



FINANCIAL SERVICES COMMISSION

1 October 2024

Financial Sanction Notice

Directions from Financial Services Commission

Please be informed 2 entries have been added to the Haitian financial sanction regime.

On 1st 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.

2 entries have been added to the Haitian 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>) under the heading "Sanctions" for your future reference.

Please be guided accordingly.



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Financial Sanction Notice

Haiti

Introduction

1. The Haiti (Sanctions) Regulations 2022 (S.I. 2022/1281) (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 designated by the United Nations as responsible for or complicit in, or having engaged in, directly or indirectly, actions that threaten the peace, security or stability of Haiti.
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:
 - Luckson ELAN (Group ID: 16596)
 - Prophane VICTOR (Group ID: 16595)

What you must do

5. You must:
 - i. check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the Annex to this Notice 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.

Further Information

8. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Haiti financial sanctions page on the GOV.UK website:
<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>.
9. Further details on the UN measures in respect of Haiti can be found on the relevant UN Sanctions Committee webpage:
<https://www.un.org/securitycouncil/sanctions/information>.
10. The UN Consolidated List can be found here:
<https://www.un.org/securitycouncil/content/list-updates-unsc-consolidated-list>.

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**

ANNEX TO NOTICE

FINANCIAL SANCTIONS: HAITI

THE HAITI (SANCTIONS) REGULATIONS 2022 (S.I. 2022/1281)

ADDITIONS

Individuals

1. ELAN, Luckson

DOB: 06/01/1988. **Nationality:** Haiti **Position:** Leader of Gran Grif gang **Other Information:** (UK Sanctions List Ref): HAI0008. (UN Ref): HTi.007. Luckson Elan, leader of the Gran Grif gang, has long been involved in activities that threaten the peace, security, and stability of Haiti, as well as the entire region. His gang is the largest and most powerful in the Artibonite Department and has been expanding its territorial control, committing human rights abuses, and trafficking weapons and ammunition. On February 8, 2023, members of the Coalition of Jean Denis self-defense group intercepted a vehicle coming from Port-au-Prince which was carrying several crates of arms and ammunition destined for the Gran Grif gang (see OHCHR report, "Criminal Violence Extends beyond Port-au-Prince," Nov 2023). Under Elan's leadership, the human rights abuses and other crimes committed by the gang include extrajudicial killings, rape, recruitment of children, robbery, destruction of property, kidnapping, and hijacking of trucks. For example, on November 30, 2023, Luckson Elan killed a woman for refusing to have sexual relations with him. In April 2024, Gran Grif committed attacks on the judiciary by killing two lawyers. Between October 2023 and January 2024, Gran Grif committed nine mass kidnappings, including 157 people. Gran Grif has also committed some of the highest levels of child recruitment in Haiti. (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 30/10/2024 **Last Updated:** 01/10/2024 **Group ID:** 16596.

2. VICTOR, Prophane

Nationality: Haiti **Position:** Former member of the Haitian Parliament, involved in weapons trafficking and using violence to secure political gain. **Other Information:** (UK Sanctions List Ref): HAI0007. (UN Ref): HTi.006. Prophane Victor has long been involved in activities that threaten the peace, security, and stability of Haiti, as well as the entire region. In particular, he has been supporting and arming gangs, trafficking weapons, diverting government revenues, and using violence to secure his political and financial gains. Prophane Victor served in the most recent National Assembly (2016-2020) where he was Member of Parliament (député) for Petite Riviere, Artibonite department, an area with increasing levels of violence and gang control. To secure his election as député in 2016 and his control over the area, Prophane Victor started arming young men in Petite Riviere who went on to form the Gran Grif gang, currently the main perpetrator of human rights abuses, including sexual violence, in the Artibonite department (see S/2023/674, para 75). He is no longer a Member of Parliament and is not serving in any political position. In addition to securing his political foothold through the use of gangs, Victor is a former senior Customs officer and a businessman who has control over parts of the Customs department, allowing him to build wealth and enabling him to engage in a range of criminal activities with impunity. According to reporting from January 2023, Victor threatened customs officers in their work. Victor continued to support Gran Grif gang until 2020 and has since supported rival gangs in that area (see S/2023/674, para

75). (Gender): Male **Listed on:** 01/10/2024 **UK Sanctions List Date Designated:** 30/09/2024 **Last Updated:** 01/10/2024 **Group ID:** 16595.

Financial Services Commission

01/10/2024