

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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CAYMAN ISLANDS

Financial Sanctions Notice

04/07/2018

Syria

Introduction

1. Council Regulation (EU) 36/2012 (“the Regulation”) imposing financial sanctions against Syria has been amended.

Notice summary (Full details are provided in the Annex to this Notice)

2. 2 entries detailed in the Annex to this Notice have been removed from the consolidated list and are no longer subject to an asset freeze and 20 entries detailed in the Annex to this Notice have been amended and are still subject to an asset freeze:

What you must do

3. 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;
 - 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 financialreportingauthority@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 financialreportingauthority@gov.ky by completing and submitting a TF/PF Asset Freeze Report Form. Information reported to FRA may be passed on to other regulatory authorities or law enforcement.
4. 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.
 5. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

Legislative details

6. On 29 May 2018 Council Implementing Regulation (EU) No 2018/774 (“the Amending Regulation”) was published in the Official Journal of the European Union (O.J. L 131, 29.5.2018, p.1) by the Council of the European Union.
7. The Amending Regulation amended Annex II to the Regulation with effect from 30 May 2018.
8. On 4 July 2018 a Corrigenda correcting the Amending Regulation was published in the Official Journal of the European Union (O.J. L 167, 4.7.2018, p.36) by the Council of the European Union.

Further Information

9. A copy of the Amending Regulation can be obtained from the website of the Official Journal of the European Union:
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0774&from=EN>
10. A copy of the Corrigenda can be obtained from the website of the Official Journal of the European Union:
[https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0774R\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0774R(01)&from=EN)

11. Copies of recent Notices, certain EU Regulations and UK legislation can be obtained from the Syria financial sanctions page on the GOV.UK website:

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

12. Please note there are also import and export restrictions on Syria. Further guidance on export and trade sanctions is available from the GOV.UK website:

<https://www.gov.uk/sanctions-embargoes-and-restrictions>.

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

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

Enquiries

14. Enquiries regarding this Financial Sanctions Notice should be addressed to:

The Sanctions Coordinator
Financial Reporting Authority
P.O. BOX 1052
Grand Cayman KY1-1102
Cayman Islands
financialreportingauthority@gov.ky

ANNEX TO NOTICE

FINANCIAL SANCTIONS: SYRIA

COUNCIL IMPLEMENTING REGULATION (EU) No 2018/774

AMENDING ANNEX II TO COUNCIL REGULATION (EU) No 36/2012

DELISTINGS

Individuals

1. **RAJIHA Dawud**

Position: Chief of Staff of the Armed Forces **Other Information:** Responsible for the military involvement in the crackdown on peaceful protesters. **Listed on:** 24/05/2011 **Last Updated:** ~~24/05/2011~~ 04/07/2018 **Group ID:** 11936.

2. **AL-TURKMANI Hassan Bin-Ali**

DOB: --/--/1935. **POB:** Aleppo **Position:** Deputy Vice Minister. **Other Information:** Special Envoy of President Bashar Al-Assad. Former Minister for Defence. Reported to have died in the bombing of 18 July 2012. **Listed on:** 24/08/2011 **Last Updated:** ~~31/05/2013~~ 04/07/2018 **Group ID:** 12044.

AMENDMENTS

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

Individuals

1. **~~AL~~-ABBAS Amjad**

a.k.a Al-Abbas, Amjad **Position:** Head of Political Security in Banyas **Listed on:** 10/05/2011 **Last Updated:** ~~31/05/2013~~ 04/07/2018 **Group ID:** 11912.

2. **MAKHLLOUF Rami**

DOB: 10/07/1969. **POB:** Damascus **Passport Details:** 454224 *Passport no 000098044, Issue number 002-03-0015187* **Other Information:** Syrian businessman operating in Syria with interests in telecommunications, financial services, transport and property sectors. He is an influential member of the Makhlof family and closely connected to the Assad family. Cousin of President Bashar Al-Assad. Has financial interests in and/or holds senior positions in Al Mashreq, Bena Properties, Cham Holding and Syriatel. **Listed on:** 10/05/2011 **Last Updated:** ~~01/06/2016~~ 04/07/2018 **Group ID:** 11913.

3. **QUDSIYAH Abd Al-Fatah**

DOB: --/--/1953. **POB:** Hama **Passport Details:** D0005788 (Diplomatic) **Position:** Head of Syrian Military Intelligence (SMI) **Other Information:** *Officer of the rank of Major General in the Syrian Armed Forces.* **Listed on:** 10/05/2011 **Last Updated:** ~~31/05/2013~~ 04/07/2018 **Group ID:** 11902.

4. **CHALICHE Zoulhima**

DOB: (1) --/--/1946. (2) --/--/1951. (3) --/--/1956. **POB:** Kerdaha **a.k.a:** (1) CHALICHE, Zu al-Himma (2) SHALEESH, Zoulhima (3) SHALEESH, Zu al-Himma (4) SHALISH, Dhu al-Himma (5) SHALISH, Zoulhima (6) SHALISH, Zu al-Himma **Position:** ~~Head of presidential security~~ **Other Information:** First cousin of President Bashar Al-Assad. *Officer of the Syrian security and intelligence services. Former Head of Presidential Security. Member of the Syrian Armed Forces of the rank of Major General.* **Listed on:** 24/06/2011 **Last Updated:** ~~31/05/2013~~ 04/07/2018 **Group ID:** 12013.

5. **SOLEIMANI Qasem**

Title: ~~Brigadier~~ *Major* General **DOB:** 11/03/1957. **POB:** Qom, Iran **a.k.a:** (1) SALIMANI, Qasem (2) SOLAIMANI, Qasem (3) SOLEIMANY, Qasim (4) SOLEMANI, Qasem (5) SOLEYMANI, Ghasem (6) SOLEYMANI, Qasem (7) SULAIMANI, Qasem (8) SULAYMAN, Qasem (9) SULAYMAN, Qasmi (10) SULEMANI, Qasem **Nationality:** Iranian (Iranian citizenship) **Passport Details:** 008827 (~~Iran Diplomatic~~). ~~Issued 1999~~ *issued in Iran.* **Position:** Commander of Iranian Revolutionary Guard Corps, IRGC - Qods **Other Information:** Both UK listing and EU listing under Terrorism and Terrorist Financing. EU listing under Syria. Promoted to Major General, retaining his position as Commander of Qods Force.

UN listing under Iran (nuc prol). Male. UN Ref IRI.039 *Also known as Haj Qasem, Haji Qassem and Sarder Soleimani*. **Listed on:** 24/06/2011 **Last Updated:** ~~19/07/2017~~ 04/07/2018 **Group ID:** 9062.

6. **TAEB Hossein**

Title: ~~Hojjatoleslam~~ **DOB:** --/--/1963. **POB:** Tehran, Iran **a.k.a:** (1) TAEB, Hassan (2) TAEB, Hosein (3) TAEB, Hussayn (4) TAEB, Hossein (5) TA'EB, Hojjatoleslam Hossein **Position:** Head of IRGC Intelligence **Other Information:** ~~Former~~ Deputy Commander for Intelligence of Iranian Revolutionary Guard Corps. EU listing under Iran (human rights) and Syria. **Listed on:** 24/06/2011 **Last Updated:** ~~13/04/2018~~ 04/07/2018 **Group ID:** 11788.

7. **AL-ASSAD Nizar**

a.k.a. ASAAD, Nizar **Other Information:** Cousin of Bashar Al-Assad. Previously head of the company 'Nizar Oilfield Supplies'. **Listed on:** 24/08/2011 **Last Updated:** ~~08/08/2013~~ 04/07/2018 **Group ID:** 12041.

8. **SHAHADAH Rafiq**

Title: ~~Brigadier General~~ Major General **DOB:** --/--/1956. **POB:** Jablah, Latakia Province **a.k.a:** (1) CHAHADA, Rafeeq (2) CHAHADA, Rafiq (3) CHAHADE, Rafeeq (4) CHAHADE, Rafiq (5) CHAHADEH, Rafeeq (6) CHAHADEH, Rafiq (7) SHAHADA, Rafeeq (8) SHAHADA, Rafiq (9) SHAHADAH, Rafeeq (10) SHAHADE, Rafeeq (11) SHAHADE, Rafiq (12) SHAHADEH, Rafeeq (13) SHAHADEH, Rafiq **Other Information:** Former Head of Syrian Military Intelligence (SMI) Branch 293 (Internal Affairs) in Damascus. Advisor to President Bashar Al-Assad for strategic questions and military intelligence. **Listed on:** 24/08/2011 **Last Updated:** ~~07/06/2017~~ 04/07/2018 **Group ID:** 12042.

9. **AKHRAS Tarif**

DOB: 02/06/1951. **POB:** Homs, Syria **a.k.a:** ~~AL-AKHRAS~~ AL AKHRAS, Tarif **Passport Details:** 0000092405 (Syrian) **Other Information:** Prominent businessman benefiting from and supporting the regime. Founder of the Akhras Group (commodities, trading, processing and logistics). Member of the Board of the Federation of Syrian Chambers of Commerce. Former Chairman of the Homs Chamber of Commerce. He has close business relations with President

Al-Assad's family. Provided logistical support for the regime (buses and tank loaders). **Listed on:** 05/09/2011 **Last Updated:** ~~22/10/2014~~ 04/07/2018 **Group ID:** 12060.

10. **MAKHLUF Talal**

Title: Brigadier *Major General a.k.a. MAKHLOUF, Talal* **Position:** *Current commander general of the Republican Guards. 103rd Brigade of the Republican Guard Division* **Other Information:** *Former commander of the 105th Brigade of the Republican Guards.* **Listed on:** 02/12/2011 **Last Updated:** ~~31/05/2013~~ 04/07/2018 **Group ID:** 12418.

11. **HASSUN Nazih**

Title: Brigadier *Major General a.k.a:* (1) HASSOUN, Nazeeh (2) HASSOUN, Nazih (3) HASSUN, Nazeeh **Position:** ~~Head of Syrian Military Intelligence, Damascus Countryside/Rif Dimashq Branch~~ *Head of the Political Security Directorate of the Syrian security services* **Other Information:** ~~Former Syrian Air Force Intelligence.~~ *Officer of the rank of Major General in the Syrian Armed Forces* **Listed on:** 02/12/2011 **Last Updated:** ~~02/06/2015~~ 04/07/2018 **Group ID:** 12419.

12. **MAHMOUD Abdul Salam Abdul-Salam Fajr**

Title: Brigadier General **Position:** Head of the Bab Tuma (Damascus) Branch of the air force's intelligence service. **Listed on:** 24/07/2012 **Last Updated:** ~~24/07/2012~~ 04/07/2018 **Group ID:** 12711.

13. **AL-ACHI Amer**

Title: General **a.k.a:** (1) AACHI, Ammar (2) AL ASHI, Amis (3) ASHI, Amer (4) *AL-ACHI, Amer Ibrahim* **Position:** Head of the intelligence branch of the air force intelligence service **Other Information:** ~~Graduate of the military school of Aleppo. Close to Daoud Rajah~~ **Listed on:** 24/07/2012 **Last Updated:** ~~24/07/2012~~ 04/07/2018 **Group ID:** 12727.

14. **HANNA Bassam**

Title: Eng. **DOB:** ~~--/--/1954~~. **POB:** *Aleppo (Syria)* **Other Information:** Former Minister of Water Resources **Listed on:** 16/10/2012 **Last Updated:** ~~07/06/2017~~ 04/07/2018 **Group ID:** 12769.

15. **AL SIKHNY Adnan Abdo**

Title: Dr. **a.k.a:** (1) AL SIKHNY, Adnan, Abdou (2) AL-SEKHNI, Adnan, Abdo (3) AL-SEKHNI, Adnan, Abdou (4) AL-SEKHNY, Adnan, Abdo (5) AL-SEKHNY, Adnan, Abdou (6) AL-SIKHNI, Adnan, Abdo (7) AL-SIKHNI, Adnan, Abdou **DOB:** --/--/1961. **POB:** *Aleppo (Syria)* **Position:** Former Minister of Industry **Listed on:** 16/10/2012 **Last Updated:** ~~30/05/2014~~ 04/07/2018 **Group ID:** 12781.

16. **ALI Malek**

Title: Dr **DOB:** --/--/1956. **POB:** *Tartous (Syria)* **a.k.a:** ALI, Dr, Malik **Other Information:** Former Higher Education Minister **Listed on:** 24/06/2014 **Last Updated:** ~~07/06/2017~~ 04/07/2018 **Group ID:** 12995.

17. **MAHALLA Muhamad**

Title: *Major* General **DOB:** --/--/1960. **POB:** Jableh, ~~Latakia Province~~ **a.k.a:** (1) MAALLA, Mohamed (2) MAALLA, Muhamad (3) MAALLA, Muhammad (4) MAHALLA, Mohamed (5) MAHALLA, Muhammad (6) MAHLA, Mohamed (7) MAHLA, Muhamad (8) MAHLA, Muhammad (9) MUALLA, Mohamed (10) MUALLA, Muhamad (11) MUALLA, Muhammad (12) MUHALLA, Mohamed (13) MUHALLA, Muhamad (14) MUHALLA, Muhammad **Position:** Head of the Syrian Military Intelligence (SMI), Branch 293 (Internal Affairs), since April 2015 **Other Information:** Former Deputy Head of Political Security (2012), Officer of the Syrian Republican Guard and Vice-Director of the Political Security Directorate. Head of Military Police, Member of the National Security Bureau. **Listed on:** 29/05/2015 **Last Updated:** ~~04/10/2016~~ 04/07/2018 **Group ID:** 13252.

18. **GHRITAWI GHWATI Mohammad Ziad**

a.k.a: GHRAYWATI, Mohammad, Ziad **Other Information:** An engineer at the Syrian Scientific Studies and Research Centre. He is involved in chemical weapons proliferation and delivery and has been involved in the construction of barrel bombs. **Listed on:** 18/07/2017 **Last Updated:** ~~18/07/2017~~ 04/07/2018 **Group ID:** 13502.

19. SULAIMAN Maher

POB: *Lattakia Syria* **a.k.a:** (1) SULAIMAN, Mahir (2) SULEIMAN, Maher (3) SULEIMAN, Mahir **Address:** Higher Institute for Applied Sciences and Technology (HIAST), PO Box 31983, Damascus. **Position:** Director of the Higher Institute for Applied Sciences and Technology (HIAST) **Other Information:** *Doctor*, Director of the Higher Institute for Applied Sciences and Technology (HIAST), which provides training and support as part of the Syrian chemical weapons proliferation sector. Due to his senior position at the HIAST, which is an affiliate and subsidiary of the Scientific Studies and Research Centre (SSRC), he is associated with the HIAST and SSRC, both of which are designated entities. **Listed on:** 19/03/2018 **Last Updated:** ~~19/03/2018~~ 04/07/2018 **Group ID:** 13621.

Entity

1. HIGHER INSTITUTE FOR APPLIED SCIENCES AND TECHNOLOGY (HISAT)

a.k.a *Institut Supérieur des Sciences Appliquées et de Technologie (ISSAT)* **Address:** P.O. Box 31983, Barzeh. **Other Information:** Affiliated to, and a subsidiary of, the designated entity, the Syrian Scientific Studies and Research Centre (SSRC). **Listed on:** 23/07/2014 **Last Updated:** ~~24/07/2014~~ 04/07/2018 **Group ID:** 13032.

Financial Reporting Authority

Portfolio of Legal Affairs

04/07/2018

PROCEDURE FOR REMOVING PERSONS FROM THE CONSOLIDATED LIST AND UN-FREEZING ASSETS:

On receipt of the Financial Sanction Notices where an entry has been removed from the consolidated list and is no longer subject to any assets freeze:

“You must immediately on receipt of the Financial Sanction Notice advising of removal of person and/or entity from the Consolidated List –

- i. Check whether you have frozen assets of any person or entity removed from the Consolidated List and verify that the person or entity is no longer subject to an asset freeze.
- ii. Remove the person or entity from your institution’s list of persons or entities subject to financial sanction;
- iii. Un-freeze the assets of the person or entity and where necessary re-activate all relevant accounts;
- iv. Send advice to person or entity that the assets are no longer subject to an asset freeze;
- v. Advise the FRA at financialreportingauthority@gov.ky of the actions taken.

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