



30 November 2023

## **NOTICE**

### **RE: Financial Sanctions**

1. The Cayman Islands Monetary Authority ("CIMA") hereby notifies you that it has received a new Notice from the Office of Financial Sanctions Implementation, HM Treasury ("OFSI"), which is attached as an Annex to this Notice.
2. **What you must do:**
  - A. In the case of an addition or amendment of a person to the [Consolidated List](#) and asset freeze:
    - i. Check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the OFSI Notice;
    - ii. Freeze any such accounts and other funds or economic resources.
    - 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 Financial Reporting Authority ("FRA") at [financialsanctions@gov.ky](mailto:financialsanctions@gov.ky) together with any additional information that would facilitate compliance with the relevant legislative requirements.
    - v. Provide any information concerning the frozen assets of designated persons to the FRA at [financialsanctions@gov.ky](mailto:financialsanctions@gov.ky) and submitting a compliance reporting form. Information reported to FRA may be passed to other regulatory authorities or law enforcement.
  - B. In the case of the removal of a person from the [Consolidated List](#) and unfreezing of assets
    - i. Check whether you have frozen assets of any person or entity removed from the Consolidated List and verify that the person is no longer subject to an asset freeze.
    - ii. Remove the person from your institution's list of persons or entities subject to financial sanction.
    - iii. Un-freeze the assets of the person and where necessary re-activate all relevant accounts.

- iv. Send advice to the person that the assets are no longer subject to an asset freeze.
  - v. Advise the FRA at [financialsanctions@gov.ky](mailto:financialsanctions@gov.ky) of the actions taken.
3. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

**Further Information.**

4. For general information on financial sanctions please see FRAs Industry Guidance on targeted financial sanctions.  
[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).
5. Enquiries regarding this 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)

---

## **REGIME: Libya**

### **INDIVIDUAL**

1. **Names (Last):** IBRAHIM (1): OSAMA (2): AL KUNI (3): n/a (4): n/a (5): n/a  
**Name (non-Latin):** أسامة الكوني ابراهيم  
**Title:** n/a  
**Position:** Manager of Al Nasr Detention Centre in Zawiyah  
**A.K.A:** (1) OSAMA AL KUNI (2) OSAMA AL-MILAD (3) OSAMA MILAD (4) OSAMA ZAWIYAH  
**Date of Birth:** 02/04/1976  
**Place of Birth:** Tripoli  
**Nationality:** Libya  
**Passport Number:** n/a **Passport Details:** n/a  
**Address:** Zawiyah, Libya.  
**Other Information** (UK Sanctions List Ref): LIB0075 (UN Ref): LYi.029 As de factor manager of the Al Nasr detention centre the person concerned has directly, and/or through subordinates engaged in or provided support to acts that violate applicable international human rights law, or acts that constitute human rights abuses in Libya. The person concerned has acted for or on behalf of or at the direction of two listed individuals intrinsically linked to the human trafficking activities of the Zawiyah network, namely Mohamed Kashlaf (LYi.025) and Abdulrahman al Milad (LYi.026). For years, the Al Nasr detention centre in Zawiyah has been singled out in public and in confidential reports describing the plight of migrants and asylum seekers in Libya, including torture, sexual and gender-based violence and human trafficking. Humanitarian organisations and victims of trafficking have consistently identified the person concerned as the de facto manager of the detention centre. Three individuals who had been

working in the Al Nasr detention centre were served prison sentences for torturing migrants in the detention centre.

**Listed On:** 26/10/2021

**Last Updated:** 30/11/2023

**Group ID:** 14142

2. **Names (Last):** IBRAHIM AL-MILAD **(1):** ABD **(2):** AL-RAHMAN **(3):** SALIM **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** Navy Major  
**Position:** Commander of the Coast Guard in Zawiya  
**A.K.A:** (1) AL-BIJA (2) ABDULRAHMAN SALIM MILAD KASHLAF (3) ABDURAHMAN SALEM IBRAHIM MILAD (4) RAHMAN SALIM MILAD  
**Date of Birth:** 27/07/1986  
**Place of Birth:** Tripoli  
**Nationality:** Libya  
**Passport Number:** G52FYPR **Passport Details:** Libya, issued on 8 May 2014 (Date of expiration: 7 May 2022)  
**Address:** Zawiya, Libya.  
**Other Information** (UK Sanctions List Ref): LIB0039 (UN Ref): LYi.026 Listed pursuant to paragraphs 15 and 17 of resolution 1970 (Travel Ban, Asset Freeze) INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/>  
**Listed On:** 08/06/2018  
**Last Updated:** 30/11/2023  
**Group ID:** 13676
  
3. **Names (Last):** KASHLAF **(1):** MOHAMMED **(2):** AL AMIN **(3):** AL-ARABI **(4):** n/a **(5):** n/a  
**Name (non-Latin):** محمد الأمين العربي كشلاف  
**Title:** n/a  
**Position:** (1) Commander of the Shuhada al-Nasr brigade (2) Head of the Petrol Refinery Guard of Zawiya's refinery  
**A.K.A:** (1) AL-QASAB (2) KASHLAF (3) KESLAF (4) KOSHLAF  
**Date of Birth:** 02/12/1985  
**Place of Birth:** Zawiya  
**Nationality:** Libya  
**Passport Number:** C17HLRL3 **Passport Details:** Issued in Zawiya on 30 Dec 2015  
**Address:** Zawiya, Libya.  
**Other Information** (UK Sanctions List Ref): LIB0055 (UN Ref): LYi.025 Listed pursuant to paragraphs 15 and 17 of resolution 1970 (Travel Ban, Asset Freeze)  
**Listed On:** 08/06/2018  
**Last Updated:** 30/11/2023  
**Group ID:** 13675

4. **Names (Last):** QADHAFI AL-DAM **(1):** SAYYID **(2):** MOHAMMED **(3):** n/a **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** n/a  
**A.K.A:** SAYED M GADDEF EDDAM  
**Date of Birth:** 00/00/1948  
**Place of Birth:** (1) Sirte (2) -  
**Nationality:** n/a  
**Passport Number:** 513519 **Passport Details:** Libyan  
**Address:** n/a  
**Other Information** (UK Sanctions List Ref): LIB0029 (UK Statement of Reasons): Involved in activities carried out on behalf of the former regime of Muammar Qadhafi implementing or connected to the repressive policies of that regime, including in the 1980s, Sayyid was involved in the dissident assassination campaign and allegedly responsible for several deaths in Europe. He is also thought to have been involved in arms procurement.. (UN Ref): LYi.003 Cousin of Muammar Qadhafi. UN Listing pursuant to paragraph 15 of resolution 1970 (Travel Ban). INTERPOL-UN Security Council Special Notice web link:  
<https://www.interpol.int/en/notice/search/un/5525735>  
**Listed On:** 03/03/2011  
**Last Updated:** 30/11/2023  
**Group ID:** 11646

5. **Names (Last):** QADHAFI **(1):** SAADI **(2):** n/a **(3):** n/a **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** Commander Special Forces  
**A.K.A:** n/a  
**Date of Birth:** 27/05/1973  
**Place of Birth:** Tripoli  
**Nationality:** n/a  
**Passport Number:** (1) 014797 (2) 524521 (3) AA862825 **Passport Details:** (1) - (2) - (3) Libya number. Issued on 19 May 2021, issued in Tripoli. Expires 18 May 2029.  
**Address:** n/a  
**Other Information** (UK Sanctions List Ref): LIB0061 (UN Ref): LYi.015 Listed pursuant to paragraph 15 of resolution 1970 (Travel Ban). Listed on 17 March 2011 pursuant to paragraph 17 of resolution 1970 (Asset Freeze). INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/5525935>  
**Listed On:** 03/03/2011  
**Last Updated:** 30/11/2023  
**Group ID:** 11648

**Names (Last):** QADHAFI **(1):** SAADI **(2):** n/a **(3):** n/a **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** Commander Special Forces  
**A.K.A:** n/a

**Date of Birth:** 01/01/1975

**Place of Birth:** Tripoli

**Nationality:** n/a

**Passport Number:** (1) 014797 (2) 524521 (3) AA862825 **Passport Details:** (1) - (2) - (3) Libya number. Issued on 19 May 2021, issued in Tripoli. Expires 18 May 2029.

**Address:** n/a

**Other Information** (UK Sanctions List Ref): LIB0061 (UN Ref): LYi.015 Listed pursuant to paragraph 15 of resolution 1970 (Travel Ban). Listed on 17 March 2011 pursuant to paragraph 17 of resolution 1970 (Asset Freeze). INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/5525935>

**Listed On:** 03/03/2011

**Last Updated:** 30/11/2023

**Group ID:** 11648

## **REGIME: Russia**

### **INDIVIDUAL**

1. **Names (Last):** PERENCEVIC **(1):** MIHAJLO **(2):** n/a **(3):** n/a **(4):** n/a **(5):** n/a

**Name (non-Latin):** Mihajlo PERENČEVIĆ

**Title:** n/a

**Position:** Former President of Velesstroy

**A.K.A:** n/a

**Date of Birth:** n/a

**Place of Birth:** n/a

**Nationality:** (1) Croatia (2) United States

**Passport Number:** n/a **Passport Details:** n/a

**Address:** n/a

**Other Information** (UK Sanctions List Ref): RUS1485 (UK Statement of Reasons): Mihajlo PERENČEVIĆ (hereafter PERENČEVIĆ) is an “involved person” under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: (1) PERENČEVIĆ has been involved in obtaining a benefit from or supporting the Government of Russia by working as a director or equivalent through his role as President of the Supervisory Board, of an entity, Velesstroy, which is or has been carrying on business in sectors of strategic significance to the Government of Russia, namely the construction, energy, and extractives sectors; (2) PERENČEVIĆ is associated with a person who is or has been involved in obtaining a benefit from or supporting the Government of Russia, namely Kresimir FILIPOVIĆ..

**Listed On:** 29/06/2022

**Last Updated:** 30/11/2023

**Group ID:** 15424