



Office of Financial  
Sanctions Implementation  
HM Treasury



# Legal Services Threat Assessment

April 2025



Office of Financial  
Sanctions Implementation  
HM Treasury

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Since February 2022, the legal services sector has submitted the second highest number of suspected breach reports to OFSI by sector, accounting for 16% (compared with 65% submitted by the financial services sector).

# Introduction

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This publication is one in a series of sector-specific assessments by the Office of Financial Sanctions Implementation (OFSI) addressing threats to UK financial sanctions compliance (all OFSI Threat Assessments are available [here](#)).<sup>1</sup> The UK sanctions landscape has changed significantly since the illegal Russian invasion of Ukraine in February 2022 and the subsequent implementation of unprecedented financial sanctions on Russia by the UK Government and international partners. OFSI recognises the evolving nature of financial sanctions compliance and is publishing these assessments to assist UK stakeholders in better understanding and protecting against threats to compliance. These assessments also demonstrate OFSI's commitment to proactively investigate breaches of UK financial sanctions.<sup>2</sup>

This assessment provides information on suspected sanctions breaches only and is intended to assist stakeholders with prioritisation as part of a risk-based approach to compliance. In some cases, including in the absence of a relevant OFSI licence, the activity described in this assessment would breach UK financial sanctions. This assessment is not necessarily a direct reflection of ongoing OFSI investigations or enforcement activity and is based on a wide range of information available to OFSI. The case study in this assessment is fictional but draws on information available to OFSI.

OFSI assesses the seriousness of suspected breaches on their merits and determines what enforcement action is appropriate and proportionate on a case-by-case basis. Guidance on breaches of financial sanctions prohibitions and OFSI enforcement can be found [here](#). The term suspected breach report in this assessment refers to a suspected breach of UK financial sanctions reported to OFSI through a compliance reporting form (further information can be found [here](#)).

## UK legal services providers

This report outlines OFSI's assessment of threats to sanctions compliance involving UK legal services providers since February 2022.<sup>3</sup> This assessment is also likely to be relevant to UK firms of all sizes operating in other sectors, including financial services.

UK financial sanctions legislation applies to all persons in the UK and UK persons wherever they are in the world. Relevant firms, as defined in legislation, comprise a firm or sole

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<sup>1</sup> This assessment covers UK financial sanctions only and does not cover UK trade sanctions. Further information on UK trade sanctions is available [here](#).

<sup>2</sup> OFSI works closely with the National Crime Agency (NCA), which is responsible for investigating suspected criminal breaches of UK financial sanctions.

<sup>3</sup> This assessment is based on information, including suspected breach reports, reviewed by OFSI between January 2022 and March 2024.

practitioner which provides by way of business accountancy services; legal or notarial services; advice about tax affairs; or certain trust or company services (further information on relevant firms can be found [here](#)). This includes but is not limited to: solicitors' firms; barristers' chambers; trust and company service providers (TCSPs); notarial service providers; or sole practitioners providing the aforementioned services.<sup>4</sup>

For the purposes of this assessment, all such firms and sole practitioners are referred to as legal services providers. The term trust in this assessment refers to trusts in the UK and similar arrangements in other jurisdictions.

Since February 2022, the legal services sector has submitted the second highest number of suspected breach reports to OFSI by sector, accounting for 16% (compared with 65% submitted by the financial services sector). Solicitors' firms and barristers' chambers submitted 98% of these suspected breach reports, while TCSPs and other legal services providers submitted the remaining 2%.

Legal services providers play a crucial role in ensuring compliance with UK financial sanctions both within and outside their sector. They provide services to a range of UK and international clients (including, in some cases, designated persons or DPs) to help them comply with UK financial sanctions. In providing services to DPs, legal services providers are uniquely positioned to identify suspected breaches. TCSPs provide their services to a variety of clients and, in addition to asset freeze prohibitions, must ensure compliance with Russia-related trust services sanctions.<sup>5</sup>

This assessment does not cover the breadth of potential breaches arising from the activities of UK legal services providers but is based on specific threats and patterns of non-compliance which OFSI has observed since February 2022.<sup>6</sup> OFSI is providing this information to assist legal services providers with a risk-based approach to compliance and to build on previous publications on sanctions compliance published by the UK Government.

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<sup>4</sup> Some providers may offer a variety of legal services. For the purposes of this assessment, OFSI has categorised suspected breach reports by type of legal services firm based on their primary activity.

<sup>5</sup> These are financial sanctions for which OFSI is responsible. Trust services sanctions are discussed further below.

<sup>6</sup> References to Russian DPs from hereon refer to individuals or entities designated under UK financial sanctions relating to Russia.



## Reporting to OFSI

Further information about reporting to OFSI can be found [here](#). OFSI encourages legal services providers to report if they suspect a breach linked to the content of this assessment has occurred.<sup>7</sup> Where appropriate and proportionate, OFSI encourages legal services providers to conduct lookback exercises to identify any suspected breaches which have not been reported to OFSI. It will assist OFSI if reporters reference “OFSI – Legal Services Threat Assessment – 0425” in any report.

## Suspicious Activity Reports (SARs)

If you know or suspect that there has been money laundering or terrorist financing activity and your business falls within the regulated sector, then you are reminded of the obligations to make reports to the National Crime Agency (NCA) under Part 7 of the Proceeds of Crime Act 2002 and the Terrorism Act 2000. If you decide to make a report in this way, you should adopt the usual mechanism for doing so. It will help analysis if the reference “OFSI – Legal Services Threat Assessment – 0425” is included. Guidance on SARs is available [here](#).

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<sup>7</sup> UK financial sanctions regulations make it clear that reporting obligations do not apply to information to which legal professional privilege is attached. However, OFSI expects legal professionals to carefully ascertain whether legal privilege applies and which information it applies to. OFSI may challenge a blanket assertion of legal professional privilege where it is not satisfied that such careful consideration has been made.

## Key judgements

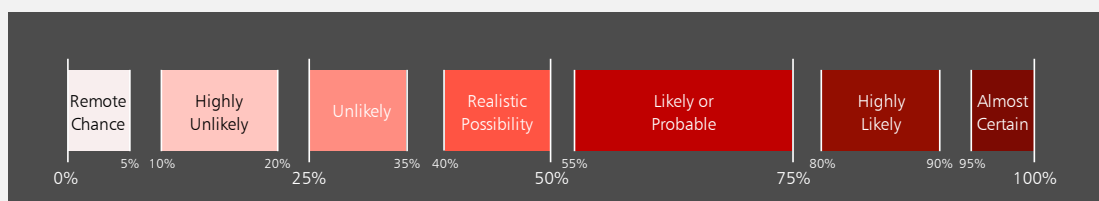
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The key judgments below concern threats to sanctions compliance relevant to UK legal services providers from February 2022 to present and are based on a range of information available to OFSI.

1. It is **highly likely** that UK trust and company services providers (TCSPs) have not self-disclosed all suspected breaches to OFSI.
2. It is **almost certain** that most non-compliance by UK legal services providers has occurred due to breaches of OFSI licence conditions.
3. It is **almost certain** that complex corporate structures, including trusts, linked to Russian DPs and their family members have obfuscated the ownership and control of assets which could be frozen under UK financial sanctions.
4. It is **likely** that Russian DPs have transferred the ownership and control of assets to non-designated individuals and entities. In some cases, this could breach UK financial sanctions.

### Probability Yardstick

This advisory uses probabilistic language as detailed in the Probability Yardstick developed by HMG's Professional Head of Intelligence Assessment (PHIA).





## Threat Overview

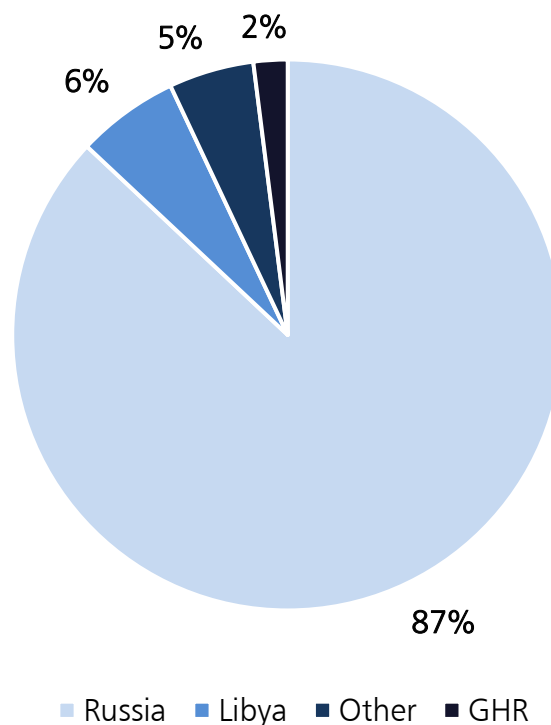
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The section below provides an overview of suspected breach reports relevant to UK legal services providers submitted to OFSI since February 2022.

### Suspected breach reporting by regime

Over 75% of sanctions designations made by the UK Government since February 2022 have been Russia-related. As shown in the pie chart below, Russia has dominated suspected breach reports submitted to OFSI by legal services providers since then.<sup>8</sup>

While Russia sanctions remain a priority, OFSI encourages legal services providers to ensure robust compliance with all UK sanctions regimes. Other regimes where OFSI has identified recent threats to compliance relevant to UK legal services providers include those relating to Libya; Global Human Rights (GHR); Belarus; Global Anti-Corruption; Myanmar; and South Sudan. The Russia-related threats to sanctions compliance described below are also applicable to other regimes.



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<sup>8</sup> The pie chart provides a breakdown of suspected breach reports received by OFSI from legal services providers by UK sanctions regime. The 'other' category is an aggregation of regimes which individually account for less than 1% of relevant suspected breaches received by OFSI. These figures are approximate and based on reports received by OFSI between January 2022 and March 2024.

The pie chart above does not include suspected breach reports received by OFSI relating to UK Counter Terrorism sanctions, including domestic and other Counter Terrorism sanctions such as United Nations sanctions regimes implemented by the UK Government (e.g., ISIL (Da'esh) and Al-Qaida sanctions). OFSI has received suspected breach reports relating to Counter Terrorism sanctions since February 2022. A significant portion of these reports concerned breaches of licence conditions, which are discussed below.

## Suspected breach reporting by types of UK legal services providers

1. It is **highly likely** that UK trust and company services providers (TCSPs) have not self-disclosed all suspected breaches to OFSI.

As mentioned, since February 2022, only 2% of the suspected breach reports submitted to OFSI from UK legal services providers came from TCSPs and providers other than solicitors' firms and barristers' chambers. Since then, OFSI has also received suspected breach reports which concerned TCSPs but were not self-disclosed and instead submitted by other firms. Larger legal services providers also account for a significant portion of the suspected breach reports submitted to OFSI from the legal services sector. OFSI therefore encourages smaller providers and sole practitioners to review this assessment and ensure robust compliance with UK financial sanctions.

In December 2022, UK financial sanctions on Russia were strengthened through the introduction of trust services sanctions. Since then, it has been prohibited for UK persons (and anyone in the UK) to newly provide trust services: to or for the benefit of a person connected with Russia (PCWR); and/or for the benefit of certain Russian DPs. In accordance with these prohibitions, trust services must be wound down, unless an exception or OFSI licence applies. These prohibitions apply to the provision of trust services by UK persons and anyone in the UK (including UK TCSPs and non-UK TCSPs operating in the UK) regardless of where a trust is established. Further information on these prohibitions, including exceptions and licensing grounds, can be found [here](#).

In light of the above and the threats described below, where appropriate and proportionate, OFSI encourages TCSPs to conduct lookback exercises to identify suspected breaches which have not yet been reported to OFSI.

## Best practice

OFSI values self-disclosure.<sup>9</sup> OFSI also proactively investigates suspected breaches which

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<sup>9</sup> <https://www.gov.uk/government/publications/financial-sanctions-enforcement-and-monetary-penalties-guidance/financial-sanctions-enforcement-and-monetary-penalties-guidance>

are not self-disclosed using a wide range of available information. When self-disclosing a suspected breach, legal services providers should report to OFSI and through other channels where relevant, including through SARs. Legal services providers should refer to OFSI guidance when self-disclosing suspected breaches.

OFSI also values timely reporting (further information on this can be found [here](#)). While reporting to OFSI from legal services providers is typically timely, OFSI has observed in some cases significant delays in legal services providers both identifying suspected breaches and subsequently making reports to OFSI. The identification and reporting of suspected breaches by legal services providers varies by regime. OFSI has observed delays in identifying and reporting suspected breaches to OFSI in relation to the Myanmar and Libya sanctions regimes in particular.





OFSI has observed areas in which sanctions compliance by UK legal services providers could be strengthened. In particular, OFSI has observed patterns of non-compliance relating to OFSI licence conditions.



## Strengthening compliance

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2. It is **almost certain** that most non-compliance by UK legal services providers has occurred due to breaches of OFSI licence conditions.

Most reports to OFSI made by UK legal services providers concern suspected breaches by clients operating in other sectors. Despite this, OFSI has observed areas in which sanctions compliance by legal services providers themselves could be strengthened. In particular, OFSI has observed the following patterns of non-compliance relating to OFSI licences:

- **Transactions exceeding licence value limits.** Typically, this stems from legal services providers receiving payments from clients who are also DPs (DP clients) which exceed the value limits set in specific or general licences. OFSI encourages legal services providers to consider the terms of OFSI licences when billing DP clients. OFSI has long had a position of not prohibiting the provision of legal advice to DPs under an asset freeze. However, receiving payment for legal services rendered to DPs, including services provided on credit, requires an OFSI licence.
- **Transactions made after licence expiry.** This applies to both OFSI general and specific licences.
- **Reporting.** OFSI encourages legal services providers to review licence reporting requirements, including making a report within 14 days of receiving payment under a general licence and providing relevant documentation which sets out the obligation under which the payment has been made. Legal services providers may assist DP clients in complying with licence reporting obligations. OFSI encourages legal services providers that identify licence reporting failures by their DP clients to report to OFSI.
- **Russia wind downs.** Following the Russian invasion of Ukraine, many UK legal services providers, including solicitors' firms in particular, wound down operations in Russia. OFSI encourages legal services providers to ensure these activities were conducted in line with general and specific licence permissions and to report any suspected breaches which may have occurred as a result. Information on a related monetary penalty imposed by OFSI on a UK legal services provider is available [here](#).

In addition to the above, OFSI has also observed legal services providers failing to adhere to asset freeze prohibitions, including through delays in freezing funds belonging to DP clients and by transferring frozen funds into accounts other than those specified in specific OFSI licences.

## Cross-sector red flags

Legal services providers can strengthen compliance by ensuring robust due diligence is conducted where relevant, including when the red flags provided over the page are detected. These red flags, which could arise in a variety of situations in the legal services sector, primarily concern Russian DPs and PCWR but could also apply to DPs designated under other regimes.



Close name matches with individual Russian DPs or non-designated individuals with discernible links to Russian DPs (including family members or associates)<sup>10</sup>



A non-designated individual or entity making payments to meet an obligation previously met by a Russian DP



Low profile legal services providers who could be acting on behalf of DPs to facilitate breaches of financial sanctions



Trusts where the identity of individuals in the trust structure, including the settlor and/or beneficiaries, are unclear or not provided to counterparties during know-your-customer (KYC) checks



Complex corporate structures, including trusts, where the source of wealth of the individuals involved is unclear and the same individuals have discernible links to Russian DPs (including family members or associates)<sup>11</sup>



Non-designated individuals with discernible links to Russian DPs, including family members and associates, dealing with assets which could be subject to an asset freeze relating to the same DP

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<sup>10</sup> See part 2.2 of OFSI's UK financial sanctions general guidance (available [here](#)) for further information on the identification of DPs.

<sup>11</sup> Although trusts have key differences with corporate entities such as companies, for the purposes of this assessment, trusts are referred to as forming part of complex corporate structures linked to Russian DPs.

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- ▶ Extensive links between a non-designated individual and a Russian DP and/or their family members without a clear business purpose. This includes current or former corporate appointments (e.g., director or company secretary) at multiple companies linked, directly or indirectly, to a Russian DP
- 
- ▶ Non-designated individuals serving as shareholders at entities linked, directly or indirectly, to a Russian DP without a clear business purpose. In some cases, these individuals could be nominee shareholders
- 
- ▶ New clients (entities) whose beneficial ownership is unclear and obfuscated by complex corporate structures, including trusts
- 
- ▶ Counterparties or clients claiming their relationship with a Russian DP ended following the DP's designation without providing information to counterparties to substantiate this
- 
- ▶ A potential PCWR who may be seeking to hide the extent of their connections to Russia, including through the use of citizenship by investment schemes, in order to receive trust services from a UK TCSP
- 
- ▶ TCSPs claiming their client is not a PCWR without conducting robust due diligence or providing information to counterparties to substantiate this
- 
- ▶ Clients, including Russian DPs, PCWR or related individuals, pressuring UK legal services providers into non-compliance, including by threatening legal action
- 
- ▶ Clients, including Russian DPs, PCWR or related individuals, refusing to provide TCSPs or other legal services providers with information upon request, including signed and dated trust deeds





## Intermediary jurisdictions

OFSI encourages vigilance from UK legal services providers when the red flags above appear in conjunction with an intermediary jurisdiction nexus. Suspected breaches of UK financial sanctions often feature a nexus with an intermediary jurisdiction (a jurisdiction other than the UK and the jurisdiction to which UK financial sanctions relates; for example, Russia) or multiple intermediary jurisdictions.

Numerous factors contribute to an intermediary jurisdiction nexus. Prior to the invasion of Ukraine in February 2022, Russian DPs typically structured their financial interests, including the ownership and control of assets, through a small number of favoured intermediary jurisdictions. While some intermediary jurisdictions have historically offered greater privacy through their legal and financial systems, as well as different tax regimes to the UK, some do not but have still been attractive to Russian investors for commercial reasons, including the products and services that they provide and/or their links to major markets.

Since February 2022, 23% of suspected breach reports involving UK legal services providers have included an intermediary jurisdiction nexus. The jurisdictions appearing most frequently in these suspected breach reports include: British Virgin Islands (BVI); Cyprus; Guernsey; and Switzerland. OFSI has also observed links between suspected breaches involving UK legal services providers and the Isle of Man; Jersey; Cayman Islands; Austria; and the United Arab Emirates (UAE).

It should be noted that the figure above is based on suspected breach reports only and does not necessarily mean that any breaches have occurred in those jurisdictions. Typically, an intermediary jurisdiction nexus involves individuals or entities based in those jurisdictions who are involved, directly or indirectly, in a suspected breach. The references to intermediary jurisdictions above do not mean that those jurisdictions do not (where relevant) enforce UK financial sanctions effectively. OFSI works closely with the relevant authorities in these intermediary jurisdictions.

## Threats: Russian DPs and their enablers

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Financial sanctions have resulted in the freezing of billions of pounds worth of Russian DPs' assets in the UK. In response, Russian DPs and their enablers have repeatedly sought to recoup frozen assets and even dissipate them beyond the reach of UK financial sanctions.

OFSI defines an enabler as any individual or entity providing services or assistance on behalf of or for the benefit of DPs to breach UK financial sanctions. Enabler activity is any activity undertaken by these individuals or entities on behalf of or for the benefit of DPs. For the purposes of this assessment, enablers' level of complicity with sanctions breaches has been differentiated at three levels: complicit, willfully blind and unwittingly involved.

A professional enabler is defined as "an individual or organisation that is providing professional services that enables criminality. Their behaviour is deliberate, reckless, improper, dishonest and/or negligent through a failure to meet their professional and regulatory obligations".<sup>12</sup> OFSI has also observed increased activity by non-professional enablers linked to Russian DPs. For the purposes of this assessment, such enablers are defined as individuals with close personal ties to DPs, such as their family members, ex-spouses, associates or other proxies. While they share the same aims as professional enablers, these enablers often employ less sophisticated methods to breach UK financial sanctions.

Legal services providers are well placed to identify attempts by Russian DPs and their enablers to breach UK financial sanctions.

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<sup>12</sup> <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/724-cross-system-professional-enablers-strategy/file>

## Complex ownership and control structures

3. It is **almost certain** that complex corporate structures, including trusts, linked to Russian DPs and their family members have obfuscated the ownership and control of assets which could be frozen under UK financial sanctions.

As previously highlighted by OFSI and the NCA, complex corporate structures linked to Russian DPs and their family members, of which trusts often form part, can obfuscate the ownership or control of assets by DPs, including assets based in the UK.<sup>13</sup>

OFSI has observed numerous complex corporate structures through which Russian DPs and their family members hold assets, including but not limited to: UK property, high value goods such as art and superyachts. These structures can be made up of a range of different entities or relationships, including but not limited to companies; trusts; foundations; and limited partnerships. Family members and associates of Russian DPs may serve a variety of roles in these structures.<sup>14</sup> For example, in trusts, the roles held by these individuals may include but are not limited to settlor; protector; beneficiary; and trustee. DPs can also appoint nominees to these complex corporate structures, including trusts, to further obfuscate the ownership and control of assets.

Since the designation of Russian DPs from February 2022 onwards, these complex corporate structures have complicated assessments by UK legal services providers (and firms operating in other sectors) of whether assets, including those based in the UK, are captured by asset freeze prohibitions.

OFSI encourages UK legal services providers, including TCSPs in particular, to carefully consider the ownership and control of assets held through complex corporate structures, including trusts, linked to Russian DPs, their family members and associates. OFSI also encourages UK legal services providers to report any suspected breaches of financial sanctions arising from non-designated individuals or entities dealing with frozen assets held through these complex corporate structures.

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<sup>13</sup> <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/605-necc-financial-sanctions-evasion-russian-elites-and-enablers/file>

<sup>14</sup> Although trusts have key differences with corporate entities such as companies, for the purposes of this assessment, trusts are referred to as forming part of complex corporate structures linked to Russian DPs.

## Post-designation ownership and control transfers

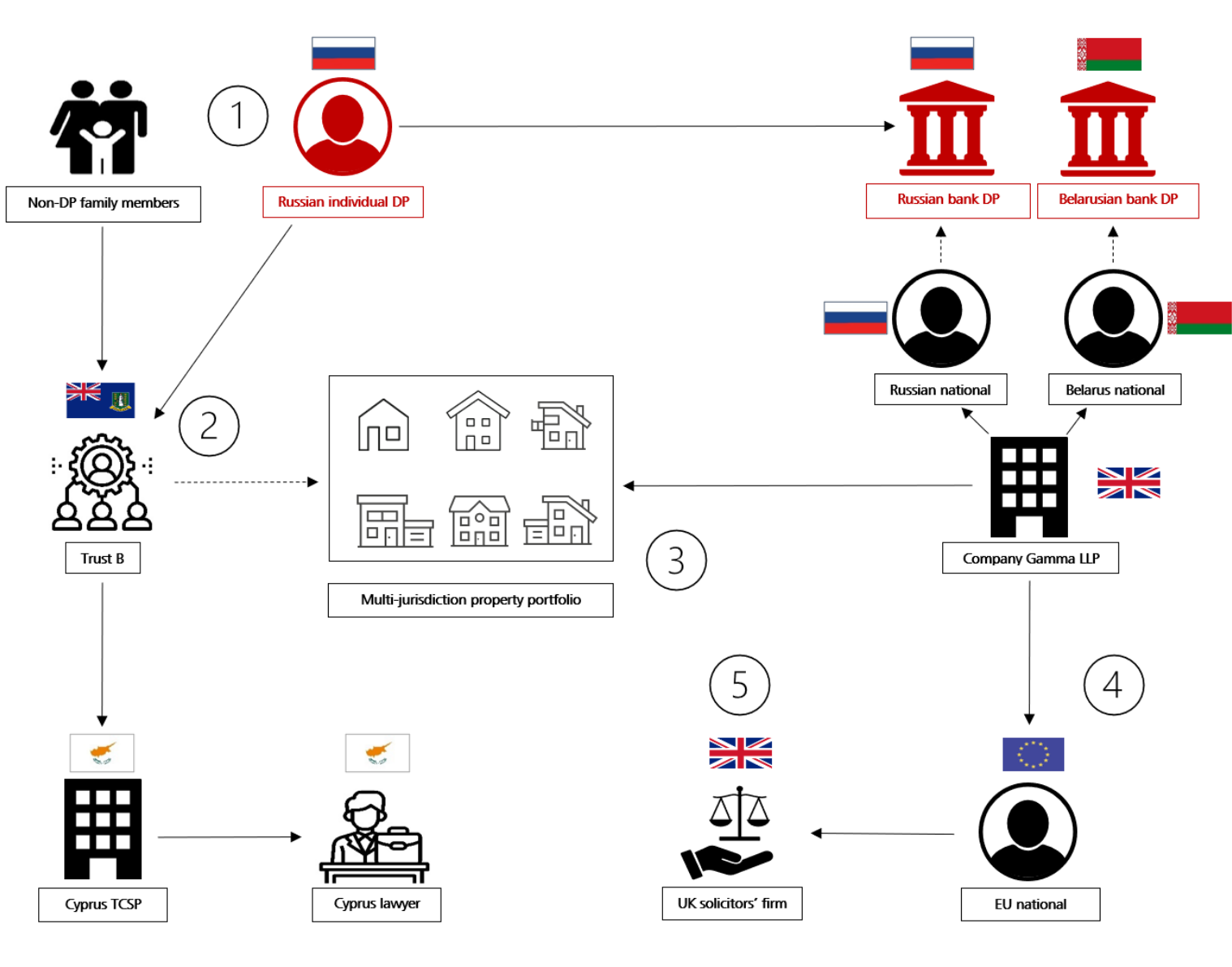
4. It is likely that Russian DPs have transferred the ownership and control of assets to non-designated individuals and entities. In some cases, this could breach UK financial sanctions.

Shortly prior to their designation, several Russian DPs reportedly made changes to complex corporate structures, including trusts, to mitigate the impact of UK financial sanctions. These pre-designation changes typically do not engage UK financial sanctions.

Since February 2022, however, OFSI has observed Russian DPs removing themselves from complex corporate structures, including trusts, following their designation, thereby creating uncertainty over whether assets held through the same structures should be frozen under UK financial sanctions. OFSI has also observed attempts at transferring the same assets to non-designated individuals and entities. In some cases, including where such transfers are made on behalf of or for the benefit of a DP, this could represent enabler activity and breach UK financial sanctions. The case study below, which is fictional but draws on information available to OFSI, is based on this scenario.

It is also worth noting that since February 2022, the UK Government has designated individuals associated with Russian DPs, including family members and professional enablers who have knowingly assisted DPs in hiding their assets in complex corporate structures.

CASE STUDY: Russian DPs and post-designation ownership and control transfers



## CASE STUDY: Russian DPs and post-designation ownership and control transfers

The case study above concerns a Russian DP and a discretionary family trust as well as the subsequent transfer of assets to non-designated individuals and entities. Legal services providers should be alert to ownership and control transfers by Russian DPs using complex corporate structures and report to OFSI where relevant.

1

A Russian businessman, the longstanding chairman of a Russian bank, is designated by the UK Government in March 2022.

2

The Russian DP is the original settlor and, along with family members, a beneficiary of Trust B, a discretionary trust established in the BVI in 2015. The trust is managed by a Cyprus-headquartered TCSP (which also has operations in BVI) headed by a Cyprus national and lawyer. At the time of designation, the assets held within Trust B include a valuable property portfolio comprising assets in the UK and EU.

3

In June 2022, having removed the Russian DP from the structure of Trust B through a deed of exclusion, the Cyprus-based TCSP oversees the sale of Trust B's property portfolio to Company Gamma LLP, a recently incorporated and low-profile UK-registered company, which is jointly owned by a Russian national and a Belarusian national. The first is a former executive at the designated Russian bank chaired by the Russian DP. The second is a senior manager at a designated Belarusian bank. The sale price is significantly lower than the estimated market value of the property portfolio.

4

Following the acquisition of the property portfolio, Company Gamma creates a new share class and transfers economic ownership rights to an individual with EU country nationality and a limited public profile.

5

A UK-registered solicitors' firm is approached by the EU national on behalf of Company Gamma to provide services relating to the management of the property portfolio. The EU national initially provides only limited information to the UK solicitors' firm regarding the acquisition of the portfolio. However, through a combination of due diligence and engagement with the EU national, the solicitors' firm establishes the facts above. Based on concerns over the circumstances in which Company Gamma acquired the property portfolio and the links between Company Gamma's shareholders and the Russian DP, the solicitors' firm reports to OFSI.

## Other threats

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### Historical interests in the UK

While this assessment and other OFSI publications focus primarily on the threat to financial sanctions compliance posed by designated Russian individuals, the activities of designated Russian businesses, including banks and conglomerates with historical interests in the UK, should also be considered.

Since February 2022, designated Russian businesses have sought to transfer or otherwise dispose of their historical business interests in the UK. Legal services providers, including TCSPs, may assist designated Russian businesses in doing so, including by making changes to financial instruments (through debt restructuring, for example). When doing so, UK providers must ensure compliance with relevant OFSI licences.

The UK is a hub for international litigation and has historically been favoured by Russian litigants pursuing a variety of claims. Despite UK financial sanctions, some designated Russian individuals or organisations may continue to be involved in legal disputes in the UK. When providing legal services to DPs, including during disputes, legal services providers must also ensure compliance with UK financial sanctions, including OFSI licence permissions where relevant.

OFSI encourages legal services providers to report any suspected breaches arising from the activities of designated Russian businesses described above.

### Money laundering

In addition, legal services providers should be alert to Russian DPs and their enablers obfuscating the source of their funds through money laundering. In December 2024, an NCA-led investigation exposed and disrupted a Russian money laundering network employing complex methods, including a combination of cash and cryptoassets, to contravene sanctions and other financial restrictions.<sup>15</sup> Although often difficult to detect, OFSI encourages UK legal services providers to remain alert to attempts at money laundering by or on behalf of Russian DPs, including any indications of high value cryptoasset to cash (or vice versa) transfers.

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<sup>15</sup> NCA Operation Destabilise press release, published 4th December 2024.



## Further resources

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This assessment highlights OFSI's ongoing commitment to proactively engage with stakeholders to ensure UK financial sanctions are properly understood, implemented and enforced in the UK. OFSI will publish further sector-specific assessments in 2025 which are also likely to be relevant to legal services providers. OFSI has also published (and will continue to publish) information on specific threats to UK financial sanctions compliance, including, for example, the recent advisory on North Korean IT workers (available [here](#)).

This assessment does not represent legal advice and should be read in conjunction with OFSI guidance (available [here](#)). OFSI encourages legal services providers to review Frequently Asked Questions (FAQs) published by OFSI which provide short form guidance and technical information on financial sanctions (available [here](#)). OFSI also encourages UK legal services providers to subscribe to free OFSI e-mail alerts (available [here](#)) to receive further relevant information about UK financial sanctions.

This assessment builds on previous and related publications issued by OFSI and UK Government partners, including the Financial Services Threat Assessment published by OFSI in February 2025 (available [here](#)) and the Red Alert on Financial Sanctions Evasion Typologies By Russian Elites and Enablers published by OFSI and the NCA in July 2022 (available [here](#)).

OFSI also encourages legal services providers to review relevant sanctions-related publications published by the Financial Conduct Authority and Office for Professional Body AML Supervision (available [here](#)) and the Solicitors Regulation Authority (available [here](#)). TCSPs may also wish to consult general guidance from the Financial Action Task Force (available [here](#)).



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