

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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CAYMAN ISLANDS

Financial Sanctions Notice

09/10/2020

Global Human Rights

Introduction

1. The Global Human Rights Sanctions Regulations 2020 (S.I. 680/2020) (the Regulations) 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 responsible for or involved in serious violations of human rights.
2. On 29 September 2020 the Foreign, Commonwealth and Development Office updated the UK Sanctions List on GOV.UK. This list includes details of all sanctions enacted 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. Corrections have been made to 17 entries, to align them with the Global Human Rights Sanctions Regulations 2020 (S.I. 680/2020).

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 Global Human Rights financial sanctions page on the Gov.UK website:
<https://www.gov.uk/government/collections/financial-sanctions-regime-specificconsolidated-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 under Sanctions Act Regulations:
<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 HUMAN RIGHTS

AMENDMENTS

Individuals

1. AL ASIRI, Ahmad Hassan Mohammed

DOB: 12/02/1952. **POB:** Mahayel, Asir Province (unconfirmed) **Nationality:** Saudi Arabian **Address:** Riyadh, Saudi Arabia. **Position:** Deputy Head of Saudi Intelligence Services **Other Information:** UK Sanctions List Ref: GHR0043. Gender: male. Ahmad Hassan Mohammed Al Asiri held the position of Deputy Head of the Saudi Intelligence services (General Intelligence Presidency, GIP) in Saudi Arabia. He was involved in the unlawful killing of Jamal Khashoggi. He was a senior official involved in commissioning the 15 man team sent to Turkey to kill Jamal Khashoggi. DOB is unconfirmed. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13894.

2. ANICHIN, Aleksey Vasilyevich

DOB: ~~01/12/1949~~ **POB:** Sevastopol, Ukraine **a.k.a:** ANICHIN, Alexei, Vasilyevich **Nationality:** Russian **Other Information:** UK Sanctions List Ref: GHR0002. Gender: male. Aleksey Vasilyevich Anichin, as a deputy Minister in the Russian Interior Ministry and the head of the Investigative Committee, was involved in the mistreatment of Sergei Magnitsky whilst in detention, which contributed significantly to his death on 16 November 2009. Anichin oversaw a 'team' of investigators who failed to investigate complaints made by Magnitsky about his mistreatment and concealed evidence of Magnitsky's deteriorating medical condition. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13853.

3. AL BOSTANI, Meshal Saad

Title: First Lieutenant in the Saudi Air Force **DOB:** 27/03/1987. **a.k.a:** ~~(1) AL BOSTANI, Meshal, Saad, M. (2) ALBOST, Meshal, Saad (3) ALBOST, Meshal, Saad, M. (4) ALBOSTANI, Meshal, Saad (5) AL-BOSTANI, Meshal, Saad (6) ALBOSTANI, Meshal, Saad, M. (7) AL-BOSTANI, Meshal, Saad, M.~~ **Nationality:** Saudi Arabian **Passport Details:** R339037 **Other Information:** UK Sanctions List Ref: GHR0036. Gender: male. Meshal Saad Al Bostani was First Lieutenant in the Saudi Air Force. He was involved in the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities. He was involved in the concealment of evidence at the Saudi General Consul's residence following the killing. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13885.

4. **AL QAHTANI, Saif Saad Q.**

DOB: --/--/1973. ~~a.k.a: AL QAHTANI, Saif, Saad, Q.~~ **Nationality:** Saudi Arabian **Position:** Training Officer, Saudi Air Force **Other Information:** UK Sanctions List Ref: GHR0038. Gender: male. Saif Saad Q. Alqahtani was a training officer in the Saudi Air Force who worked in the Office of the Crown Prince in Saudi Arabia. He was in the Consulate during the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, and played an active part of the 15 man team sent to Turkey by Saudi authorities, including through the concealment of evidence relating to the killing. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13889.

5. **MUTREB, Maher Abdulaziz**

DOB: 23/05/1971. **POB:** Makkah, Saudi Arabia **Nationality:** Saudi Arabian **Passport Details:** D088677 **Address:** Riyadh, Saudi Arabia (currently in detention). **Position:** Intelligence Officer **Other Information:** UK Sanctions List Ref: GHR0042. Gender: male. ~~Assigned to Saudi Embassy in London in 2007. Worked with Saud Alqahtani, the Crown Prince's advisor.~~ Maher Abdulaziz Mutreb held the position of Intelligence Officer in Saudi Arabia. He was directly involved in carrying out the unlawful killing of Jamal Khashoggi at the Saudi Consulate in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13893.

6. **BASTRYKIN, Alexander Ivanovich**

DOB: 27/08/1953. **POB:** Russia **Nationality:** Russian ~~**Passport Details:** (1) 5726608 (2) 200125935~~ **Position:** Head of the Investigative Committee of Russia **Other Information:** UK Sanctions List Ref: GHR0011. Gender: male. General of Justice of the Russian Federation. Went to university with Vladimir Putin. Alexander Ivanovich Bastrykin was appointed First Deputy Prosecutor General and Head of the Investigative Committee under the Prosecutor's Office on 22 June 2007, he continued as Chairman of the Investigative Committee after it became an independent body in January 2011. In this role Bastrykin was responsible for the investigation of the mistreatment and death of Sergei Magnitsky in detention and intentionally or recklessly failed to fulfil that responsibility. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13867.

7. **KARLOV, Gennady Vyacheslavovich**

~~**Title:** Colonel~~ **DOB:** 27/02/1960. **Nationality:** Russian ~~**Position:** Head of Department of Ownership and Financial Crimes in the Investigative Committee of the Russian Interior Ministry~~ **Other Information:** UK Sanctions List Ref: GHR0004. Gender: male. Gennady Karlov, as the Head of the Department of Ownership and Financial Crimes in the Investigative Committee of the Russian Ministry of Interior, was involved in the mistreatment of Sergei Magnitsky whilst in detention, which contributed significantly to his death. Karlov was part of a 'team' of investigators who failed to investigate complaints made by Magnitsky about his mistreatment and approved actions to conceal

evidence relating to subordinates who were directly involved in that conduct. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13856.

8. VINOGRADOVA, Natalya

Title: Colonel **DOB:** 16/06/1973. **Nationality:** Russian **Position:** ~~Deputy Head of Department of Ownership and Financial Crimes in the Investigative Committee in Russian Ministry of Internal Affairs~~ **Other Information:** UK Sanctions List Ref: GHR0005. Gender: female. Natalya Vinogradova, as the Deputy Head of the Ownership and Financial Crimes Department in the Investigative Committee of the Russian Interior Ministry, was involved in the mistreatment of Sergei Magnitsky, which contributed significantly to his death on 16 November 2009. Vinogradova was part of a 'team' of investigators, who failed to investigate complaints made by Magnitsky about his mistreatment and provided support to subordinates who were directly involved in that conduct. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13858.

9. LITVINOVA, Larisa Anatolievna

Title: Doctor **DOB:** 18/11/1963. **Nationality:** Russian **Position:** ~~(1) Medical Officer, Butyrka Prison (2) Head of the Therapeutic Ward, Butyrka Prison~~ **Other Information:** UK Sanctions List Ref: GHR0010. Gender: female. Larisa Anatolievna Litvinova was head of the therapeutic ward at Butyrka Prison where Sergei Magnitsky was detained between 25 July and 16 November 2009. She was involved in the mistreatment of Sergei Magnitsky by failing to ensure the proper administration of medical care to him during this period causing him considerable suffering and contributing significantly to his death. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13865.

10. TRIKUYLA, Elena Anatolievna

DOB: 18/03/1975. **Nationality:** Russian **Position:** ~~Investigator in the Russian Investigative Committee~~ **Other Information:** UK Sanctions List Ref: GHR0015. Gender: female. Elena Anatolievna Trikulya, as an investigator for the Investigative Committee in the Russian Ministry of the Interior after the death of Sergei Magnitsky on 16 November 2009, failed to properly investigate those responsible for his mistreatment in detention, which contributed significantly to his death, and concealed evidence in relation to that conduct. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13873.

11. PECHEGIN, Andrey Ivanovich

DOB: 24/09/1965. **POB:** Russia a.k.a: PECHEGIN, Andrei, Ivanovich **Nationality:** Russian **Position:** ~~Deputy Division Head in Prosecutor's Office~~ **Other Information:** UK Sanctions List Ref: GHR0017. Gender: male. Andrey Pechegin was Deputy Head of the Division of Supervision of Investigations of the Prosecutor's Office and he was responsible for the investigation of complaints about the ill-treatment of Sergei Magnitsky in detention. The evidence suggests that Pechegin intentionally or recklessly failed to fulfil that

responsibility in that he ignored and denied complaints about the ill-treatment of Magnitsky. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13876.

12. DROGANOV, Aleksei

DOB: 11/10/1975. **POB:** Lesnoi Settlement, Pushkin Area, Moscow Region, Russia **Nationality:** Russian **Position:** ~~Operative of Tax Crimes Department in the Moscow directorate of the Interior Ministry~~ **Other Information:** UK Sanctions List Ref: GHR0020. Gender: male. Aleksei Droганov was an officer in the Tax Crimes Department in the Moscow directorate of the Interior Ministry and was involved in the detention and mistreatment of Sergei Magnitsky, which contributed significantly to his death. Droганov was part of the 'team' of investigators, led by Artem Kuznetsov, the Deputy Head of the Tax Crimes Department, who were allegedly involved in the initial fraud exposed by Sergei Magnitsky and who falsified evidence to justify his arrest and detention. As part of this investigation team Aleksei Droганov facilitated the mistreatment of Sergei Magnitsky whilst in detention which was designed to force Magnitsky to retract his earlier testimony. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13880.

13. PODOPRIGOROV, Sergei

Title: Judge **DOB:** 08/01/1974. **POB:** Moscow, Russia **a.k.a:** PODOPRIGOROV, Judge, Sergey **Nationality:** Russian **Position:** ~~Judge at Moscow's Tverskoi District Court~~ **Other Information:** UK Sanctions List Ref: GHR0021. Gender: male. Sergei Podoprigorov was a judge at Moscow's Tverskoi district court. He made two rulings in relation to Sergei Magnitsky: in November 2008 to approve Magnitsky's arrest and in March 2009 to prolong his detention. In this capacity, Podoprigorov authorised Magnitsky's detention, prolonging his detention without trial without subjecting to challenge the evidence originally provided to justify Magnitsky's detention or exploring other factors relevant to the decision. Podoprigorov therefore facilitated the mistreatment and death of Magnitsky by authorising the extension of his detention. UK listing (Sanctions Act). Subject to a travel ban and asset freeze. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13881.

14. UKHNALYOVA, Svetlana

Title: Judge **DOB:** 14/03/1973. **POB:** Moscow, Russia **a.k.a:** (1) UKHNALEV, Judge, Svetlana (2) UKHNALEV, Judge, Svetlana, V. (3) UKHNALEVA, Judge, Svetlana (4) UKHNALEVA, Judge, Svetlana, V. (5) UKHNALYOVA, Judge, Svetlana, V. **Nationality:** Russian **Position:** ~~Judge at Moscow's Tverskoi District Court~~ **Other Information:** UK Sanctions List Ref: GHR0025. Gender: female. Svetlana Ukhnyalova, as a Judge at Moscow's Tverskoi District Court, was involved in decisions to extend the detention of Sergei Magnitsky, and in particular on 15 June 2009. In this capacity, Ukhnyalova facilitated the mistreatment / denial of medical care to Sergei Magnitsky which contributed significantly to his death on 16 November 2009. UK listing (Sanctions Act).

Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13887.

15. ABAHUSSAIN, Mansour Othman M

DOB: (1) 10/08/1972. (2) 11/08/1972. **POB:** Majmaa, Saudi Arabia **a.k.a:** (1) ABAHUSEYIN, Hussein, Mansour, Othman, Aba (2) ABAHUSEYIN, Mansour, Osman (3) ABAHUSEYIN, Mansour, Othman, M (4) ABAHUSEYIN, Mansur, Othman, M (5) ABAHUSSAIN, Hussein, Mansour, Othman, Aba (6) ABAHUSSAIN, Mansour, Osman (7) ABAHUSSAIN, Mansur, Othman, M (8) ABAHUSSEIN, Hussein, Mansour, Othman, Aba (9) ABAHUSSEIN, Mansour, Osman (10) ABAHUSSEIN, Mansour, Othman, M (11) ABAHUSSEIN, Mansur, Othman, M (12) ABU HUSEYN, Hussein, Mansour, Othman, Aba (13) ABU HUSEYN, Mansour, Osman (14) ABU HUSEYN, Mansour, Othman, M (15) ABU HUSEYN, Mansur, Othman, M (16) ABU HUSSEIN, Hussein, Mansour, Othman, Aba (17) ABU HUSSEIN, Mansour, Osman (18) ABU HUSSEIN, Mansour, Othman, M (19) ABU HUSSEIN, Mansur, Othman, M (20) ABUHUSSAIN, Hussein, Mansour, Othman, Aba (21) ABUHUSSAIN, Mansour, Osman (22) ABUHUSSAIN, Mansour, Othman, M (23) ABUHUSSAIN, Mansur, Othman, M **Nationality:** Saudi Arabian **Passport Details:** S059033 **Position:** ~~Major General, Intelligence Officer~~ **Other Information:** UK Sanctions List Ref: GHR0028. Gender: male. Mansour Othman M Abahussain held the position of Major General and worked in the office of the Crown Prince. He was involved in the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities. He was involved in the concealment of evidence at the Saudi Consul General's residence following the killing. UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13861.

16. WIN, Soe

~~**Title:** Vice Senior General~~ **DOB:** 01/03/1960. **POB:** Myanmar **Nationality:** Myanmar **Position:** Second in Command of the Myanmar Armed Forces (Tatmadaw) **Other Information:** UK Sanctions List Ref: GHR0047. Gender: male. Vice Senior General Soe Win, as Deputy Commander-in-Chief of the Myanmar Armed Forces (Tatmadaw) and Commander-in-Chief of the Myanmar Army, had responsibility for the Tatmadaw troops who carried out serious human rights violations against the Rohingya population in Rakhine State in 2017 and 2019 including unlawful killings, torture, forced labour, systematic rape and other forms of targeted sexual violence. Soe Win was also involved in the financing of the Tatmadaw military operations in Rakhine State during which these violations took place, knowing that this financing would contribute to the commission of these violations. ~~As Deputy Commander-in-Chief of the Tatmadaw and Commander-in-Chief of the Army, Soe Win also has responsibility for the serious human rights violations by the Tatmadaw in connection with its business interests in the extractive industries in Myanmar.~~ UK listing (Sanctions Act). Subject to an asset freeze and travel ban. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13898.

Entities

1. **MINISTRY OF STATE SECURITY (~~MSS~~) BUREAU 7**

a.k.a: (1) Farm Guidance Bureau (2) Farming Bureau (3) Prison Bureau **Address:** Pyongyang. **Other Information:** UK Sanctions List Ref: GHR0048. Government entity. As the entity responsible for running the DPRK's political prison camps, MSS Bureau 7 is involved in the widespread serious human rights violations committed against prisoners in those camps by camp guards and other DPRK officials. These violations include murder, torture and enslavement. UK listing (Sanctions Act). Subject to an asset freeze. **Listed on:** 06/07/2020 **Last Updated:** ~~06/07/2020~~ 09/10/2020 **Group ID:** 13899.

Financial Reporting Authority

Portfolio of Legal Affairs

09/10/2020