2020/597)

ADDITIONS

Individuals

1. **CHERNOV, Mikhail Vadimovich**

DOB: 26/01/1986. **a.k.a:** (1) BULLET (2) M2686 **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0030. (UK Statement of Reasons):Mikhail Vadimovich CHERNOV is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Mikhail Vadimovich CHERNOV was part of the internal utilities group which were responsible for projects including autotests, cryptopanel and avclean. (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16072.

2. **GALOCHKIN, Maksim Sergeyevich**

DOB: 19/05/1982. **a.k.a:** (1) BENTLEY (2) GALOCHKIN, Maxsim (3) MAX17 (4) VOLHVB **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0031. (UK Statement of Reasons):Maksim Sergeyevich GALOCHKIN is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Maksim Sergeyevich GALOCHKIN led a group of testers, with responsibilities for development, supervision and implementation of tests. He was also responsible for the issuing of crypts. (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16073.

3. **KHALIULLIN, Maksim Marselevich**

DOB: 28/02/1993. **a.k.a:** (1) KAGAS (2) KHALIULLIN, Maxsim **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0032. (UK Statement of Reasons):Maksim Marselevich KHALIULLIN is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to,

or prejudice the commercial interests of, those companies affected by the activity. Specifically, Maksim Marselevich KHALIULLIN was an HR manager for the Group. He was associated with the purchase of Trickbot infrastructure including procuring Virtual Private Servers (VPS). (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16074.

4. KUROV, Artem Igorevich

DOB: 30/03/1993. **a.k.a:** NANED **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0033. (UK Statement of Reasons):Artem Igorevich KUROV is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Artem Igorevich KUROV worked as a coder with development duties in the Trickbot group. (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16075.

5. LOGUNTSOV, Sergey

DOB: 15/07/1983. **a.k.a:** (1) BEGEMOT (2) BEGEMOT_SUN (3) ZULAS **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0038. (UK Statement of Reasons):Sergey LOGUNTSOV is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Sergey LOGUNTSOV was a developer for the Group. (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16080.

6. MOZHAEV, Alexander Vyacheslavovich

DOB: 02/10/1978. **a.k.a:** (1) GREEN (2) MOZHAEV, Alexandr, Vyacheslavovich (3) ROCCO **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0034. (UK Statement of Reasons):Alexander Vyacheslavovich MOZHAEV is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Alexander Vyacheslavovich MOZHAEV was part of the admin team responsible for general administration duties. (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16076.

7. PUTILIN, Dmitry Sergeevich

DOB: 24/03/1993. **a.k.a:** (1) GRAD (2) STAFF **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0035. (UK Statement of Reasons):Dmitry Sergeevich PUTILIN

is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Dmitry Sergeevich PUTILIN was associated with the purchase of Trickbot infrastructure. (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16077.

8. RUDENSKIY, Maksim

DOB: 01/11/1977. **a.k.a:** (1) BINMAN (2) BUZA (3) SILVER **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0036. (UK Statement of Reasons):Maksim RUDENSKIY is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Maksim RUDENSKIY was a key member of the Trickbot group. He was the team lead for coders. (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16078.

9. TSAREV, Mikhail

DOB: 20/04/1989. **a.k.a:** (1) FRANCES (2) KHANO (3) MANGO **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0037. (UK Statement of Reasons):Mikhail TSAREV is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Mikhail TSAREV was a mid-level manager who assisted with the Group's finances and overseeing of HR functions. (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16079.

10. VALIAKHMETOV, Vadym Firdavysovych

DOB: 07/05/1981. **a.k.a:** (1) MENTOS (2) VALIAKHMETOV, Vadim, Firdavysovych (3) VASM (4) WELDON **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0039. (UK Statement of Reasons):Vadym Firdavysovych VALIAKHMETOV is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Vadym Firdavysovych VALIAKHMETOV worked as a coder and his duties included backdoor and loader projects. (Gender):Male

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11. ZHUYKOV, Andrey Yuryevich

DOB: 18/02/1982. **a.k.a:** (1) ADAM (2) DEFENDER (3) DIF **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0040. (UK Statement of Reasons):Andrey Yuryevich ZHUYKOV is or has been involved in relevant cyber activity, including being responsible for, engaging in providing support for, or promoting the commission, planning or preparation of relevant cyber activity; and providing technical assistance that could contribute to relevant cyber activity, namely ransomware attacks which undermined, or were intended to undermine, the integrity, prosperity and security of the United Kingdom and other countries, and were intended to cause economic loss to, or prejudice the commercial interests of, those companies affected by the activity. Specifically, Andrey Yuryevich ZHUYKOV was a central actor in the Group and a senior administrator. (Gender):Male **Listed on:** 07/09/2023 **UK Sanctions List Date Designated:** 07/09/2023 **Last Updated:** 07/09/2023 **Group ID:** 16082.

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07/09/2023