

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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CAYMAN ISLANDS

Financial Sanctions Notice

15/10/2020

Chemical Weapons

Introduction

1. Council Regulation (EU) 2018/1542 (“the Regulation”) imposing financial sanctions against those who are responsible for manufacturing, using or engaging in preparations to use chemical weapons has been amended so that an asset freeze now applies to the persons listed in the Annex to this Notice.

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

2. The following entries have been added to the consolidated list and are now subject to an asset freeze.
 - Andrei Veniaminovich YARIN (Group ID: 13969)
 - Sergei Vladilenovich KIRIYENKO (Group ID: 13970)
 - Sergei Ivanovich MENYAILO (Group ID: 13971)
 - Aleksandr Vasilievich BORTNIKOV (Group ID: 13972)
 - Pavel Anatolievich POPOV (Group ID: 13973)
 - Aleksei Yurievich KRIVORUCHKO (Group ID: 13974)
 - STATE SCIENTIFIC RESEARCH INSTITUTE FOR ORGANIC CHEMISTRY AND TECHNOLOGY (GOSNIIOKHT) (Group ID: 13975)

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 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) available from the [FRA website](#). Information reported to FRA may be passed on to other regulatory authorities or law enforcement.
4. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

Legislative details

5. On 15 October 2020 Council Implementing Regulation (EU) 2020/1480 (“the Amending Regulation”) was published in the Official Journal of the European Union (O.J. L 341, 15.10.2020, p.1) by the Council of the European Union.
6. The Amending Regulation amended Annex I to the Regulation with effect from 15 October 2020.

Further Information

7. A copy of the Amending Regulation 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:32020R1480&from=EN>
8. Copies of recent Notices, certain EU Regulations, and UK legislation can be obtained from the Chemical Weapons financial sanctions page on the GOV.UK website:
<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>
9. For more information please see OFSI’s guide to financial sanctions:
<https://www.gov.uk/government/publications/financial-sanctions-faqs>

10. 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)

11. **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: CHEMICAL WEAPONS

COUNCIL IMPLEMENTING REGULATION (EU) 2020/1480

AMENDING ANNEX I TO COUNCIL REGULATION (EU) 2018/1542

ADDITIONS

Individuals

1. BORTNIKOV, Aleksandr Vasilievich

DOB: 15/11/1951. **POB:** Perm **Nationality:** Russian **Position:** Director of the Federal Security Service of the Russian Federation **Other Information:** Gender: male. Aleksandr Bortnikov is responsible for the activities of the principal security agency in Russia. Responsible for providing support to the persons who carried out or were involved in the poisoning of Alexei Navalny with the Novichok nerve agent, which constitutes a use of chemical weapons under the Chemical Weapons Convention. **Listed on:** 15/10/2020 **Last Updated:** 15/10/2020 **Group ID:** 13972

2. KIRIYENKO, Sergei Vladilenovich

DOB: 26/07/1962. **POB:** Sukhumi **Nationality:** Russian **Position:** First Deputy Chief of Staff of the Presidential Executive Office **Other Information:** Gender: male. Sergei Kiriyenko is responsible for domestic affairs, including political groups and activities. Responsible for inducing and providing support to the persons who carried out or were involved in the poisoning of Alexei Navalny with the Novichok nerve agent, which constitutes a use of chemical weapons under the Chemical Weapons Convention. **Listed on:** 15/10/2020 **Last Updated:** 15/10/2020 **Group ID:** 13970.

3. KRIVORUCHKO, Aleksei Yurievich

DOB: 17/07/1975. **POB:** Stavropol **Nationality:** Russian **Position:** Deputy Minister of Defence of the Russian Federation **Other Information:** Gender: male. Aleksei Krivoruchko is the Deputy Minister in the Ministry of Defence of the Russian Federation with the overall responsibility for armaments. This includes the oversight of the Ministry's stocks of weapons and military equipment. He is also responsible for their elimination within the framework of the implementation of international treaties assigned to the Ministry of Defence. The Russian Ministry of Defence took on the responsibility for the chemical weapons stocks inherited from the Soviet Union and their safe storage until their destruction could be completed. As a consequence of the overall responsibility of the Ministry of Defence for the safe storage and destruction of chemical weapons, the use of such chemical weapons in the territory of the Russian Federation could only be as a result of intent or negligence by the Ministry of Defence and its political leadership. Given his senior leadership role in the Ministry of Defence of the Russian Federation, Aleksei Krivoruchko is therefore responsible for assisting the persons who carried out or were involved in the poisoning of Alexei Navalny with the Novichok nerve agent, which constitutes a use of chemical weapons under the Chemical Weapons Convention. **Listed on:** 15/10/2020 **Last Updated:** 15/10/2020 **Group ID:** 13974.

4. MENYAILO, Sergei Ivanovich

DOB: 22/08/1960. **POB:** Alagir **Nationality:** Russian **Position:** Plenipotentiary Representative of the President of the Russian Federation in the Siberian Federal District **Other Information:** Gender: male. Non-permanent member of the Security Council of the Russian Federation. Sergei Menyailo is responsible for ensuring the implementation of the constitutional powers of the President including the implementation of domestic and foreign policy of the State. Responsible for inducing and providing support to the persons who carried out or were involved in the poisoning of Alexei Navalny with the Novichok nerve agent, which constitutes a use of chemical weapons under the Chemical Weapons Convention. **Listed on:** 15/10/2020 **Last Updated:** 15/10/2020 **Group ID:** 13971.

5. POPOV, Pavel Anatolievich

DOB: 01/01/1957. **POB:** Krasnoyarsk **Nationality:** Russian **Position:** Deputy Minister of Defence of the Russian Federation **Other Information:** Gender: male. Pavel Popov has overall responsibility for research activities. This includes the oversight and development of the Ministry's scientific and technical capabilities, including the development of potential and modernisation of existing weapons and military equipment. The Russian Ministry of Defence took on the responsibility for the chemical weapons stocks inherited from the Soviet Union and their safe storage until their destruction could be completed. The use of such chemical weapons in the territory of the Russian Federation could only be as a result of intent or negligence by the Ministry of Defence and its political leadership. Responsible for assisting the persons who carried out or were involved in the poisoning of Alexei Navalny with the Novichok nerve agent, which constitutes a use of chemical weapons under the Chemical Weapons Convention. **Listed on:** 15/10/2020 **Last Updated:** 15/10/2020 **Group ID:** 13973.

6. YARIN, Andrei Veniaminovich

DOB: 13/02/1970. **POB:** Nizhny Tagil **Nationality:** Russian **Position:** Chief of the Presidential Domestic Policy Directorate **Other Information:** Gender: male. Andrei Yarin is in charge of designing and implementing internal political orientations and was appointed to a task force inside the Presidential Executive Office whose role was to counter Alexei Navalny's influence in Russian society including through operations meant to discredit him. Responsible for inducing and providing support to the persons who carried out or were involved in the poisoning of Alexei Navalny with the Novichok nerve agent, which constitutes a use of chemical weapons under the Chemical Weapons Convention. **Listed on:** 15/10/2020 **Last Updated:** 15/10/2020 **Group ID:** 13969.

Entity

1. STATE SCIENTIFIC RESEARCH INSTITUTE FOR ORGANIC CHEMISTRY AND TECHNOLOGY (GOSNIIOKHT)

Address: Shosse Entuziastov 23, 11 124, Moscow, Moscow Oblast, Russia. **Other Information:** A state research institute with the responsibility for the destruction of chemical weapons stocks inherited from the Soviet Union. The institute in its original role before 1994 was involved in the development and production of chemical weapons including the toxic nerve agent now known as 'Novichok'. After 1994, the same facility took part in the government's programme for the destruction of the stocks of chemical weapons inherited from the Soviet Union. Alexei Navalny was poisoned with a toxic nerve agent of the Novichok group. This toxic agent is accessible

only to State authorities in the Russian Federation. The deployment of a toxic nerve agent of the Novichok group would therefore only be possible due to the failure of the Institute to carry out its responsibility to destroy the stockpiles of chemical weapons. Phone: +7 (495) 673 7530. Fax: +7 (495) 673 2218. Website: <http://gosniokht.ru>. Email: dir@gosniokht.ru. **Listed on:** 15/10/2020 **Last Updated:** 15/10/2020 **Group ID:** 13975.

Financial Reporting Authority

Portfolio of Legal Affairs

15/10/2020