Global Anti-Corruption

Introduction

1. On 26 April 2021, the Foreign Secretary laid before Parliament the Global Anti-Corruption Sanctions Regulations 2021 (S.I. 2021/488) (the Regulations). The Regulations are 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 involved in serious corruption.

2. The Foreign, Commonwealth and Development Office have 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. 22 entries have been added to the consolidated list and are now subject to an asset freeze.

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;
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 Office of Financial Sanctions Implementation (OFSI);

iv. report any findings to OFSI, together with any additional information that would facilitate compliance with the Regulations;

v. provide any information concerning the frozen assets of designated persons that OFSI may request. Information reported to OFSI may be passed on to other regulatory authorities or law enforcement.

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: 

8. The Consolidated List can be found here:
   https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/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 our guide to financial sanctions:


Enquiries

11. Non-media enquiries about the implementation of financial sanctions in the UK should be addressed to:

Office of Financial Sanctions Implementation
HM Treasury
1 Horse Guards Road
London
SW1A 2HQ
ofsi@hmtreasury.gov.uk

12. Non-media enquiries about the sanctions measures themselves should be addressed to:

sanctions@fcdo.gov.uk

13. Media enquiries about how financial sanctions are implemented in the UK should be addressed to the Treasury Press Office on 020 7270 5238.

14. Media enquiries about the sanctions measures themselves should be addressed to the Foreign, Commonwealth & Development Office Press Office on 020 7008 3100.
ANNEX TO NOTICE

FINANCIAL SANCTIONS: GLOBAL ANTI-CORRUPTION

THE GLOBAL ANTI-CORRUPTION SANCTIONS REGULATIONS 2021 (S.I. 2021/488)

ADDITIONS

Individuals

1. ALEJOS LORENZANA, Felipe
   DOB: 03/10/1984. Nationality: Guatemala Position: Deputy and Vice President of the Board of Directors of the Congress of Guatemala Other Information: (UK Sanctions List Ref): GAC0021 (UK Statement of Reasons): Alejos Lorenzana is a Deputy and Vice President of the Board of Directors of the Congress of Guatemala. He has been involved in serious corruption using his position to attract clients with the offer of expediting the refund of tax credits in exchange for bribes, and benefitting from commission charges. He is responsible for, and facilitated or provided support for, and benefitted from, serious corruption. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14089.

2. ALI, Ashraf Said Ahmed Hussein
   DOB: (1) --/01/1957. (2) 01/04/1957. a.k.a: (1) AL-CARDINAL (2) ALI, Ashiraf, Seed, Ahmed (3) ALI, Ashraf, Hussein (4) ALI, Ashraf, Sayed (5) ALI, Ashraf, Seed, Ahmed (6) ALI, Ashraf, Seed, Ahmed, Hussein (7) ALI, Ashraff, Seed, Ahmed Nationality: (1) Sudan (2) South Sudan (3) possibly United Arab Emirates Passport Details: B00018325 Address: Dubai, United Arab Emirates (UAE). Position: Businessman Other Information: (UK Sanctions List Ref): GAC0015 (UK Statement of Reasons): Ashraf Seed Ahmed Hussein Ali, widely known as Al-Cardinal, has been involved in serious corruption in South Sudan involving the misappropriation of state property to his benefit and the benefit of others. He has been the beneficiary of commitments from the State which constituted the improper diversion of significant amounts of government revenues and funds. His actions facilitated or provided support for serious corruption that has caused damage to South Sudan’s public finances and contributed to ongoing instability and conflict. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14097.

3. ESSA, Salim Azziz
4. **GORDIEVSKY, Stanislav Evgenievich**
   - **Title:** Major  
   - **DOB:** 09/09/1977.  
   - **POB:** Russia  
   - **a.k.a.** (1) GORDIEVSKY, Stanislav, Evgenievich (2) GORDIEVSKY, Stanislav, Yevgenievich  
   - **Nationality:** Russia  
   - **Position:** Investigator of the Investigative Department of the South Administrative District, of the Prosecutor Service in Moscow  
   - **Other Information:** (UK Sanctions List Ref): GAC0003 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Gordievsky participated in the fraud through his actions during the course of a tax investigation into companies involved in the serious corruption. His actions facilitated or provided support for the serious corruption. (Gender): Male  
   - **Listed On:** 26/04/2021  
   - **Last Updated:** 26/04/2021  
   - **Group ID:** 14096.

5. **GUPTA, Ajay Kumar**
   - **Title:** Mr  
   - **DOB:** 05/02/1956.  
   - **POB:** Saharanpur, India  
   - **Nationality:** (1) India (2) South Africa  
   - **Passport Details:** (1) Z1876211. Expiry: 03 Sep 2018. (2) Z1440582. (3) Z2325724.  
   - **Address:** Dubai, United Arab Emirates (UAE).  
   - **Position:** Businessperson  
   - **Other Information:** (UK Sanctions List Ref): GAC0016 Associated with: Atul Gupta (brother/business partner), Rajesh Kumar Gupta (brother/business partner), Salim Essa (business partner). (UK Statement of Reasons): Ajay Gupta, in association with Atul Gupta, Rajesh Gupta and Salim Essa, has been involved in serious corruption in South Africa, involving the misappropriation of property. He has been responsible for this corruption by playing a key part in its organisation and has financially benefitted from it. This corruption caused serious damage to South Africa. (Gender): Male  
   - **Listed On:** 26/04/2021  
   - **Last Updated:** 26/04/2021  
   - **Group ID:** 14098.

6. **GUPTA, Atul Kumar**
   - **Title:** Mr  
   - **DOB:** 14/06/1968.  
   - **POB:** Saharanpur, India  
   - **Nationality:** (1) India (2) South Africa  
   - **Address:** Dubai, United Arab Emirates (UAE).  
   - **Position:** Businessperson  
   - **Other Information:** (UK Sanctions List Ref): GAC0017 Associated with: Ajay Kumar Gupta (brother/business partner), Rajesh Kumar Gupta (brother/business partner), Salim Essa (business partner). (UK Statement of Reasons): Atul Gupta, in association with Ajay Gupta, Rajesh Gupta and Salim Essa, has been involved in serious corruption in South Africa, involving the misappropriation of property. He has been responsible for this corruption by playing a key part in its organisation and has financially benefitted from it. This corruption caused serious damage to South Africa. (Gender): Male  
   - **Listed On:** 26/04/2021  
   - **Last Updated:** 26/04/2021  
   - **Group ID:** 14100.

7. **GUPTA, Rajesh Kumar**
   - **Title:** Mr  
   - **DOB:** 05/08/1972.  
   - **POB:** Saharanpur, India  
   - **a.k.a.** GUPTA, Tony  
   - **Nationality:** (1) India (2) South Africa  
   - **Address:** Dubai, United Arab Emirates (UAE).  
   - **Position:** Businessperson  
   - **Other Information:** (UK Sanctions List Ref): GAC0018 Associated with: Ajay Kumar Gupta (brother/business partner), Atul Kumar Gupta (brother/business partner), Salim Essa (business partner). (UK Statement of Reasons): Rajesh "Tony" Gupta, in association with Ajay Gupta, Atul Gupta and Salim Essa, has been involved in serious corruption in South Africa, involving the misappropriation of property. He has been responsible for this corruption by playing a key part in its organisation and has financially
benefitted from it. This corruption caused serious damage to South Africa. (Gender): Male
Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14102.

8. KARPOV, Pavel Aleksandrovich
   Title: Major DOB: 27/08/1977. POB: Moscow, Russia a.k.a: KARPOV, Pavel, Aleksandrovich
   Nationality: Russia Passport Details: 604176957 (likely expired)
   Position: (1) Formerly described as Investigator of the Investigative Unit of the Moscow branch of the Interior Ministry (2) Senior Investigating Officer for Major Cases. Retired July 2012. Other Information: (UK Sanctions List Ref): GAC0002 (UK Statement of Reasons: In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of US$ 230 million of Russian state property via a complex scheme involving a fraudulent tax rebate. Karpov participated in the fraud through his role as an investigator of alleged tax fraud by the Kameya company. His actions facilitated or provided support for serious corruption, and he benefitted financially from the proceeds of the serious corruption. (Gender): Male

9. KHIMINA, Yelena Ivanovna
   DOB: 11/09/1953. POB: Moscow, Russia a.k.a: KHIMINA, Elena, Ivanovna Nationality: Russia
   Position: Head of Moscow Tax Office No. 25 Other Information: (UK Sanctions List Ref): GAC0006 (UK Statement of Reasons: In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of state property via a complex scheme involving a fraudulent tax rebate. Khimina participated in the serious corruption through her approval of part of the fraudulent tax rebate. She was responsible for and her actions facilitated or provided support for the serious corruption. She also transferred or converted, or facilitated the transfer or conversion of, the proceeds of the serious corruption. (Gender): Female

10. KHLEBNIKOV, Vyacheslav Georgievich
    DOB: 09/07/1967. POB: Tambov, Russia a.k.a: KHLEBNIKOV, Viacheslav, Georgievich
    Nationality: Russia Position: Businessman Other Information: (UK Sanctions List Ref): GAC0010 (UK Statement of Reasons: In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Khlebnikov participated in the fraud through his involvement, in particular, in the improper transfer of ownership of the company Makhaon and the submission of applications for fraudulent tax rebates. His actions facilitated or provided support for the serious corruption. (Gender): Male

11. KLYUEV, Dmitry Vladislavovich
    DOB: 10/08/1967. POB: Moscow, Russia a.k.a: (1) CHELTER, Dima (2) KLYUEV, Dmitriy, Vladislavovich
    Nationality: Russia Position: Owner of Universal Savings Bank Other Information: (UK Sanctions List Ref): GAC0012 (UK Statement of Reasons: In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Klyuev participated in the fraud through his involvement, in particular in planning the fraud, and through his ownership of Universal Savings Bank. He was responsible for, and his actions facilitated or provided support for, the serious corruption. He also transferred or converted, or facilitated the transfer or
conversion of, the proceeds of the serious corruption. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14091.

12. KUZNETSOV, Artem Konstantinovich
Title: Lt. Colonel DOB: 28/02/1975. POB: Baku, former USSR, now Azerbaijan a.k.a: KUZNETSOV, Artyom, Konstantinovich Nationality: Russia Position: (1) Deputy Division Head, Tax Crimes Department of the Moscow Branch of the Interior Ministry in 2007. (2) After Magnitsky’s death he was promoted to the Interior Ministry's Economic Security Department. Other Information: (UK Sanctions List Ref): GAC0001 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Kuznetsov participated in the fraud through his involvement, in particular, in seizing documents used to secure the fraudulent tax rebate. He interfered in judicial processes and benefited financially from the proceeds of the serious corruption. His actions facilitated or provided support for serious corruption. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14092.

13. LOPEZ CENTENO, Jose Francisco
DOB: 17/09/1950. POB: Nicaragua a.k.a: LOPEZ CENTENO, Chico, Lopez Nationality: Nicaragua Passport Details: C0915261 (Nicaragua). Address: Nicaragua. Position: (1) Treasurer of Sandinista Party (2) Minister (Advisory) of Production and Trade Other Information: (UK Sanctions List Ref): GAC0022 (UK Statement of Reasons): Lopez Centeno was a high-ranking public official and Vice President of state-owned Albanisa. He has been involved in serious corruption by presiding over misappropriation during his leadership whereby public funds were diverted to fake companies, or inflated projects. He has been responsible for serious corruption, and facilitated or supported it. This deprived the Nicaraguan state and its citizens of vital resources for development. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14090.

14. MARKELOV, Viktor Aleksandrovich
DOB: 15/12/1957. POB: Leninskoye village, Uzganskiy District, Osh region, former USSR, now Kyrgyzstan a.k.a: MARKELOV, Viktor, Alexandrovich Nationality: Russia Position: Businessman Other Information: (UK Sanctions List Ref): GAC0011 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Markelov participated in the fraud through his involvement, in particular, in the improper transfer of ownership of the company Parfenion and the submission of applications for fraudulent tax rebates. His actions facilitated or provided support for the serious corruption. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14104.

15. MAYOROVA, Yulia Mikhailovna
DOB: 23/04/1979. POB: Moscow, Russia a.k.a: (1) MAIOROVA, Yulia, Mikhailovna (2) MAIOROVA, Yuliya, Mikhailovna (3) MAYOROVA, Yuliya, Mikhaylovna Nationality: Russia Passport Details: 622264502 (as of 2006). Position: Lawyer Other Information: (UK Sanctions List Ref): GAC0014 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Mayorova participated in the fraud through her involvement, in particular, in court processes based on fraudulent claims for damages, as the lawyer representing Makhaon. Her actions facilitated or provided
support for the serious corruption. (Gender): Female Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14095.

16. NAJERA, Oscar Ramon
DOB: 12/12/1950. POB: Honduras Nationality: Honduras Address: Honduras. Position: Congressman Other Information: (UK Sanctions List Ref): GAC0020 (UK Statement of Reasons): Najera is a Congressman in the Honduran Congress. He has been involved in serious corruption using his position to facilitate bribes that supported a major drug trafficking organisation, ‘Los Cachiros’, and which enabled the cartel to evade accountability. Conduct of this nature seriously undermines the rule of law and trust in public institutions in Honduras. He is responsible for, and facilitated or provided support for, serious corruption, and financially benefitted from it. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14088.

17. PAVLOV, Andrey Alekseyevich
DOB: 07/08/1977. a.k.a: (1) PAVLOV, Andrei, Alekseevich (2) PAVLOV, Andrei, Alexeevich (3) PAVLOV, Andrei, Alexeyevich Nationality: Russia Position: Lawyer Other Information: (UK Sanctions List Ref): GAC0007 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Pavlov participated in the fraud through his involvement, in particular, in court processes based on fraudulent claims for damages, as the lawyer representing Rilend. His actions facilitated or provided support for the serious corruption. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14084.

18. PLAKSIN, Gennady Nikolaevich
DOB: 30/08/1961. POB: Klin, Moscow Region, Russia a.k.a: PLAKSIN, Gennadiy, Nikolayevich Position: Former Chairman of the Universal Savings Bank Other Information: (UK Sanctions List Ref): GAC0009 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Plaksin participated in the fraud through his involvement, in particular, in court processes based on fraudulent claims for damages, as the director of Instar LLC. His actions facilitated or provided support for the serious corruption. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14086.

19. SHESHENYA, Aleksey Nikolaevich
DOB: 16/04/1971. POB: Kommunarsk, Voroshilov region, former USSR, now Ukraine a.k.a: (1) SHESHENIA, Aleksei, Nikolayevich (2) SHESHENIA, Alexei, Nikolayevich (3) SHESHENIA, Alexey, Nikolayevich Other Information: (UK Sanctions List Ref): GAC0008 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Sheshenya participated in the fraud through his involvement, in particular, in court processes based on fraudulent claims for damages, as the director of Grand-Aktiv LLC. His actions facilitated or provided support for the serious corruption. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14085.

20. STEPANOV, Vladlen Yurievich
DOB: 17/07/1962. a.k.a: STEPANOV, Vladlen, Yuryevich Other Information: (UK Sanctions List Ref): GAC0005 Husband of Olga Stepanova at the time of the serious corruption. (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Stepanov participated in the serious corruption through his involvement, in particular, owning the bank account which received the misappropriated funds. His actions provided support for or facilitated the misappropriation. He transferred or converted, or facilitated the transfer or conversion of, the proceeds the serious corruption, and benefitted financially from the serious corruption. Stepanov is also associated with Olga Stepanova, his then wife, who is also a person involved in serious corruption. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14101.

21. STEPANOVA, Olga Germanovna
DOB: 29/07/1962. POB: Moscow, Russia a.k.a: STEPANOVA, Olga, Hermanovna
Nationality: Russia Position: Previous Head of Tax Office no. 28 Other Information: (UK Sanctions List Ref): GAC0004 Wife of Vladlen Stepanov at the time of the serious corruption. (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Stepanova participated in the serious corruption through her approval of part of the fraudulent tax rebate. She was responsible for and her actions facilitated or provided support for the serious corruption. She transferred or converted, or facilitated the transfer or conversion of, the proceeds of the serious corruption and benefitted financially from the serious corruption. (Gender): Female Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14099.

22. URZHUMTSEV, Oleg Vyacheslavovich
Title: Lt Col DOB: 22/10/1968. Nationality: Russia Position: Formerly Senior Investigator of the Department for Investigating Organised Economic Criminal Activity of the Investigative Committee under the Ministry of Internal Affairs of Russia Other Information: (UK Sanctions List Ref): GAC0013 (UK Statement of Reasons): In December 2007, an organised criminal group was involved in serious corruption through the misappropriation of the equivalent of $230m of Russian state property via a complex scheme involving a fraudulent tax rebate. Urzhumtsev was involved in the fraud, in particular, by closing an investigation into the re-registration of companies involved in the misappropriation. His actions facilitated or provided support for the serious corruption. (Gender): Male Listed On: 26/04/2021 Last Updated: 26/04/2021 Group ID: 14093.

Office of Financial Sanctions Implementation
HM Treasury
26/04/2021