



28 October 2024

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 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

REGIME: Russia
INDIVIDUAL

- Names (Last):** GAMBASHIDZE **(1):** ILYA **(2):** ANDREEVICH **(3):** n/a **(4):** n/a **(5):** n/a
Name (non-Latin): Илья Андреевич Гамбашидзе
Title: n/a
Position: Director of Structura and The Social Design Agency
A.K.A: n/a
Date of Birth: 07/05/1977
Place of Birth: Kyiv
Nationality: Russia
Passport Number: 756410352 **Passport Details:** n/a
Address: 16 Zorge, Apt 57, Moscow, Russia.
Other Information (UK Sanctions List Ref): RUS2290 (UK Statement of Reasons): Ilya Andreevich Gambashidze (hereafter Gambashidze) is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) Gambashidze is and has been obtaining a benefit from the Government of Russia by acting as a director or equivalent of entities, the Social Design Agency and Structura, which are carrying on business in a sector of strategic significance to the Government of Russia, namely the Russian information, communications and digital technologies sector; and 2) Gambashidze is and has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by working as a director or equivalent of entities, the Social Design Agency and Structura, that are responsible for, engage in, provide support for, or promote any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. .
Listed On: 28/10/2024
Last Updated: 28/10/2024
Group ID: 16614
- Names (Last):** PERLA **(1):** ANDREY **(2):** NAUMOVICH **(3):** n/a **(4):** n/a **(5):** n/a
Name (non-Latin): Андрей Наумович Перла
Title: n/a
Position: The Programme Director of Social Design Agency
A.K.A: ANDREI NAUMOVICH PERLA
Date of Birth: 31/12/1973
Place of Birth: Samara
Nationality: Russia
Passport Number: 3604110270 **Passport Details:** n/a
Address: (1) Maslennikova 41/24, Samara, Russia., (2) Gurzufskaya 16/102, Yekaterinburg, Russia.
Other Information (UK Sanctions List Ref): RUS2289 (UK Statement of Reasons): Andrey Naumovich Perla (hereafter Perla) is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) Perla is and has been obtaining a benefit from the Government of Russia by acting as a director or equivalent of an entity, Social Design Agency, which is carrying on business in a sector of strategic significance to the Government of Russia, namely the Russian information, communications and digital technologies sector; 2) Perla is and has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by working as a director or equivalent of an entity, Social Design Agency, that is responsible for, engages in, provides support for, or promotes any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity,

sovereignty or independence of Ukraine; and 3) Perla is and has been involved in destabilising Ukraine, undermining, or threatening the territorial integrity, sovereignty, or independence of Ukraine by promoting policies and actions which destabilise Ukraine, undermine and threaten the territorial integrity, sovereignty, and independence of Ukraine. .

Listed On: 28/10/2024

Last Updated: 28/10/2024

Group ID: 16613

3. **Names (Last):** TUPIKIN **(1):** NIKOLAI **(2):** ALEKSANDROVICH **(3):** n/a **(4):** n/a **(5):** n/a
Name (non-Latin): Николай Александрович Тупикин
Title: n/a
Position: The General Director of Structura
A.K.A: NIKOLAY ALEKSANDROVICH TUPIKIN
Date of Birth: 06/06/1977
Place of Birth: Moscow
Nationality: Russia
Passport Number: 727760853 **Passport Details:** n/a
Address: Raspletina, Dom 17, Korpus 2, Kv. 7, Moscow, Russia.
Other Information (UK Sanctions List Ref): RUS2291 (UK Statement of Reasons): Nikolai Aleksandrovich Tupikin (hereafter Tupikin) is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) Tupikin is and has been obtaining a benefit from the Government of Russia by acting as a director or equivalent of an entity, Structura, which is carrying on business in a sector of strategic significance to the Government of Russia, namely the Russian information, communications and digital technologies sector; and 2) Tupikin is and has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by working as a director or equivalent of an entity, Structura, that is responsible for, engages in, provides support for, or promotes any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. .
Listed On: 28/10/2024
Last Updated: 28/10/2024
Group ID: 16615

ENTITY

1. **Name:** SOCIAL DESIGN AGENCY
A.K.A: (1) AGENTSTVO SOTSIALNOGO PROEKTIROVANIYA (2) SDA
Other Information (UK Sanctions List Ref): RUS2292 (UK Statement of Reasons): The Social Design Agency (hereafter "SDA") is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) The SDA is obtaining a benefit from or supporting the Government of Russia by carrying on business in a sector of strategic significance, namely the 200 information, communications and digital technologies sector; and 2) the SDA is and has been involved in destabilising or undermining the territorial integrity, sovereignty or independence of Ukraine. .
Listed On: 28/10/2024
Last Updated: 28/10/2024
Group ID: 16616
2. **Name:** ANO DIALOG
A.K.A: AUTONOMOUS NON-PROFIT ORGANIZATION FOR THE DEVELOPMENT OF DIGITAL PROJECTS IN THE FIELD OF PUBLIC RELATIONS AND COMMUNICATIONS DIALOGUE (non-Latin: АВТОНОМНАЯ НЕКОММЕРЧЕСКАЯ ОРГАНИЗАЦИЯ ПО РАЗВИТИЮ ЦИФРОВЫХ ПРОЕКТОВ В СФЕРЕ ОБЩЕСТВЕННЫХ СВЯЗЕЙ И КОММУНИКАЦИЙ ДИАЛОГ)
Other Information (UK Sanctions List Ref): RUS2294 (UK Statement of Reasons): ANO

DIALOG is an involved entity under the Russia (Sanctions) (EU Exit) Regulations 2019 because it is or has been involved in: obtaining a benefit from or supporting the Government of Russia, through 1) carrying on business as a Government of Russia-affiliated entity, and; 2) carrying on business in a sector of strategic significance, namely, the Russian information, communications and digital technologies sector. .

Listed On: 28/10/2024

Last Updated: 28/10/2024

Group ID: 16618

3. **Name:** STRUCTURA NATIONAL TECHNOLOGIES

A.K.A: (1) COMPANY GROUP STRUKTURA LLC (2) GK STRUKTURA (non-Latin: ГК Структура) (3) GRUPPA KOMPANII STRUKTURA (non-Latin: Группа Компаний "Структура") (4) STRUCTURA (5) STRUCTURA NATIONAL TECHNOLOGY (6) STRUKTURA NATIONAL TECHNOLOGIES

Other Information (UK Sanctions List Ref): RUS2293 (UK Statement of Reasons): Structura National Technologies (hereafter 'Structura') is an involved person under the Russia (EU Exit) (Sanctions) Regulations 2019 on the basis of the following grounds: (1) Structura is obtaining a benefit from or supporting the Government of Russia by carrying on business in a sector of strategic significance, namely the information, communications and digital technologies sector; and (2) Structura engages in, provides support for, or promotes any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. .

Listed On: 28/10/2024

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Group ID: 16617