



# **FINANCIAL SERVICES COMMISSION**

1 October 2024

## **Financial Sanction Notice**

### **Directions from Financial Services Commission**

Please be informed 16 entries have been added to the Cyber financial sanction regime.

On 1<sup>st</sup> October 2024, the Foreign, Commonwealth and Development Office updated the UK Sanctions List on Gov.Uk. This list provides details of those details designated under regulations made under the Sanctions Act.

16 entries have been added to the Cyber Financial sanction regime and now subject to an asset freeze.

The consolidated list of asset freeze targets has been updated to reflect these changes.

The notice will also be placed on our website at [www.fscmontserrat.org](http://www.fscmontserrat.org) (<http://www.fscmontserrat.org>) under the heading "Sanctions" for your future reference.

Please be guided accordingly.



# FINANCIAL SERVICES COMMISSION

1 October 2024  
Financial Sanction Notice

## **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 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 organisation 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 1 October 2024 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.
- BENDERSKIY, Eduard Vitalevich
  - GUSEV, Denis Igorevich
  - PLOTNITSKIY, Andrey Vechislavovich
  - POGODIN, Vadim Gennadyevich
  - RAMAZANOV, Beyat Enverovich
  - RYZHENKOV, Sergey Viktorovich
  - RYZHENKOV, Aleksandr Viktorovich
  - SHCHETININ, Aleksey Evgenyevich
  - SLOBODSKOY, Dmitriy Alekseyevich
  - SLOBODSKOY, Kirill Alekseyevich
  - SMIRNOV, Dmitry Konstantinovich
  - TUCHKOV, Ivan Dmitriyevich
  - TURASHEV, Igor Olegovic
  - YAKUBETS, Maksim Viktorovich
  - YAKUBETS, Artem Viktorovich
  - YAKUBETS, Viktor Grigoryevich

## **What you must do**

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.

5. 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.
6. Failure to comply with UK financial sanctions legislation or to seek to circumvent its provisions may be a criminal offence.

### **Ransomware and sanctions**

7. Making or facilitating a ransomware payment risk exposing those involved to civil or criminal penalties where such payments are made to designated persons.
8. 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.
9. Guidance on ransomware and sanctions can be found here:  
<https://www.gov.uk/government/publications/financial-sanctions-faqs>.

### **Further Information**

10. 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>.
11. The Consolidated List can be found here:  
<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>.
12. The UK Sanctions List can be found here:  
<https://www.gov.uk/government/publications/the-uk-sanctions-list>.

13. The Compliance Reporting Form can be found here:

<https://www.gov.uk/guidance/suspected-breach-of-financial-sanctions-what-to-do>.

14. For more information, please see our financial sanctions guidance:

<https://www.gov.uk/government/publications/financial-sanctions-faqs>.

## **Enquiries**

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

**Her Excellency, the Governor**  
**The Governor's Office**  
**#8 Farara Plaza**  
**Brades, MSR 1110**  
**E-Mail: [lisa.walkden@fcdo.gov.uk](mailto:lisa.walkden@fcdo.gov.uk)**

## ANNEX TO NOTICE

### FINANCIAL SANCTION: CYBER

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

#### Additions

##### 1. BENDERSKIY, Eduard Vitalevich

**Name (non-latin script):** Эдуард Витальевич БЕНДЕРСКИЙ

**DOB:** 25/06/1970. **Other information:** (UK Sanctions List Ref): CYB0057. (UK Statement of Reasons): Eduard Vitalevich BENDERSKIY has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. Eduard BENDERSKIY facilitated Evil Corp's connections and involvement with the Russian Intelligence Services and provided both political and physical protection to the group, enabling their malicious cyber operations. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16584.

##### 2. GUSEV, Denis Igorevich

**Name (non-latin script):** Денис Игоревич ГУСЕВ

**DOB:** 10/06/1986. **Other information:** (UK Sanctions List Ref): CYB0050. (UK Statement of Reasons): Denis Igorevich GUSEV is a member of Evil Corp, and has been involved in relevant cyber activity, including providing financial services, or making available funds or economic resources, that could contribute to malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. He has also provided financial services that could contribute to relevant cyber activity. Denis GUSEV provided financial services for Evil Corp including acting as a cash courier. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16587.

##### 3. PLOTNITSKIY, Andrey Vechislavovich

**Name (non-latin script):** Андрей Вечиславович ПЛОТНИЦКИЙ

**DOB:** 25/07/1989. **a.k.a:** KOVALSKIY, Andrey, Vechislavovich (non-Latin script: Андрей Вечиславович КОВАЛЬСКИЙ) **Other information:** (UK Sanctions List Ref): CYB0054. (UK Statement of Reasons): Andrey Vechislavovich PLOTNITSKIY is a member of Evil Corp, and has been involved in relevant cyber activity, including being responsible for,

engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. Andrey PLOTNITSKIY is associated with Maksim YAKUBETS who was involved in relevant cyber activity through his leadership of Evil Corp and Dmitry SMIRNOV who was involved in relevant cyber activity through his facilitation of money laundering activity for Evil Corp. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16580.

#### 4. POGODIN, Vadim Gennadyevich

**Name (non-latin script):** Вадим Геннадьевич ПОГОДИН  
**DOB:** 19/03/1986. **a.k.a:** (1) BIBA (2) POGODIN, Vadim, Gennadievich **Other information:** (UK Sanctions List Ref): CYB0063. (UK Statement of Reasons): Vadim Gennadyevich POGODIN is a member of Evil Corp, and has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. Vadim POGODIN had a direct role in Evil Corp's ransomware activity. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16594.

#### 5. RAMAZANOV, Beyat Enverovich

**Name (non-latin script):** Бейат Энверович РАМАЗАНОВ  
**DOB:** 05/01/1988. **Other information:** (UK Sanctions List Ref): CYB0059. (UK Statement of Reasons): Beyat Enverovich RAMAZANOV is a member of Evil Corp, and has been involved in relevant cyber activity, including providing financial services, or making available funds or economic resources, that could contribute to malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. He has also provided financial services that could contribute to relevant cyber activity. Beyat RAMAZANOV is associated with Maksim YAKUBETS who was involved in relevant cyber activity through his leadership of Evil Corp; Dmitry SMIRNOV who was involved in relevant cyber activity through his facilitation of money laundering activity for Evil Corp; and Aleksandr RYZHENKOV who was a senior member and manager of Evil Corp, and was involved in the development and deployment of ransomware that was used by Evil Corp to carry out its relevant cyber activity. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16590.

#### 6. RYZHENKOV, Sergey Viktorovich

**Name (non-latin script):** Сергей Викторович РЫЖЕНКОВ

**DOB:** 15/02/1989. **Other information:** (UK Sanctions List Ref): CYB0061. (UK Statement of Reasons): Sergey Viktorovich RYZHENKOV is a member of Evil Corp, and has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. He has also provided technical assistance that could contribute to relevant cyber activity. Sergey RYZHENKOV was involved in the development of ransomware that was used by Evil Corp to carry out its relevant cyber activity. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16592.

## 7. RYZHENKOV, Aleksandr Viktorovich

**Name (non-latin script):** Александр Викторович РЫЖЕНКОВ

**DOB:** 26/05/1993. **a.k.a:** (1) BEVERLEY (2) GUESTER (3) MX1R **Other information:** (UK Sanctions List Ref): CYB0062. (UK Statement of Reasons): Aleksandr Viktorovich RYZHENKOV is a member of Evil Corp, and has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. He has also provided technical assistance that could contribute to relevant cyber activity. Aleksandr RYZHENKOV was a senior member and manager of Evil Corp, and was involved in the development and deployment of ransomware that was used by Evil Corp to carry out its relevant cyber activity. Additionally, Aleksandr RYZHENKOV is linked to the deployment of LockBit ransomware and is associated with UNC2165 (an evolution of Evil Corp affiliated actors). Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16593.

## 8. SHCHETININ, Aleksey Evgenyevich

**Name (non-latin script):** Алексей Евгеньевич ЩЕТИНИН

**DOB:** 22/08/1987. **Other information:** (UK Sanctions List Ref): CYB0058. (UK Statement of Reasons): Aleksey Evgenyevich SHCHETININ is a member of Evil Corp, and has been involved in relevant cyber activity, including providing financial services, or making available funds or economic resources, that could contribute to malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. He has also provided financial services that could contribute to relevant cyber activity. Aleksey SHCHETININ provided financial services through coordinating the trading of cryptocurrency on behalf of Evil Corp. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions and commercial technology companies, for financial gain, undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List**



**Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16586.

#### 9. SLOBODSKOY, Dmitriy Alekseyevich

**Name (non-latin script):** Дмитрий Алексеевич СЛОБОДСКОЙ

**DOB:** 28/07/1988. **Other information:** (UK Sanctions List Ref): CYB0055. (UK Statement of Reasons): Dmitry Alekseyevich SLOBODSKOY is a member of Evil Corp, and has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. Dmitry SLOBODSKOY is associated with Aleksandr RYZHENKOV who was a senior member and manager of Evil Corp, and was involved in the development and deployment of ransomware that was used by Evil Corp to carry out its relevant cyber activity. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16581.

#### 10. SLOBODSKOY, Kirill Alekseyevich

**Name (non-latin script):** Кирилл Алексеевич СЛОБОДСКОЙ

**DOB:** 26/02/1987. **Other information:** (UK Sanctions List Ref): CYB0056. (UK Statement of Reasons): Kirill Alekseyevich SLOBODSKOY is a member of Evil Corp, and has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. Kirill SLOBODSKOY was involved in activity on a cybercrime forum on behalf of the group. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16582.

#### 11. SMIRNOV, Dmitry Konstantinovich

**Name (non-latin script):** Дмитрий Константинович СМИРНОВ

**DOB:** 10/11/1987. **Other information:** (UK Sanctions List Ref): CYB0051. (UK Statement of Reasons): Dmitry Konstantinovich SMIRNOV is a member of Evil Corp, and has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. He has also provided financial services that could contribute to relevant cyber activity. Dmitry SMIRNOV was involved in laundering the proceeds for Evil Corp's cyber activity, and other financial activities including the coordination of payment for those involved in developing and maintaining Evil Corp's tools and infrastructure. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of

the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16588.

#### 12. TUCHKOV, Ivan Dmitriyevich

**Name (non-latin script):** Иван Дмитриевич ТУЧКОВ

**DOB:** 27/11/1986. **Other information:** (UK Sanctions List Ref): CYB0053. (UK Statement of Reasons): Ivan Dmitriyevich TUCHKOV is a member of Evil Corp, and is associated with Maksim YAKUBETS who was involved in relevant cyber activity through his leadership of Evil Corp. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16579.

#### 13. TURASHEV, Igor Olegovic

**Name (non-latin script):** Игорь Олегович ТУРАШЕВ

**DOB:** 15/06/1981. **a.k.a:** (1) ENKI (2) NINTUTU **Other information:** (UK Sanctions List Ref): CYB0049. (UK Statement of Reasons): Igor Olegovich TURASHEV is a member of Evil Corp, and has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. He has also provided technical assistance that could contribute to relevant cyber activity. Igor TURASHEV was involved in malware and ransomware operations. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16585.

#### 14. YAKUBETS, Maksim Viktorovich

**Name (non-latin script):** Максим Викторович ЯКУБЕЦ

**DOB:** 10/06/1986. **a.k.a:** AQUA **Other information:** (UK Sanctions List Ref): CYB0048. (UK Statement of Reasons): Maksim Viktorovich YAKUBETS is a member of Evil Corp, and has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the unauthorised access and exfiltration of sensitive data from UK infrastructure and networks. Maksim YAKUBETS was a central figure in the administration and leadership of Evil Corp and was responsible for managing and overseeing the group's malicious cyber activities. Additionally, Maksim YAKUBETS was involved in the development of Evil Corp's malware and ransomware strains. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, which undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16583.

#### 15. YAKUBETS, Artem Viktorovich

**Name (non-latin script):** Артем Викторович ЯКУБЕЦ

**DOB:** 17/01/1986. **Other information:** (UK Sanctions List Ref): CYB0052. (UK Statement of Reasons): Artem Viktorovich YAKUBETS is a member of Evil Corp, and is associated with Maksim YAKUBETS who was involved in relevant cyber activity through his leadership of Evil Corp; and Dmitry SMIRNOV and Aleksey SHCHETININ who were involved in relevant cyber activity through their facilitation of financial and money laundering activity for Evil Corp. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16589.

#### 16. YAKUBETS, Viktor Grigoryevich

**Name (non-latin script):** Виктор Григорьевич ЯКУБЕЦ **DOB:** 19/02/1964. **Other information:** (UK Sanctions List Ref): CYB0060. (UK Statement of Reasons): Viktor Grigoryevich YAKUBETS is a member of Evil Corp, and is associated with Maksim YAKUBETS who has been involved in relevant cyber activity through his leadership of Evil Corp; and Dmitry SMIRNOV who was involved in relevant cyber activity through his facilitation of money laundering activity for Evil Corp. Evil Corp's malicious cyber activity involved a concerted effort to compromise UK health, government and public sector institutions, and commercial technology companies, for financial gain, undermined or was intended to undermine the integrity, prosperity and security of the United Kingdom and its allies. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 01/10/2024 **Last updated:** 01/10/2024 **Group ID:** 16591.