

02 April 2025

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 <u>Consolidated List</u> 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 <u>financialsanctions@gov.ky</u> 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 <u>financialsanctions@gov.ky</u> 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 <u>Consolidated List</u> 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 <u>financialsanctions@gov.ky</u> 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. https://fra.gov.ky/guides-to-financial-sanctions/.
- 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

<u>REGIME:</u> Global Anti-Corruption INDIVIDUAL

1. Names (Last): CHINCHALADZE (1): MIKHEIL (2): n/a (3): n/a (4): n/a (5): n/a Name (non-Latin): მიხეილ ჩინჩალამე Title: n/a Position: (1) Chairman of the Tblisi Court of Appeals (2) Member of the High Council of Justice of Georgia A.K.A: n/a Date of Birth: 09/03/1978 Place of Birth: n/a Nationality: n/a Passport Number: n/a Passport Details: n/a Address: n/a

Other Information (UK Sanctions List Ref): GAC0077 (UK Statement of Reasons): There are reasonable grounds to suspect that Mikheil Chinchaladze ("CHINCHALADZE") is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) CHINCHALADZE is or has been involved in serious corruption by engaging in serious corruption. As Chairman of the Tbilisi Court of Appeal, a foreign public official performing an executive or judicial function, he received a financial advantage as a reward for improperly performing his public functions, specifically improperly asserting his influence as chairman of the Tbilisi Court of Appeals to ensure that judicial appointments and decisions favoured the incumbent Georgian Dream Party. (2) CHINCHALADZE is or has been involved in serious corruption by engaging in serious corruption. As Chairman of the Tbilisi Court of Appeals, a foreign public official performing an executive or judicial function, he accepted an advantage, namely a lifetime appointment to Tbilisi Court of Appeals, intending in consequence to continue improperly performing his public functions by ensuring that decisions in the Tbilisi Court of Appeals favour the incumbent Georgia Dream Party. (3) CHINCHALADZE is or has been involved in serious corruption by engaging in serious corruption. As Chairman of the Tbilisi Court of Appeals of Georgia, a foreign public official performing an executive or judicial function, he accepted an advantage, namely a lifetime appointment to the Tbilisi Court of Appeals, intending to improperly perform his public functions by ensuring that judicial appointments and decisions favour the incumbent Georgian Dream Party. .

Listed On: 02/04/2025 Last Updated: 02/04/2025 Group ID: 16851

 Names (Last): CURRUCHICHE CUCUL (1): JOSE (2): RAFAEL (3): n/a (4): n/a (5): n/a Name (non-Latin): n/a Title: n/a

Position: Head of the Special Prosecution Office Against Impunity (La Fiscalía Especial contra la Impunidad) **A.K.A:** n/a

A.K.A: II/d

Date of Birth: 28/07/1970 Place of Birth: n/a

Nationality: Guatemala

Passport Number: 229488307 Passport Details: n/a

Address: n/a

Other Information (UK Sanctions List Ref): GAC0068 (UK Statement of Reasons): There are reasonable grounds to suspect that José Rafael Curruchiche Cucul ("Curruchiche") is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) Curruchiche is or has been involved in

serious corruption by being responsible for or engaging in serious corruption. Whilst a prosecutor within the Public Ministry (Ministerio Público, MP), a foreign public official exercising a judicial function, he accepted a promotion to Head of the Special Prosecution Office Against Impunity (Fiscalía Especial contra la Impunidad, FECI). He did so in anticipation of him improperly performing a public function as Head of the FECI, intentionally undermining corruption investigations into the Guatemalan political elite. (2) Curruchiche is or has been involved in serious corruption, by being responsible for the investigation or prosecution of serious corruption and intentionally failing to fulfil that responsibility. Whilst a prosecutor within the MP, a foreign public official exercising a judicial function, he accepted a promotion to Head of the FECI. He did so in anticipation of him improperly performing a public function as Head of the FECI, intentionally undermining corruption investigations into the Guatemalan political elite. (3) Curruchiche is or has used threats or intimidation to interfere in a law enforcement or judicial process in connection with serious corruption. Whilst a prosecutor within the MP, a foreign public official exercising a judicial function, he accepted a promotion to Head of the FECI. He did so in anticipation of him improperly performing a public function as Head of the FECI, intentionally undermining corruption investigations into the Guatemalan political elite. . Listed On: 02/04/2025

Last Updated: 02/04/2025 Group ID: 16842

Names (Last): GIAMMATTEI FALLA (1): ALEJANDRO (2): EDUARDO (3): n/a (4): n/a (5): n/a

Name (non-Latin): n/a Title: n/a Position: n/a A.K.A: n/a Date of Birth: 06/03/1956 Place of Birth: n/a Nationality: (1) Guatemala (2) Italy Passport Number: n/a Passport Details: n/a Address: n/a

Other Information (UK Sanctions List Ref): GAC0064 (UK Statement of Reasons): Alejandro Eduardo Giammattei Falla ("Giammattei") is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 based on the following grounds: (1) Giammattei is or has been involved in serious corruption by profiting financially from serious corruption. As President of Guatemala, a foreign public official performing an executive function, he received a financial advantage to induce him to perform a public function improperly. He accepted a bribe from a Russian mining company in return for favourable exploration licences and port access. (2) Giammattei is or has been involved in serious corruption by being responsible for or engaging in serious corruption. During his campaign for the presidency of Guatemala, he bribed a foreign public official to induce the improper performance of a public function. He promised José Luis Benito Ruiz, then Minister of Communications, Infrastructure and Housing, a foreign public official holding an executive function, that he would continue his tenure after the election if Benito received illicit campaign contributions on Giammattei's behalf. The reappointment was an advantage since it permitted Benito to continue improperly awarding construction contracts. (3) Giammattei is or has been involved in serious corruption by being responsible for or engaging in serious corruption. As President of Guatemala, he bribed a foreign public official for improperly performing a public function and intended to reward her for doing so. He secured the reappointment of María Consuelo Porras Argueta de Porres as Attorney General and Head of the Public Ministry (Ministerio Público), a foreign public official holding an executive or judicial position, in return for her undermining anti-corruption investigations into himself and other members of the Guatemalan political elite. .

Listed On: 02/04/2025 Last Updated: 02/04/2025 Group ID: 16838

4. Names (Last): PARUTENKO (1): NELLI (2): ALEKSEYEVNA (3): n/a (4): n/a (5): n/a Name (non-Latin): Нелли Алексеевна Парутенко Title: n/a **Position:** Director of Evrazia A.K.A: (1) NELI JARDAN (2) NELLI PARUTENCO (3) NELLI PARUTENCOVA Date of Birth: 21/03/1962 Place of Birth: n/a Nationality: Moldova Passport Number: 0970403899047 Passport Details: n/a Address: n/a Other Information (UK Sanctions List Ref): GAC0074 (UK Statement of Reasons): Nelli Alekseyevna PARUTENKO ("PARUTENKO") is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) PARUTENKO is acting on behalf of or at the direction of Ilan Shor; (2) PARUTENKO is associated with Ilan Shor. Ilan Shor is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis that he has been involved in serious corruption,

namely being responsible for or engaging in serious corruption with respect to bribery of foreign public officials.

Listed On: 02/04/2025 Last Updated: 02/04/2025 Group ID: 16848

5. Names (Last): MARTINEZ MORALES (1): LUIS (2): MIGUEL (3): n/a (4): n/a (5): n/a Name (non-Latin): n/a

Title: n/a Position: n/a A.K.A: n/a Date of Birth: 12/09/1989 Place of Birth: Santa Lucia Cotzumalguapa Nationality: Guatemala Passport Number: n/a Passport Details: n/a Address: n/a Other Information (UK Sanctions List Ref): GAC0070 (UK Statement of Reasons): Luis Miguel Martínez Morales ("Martínez") is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following ground: Martínez is associated with a person who is or has been involved in serious corruption, namely Alejandro Eduardo Giammattei Falla. . Listed On: 02/04/2025

Last Updated: 02/04/2025 Group ID: 16844

6. Names (Last): MONTERROSO GOMEZ (1): CINTHIA (2): EDELMIRA (3): n/a (4): n/a (5): n/a Name (non-Latin): n/a Title: n/a Position: Prosecutor in the Special Prosecution Office Against Impunity (La Fiscalía Especial contra la Impunidad) A.K.A: n/a Date of Birth: 25/03/1983 Place of Birth: n/a Nationality: Guatemala

Passport Number: n/a Passport Details: n/a Address: n/a

Other Information (UK Sanctions List Ref): GAC0066 (UK Statement of Reasons): There are reasonable grounds to suspect that Cinthia Edelmira Monterroso Gómez ("Monterroso") is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) Monterroso is or has been involved in serious corruption, by being responsible for or engaging in serious corruption by way of receiving a bribe. As a prosecutor in the Public Ministry (Ministerio Público, MP), a foreign public official performing a judicial or executive function. Monterroso was promoted to Head of Unit at the Special Prosecution Office Against Impunity (Fiscalía Especial contra la Impunidad, FECI). She received this advantage to induce her to perform a public function improperly, namely by intentionally undermining corruption investigations into the political elite that nominated her. (2) Monterroso is or has been involved in serious corruption, by being responsible for the investigation or prosecution of serious corruption and intentionally failing to fulfil that responsibility. As a prosecutor in the MP, a foreign public official performing a judicial or executive function, Monterroso was promoted to Head of Unit at the FECI. She received this advantage to induce her to perform a public function improperly, namely by intentionally undermining corruption investigations into the political elite that nominated her. (3) Monterroso is or has been involved in serious corruption by using threats and intimidation to interfere in a law enforcement or judicial process in connection with serious corruption. As a prosecutor in the MP, a foreign public official performing a judicial or executive function, Monterroso was promoted to Head of Unit at the FECI. She received this advantage to induce her to perform a public function improperly, namely by intentionally launching baseless legal challenges against noted journalists and judicial figures who had uncovered corruption in order to silence them. . Listed On: 02/04/2025

Last Updated: 02/04/2025 Group ID: 16840

7. Names (Last): MURUSIDZE (1): LEVAN (2): n/a (3): n/a (4): n/a (5): n/a Name (non-Latin): ლევან მურუსიძე Title: n/a Position: (1) Judge on the Tblisi Court of Appeals (2) Member of the High Council of Justice of Georgia A.K.A: n/a Date of Birth: 01/03/1975 Place of Birth: Tblisi Nationality: n/a Passport Number: n/a Passport Details: n/a Address: n/a

Other Information (UK Sanctions List Ref): GAC0076 (UK Statement of Reasons): There are reasonable grounds to suspect that Levan Murusidze ("MURUSIDZE") is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) MURUSIDZE is or has been involved in serious corruption by engaging in serious corruption. As a Member of the High Council of Justice of Georgia, a foreign public official performing an executive or judicial function, he received a financial advantage as a reward for improperly performing his public functions, specifically improperly asserting his influence as a Member of the High Council of Justice to ensure that judicial appointments and decisions favoured the incumbent Georgian Dream Party. (2) MURUSIDZE is or has been involved in serious corruption. As a Member of the High Council of Justice to ensure that judicial appointments of the High Council of Justice of Georgia, a foreign public official function, he accepted an advantage, namely a lifetime appointment to the Tbilisi Court of Appeals, intending in consequence to continue improperly performing his public functions by ensuring that judicial appointments and decisions favoure Party. (3) MURUSDIZE is or has been

involved in serious corruption by engaging in serious corruption. As a Member of the High Council of Justice of Georgia, a foreign public official performing an executive or judicial function, he accepted an advantage, namely a lifetime appointment to the Tbilisi Court of Appeals, intending to improperly perform his public functions by ensuring that judicial appointments and decisions favour the incumbent Georgian Dream Party. **. Listed On:** 02/04/2025 **Last Updated:** 02/04/2025 Group ID: 16850

 Names (Last): PARASCA (1): NATALIA (2): n/a (3): n/a (4): n/a (5): n/a Name (non-Latin): n/a Title: n/a

Position: Board Member of Evrazia A.K.A: n/a Date of Birth: n/a Place of Birth: n/a Nationality: n/a Passport Number: n/a Passport Details: n/a Address: n/a Other Information (UK Sanctions List Ref): GAC0073 (UK Statement of Reasons): Natalia PARASCA ("PARASCA") is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) PARASCA is acting on behalf of or at the direction of Ilan Shor; (2) PARASCA is associated with Ilan Shor. Ilan Shor is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis that he has been involved in serious corruption, namely being responsible for or engaging in serious corruption with respect to bribery of foreign public officials. . Listed On: 02/04/2025

Last Updated: 02/04/2025 Group ID: 16847

 Names (Last): PINEDA AVILA (1): ANGEL (2): ARNOLDO (3): n/a (4): n/a (5): n/a Name (non-Latin): n/a

Title: n/a Position: Secretary General of the Public Ministry (Ministerio Público) A.K.A: n/a Date of Birth: 10/05/1975 Place of Birth: n/a Nationality: Guatemala Passport Number: 238937186 Passport Details: n/a Address: n/a

Other Information (UK Sanctions List Ref): GAC0065 (UK Statement of Reasons): There are reasonable grounds to suspect that Ángel Arnoldo Pineda Ávila ("Pineda") is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) Pineda is or has been involved in serious corruption, by being responsible for or engaging in serious corruption. When Secretary of International Affairs and Cooperation at the Public Ministry (Ministerio Público, MP), a foreign public official performing an executive or administrative function, he received an advantage, namely his appointment as Secretary General of the MP. On accepting the advantage, he intended to improperly perform a public function. He has done so by intentionally undermining corruption investigations into the Guatemalan political elite and pursuing meritless legal challenges against journalists, judges and prosecutors who revealed endemic corruption in Guatemala. (2) Pineda is or has been involved in serious corruption, by being responsible for the investigation or prosecution of serious corruption and intentionally failing to fulfil that responsibility. When Secretary of International Affairs and Cooperation at the MP, a foreign public official performing an executive or

administrative function, he received an advantage, namely his appointment as Secretary General of the MP. On accepting the advantage, he intended to improperly perform a public function. He has done so by intentionally undermining corruption investigations into the Guatemalan political elite and pursuing meritless legal challenges against journalists, judges and prosecutors who revealed endemic corruption in Guatemala. (3) Pineda is or has used threats or intimidation to interfere in a law enforcement or judicial process in connection with serious corruption. When Secretary of International Affairs and Cooperation at the MP, a foreign public official performing an executive or administrative function, he received an advantage, namely his appointment as Secretary General of the MP. On accepting the advantage, he intended to improperly perform a public function. He has done so by intentionally undermining corruption investigations into the Guatemalan political elite and pursuing meritless legal challenges against journalists, judges and prosecutors who revealed endemic corruption in Guatemala. .

Listed On: 02/04/2025 Last Updated: 02/04/2025 Group ID: 16839

10. Names (Last): PORRAS ARGUETA DE PORRES (1): MARIA (2): CONSUELO (3): n/a (4): n/a (5): n/a

Name (non-Latin): n/a Title: n/a Position: (1) Attorney General (2) Head of the Public Ministry (Ministerio Público) A.K.A: n/a Date of Birth: 23/08/1953 Place of Birth: n/a Nationality: Guatemala Passport Number: n/a Passport Details: n/a

Address: n/a

Other Information (UK Sanctions List Ref): GAC0067 (UK Statement of Reasons): There are reasonable grounds to suspect that María Consuelo Porras Argueta de Porres ("Porras") is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) Porras is or has been involved in serious corruption by being responsible for or engaging in serious corruption by way of receiving a bribe. As Attorney General and Head of the Public Ministry (Ministerio Público, MP) of Guatemala, a foreign public official performing a judicial or executive function, Porras received an advantage to induce her to improperly perform a public function. That advantage was President Giammattei's decision to reappoint her to the role. Thereafter, she continued to improperly discharge her functions by intentionally undermining corruption investigations into the political elite that nominated her. In particular, she undermined investigations into President Giammattei's election and tenure as President. (2) Porras is or has been involved in serious corruption by being responsible for the investigation or prosecution of serious corruption and intentionally failing to fulfil that responsibility. As Attorney General and Head of the MP of Guatemala, a foreign public official performing a judicial or executive function, Porras received an advantage to induce her to perform a public function improperly, namely her reappointment to the role. Thereafter, she continued to improperly perform her function by intentionally undermining corruption investigations into the political elite that nominated her. In particular, she undermined the operational independence of the Special Prosecutor's Office Against Impunity (Fiscalía Especial contra la Impunidad), dismissing prosecutors therefrom and appointing compliant replacements. (3) Porras is or has been involved in serious corruption by using threats or intimidation to interfere in, or otherwise interfering in, a law enforcement or judicial process in connection with serious corruption. As Attorney General and Head of the MP of Guatemala, a foreign public official performing a judicial or executive function, Porras received an advantage to induce her to perform a public function improperly, namely her reappointment to the role. Thereafter, she continued to

improperly perform her function by intentionally undermining corruption investigations into the political elite that nominated her. In particular, she removed from office and pursued unfounded legal challenges against notable anti-corruption prosecutors who had sought to tackle serious corruption in Guatemala. . **Listed On:** 02/04/2025

Listed On: 02/04/2025 Last Updated: 02/04/2025 Group ID: 16841

11. Names (Last): QUIJIVIX VEGA (1): MELVIN (2): ERNESTO (3): n/a (4): n/a (5): n/a Name (non-Latin): n/a Title: n/a Position: n/a A.K.A: n/a Date of Birth: 09/07/1977 Place of Birth: n/a Nationality: Guatemala Passport Number: n/a Passport Details: n/a Address: n/a

Other Information (UK Sanctions List Ref): GAC0069 (UK Statement of Reasons): There are reasonable grounds to suspect that Melvin Ernesto Quijivix Vega ("Quijivix") is an involved person under the Global Anti-Corruption Sanctions Regulation 2021 on the basis of the following ground: Quijivix is or has been involved in serious corruption by profiting financially or obtaining a benefit from serious corruption. During his tenure as President of the National Institute of Electrification (Instituto Nacional de Electrificación), when he was a foreign public official holding an executive or administrative position in Guatemala, he had a role in the grant or allocation of property and improperly diverted, granted or allocated that property, namely public funds, for his own benefit, to companies in which he held an interest, specifically Grupo Eda and MINE.

Listed On: 02/04/2025 Last Updated: 02/04/2025 Group ID: 16843

12. Names (Last): TAUBER (1): MARINA (2): n/a (3): n/a (4): n/a (5): n/a Name (non-Latin): Марина Таубер Title: n/a Position: Member of Parliament A.K.A: MARINA TAUBEROVA Date of Birth: 01/05/1986 Place of Birth: Chişinău Nationality: n/a Passport Number: n/a Passport Details: n/a Address: n/a Other Information (UK Sanctions List Ref): GAC0075 (UK Statement of Reasons): Marina TAUBER ("TAUBER") is an involved person under the Global Anti-Corruption

Marina TAUBER ("TAUBER") is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) TAUBER is associated with Ilan Shor, an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis that he has been involved in serious corruption, namely being responsible for or engaging in serious corruption with respect to bribery of foreign public officials; (2) TAUBER is acting on behalf of or at the direction of Ilan Shor. . **Listed On:** 02/04/2025

Last Updated: 02/04/2025 Group ID: 16849

ENTITY

1. Name: EVRAZIA

A.K.A: (1) AUTONOMOUS NON-COMMERCIAL ORGANIZATION FOR THE PROMOTION OF INTERNATIONAL COOPERATION EURASIA (2) EURASIA (3) EVRAZIA - AUTONOME NIET-COMMERCIELE ORGANISATIE VOOR DE BEVORDERING VAN INTERNATIONALE SAMENWERKING (4) EVRAZIYA (5) ORGANISATION AUTONOME NON COMMERCIALE POUR LA PROMOTION DE LA COOPERATION INTERNATIONALE

Other Information (UK Sanctions List Ref): GAC0072 (UK Statement of Reasons): EVRAZIA is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) EVRAZIA is acting on behalf of or at the direction of Ilan Shor; (2) EVRAZIA is associated with Ilan Shor. Ilan Shor is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis that he has been involved in serious corruption, namely being responsible for or engaging in serious corruption with respect to bribery of foreign public officials.

Listed On: 02/04/2025 Last Updated: 02/04/2025 Group ID: 16846