# FINANCIAL REPORTING AUTHORITY

## (CAYFIN)

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Grand Cayman KY1-1102
CAYMAN ISLANDS

**Financial Sanctions Notice** **12/08/2021**

# 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. This Notice is to issue a correction for 2 listings in the Global Anti-Corruption financial sanctions regime. This amendment brings the Consolidated List entries into line with the UK Sanctions List.

### Notice summary

3. The following entries have been amended are still subject to an asset freeze.

- Alvaro Enrique PULIDO VARGAS (Group ID: 14129)
- Alex Nain SAAB MORAN (Group ID: 14128)

**What you must do**

4. 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.

5. 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.

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-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%20Santions%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)**

**AMENDMENTS**

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

**Individuals**

1. **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 (Col~~u~~ombia) **National Identification no:** 79324956 (Col~~u~~ombia) **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~~ *12/08/2021* **Group ID:** 14129.

2. **SAAB MORAN, Alex Nain**
   **DOB:** 21/12/1971. **POB:** Barranquilla, Colombia **Nationality:** (1) Colombia (2) Venezuela **Passport Details:** (1) PE085897 (Col~~u~~ombia) (2) 085635076 (Venezuela) **National Identification no:** (1) 72180017 (Col~~u~~ombia) (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~~ *12/08/2021* **Group ID:** 14128.

Financial Reporting Authority

Portfolio of Legal Affairs

12/08/2021