

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



Delivery Address:

133 Elgin Ave, 4th Floor
Government Administrative Building
Grand Cayman
CAYMAN ISLANDS
Direct Tel No. (345) 244-2394
Tel No. (345) 945-6267
Fax No. (345) 945-6268
Email: financialsanctions@gov.ky

Mailing Address:

P.O. Box 1054
Grand Cayman KY1-1102
CAYMAN ISLANDS

Financial Sanctions Notice

22/07/2021

Global Anti-Corruption

Introduction

1. The Global Anti-Corruption Sanctions Regulations 2021 (S.I. 2021/488) (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 corruption.
2. On 22 July 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 added to the consolidated list and are now subject to an asset freeze.
 - Nawfal Hammadi AL-SULTAN (Group ID: 14130)
 - Teodoro NGUEMA OBIANG MANGUE (Group ID: 14127)
 - Alvaro Enrique PULIDO VARGAS (Group ID: 14129)
 - Alex Nain SAAB MORAN (Group ID: 14128)
 - Kudakwashe Regimond TAGWIREI (Group ID: 14126)

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 obtained from the Global Anti-Corruption financial sanctions page on the Gov.UK website:
<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>
8. The Consolidated List can be found here:
<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/oftargets/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:
<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 ANTI-CORRUPTION

THE GLOBAL ANTI-CORRUPTION SANCTIONS REGULATIONS 2021 (S.I. 2021/488)

ADDITIONS

Individuals

- 1. AL-SULTAN, Nawfal Hammadi**
DOB: 23/02/1964. **POB:** Iraq **a.k.a:** (1) AGUB, Nofal (2) AKOUB, Nawfel (3) AL-AKOUB, Nawfel (4) AL-SULTAN, Nofal, Hammadi (5) SULTAN ALBU HAMAD, Nofal, Hammadi (6) SULTAN YOUSEF, Nawfal, Hamadi (7) SULTAN YOUSIF ALBOHAMAD, Nawful, Humadi **Nationality:** Iraq **National Identification no:** 71719043 **Address:** Iraq. **Other Information:** (UK Sanctions List Ref):GAC0027 (UK Statement of Reasons): Nawfal Hammadi Al-Sultan has been involved in serious corruption in Nineveh province, Iraq involving the misappropriation of state property to his benefit and the benefit of others. In his role as governor of Nineveh province, he misappropriated public funds intended for reconstruction efforts and to provide support for civilians and improperly awarded contracts and other state property. Additional information: in February 2021 Al-Sultan was convicted by the Central Anti-Corruption Criminal Court in Iraq in relation to some of his corrupt activities when governor of Nineveh Governorate. He was convicted of two offences of “harming a public body” under Article 340 of Iraq’s Penal Code and sentenced to a total of five years in prison, for: (i) wasting five billion Iraqi Dinars of public funds of Nineveh Governorate through fictitious works and contracts, and (ii) improperly disposing of 50 tons of asphalt delivered to him for paving the streets and for reconstruction in 2017. (Gender): Male **Listed on:** 22/07/2021 **Last Updated:** 22/07/2021 **Group ID:** 14130.
- 2. NGUEMA OBIANG MANGUE, Teodoro**
Title: Vice President **DOB:** 25/06/1968. **POB:** Malabo, Equatorial Guinea **a.k.a:** TEODORIN **Nationality:** Equatorial Guinea **Address:** Malabo, Equatorial Guinea. **Position:** Vice President **Other Information:** (UK Sanctions List Ref):GAC0024 (UK Statement of Reasons): Teodoro Nguema Obiang Mangue has been involved in the misappropriation of significant amounts of public assets from Equatorial Guinea as well as bribery, to fund a lavish lifestyle in various countries abroad including the United States and France, where he held assets which were vastly disproportionate in value by comparison to his official salary as an Equatorial Guinean government minister. (Gender): Male **Listed on:** 22/07/2021 **Last Updated:** 22/07/2021 **Group ID:** 14127.
- 3. PULIDO VARGAS, Alvaro Enrique**
DOB: 10/12/1963. **POB:** Bogota, Colombia **a.k.a:** (1) CUCHI (2) RUBIO SALAS, German, Enrique **Nationality:** Colombia **Passport Details:** PE069914 (Columbia) **National Identification no:** 79324956 (Columbia) **Other Information:** (UK Sanctions List Ref):GAC0026 (UK Statement of Reasons): Alvaro Enrique Pulido Vargas (aka

German Enrique Rubio Salas) is a close business associate of Alex Saab. With him, he engaged in serious corruption in Venezuela through his participation in two of Venezuela's public programmes: the 'Local Committees for Supply and Production' (CLAP) and the Great Housing Scheme Venezuela (GMVV). In each case, contracts were improperly granted for the benefit of an official and/or for another person including Pulido Vargas himself. In the CLAP programme, basic foodstuffs were provided at highly inflated prices. For GMVV, Global Construction Fund only delivered a small proportion of the products they had agreed to deliver, misappropriating the remainder of the funds. (Gender): Male **Listed on:** 22/07/2021 **Last Updated:** 22/07/2021 **Group ID:** 14129.

4. SAAB MORAN, Alex Nain

DOB: 21/12/1971. **POB:** Barranquilla, Colombia **Nationality:** (1) Colombia (2) Venezuela **Passport Details:** (1) PE085897 (Columbia) (2) 085635076 (Venezuela) **National Identification no:** (1) 72180017 (Columbia) (2) 21.495.350 (Venezuela) **Address:** Cape Verde. **Other Information:** (UK Sanctions List Ref):GAC0025 (UK Statement of Reasons): Alex Nain Saab Moran engaged in serious corruption in Venezuela through his participation in two of Venezuela's public programmes: the 'Local Committees for Supply and Production' (CLAP) and the Great Housing Scheme Venezuela (Spanish acronym: GMVV). In each case, contracts were improperly granted by public officials to companies owned or controlled by Saab Moran, for the benefit of the official(s) and/or for another person, including Saab Moran himself. In the CLAP programme, basic foodstuffs were provided at highly inflated prices. For GMVV, Saab Moran's company only delivered a small proportion of the products they had agreed to deliver and for which it had been paid, misappropriating the remainder of the funds. (Gender): Male **Listed on:** 22/07/2021 **Last Updated:** 22/07/2021 **Group ID:** 14128.

5. TAGWIREI, Kudakwashe Regimond

DOB: 12/02/1969. **POB:** Shurugwi, Zimbabwe **a.k.a:** KUDA **Nationality:** (1) Zimbabwe (2) South Africa **Passport Details:** (1) FN920256 (Zimbabwe) (2) EN183928 (Zimbabwe) (3) VUK491921 (Canada) **National Identification no:** 29135894Z66 **Address:** 4 Luna Road, Borrowdale, Harare, Zimbabwe. **Other Information:** (UK Sanctions List Ref):GAC0023 (UK Statement of Reasons): Kudakwashe Regimond Tagwirei profited or otherwise benefitted from the misappropriation of property when his company, Sakunda Holdings, redeemed Government of Zimbabwe Treasury Bills at up to ten times their official value. This meant that Sakunda Holdings and Tagwirei, as its CEO and owner, profited significantly at the expense of macroeconomic stability in Zimbabwe. (Gender):Male **Listed on:** 22/07/2021 **Last Updated:** 22/07/2021 **Group ID:** 14126.

Financial Reporting Authority

Portfolio of Legal Affairs

22/07/2021