

# FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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**Financial Sanctions Notice**

**08/01/2021**

## Chemical Weapons

### Introduction

1. The Chemical Weapons (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/618) 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 involved in the proliferation and use of chemical weapons.
2. On 8 January 2021 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 following entries have been amended and are still 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**

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](mailto: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](mailto: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 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. 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:

<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](mailto:financialsanctions@gov.ky)

## ANNEX TO NOTICE

### FINANCIAL SANCTIONS: CHEMICAL WEAPONS

#### THE CHEMICAL WEAPONS (SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I. 2019/618)

#### AMENDMENTS

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

#### Individuals

##### 1. YARIN, Andrei Veniaminovich

**DOB:** 13/02/1970. **POB:** Nizhny Tagil, Sverdlovsk Oblast, Russia **Nationality:** Russian **Position:** Chief of the Presidential Domestic Policy Directorate **Other Information:** (UK Sanctions List Ref): CHW0011 Date designated on UK Sanctions List: 31/12/2020 (UK Statement of Reasons): Andrei Yarin is the Chief of the Presidential Domestic Policy Directorate in the Presidential Executive Office. The Presidential Office is a state body providing support for the President's work and monitoring the implementation of the President's decisions and overall Governmental policies and most important action. Russian opposition leader Alexey Navalny was the victim of an attempted assassination during his August 2020 visit to Siberia, in which a chemical weapon—a toxic nerve agent of the Novichok group—was used. The activities and movements of Alexey Navalny during his journey to Siberia, from where he intended to return to Moscow on 20th August 2020, were closely monitored by the authorities of the Russian Federation, including the Federal Security Service (FSB). *Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny was a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. Given the role of the state within the attack, and the scale of the operation against Navalny, it is reasonable to conclude that the poisoning of Alexey Navalny was only possible with the consent of the Presidential Executive Office. As Chief of the Presidential Domestic Policy Directorate in the Presidential Executive Office, Andrei Yarin bears responsibility for the preparation, support for and use of chemical weapons in the attempted assassination of Alexey Navalny.* (Gender): Male **Listed on:** 15/10/2020 **Last Updated:** ~~31/12/2020~~ 08/01/2021 **Group ID:** 13969.

##### 2. KIRIYENKO, Sergei Vladilenovich

**DOB:** 26/07/1962. **POB:** Sukhumi, Russia **Nationality:** Russian **Position:** First Deputy Chief of Staff of the Presidential Executive Office **Other Information:** (UK Sanctions List Ref): CHW0012 Date designated on UK Sanctions List: 31/12/2020 (UK Statement of Reasons): As First Deputy Chief of Staff of the Presidential Executive Office of the Russian Federation, Sergei Kiriyenko is responsible for domestic affairs. The Presidential Office is a state body within Russia that provides support for the President's work, monitors the implementation of the President's decisions, and has responsibility for governmental policy and the regime's most important actions domestically. Russian opposition leader Alexey Navalny was the victim of an attempted assassination during his August 2020 visit to Siberia, in which a chemical weapon - a toxic nerve agent of the Novichok group - was used. The activities and movements of Alexei Navalny during his journey to Siberia, from where he intended to return to Moscow on 20th August 2020 were closely monitored by the authorities of the Russian Federation. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny was a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. Given the role of the state within the attack, and the scale of the operation against Navalny, it is reasonable to conclude that the poisoning of Alexey Navalny was only possible with the consent of the Presidential Executive Office. (Gender): Male **Listed on:** 15/10/2020 **Last Updated:** 31/12/2020 **08/01/2021** **Group ID:** 13970.

**3. MENYAILO, Sergei Ivanovich**

**DOB:** 22/08/1960. **POB:** Alagir, Russia **Nationality:** Russian **Position:** Plenipotentiary Representative of the President of the Russian Federation in the Siberian Federal District **Other Information:** (UK Sanctions List Ref): CHW0013 Date designated on UK Sanctions List: 31/12/2020 (UK Statement of Reasons): Sergei Menyailo is the Plenipotentiary Representative of the President of the Russian Federation in the Siberian Federal District and, therefore, responsible for ensuring the implementation of the constitutional powers of the President, including the implementation by public authorities of domestic and foreign policy of the state in the federal district of Siberia. The activities and movements of Alexey Navalny during his recent journey to Siberia, from where he intended to return to Moscow on 20th August, were closely monitored by the authorities of the Russian Federation. The poisoning of Alexey Navalny took place at Tomsk Bogashevo airport in Siberia. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of

nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny was a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. Given the scale of the operation involved, it is reasonable to conclude that the poisoning was only possible with the consent of the Presidential Office. Given his senior leadership role in the Siberian Federal District, Sergei Menyailo bears responsibility for the providing support for the preparation and use of chemical weapons in the attempted assassination of Alexey Navalny in Tomsk, Siberia. (Gender): Male Listed on: 15/10/2020 Last Updated: ~~31/12/2020~~ 08/01/2021 Group ID: 13971.

4. **BORTNIKOV, Aleksandr Vasilievich**

**DOB:** 15/11/1951. **POB:** Perm, Russia **a.k.a:** BORTNIKOV, Alexander **Nationality:** Russian **Position:** Director of the Federal Security Service of the Russian Federation **Other Information:** (UK Sanctions List Ref): CHW0014 Date designated on UK Sanctions List: 31/12/2020 (UK Statement of Reasons): Alexander Bortnikov is the director of the Federal Security Service of the Russian Federation and, therefore, responsible for the activities conducted by the Federal Security Service of the Russian Federation. Russian opposition leader Alexey Navalny was the victim of an attempted assassination during his August 2020 visit to Siberia, in which a chemical weapon—a toxic nerve agent of the Novichok group—was used. The activities and movements of Alexey Navalny during his journey to Siberia, from where he intended to return to Moscow on 20th August 2020, were closely monitored by the Federal Security Service of the Russian Federation. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny was a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. Given the role of the FSB, and the extent of surveillance, there are therefore reasonable grounds to suspect that the Federal Security Service of the Russian Federation was involved in the attempted assassination of Alexey Navalny using a toxic nerve agent. As director of the Federal Security Service, Alexander Bortnikov bears responsibility for the preparation and use of chemical weapons in the attempted assassination of Alexey Navalny. (Gender): Male Listed on: 15/10/2020 Last Updated: ~~31/12/2020~~ 08/01/2021 Group ID: 13972.

5. **POPOV, Pavel Anatolievich**

**Title:** General of The Army **DOB:** 01/01/1957. **POB:** Krasnoyarsk, Russia **Nationality:** Russian **Position:** Deputy Minister of Defence of the Russian Federation **Other Information:** (UK Sanctions List Ref):CHW0015 Date designated on UK Sanctions List: 31/12/2020 (UK Statement of Reasons): Pavel Popov is the Deputy Minister in the Ministry of Defence of the Russian Federation. In this capacity, he 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 weapons, 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 Russian Ministry of Defence has overall responsibility for the safe storage and destruction of chemical weapons. Russian opposition leader Alexey Navalny was the victim of an attempted assassination during his August 2020 visit to Siberia, in which a chemical weapon - a toxic nerve agent of the Novichok group - was used. Given the use of such chemical weapons in the territory of the Russian Federation and the evidence of the continued involvement of the Russian MoD in the Novichok programme, this could only be on account of intent by the Ministry of Defence and its political leadership, which includes Pavel Popov. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny was a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. Given Pavel Popov's senior role in the Russian military, the evidence suggests that he is responsible for the preparation and use of chemical weapons in the attempted assassination of Alexey Navalny. (Gender): Male **Listed on:** 15/10/2020 **Last Updated:** ~~31/12/2020~~ 08/01/2021 **Group ID:** 13973.

**6. KRIVORUCHKO, Aleksei Yurievich**

**DOB:** 17/07/1975. **POB:** Stavropol, Russia **Nationality:** Russian **Position:** Deputy Minister of Defence of the Russian Federation **Other Information:** (UK Sanctions List Ref):CHW0016 Date designated on UK Sanctions List: 31/12/2020 (UK Statement of Reasons): Aleksei Krivoruchko is the Deputy Minister in the Ministry of Defence of the Russian Federation. In this capacity, he has overall responsibility for armaments. This includes the oversight of the Ministry's stocks of weapons and military equipment. This includes the oversight of the Ministry's stocks of 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 Russian Ministry of Defence has overall responsibility for the safe storage and destruction of chemical weapons. Russian opposition leader Alexey Navalny was the victim of an attempted assassination during his August 2020 visit to Siberia, in which a chemical weapon - a toxic nerve agent of the Novichok group - was used. Given the use of such chemical weapons in the territory of the Russian Federation and the evidence of the continued involvement of the Russian MoD in the Novichok programme, this could only be on account of intent by the Ministry of Defence and its political leadership. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by

non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny was a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. Given Aleksei Krivoruchko's senior role in the Russian military, the evidence suggests that he is responsible for the preparation and use of chemical weapons in the attempted assassination of Alexey Navalny. (Gender): Male **Listed on:** 15/10/2020 **Last Updated:** ~~31/12/2020~~ 08/01/2021 **Group ID:** 13974.

## **Entity**

### **1. STATE SCIENTIFIC RESEARCH INSTITUTE FOR ORGANIC CHEMISTRY AND TECHNOLOGY (GOSNIIKOHT)**

**Other Information:** (UK Sanctions List Ref): CHW0017. Date designated on UK Sanctions List: 31/12/2020. (UK Statement of Reasons): The Federal State Unitary Enterprise State Scientific Research Institute for Organic Chemistry and Technology (GoSNIIKOHT) is a state research institute with the responsibility for the destruction of chemical weapon 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. Russia had the technical capability to carry out the attack. The Russian State has previously produced Novichoks and would still be capable of doing so. Within the last decade, Russia has produced and stockpiled small quantities of Novichok. It is unlikely that Novichoks could be made and deployed by non-state actors (e.g. a criminal or terrorist group). Russia had the operational experience to carry out the attack. Russia has a proven record of state-sponsored assassination. It is highly likely that the Russian state was responsible for the attempted assassination of Sergei Skripal in Salisbury in 2018 using a similar type of nerve agent. During the 2000s, Russia commenced a programme to test means of delivering chemical warfare agents, including investigation of ways of delivering nerve agents. Russia had the motive and opportunity to carry out the attack. Navalny was a high profile Russian opposition politician who vocally criticised the Russian administration and establishment. He was on Russian territory under surveillance by the Federal Security Service of the Russian Federation at the time of the attack. As the institute responsible for the destruction of chemical weapons within the Russian Federation, GoSNIIKOHT bears responsibility for the preparation and use of chemical weapons in the attempted assassination of Alexey Navalny. (Parent company): ~~Parent Company~~— Russian Ministry of Defence. **Listed on:** 15/10/2020 **Last Updated:** ~~31/12/2020~~ 08/01/2021 **Group ID:** 13975.



Financial Reporting Authority

Portfolio of Legal Affairs

08/01/2021