FINANCIAL REPORTING AUTHORITY

(CAYFIN)

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CAYMAN ISLANDS

Financial Sanctions Notice **06/11/2025**

Counter-Terrorism (Domestic)

Introduction

1. The Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/577) were made under the Sanctions and Anti-Money Laundering Act 2018 ("the Sanctions Act") and provide for the imposition of financial sanctions, namely the freezing of funds and economic resources of persons who are or have been involved in terrorist activity.

2. On 6 November 2025 the Consolidated List was updated following HM Treasury's decision to designate 2 persons.

3. The Foreign, Commonwealth and Development Office have also updated the UK Sanctions List on GOV.UK. This list provides details of those designated under regulations made under the Sanctions Act.

4. A link to the Consolidated List and UK Sanctions List can be found below.

Notice summary

5. The following entries have been added to the Consolidated List and are now subject to an asset freeze:

- Kieran James GALLAGHER (Group ID: 17216)
- NEW IRISH REPUBLICAN ARMY (Group ID: 17217)

What <u>you</u> must do

6. 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 and any entities owned or controlled by them;

   ii. freeze such accounts, and other funds or economic resources;

   iii. refrain from dealing with the funds or economic resources or making them available directly or indirectly to or for the benefit of designated persons unless licensed by the Governor or if an exception applies;

   iv. report any findings to the FRA at financialsanctions@gov.ky, together with the information or other matter on which the knowledge or suspicion is based by completing and submitting a Compliance Reporting Form (CRF). Where the information relates to funds or economic resources, the nature and quantity should also be reported.

7. Information received by the FRA may be disclosed to third parties in accordance with provisions set out in the Information and Records part of the regulations and in compliance with applicable data protection laws.

8. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions may be a criminal offence.

Further Information

9. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Counter-Terrorism (Domestic) financial sanctions page on the GOV.UK website:

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

10. The Consolidated List can be found here:

    https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets

11. The UK Sanctions List can be found here:

    https://www.gov.uk/government/publications/the-uk-sanctions-list

12. The Compliance Reporting Form can be found here:

    https://fra.gov.ky/forms-documents/#74-91-wpfd-financial-sanctions-forms

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

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

14. For general information on financial sanctions please see our Financial Sanctions Guidance:

    https://fra.gov.ky/guides-to-financial-sanctions/

Enquiries

15. 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: COUNTER-TERRORISM (DOMESTIC)

THE COUNTER-TERRORISM (SANCTIONS) (EU EXIT) REGULATIONS 2019

ADDITIONS

Individual

1. **GALLAGHER, Kieran James**
   Title: Mr **DOB:** 26/04/1977. **POB:** Londonderry, United Kingdom **Nationality:** (1) United Kingdom (2) Republic of Ireland **Address:** Londonderry, United Kingdom. **Other Information:** (UK Sanctions List Ref): CTD0009. Sanction imposed in addition to an asset freeze: Director Disqualification Sanction was imposed on 06/11/2025 (UK Statement of Reasons): HMT has reasonable grounds to suspect that the Kieran Gallagher is an involved person under the Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 on the basis that he has been, and is, involved in terrorist activity on the basis that: (1) Gallagher is and has been involved in terrorist activity by providing financial services, or making available funds or economic resources, for the purposes of terrorism; and (2) Gallagher is and has been involved in terrorist activity by facilitating terrorism. (Gender): Male **Listed on:** 06/11/2025 **UK Sanctions List Date Designated:** 06/11/2025 **Last Updated:** 06/11/2025 **Group ID:** 17216.

Entity

1. **NEW IRISH REPUBLICAN ARMY**
   a.k.a: (1) New IRA (2) nIRA **Other Information:** (UK Sanctions List Ref): CTD0010. (UK Statement of Reasons): HMT has reasonable grounds to suspect that the New Irish Republican Army ("NIRA") is an involved person under the Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 on the basis that NIRA has been, and is, involved in terrorist activity on the basis that: (1) NIRA has been responsible for, engaged in and provided support for, the commission, preparation and instigation of acts of terrorism. (2) NIRA has facilitated, promoted and encouraged terrorism. (3) NIRA has carried out recruitment activities for a person involved in terrorism. **Listed on:** 06/11/2025 **UK Sanctions List Date Designated:** 06/11/2025 **Last Updated:** 06/11/2025 **Group ID:** 17217.

Financial Reporting Authority

Portfolio of Legal Affairs

06/11/2025