

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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CAYMAN ISLANDS

Financial Sanctions Notice

13/01/2022

Global Human Rights

Introduction

1. The Global Human Rights Sanctions Regulations 2020 (S.I. 2020/680) (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 13 January 2022 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 below entries have been amended following their designation under the Global Human Rights Sanctions Regulations and are still subject to an asset freeze:
 - Dmitry Vadimovich KOVTUN (Group ID: 13311)
 - Andrey Konstantinovich LUGOVOY (Group ID: 13310)

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. 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.
 7. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

Further Information

8. 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-specific-consolidated-lists-and-releases>
9. The Consolidated List can be found here:
<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>
10. The UK Sanctions List can be found here:
<https://www.gov.uk/government/publications/the-uk-sanctions-list>
11. 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>
12. 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)

13. **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

THE GLOBAL HUMAN RIGHTS SANCTIONS REGULATIONS 2020 (S.I. 2020/680)

AMENDMENTS

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

Individuals

1. KOVTUN, Dmitriy Vadimovich

DOB: (1) 25/09/1965. (2) 25/09/1969. **POB:** Moscow, *Russia* **Nationality:** *Russia* **a.k.a:** KOVTUN, Dmitry, Vadimovich **Passport Details:** Reference ~~62~~. Passport no. ~~9632078~~. issued ~~17/08/2006~~. expired ~~17/08/2011~~ **Address:** Apartment no. 150, Golubinskay Street, Moscow, Russia, 117463. **Position:** General Director of Global Project LLC **Other Information:** *(UK Sanctions List Ref): GHR0083. Currently subject to an Anti-Terrorism, Crime and Security Act 2001 (ATCSA) freezing order. (UK Statement of Reasons): Dmitry Kovtun is a former member of the Russian military. He was one of the two individuals found to be responsible by the Litvinenko Inquiry for the killing of Alexander Litvinenko through deliberate poisoning with polonium 210 in November 2006. This action constitutes a serious violation of the right to life. It is probable that this action was carried out under the direction of the Federal Security Service of the Russian Federation (FSB). (Gender): Male. Listed on: 13/01/2022 Last Updated: 13/01/2022 Group ID: 13311.*

2. LUGOVOY, Andrey Konstantinovich

DOB: 19/09~~10~~/1966. **POB:** Baku, Azerbaijan **Nationality:** *Russia* **a.k.a:** LUGOVOI, Andrey, Konstantinovich **Passport Details:** Reference ~~51~~. Passport no. 0608109. issued ~~18/11/2005~~. expiring ~~03/05/2009~~ **Address:** Soloviniya ~~Proezel~~ *Proezd*, 16-1-247, Moscow, Russia, 117593. **Position:** Member of *Parliament* ~~the~~ (Russian Duma) ~~(Parliament)~~ **Other Information:** *(UK Sanctions List Ref): GHR0084. Currently subject to an Anti-Terrorism, Crime and Security Act 2001 (ATCSA) freezing order. (UK Statement of Reasons): Andrey Lugovoy is a former member of the Russian military and currently serves in the Russian Parliament. He was one of the two individuals found to be responsible by the Litvinenko Inquiry for the killing of Alexander Litvinenko through deliberate poisoning with polonium 210 in November 2006. This action constitutes a serious violation of the right to life. It is probable that this action was carried out under the direction of the Federal Security Service of the Russian Federation (FSB). (Gender): Male. Listed on: 13/01/2022 Last Updated: 13/01/2022 Group ID: 13310.*

Financial Reporting Authority

Portfolio of Legal Affairs

13/01/2022