

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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CAYMAN ISLANDS

Financial Sanctions Notice

29/04/2021

Global Anti-Corruption

Introduction

1. On 26 April 2021, the Foreign Secretary laid before Parliament the Global Anti-Corruption Sanctions Regulations 2021 (S.I. 2021/488) (the Regulations). The Regulations are 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 serious corruption.
2. The Foreign, Commonwealth and Development Office have 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. 22 entries have been added to the consolidated list and are now subject to an asset freeze.

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 obtained from the Global Anti-Corruption 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: GLOBAL ANTI-CORRUPTION

THE GLOBAL ANTI-CORRUPTION SANCTIONS REGULATIONS 2021 (S.I. 2021/488)

ADDITIONS

Individuals

1. ALEJOS LORENZANA, Felipe

DOB: 03/10/1984. **Nationality:** Guatemala **Position:** Deputy and Vice President of the Board of Directors of the Congress of Guatemala **Other Information:** (UK Sanctions List Ref): GAC0021 (UK Statement of Reasons): Alejos Lorenzana is a Deputy and Vice President of the Board of Directors of the Congress of Guatemala. He has been involved in serious corruption using his position to attract clients with the offer of expediting the refund of tax credits in exchange for bribes, and benefitting from commission charges He is responsible for, and facilitated or provided support for, and benefitted from, serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14089.

2. ALI, Ashraf Said Ahmed Hussein

DOB: (1) --/01/1957. (2) 01/04/1957. **a.k.a:** (1) AL-CARDINAL (2) ALI, Ashiraf, Seed, Ahmed (3) ALI, Ashraf, Hussein (4) ALI, Ashraf, Sayed (5) ALI, Ashraf, Seed, Ahmed (6) ALI, Ashraf, Seed, Ahmed, Hussein (7) ALI, Ashraff, Seed, Ahmed **Nationality:** (1) Sudan (2) South Sudan (3) possibly United Arab Emirates **Passport Details:** B00018325 **Address:** Dubai, United Arab Emirates (UAE). **Position:** Businessman **Other Information:** (UK Sanctions List Ref): GAC0015 (UK Statement of Reasons): Ashraf Seed Ahmed Hussein Ali, widely known as Al-Cardinal, has been involved in serious corruption in South Sudan involving the misappropriation of state property to his benefit and the benefit of others. He has been the beneficiary of commitments from the State which constituted the improper diversion of significant amounts of government revenues and funds. His actions facilitated or provided support for serious corruption that has caused damage to South Sudan's public finances and contributed to ongoing instability and conflict. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14097.

3. ESSA, Salim Azziz

Title: Mr **DOB:** 15/01/1978. **POB:** Johannesburg, South Africa **Nationality:** South Africa **Passport Details:** (1) M00073786. Expiry: 08 Nov 2022. (2) 481034886. Expiry: 06 Nov 2018. (3) M00134539. Expiry: 28 Dec 2024. (4) 48103. Expiry: 08 Nov 2022. **Address:** Dubai, United Arab Emirates (UAE). **Position:** Businessperson **Other Information:** (UK Sanctions List Ref): GAC0019 Ajay Kumar Gupta (business partner), Atul Kumar Gupta (business partner), Rajesh Kumar Gupta (business partner). (UK Statement of Reasons): Salim Essa, in association with Ajay Gupta, Atul Gupta and Rajesh Gupta, has been involved in serious corruption in South Africa, involving the misappropriation of property. He has been responsible for this corruption by playing a key part in its organisation and has financially benefitted from it. This corruption caused serious damage to South Africa. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14087.

4. GORDIEVSKY, Stanislav Evgenievich

Title: Major **DOB:** 09/09/1977. **POB:** Russia **a.k.a:** (1) GORDIEVSKIY, Stanislav, Evgenievich (2) GORDIEVSKIY, Stanislav, Yevgyenyevich (3) GORDIEVSKY, Stanislav, Yevgyenyevich **Nationality:** Russia **Position:** Investigator of the Investigative Department of the South Administrative District, of the Prosecutor Service in Moscow **Other Information:** (UK Sanctions List Ref): GAC0003 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Gordievsky participated in the fraud through his actions during the course of a tax investigation into companies involved in the serious corruption. His actions facilitated or provided support for the serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14096.

5. GUPTA, Ajay Kumar

Title: Mr **DOB:** 05/02/1956. **POB:** Saharanpur, India **Nationality:** (1) India (2) South Africa **Passport Details:** (1) Z1876211. Expiry: 03 Sep 2018. (2) Z1440582. (3) Z2325724. **Address:** Dubai, United Arab Emirates (UAE). **Position:** Businessperson **Other Information:** (UK Sanctions List Ref): GAC0016 Associated with: Atul Gupta (brother/business partner), Rajesh Kumar Gupta (brother/business partner), Salim Essa (business partner). (UK Statement of Reasons): Ajay Gupta, in association with Atul Gupta, Rajesh Gupta and Salim Essa, has been involved in serious corruption in South Africa, involving the misappropriation of property. He has been responsible for this corruption by playing a key part in its organisation and has financially benefitted from it. This corruption caused serious damage to South Africa. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14098.

6. GUPTA, Atul Kumar

Title: Mr **DOB:** 14/06/1968. **POB:** Saharanpur, India **Nationality:** (1) India (2) South Africa **Passport Details:** (1) 233646059. Expiry: 04 Jun 2018. (2) 477486059. Expiry: 04 Jun 2018. (3) 589623059. Expiry: 04 Jun 2018. **Address:** Dubai, United Arab Emirates (UAE). **Position:** Businessperson **Other Information:** (UK Sanctions List Ref): GAC0017 Associated with: Ajay Kumar Gupta (brother/business partner), Rajesh Kumar Gupta (brother/business partner), Salim Essa (business partner). (UK Statement of Reasons): Atul Gupta, in association with Ajay Gupta, Rajesh Gupta and Salim Essa, has been involved in serious corruption in South Africa, involving the misappropriation of property. He has been responsible for this corruption by playing a key part in its organisation and has financially benefitted from it. This corruption caused serious damage to South Africa. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14100.

7. GUPTA, Rajesh Kumar

Title: Mr **DOB:** 05/08/1972. **POB:** Saharanpur, India **a.k.a:** GUPTA, Tony **Nationality:** (1) India (2) South Africa **Passport Details:** (1) M00069726. Expiry: 13 Sep 2022. (2) 462064042. Expiry: 26 Jul 2016. (3) M00006520. Expiry: 26 Jul 2019. (4) M00138156. Expiry: 04 Feb 2025. **Address:** Dubai, United Arab Emirates (UAE). **Position:** Businessperson **Other Information:** (UK Sanctions List Ref): GAC0018 Associated with: Ajay Kumar Gupta (brother/business partner), Atul Kumar Gupta (brother/business partner), Salim Essa (business partner). (UK Statement of Reasons): Rajesh "Tony" Gupta, in association with Ajay Gupta, Atul Gupta and Salim Essa, has been involved in serious corruption in South Africa, involving the misappropriation of property. He has been responsible for this corruption by playing a key part in its organisation and has financially

benefitted from it. This corruption caused serious damage to South Africa. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14102.

8. KARPOV, Pavel Aleksandrovich

Title: Major **DOB:** 27/08/1977. **POB:** Moscow, Russia **a.k.a:** KARPOV, Pavel, Alexandrovich **Nationality:** Russia **Passport Details:** 604176957 (likely expired) **Position:** (1) Formerly described as Investigator of the Investigative Unit of the Moscow branch of the Interior Ministry (2) Senior Investigating Officer for Major Cases. Retired July 2012. **Other Information:** (UK Sanctions List Ref): GAC0002 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of US\$ 230 million of Russian state property via a complex scheme involving a fraudulent tax rebate. Karpov participated in the fraud through his role as an investigator of alleged tax fraud by the Kameya company. His actions facilitated or provided support for serious corruption, and he benefited financially from the proceeds of the serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14094.

9. KHIMINA, Yelena Ivanovna

DOB: 11/09/1953. **POB:** Moscow, Russia **a.k.a:** KHIMINA, Elena, Ivanovna **Nationality:** Russia **Position:** Head of Moscow Tax Office No. 25 **Other Information:** (UK Sanctions List Ref): GAC0006 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of state property via a complex scheme involving a fraudulent tax rebate. Khimina participated in the serious corruption through her approval of part of the fraudulent tax rebate. She was responsible for and her actions facilitated or provided support for the serious corruption. She also transferred or converted, or facilitated the transfer or conversion of, the proceeds of the serious corruption. (Gender): Female **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14083.

10. KHLEBNIKOV, Vyacheslav Georgievich

DOB: 09/07/1967. **POB:** Tambov, Russia **a.k.a:** KHLEBNIKOV, Viacheslav, Georgiyevich **Nationality:** Russia **Position:** Businessman **Other Information:** (UK Sanctions List Ref): GAC0010 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Khlebnikov participated in the fraud through his involvement, in particular, in the improper transfer of ownership of the company Makhaon and the submission of applications for fraudulent tax rebates. His actions facilitated or provided support for the serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14103.

11. KLYUEV, Dmitry Vladislavovich

DOB: 10/08/1967. **POB:** Moscow, Russia **a.k.a:** (1) CHELTER, Dima (2) KLYUEV, Dmitriy, Vladislavovich **Nationality:** Russia **Position:** Owner of Universal Savings Bank **Other Information:** (UK Sanctions List Ref): GAC0012 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Klyuev participated in the fraud through his involvement, in particular in planning the fraud, and through his ownership of Universal Savings Bank. He was responsible for, and his actions facilitated or provided support for, the serious corruption. He also transferred or converted, or facilitated the transfer or

conversion of, the proceeds of the serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14091.

12. KUZNETSOV, Artem Konstantinovich

Title: Lt. Colonel **DOB:** 28/02/1975. **POB:** Baku, former USSR, now Azerbaijan **a.k.a:** KUZNETSOV, Artyom, Konstantinovich **Nationality:** Russia **Position:** (1) Deputy Division Head, Tax Crimes Department of the Moscow Branch of the Interior Ministry in 2007. (2) After Magnitsky's death he was promoted to the Interior Ministry's Economic Security Department. **Other Information:** (UK Sanctions List Ref): GAC0001 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Kuznetsov participated in the fraud through his involvement, in particular, in seizing documents used to secure the fraudulent tax rebate. He interfered in judicial processes and benefited financially from the proceeds of the serious corruption. His actions facilitated or provided support for serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14092.

13. LOPEZ CENTENO, Jose Francisco

DOB: 17/09/1950. **POB:** Nicaragua **a.k.a:** LOPEZ CENTENO, Chico, Lopez **Nationality:** Nicaragua **Passport Details:** C0915261 (Nicaragua). **Address:** Nicaragua. **Position:** (1) Treasurer of Sandinista Party (2) Minister (Advisory) of Production and Trade **Other Information:** (UK Sanctions List Ref): GAC0022 (UK Statement of Reasons): Lopez Centeno was a high-ranking public official and Vice President of state-owned Albanisa. He has been involved in serious corruption by presiding over misappropriation during his leadership whereby public funds were diverted to fake companies, or inflated projects. He has been responsible for serious corruption, and facilitated or supported it. This deprived the Nicaraguan state and its citizens of vital resources for development. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14090.

14. MARKELOV, Viktor Aleksandrovich

DOB: 15/12/1957. **POB:** Leninskoye village, Uzganskiy District, Osh region, former USSR, now Kyrgyzstan **a.k.a:** MARKELOV, Viktor, Alexandrovich **Nationality:** Russia **Position:** Businessman **Other Information:** (UK Sanctions List Ref): GAC0011 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Markelov participated in the fraud through his involvement, in particular, in the improper transfer of ownership of the company Parfenion and the submission of applications for fraudulent tax rebates. His actions facilitated or provided support for the serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14104.

15. MAYOROVA, Yulia Mikhailovna

DOB: 23/04/1979. **POB:** Moscow, Russia **a.k.a:** (1) MAIOROVA, Yulia, Mikhailovna (2) MAIOROVA, Yuliya, Mikhaylovna (3) MAYOROVA, Yuliya, Mikhaylovna **Nationality:** Russia **Passport Details:** 622264502 (as of 2006). **Position:** Lawyer **Other Information:** (UK Sanctions List Ref): GAC0014 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Mayorova participated in the fraud through her involvement, in particular, in court processes based on fraudulent claims for damages, as the lawyer representing Makhaon. Her actions facilitated or provided

support for the serious corruption. (Gender): Female **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14095.

16. NAJERA, Oscar Ramon

DOB: 12/12/1950. **POB:** Honduras **Nationality:** Honduras **Address:** Honduras. **Position:** Congressman **Other Information:** (UK Sanctions List Ref): GAC0020 (UK Statement of Reasons): Najera is a Congressman in the Honduran Congress. He has been involved in serious corruption using his position to facilitate bribes that supported a major drug trafficking organisation, 'Los Cachiros', and which enabled the cartel to evade accountability. Conduct of this nature seriously undermines the rule of law and trust in public institutions in Honduras. He is responsible for, and facilitated or provided support for, serious corruption, and financially benefitted from it. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14088.

17. PAVLOV, Andrey Alekseyevich

DOB: 07/08/1977. **a.k.a:** (1) PAVLOV, Andrei, Alekseevich (2) PAVLOV, Andrei, Alexeevich (3) PAVLOV, Andrei, Alexeyevich **Nationality:** Russia **Position:** Lawyer **Other Information:** (UK Sanctions List Ref): GAC0007 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Pavlov participated in the fraud through his involvement, in particular, in court processes based on fraudulent claims for damages, as the lawyer representing Rilend. His actions facilitated or provided support for the serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14084.

18. PLAKSIN, Gennady Nikolaevich

DOB: 30/08/1961. **POB:** Klin, Moscow Region, Russia **a.k.a:** PLAKSIN, Gennadiy, Nikolayevich **Position:** Former Chairman of the Universal Savings Bank **Other Information:** (UK Sanctions List Ref): GAC0009 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Plaksin participated in the fraud through his involvement, in particular, in court processes based on fraudulent claims for damages, as the director of Instar LLC. His actions facilitated or provided support for the serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14086.

19. SHESHENYA, Aleksey Nikolaevich

DOB: 16/04/1971. **POB:** Kommunarisk, Voroshilov region, former USSR, now Ukraine **a.k.a:** (1) SHESHENIA, Aleksei, Nikolayevich (2) SHESHENIA, Alexei, Nikolayevich (3) SHESHENIA, Alexey, Nikolayevich **Other Information:** (UK Sanctions List Ref): GAC0008 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Sheshenya participated in the fraud through his involvement, in particular, in court processes based on fraudulent claims for damages, as the director of Grand-Aktiv LLC. His actions facilitated or provided support for the serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14085.

20. STEPANOV, Vladlen Yurievich

DOB: 17/07/1962. **a.k.a:** STEPANOV, Vladlen, Yuryevich **Other Information:** (UK Sanctions List Ref): GAC0005 Husband of Olga Stepanova at the time of the serious corruption. (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Stepanov participated in the serious corruption through his involvement, in particular, owning the bank account which received the misappropriated funds. His actions provided support for or facilitated the misappropriation. He transferred or converted, or facilitated the transfer or conversion of, the proceeds the serious corruption, and benefitted financially from the serious corruption. Stepanov is also associated with Olga Stepanova, his then wife, who is also a person involved in serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14101.

21. STEPANOVA, Olga Germanovna

DOB: 29/07/1962. **POB:** Moscow, Russia **a.k.a:** STEPANOVA, Olga, Hermanovna **Nationality:** Russia **Position:** Previous Head of Tax Office no. 28 **Other Information:** (UK Sanctions List Ref): GAC0004 Wife of Vladlen Stepanov at the time of the serious corruption. (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Stepanova participated in the serious corruption through her approval of part of the fraudulent tax rebate. She was responsible for and her actions facilitated or provided support for the serious corruption. She transferred or converted, or facilitated the transfer or conversion of, the proceeds of the serious corruption and benefitted financially from the serious corruption. (Gender): Female **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14099.

22. URZHUMTSEV, Oleg Vyacheslavovich

Title: Lt Col **DOB:** 22/10/1968. **Nationality:** Russia **Position:** Formerly Senior Investigator of the Department for Investigating Organised Economic Criminal Activity of the Investigative Committee under the Ministry of Internal Affairs of Russia **Other Information:** (UK Sanctions List Ref): GAC0013 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of \$230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Urzhumtsev was involved in the fraud, in particular, by closing an investigation into the re-registration of companies involved in the misappropriation. His actions facilitated or provided support for the serious corruption. (Gender): Male **Listed On:** 26/04/2021 **Last Updated:** 26/04/2021 **Group ID:** 14093.

Financial Reporting Authority

Portfolio of Legal Affairs

26/04/2021