



21 February 2024

NOTICE

RE: Financial Sanctions

February 21, 2024

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 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 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 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

REGIME: Global Human Rights

INDIVIDUAL

1. **Names (Last):** GOLYAKOV **(1):** ALEKSANDR **(2):** VLADIMIROVICH **(3):** n/a **(4):** n/a **(5):** n/a
Name (non-Latin): Александр Владимирович ГОЛЯКОВ
Title: Lieutenant Colonel
Position: Deputy Head of Arctic Penal Colony IK-3
A.K.A: n/a
Date of Birth: n/a
Place of Birth: n/a
Nationality: Russia
Passport Number: n/a **Passport Details:** n/a
Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia.
Other Information (UK Sanctions List Ref): GHR0122 (UK Statement of Reasons): Lieutenant Colonel Aleksandr Vladimirovich ("GOLYAKOV") is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, GOLYAKOV as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. .
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Last Updated: 21/02/2024
Group ID: 16378
2. **Names (Last):** KALININ **(1):** VADIM **(2):** KONSTANTINOVICH **(3):** n/a **(4):** n/a **(5):** n/a
Name (non-Latin): Вадим Константинович Калинин
Title: Colonel

Position: Head of Arctic Penal Colony IK-3

A.K.A: n/a

Date of Birth: n/a

Place of Birth: n/a

Nationality: Russia

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

Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia.

Other Information (UK Sanctions List Ref): GHR0117 (UK Statement of Reasons): Colonel Vadim Konstantinovich Kalinin ("KALININ") is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, KALININ as Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. .

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3. **Names (Last):** KORZHOV **(1):** SERGEY **(2):** NIKOLAEVICH **(3):** n/a **(4):** n/a **(5):** n/a

Name (non-Latin): Сергей Николаевич КОРЖОВ

Title: Lieutenant Colonel

Position: Deputy Head of Arctic Penal Colony IK-3

A.K.A: n/a

Date of Birth: n/a

Place of Birth: n/a

Nationality: Russia

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

Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia.

Other Information (UK Sanctions List Ref): GHR0118 (UK Statement of Reasons): Lieutenant Colonel Sergey Nikolaevich KORZHOV ('KORZHOV') is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, KORZHOV as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. .

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4. **Names (Last):** OBRAZTSOV **(1):** ALEKSANDR **(2):** VALERIEVICH **(3):** n/a **(4):** n/a **(5):** n/a

Name (non-Latin): Александр Валерьевич ОБРАЗЦОВ

Title: Lieutenant Colonel

Position: Deputy Head of Arctic Penal Colony IK-3

A.K.A: n/a

Date of Birth: n/a

Place of Birth: n/a

Nationality: Russia

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

Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia.

Other Information (UK Sanctions List Ref): GHR0121 (UK Statement of Reasons): Lieutenant Colonel Aleksandr Valerievich OBRAZTSOV ("OBRAZTSOV") is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, OBRAZTSOV as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the

mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment..

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5. **Names (Last):** PILIPCHIK (1): VLADIMIR (2): IVANOVICH (3): n/a (4): n/a (5): n/a

Name (non-Latin): Владимир Иванович ПИЛИПЧИК

Title: Lieutenant Colonel

Position: Deputy Head of Arctic Penal Colony IK-3

A.K.A: n/a

Date of Birth: n/a

Place of Birth: n/a

Nationality: Russia

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

Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia.

Other Information (UK Sanctions List Ref): GHR0119 (UK Statement of Reasons): Lieutenant Colonel Vladimir Ivanovich PILIPCHIK ('PILIPCHIK') is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, PILIPCHIK as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. .

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6. **Names (Last):** VYDRIN (1): VASILYI (2): ALEXANDROVICH (3): n/a (4): n/a (5): n/a

Name (non-Latin): Василий Александрович ВЬДРИН

Title: Lieutenant Colonel

Position: Deputy Head of Arctic Penal Colony IK-3

A.K.A: n/a

Date of Birth: n/a

Place of Birth: n/a

Nationality: Russia

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

Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia.

Other Information (UK Sanctions List Ref): GHR0120 (UK Statement of Reasons): Lieutenant Colonel Vasily Alexandrovich VYDRIN ('VYDRIN') is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, VYDRIN as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. .

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