Office of Financial
Sanctions Implementation
HM Treasury

**Financial Sanctions Notice**

19/11/2025

# Cyber

## Introduction

1. The Cyber (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/597) ("the Regulations") were made under the Sanctions and Anti-Money Laundering Act 2018 ("the Sanctions Act") and provide for the imposition of financial sanctions, namely the freezing of funds and economic resources of persons who are have been involved in cyber activity which undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom; directly or indirectly causes, or is intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity; undermines, or is intended to undermine, the independence or effective functioning of an international organisations or a non-government organisation or forum whose mandate or purposes related to the governance of international sport or the Internet; or otherwise affects a significant number of persons in an indiscriminate manner.

2. On 19 November 2025 the Foreign, Commonwealth and Development Office 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. The following entries have been added to the Consolidated List and are now subject to an asset freeze:

- Alexander Alexandrovich VOLOSOVIK (Group ID: 17220)
- Kirill Andreevich ZATOLOKIN (Group ID: 17221)
- Yulia Vladimirovna PANKOVA (Group ID: 17222)
- Andrei Valerevich KOZLOV (Group ID: 17223)
- MEDIA LAND LLC (Group ID: 17218)
- ML.CLOUD LLC (17219)

**What <u>you</u> 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 and any entities owned or controlled by them;

   ii. freeze such accounts, and other funds or economic resources;

   iii. refrain from dealing with the funds or economic resources or making them available directly or indirectly to or for the benefit of designated persons unless licensed by the Office of Financial Sanctions Implementation (OFSI) or if an exception applies;

   iv. report any findings to OFSI, together with the information or other matter on which the knowledge or suspicion is based. Where the information relates to funds or economic resources, the nature and quantity should also be reported.

6. Information received by OFSI may be disclosed to third parties in accordance with provisions set out in the Information and Records part of the regulations and in compliance with applicable data protection laws.

7. Failure to comply with UK financial sanctions legislation or to seek to circumvent its provisions may be a criminal offence.

**Ransomware and Sanctions**

8. Making or facilitating a ransomware payment risks exposing those involved to civil or criminal penalties where such payments are made to designated persons.

9. OFSI, in partnership with other HM Government organisations has published guidance on sanctions and ransomware, which includes information on the impact of ransomware payments, cyber resilience and HM Government's approach to enforcement.

10. Guidance on ransomware and sanctions can be found here: https://www.gov.uk/government/publications/financial-sanctions-faqs.

**Further Information**

11. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Cyber financial sanctions page on the GOV.UK website: https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases.

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

13. The UK Sanctions List can be found here: https://www.gov.uk/government/publications/the-uk-sanctions-list.

14. The Compliance Reporting Form can be found here: https://www.gov.uk/guidance/suspected-breach-of-financial-sanctions-what-to-do.

15. For more information please see our financial sanctions guidance: https://www.gov.uk/government/publications/financial-sanctions-faqs.

**Enquiries**

16. 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.

17. Non-media enquiries about the sanctions measures themselves should be addressed to: fcdo.correspondence@fcdo.gov.uk.

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

19. 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: CYBER**

**THE CYBER (SANCTIONS) (EU EXIT) REGULATIONS 2020 (S.I. 2020/597)**

**ADDITIONS**

**Individuals**

1. **KOZLOV, Andrei Valerevich**
   **Name (non-Latin script):** Андрей Валерьевич Козлов
   **a.k.a:** KOZLOV, Andrey, Valerevich Position: Employee of Media Land LLC **Other Information:** (UK Sanctions List Ref): CYB0103. (UK Statement of Reasons):"The Secretary of State considers that there are reasonable grounds to suspect that Andrei Valerevich KOZLOV is or has been involved in relevant cyber activity as an employee of MEDIA LAND LLC, an involved person identified as a key enabler of the cybercrime ecosystem. In this capacity, KOZLOV is or has been involved in the supply of goods or technology that could contribute to relevant cyber activity or in providing financial services relating to such supply. KOZLOV is therefore involved in enabling cybercrime. Such activity that KOZLOV is or has been involved in, directly or indirectly caused, or was intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity." (Gender): Male Listed on: 19/11/2025 **UK Sanctions List Date Designated:** 19/11/2025 **Last Updated:** 19/11/2025 **Group ID:** 17223.

2. **PANKOVA, Yulia Vladimirovna**
   **Name (non-Latin script):** Юлия Владимировна Панкова
   **DOB:** 10/12/1996. **a.k.a:** PANKOVA, Yuliya, Vladimirovna **Nationality:** Russia **Passport Number:** 753221719 **Passport Details:** Issued: 25/05/2016, expires: 25/05/2026 **National Identification Number:** 743016842436 **Position:** (1) Founder of ML.Cloud LLC (2) Employee of Media Land LLC **Other Information:** (UK Sanctions List Ref): CYB0102. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect that Yulia Vladimirovna PANKOVA is or has been involved in relevant cyber activity through her association with ML.CLOUD LLC, and with MEDIA LAND LLC, involved persons identified as key enablers of the cybercrime ecosystem. In this capacity, PANKOVA is or has been involved in the supply of goods or technology that could contribute to relevant cyber activity or in providing financial services relating to such supply. PANKOVA is therefore involved in enabling cybercrime. Such activity that PANKOVA is or has been involved in, directly or indirectly caused, or was intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity. (Gender): Female **Listed on:** 19/11/2025 **UK Sanctions List Date Designated**: 19/11/2025 **Last Updated:** 19/11/2025 **Group ID:** 17222.

3. **VOLOSOVIK, Alexander Alexandrovich**
   **Name (non-Latin script):** Александр Александрович Волосовик
   **DOB:** 30/01/1983. **a.k.a:** (1) DOWNLOW (2) OHYEAHHELLNO (3) PODZEMNIYL (4) STAS_VL (5) VOLOSOVIK, Aleksandr, Alexandrovich (6) YALISHANDA **Nationality:** Russia **Passport Number:** 762988138 **Passport Details:** Issued: 01/04/2020, expires: 01/04/**2030 National Identification Number:** 253609232850 **Position:** Owner of Media Land LLC **Other Information:** (UK Sanctions List Ref):CYB0100. (UK Statement of

Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Alexander Alexandrovich VOLOSOVIK is or has been involved in relevant cyber activity through his role in and association with MEDIA LAND LLC, an involved person identified as a key enabler of the cybercrime ecosystem. In this capacity, VOLOSOVIK is or has been involved in the supply of goods or technology that could contribute to relevant cyber activity, or in providing financial services relating to such supply. VOLOSOVIK is therefore involved in enabling cybercrime. Such activity that VOLOSOVIK is or has been involved in, directly or indirectly caused, or was intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity. (Gender): Male **Listed on:** 19/11/2025 **UK Sanctions List Date Designated:** 19/11/2025 **Last Updated:** 19/11/2025 **Group ID:** 17220.

4. **ZATOLOKIN, Kirill Andreevich**
**Name (non-Latin script):** Кирилл Андреевич Затолокин
**DOB:** 30/04/1992. **a.k.a:** DOWNLOW **Nationality:** Russia **Passport Number:** 726146360 **Passport Details:** Issued: 06/09/2013, expires: 06/09/2023 **Position:** Employee of Media Land LLC **Other Information:** (UK Sanctions List Ref): CYB0101. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Kirill Andreevich ZATOLOKIN is or has been involved in relevant cyber activity through his role in and association with MEDIA LAND LLC, an involved person identified as a key enabler of the cybercrime ecosystem. In this capacity, ZATOLOKIN is or has been involved in providing technical assistance that could contribute to relevant cyber activity and is or has been involved in the supply of goods or technology that could contribute to relevant cyber activity or in providing financial services relating to such supply. ZATOLOKIN is therefore involved in enabling cybercrime. Such activity that ZATOLOKIN is or has been involved in, directly or indirectly caused, or was intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity. (Gender): Male **Listed on:** 19/11/2025 **UK Sanctions List Date Designated:** 19/11/2025 **Last Updated:** 19/11/2025 **Group ID:** 17221.

**Entities**

1. **MEDIA LAND LLC**
**a.k.a:** (1) Media Land (2) Medialand **Address:** Office 27, Tsvetnochnoye str. 16, Moskovskaya zastava Municipal Okrug, St Petersburg, Russia, 196006.**Other Information**: (UK Sanctions List Ref): CYB0098. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect that MEDIA LAND LLC is or has been involved in relevant cyber activity, in that it has provided support for the commission, planning or preparation of such activity, and has supplied technology and provided technical assistance that could contribute to the commission of relevant cyber activity. MEDIA LAND has operated from St. Petersburg, Russia and has promoted itself as a Bulletproof Hosting (BPH) provider. MEDIA LAND has been involved in relevant cyber activity through its role in providing infrastructure used in ransomware incidents and malicious cyber activity for customers, including those affiliated with the LockBit ransomware group. MEDIA LAND has been identified as a key enabler of the cybercrime ecosystem. Such activity that MEDIA LAND is or has been involved in, directly or indirectly caused, or was intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity. (Business Reg No):2536288610 **Listed on:** 19/11/2025 **UK Sanctions List Date Designated:** 19/11/2025 **Last Updated:** 19/11/2025 **Group ID:** 17218.

2. **ML.CLOUD LLC**
**a.k.a:** (1) ML Cloud LLC (2) ML.Cloud **Address**: Office 28, Tsvetnochnoye str. 16, Moskovskaya zastava Municipal Okrug, St Petersburg, Russia, 196006 **Other Information:** (UK Sanctions List Ref): CYB0099. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect that ML.CLOUD LLC is or has been involved in relevant cyber activity, in that it has provided support for the commission, planning or preparation of such activity, and has supplied technology and provided technical assistance that could contribute to the commission of relevant cyber activity. Such activity that ML.CLOUD is or has been involved in, directly or indirectly caused, or was intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity. (Business Reg No):7810938831 **Listed on:** 19/11/2025 **UK Sanctions List Date Designated:** 19/11/2025 **Last Updated:** 19/11/2025 **Group ID:** 17219.

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