FINANCIAL REPORTING AUTHORITY

(CAYFIN)

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

Financial Sanctions Notice **23/05/2025**

Russia

Introduction

1. The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) ("the Russia Regulations") were made under the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act) and provide for the imposition of financial sanctions, including asset freezes and other financial and investment restrictions, on persons who are or have been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine; or obtaining a benefit from or supporting the Government of Russia.

1. On 23 May 2025 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 entry has been amended and is still subject to an asset freeze and trust services sanctions:

    - Michel LITVAK (Group ID: 16797)

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 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. refrain from providing trust services to or for the benefit of the persons set out to the Annex in this Notice;

   v. 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.

6. 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.

7. Information regarding a suspected designated person, and funds or economic resources belonging to them, does not need to be disclosed to the FRA where it has previously been reported.

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 Russia 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/uk-financial-sanctions-guidance

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: RUSSIA

THE RUSSIA (SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I. 2019/855)

AMENDMENT

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

Individual

1. **LITVAK, Michel**
   DOB: 18/08/1951. **POB**: St Petersburg, Russia **Nationality:** (1) Belgium (2) Russia ~~(3) United Kingdom~~ **Other Information:** (UK Sanctions List Ref): RUS2410. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 24/02/2025. (UK Statement of Reasons):Michel LITVAK (hereafter LITVAK) is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: LITVAK is or has been involved in obtaining a benefit from or supporting the Government of Russia by owning or controlling an entity, OTEKO, which is carrying on business in a sector of strategic significance to the Government of Russia, namely the Russian transport sector. (Gender): Male **Listed on:** 24/02/2025 UK **Sanctions List Date Designated:** 24/02/2025 **Last Updated:** ~~24/02/2025~~ *23/05/2025* **Group ID:** 16797.

Financial Reporting Authority

Portfolio of Legal Affairs

23/05/2025