



FINANCIAL SERVICES COMMISSION

28 October 2024

Financial Sanction Notice

Directions from Financial Services Commission

Please be informed 6 entries have been added to the Russia financial sanction regime.

On 28 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.

6 entries have been added to the Russia financial sanction regime and are 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.



FINANCIAL SERVICES COMMISSION

Russia

Introduction

1. The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) (“the Russia Regulations”) were made under the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act) and provide for the imposition of financial sanctions, including asset freezes and other financial and investment restrictions, on persons who are or have been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine; or obtaining a benefit from or supporting the Government of Russia.
2. On 28 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 and trust services sanctions:
 - Ilya Andreevich GAMBASHIDZE (Group ID: 16614)
 - Andrey Naumovich PERLA (Group ID: 16613)
 - Nikolai Aleksandrovich TUPIKIN (Group ID: 16615)

- ANO DIALOG (Group ID: 16618)
- SOCIAL DESIGN AGENCY (Group ID: 16616)
- STRUCTURA NATIONAL TECHNOLOGIES (Group ID: 16617)

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. refrain from providing trust services to or for the benefit of the persons set out to the Annex in this Notice;
- v. 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 Russia financial sanctions page on the GOV.UK website:

<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>.

9. The Consolidated List can be found here:
<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>.
10. The UK Sanctions List can be found here:
<https://www.gov.uk/government/publications/the-uk-sanctions-list>.
11. The Compliance Reporting Form can be found here:
<https://www.gov.uk/guidance/suspected-breach-of-financial-sanctions-what-to-do>.
12. For more information please see our financial sanctions guidance:
<https://www.gov.uk/government/publications/financial-sanctions-faqs>.

Enquiries

13. 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: michelle.webster@fcdo.gov.uk**

ANNEX TO NOTICE

FINANCIAL SANCTIONS: RUSSIA

THE RUSSIA (SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I. 2019/855)

ADDITIONS

Individuals

1. GAMBASHIDZE, Ilya Andreevich

Name (non-Latin script): Илья Андреевич Гамбашидзе

DOB: 07/05/1977. **POB:** Kyiv, Ukraine **Nationality:** Russia **Passport Number:** 756410352

National Identification Number: 771401746465 **National Identification Details:**

Russia INN **Address:** 16 Zorge, Apt 57, Moscow, Russia. **Position:** Director of Structura and The Social Design Agency **Other Information:** (UK Sanctions List Ref): RUS2290.

Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 28/10/2024. (UK Statement of Reasons): Ilya Andreevich Gambashidze (hereafter Gambashidze) is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) Gambashidze is and has been obtaining a benefit from the Government of Russia by acting as a director or equivalent of entities, the Social Design Agency and Structura, which are carrying on business in a sector of strategic significance to the Government of Russia, namely the Russian information, communications and digital technologies sector; and 2) Gambashidze is and has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by working as a director or equivalent of entities, the Social Design Agency and Structura, that are responsible for, engage in, provide support for, or promote any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Phone number): (1) +79165359238 (2) +79163900633 (3) +79166774005 (Email address): ilgamb7@gmail.com (Gender): Male

Listed on: 28/10/2024 **UK Sanctions List Date Designated:** 28/10/2024 **Last Updated:** 28/10/2024 **Group ID:** 16614.

2. PERLA, Andrey Naumovich

Name (non-Latin script): Андрей Наумович Перла

DOB: 31/12/1973. **POB:** Samara, Russia **a.k.a:** PERLA, Andrei, Naumovich **Nationality:**

Russia **Passport Number:** 3604110270 **National Identification Number:**

631605846798 **National Identification Details:** Russia INN **Address:** (1) Gurzufskaya 16/102, Yekaterinburg, Russia. (2) Maslennikova 41/24, Samara, Russia. **Position:** The

Programme Director of Social Design Agency **Other Information:** (UK Sanctions List Ref):

RUS2289. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 28/10/2024. (UK Statement of Reasons): Andrey

Naumovich Perla (hereafter Perla) is an "involved person" under the Russia (Sanctions)

(EU Exit) Regulations 2019 on the basis of the following grounds: 1) Perla is and has been

obtaining a benefit from the Government of Russia by acting as a director or equivalent of

an entity, Social Design Agency, which is carrying on business in a sector of strategic

significance to the Government of Russia, namely the Russian information, communications and digital technologies sector; 2) Perla is and has been involved in

destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or

independence of Ukraine, by working as a director or equivalent of an entity, Social Design

Agency, that is responsible for, engages in, provides support for, or promotes

any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine; and 3) Perla is and has been involved in destabilising Ukraine, undermining, or threatening the territorial integrity, sovereignty, or independence of Ukraine by promoting policies and actions which destabilise Ukraine, undermine and threaten the territorial integrity, sovereignty, and independence of Ukraine. (Phone number): (1) +79220206444 (2) +79193175340 (3) +79221630515 (4) +79220279500 (5) +79783000289 (Email address): (1) perla0606@mail.ru (2) dvp32@sev.gov.ru (3) andrewperla@gmail.com (Gender): Male **Listed on:** 28/10/2024 **UK Sanctions List Date Designated:** 28/10/2024 **Last Updated:** 28/10/2024 **Group ID:** 16613.

3. **TUPIKIN, Nikolai Aleksandrovich**

Name (non-Latin script): Николай Александрович Тупикин

DOB: 06/06/1977. **POB:** Moscow, Russia **a.k.a:** TUPIKIN, Nikolay, Aleksandrovich

Nationality: Russia **Passport Number:** 727760853 **National Identification Number:** 4503851519 **Address:** Raspletina, Dom 17, Korpus 2, Kv. 7, Moscow, Russia, 123060.

Position: The General Director of Structura **Other Information:** (UK Sanctions List Ref): RUS2291. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 28/10/2024. (UK Statement of Reasons): Nikolai Aleksandrovich Tupikin (hereafter Tupikin) is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) Tupikin is and has been obtaining a benefit from the Government of Russia by acting as a director or equivalent of an entity, Structura, which is carrying on business in a sector of strategic significance to the Government of Russia, namely the Russian information, communications and digital technologies sector; and 2) Tupikin is and has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by working as a director or equivalent of an entity, Structura, that is responsible for, engages in, provides support for, or promotes any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Phone number): (1) +79104626802

(2) +74991967100 (3) +79160353451 (Email address): (1) natupikin@mail.ru (2) kurnikoff@yandex.ru (3) nikolay.tupikin@gmail.com (Gender): Male **Listed on:** 28/10/2024 **UK Sanctions List Date Designated:** 28/10/2024 **Last Updated:** 28/10/2024 **Group ID:** 16615.

Entities

1. **ANO DIALOG**

Name (non-Latin script): АНО ДИАЛОГ

a.k.a: AUTONOMOUS NON-PROFIT ORGANIZATION FOR THE DEVELOPMENT OF DIGITAL PROJECTS IN THE FIELD OF PUBLIC RELATIONS AND COMMUNICATIONS DIALOGUE (non-Latin script: АВТОНОМНАЯ НЕКОММЕРЧЕСКАЯ ОРГАНИЗАЦИЯ ПО РАЗВИТИЮ ЦИФРОВЫХ ПРОЕКТОВ В СФЕРЕ ОБЩЕСТВЕННЫХ СВЯЗЕЙ И КОММУНИКАЦИЙ ДИАЛОГ) **Address:** 11, Bldg. 1, FLOOR 1, ROOMS VI ROOM 14, TIMUR FRUNZE STREET, MUNICIPAL DISTRICT KHAMOVNIKI, Moscow, Russia, 119021. **Other Information:** (UK Sanctions List Ref): RUS2294. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 28/10/2024. (UK Statement of Reasons): ANO DIALOG is an involved entity under the Russia (Sanctions) (EU Exit) Regulations 2019 because it is or has been involved in: obtaining a benefit from or supporting the Government of Russia, through 1) carrying on business as a Government of Russia-affiliated entity, and; 2) carrying on business in a sector of strategic significance, namely, the Russian information, communications and digital technologies sector. (Business Reg No):

9709056472 - Russia INN **Listed on:** 28/10/2024 **UK Sanctions List Date Designated:** 28/10/2024 **Last Updated:** 28/10/2024 **Group ID:** 16618.

2. SOCIAL DESIGN AGENCY

Name (non-Latin script): Агентство Социального Проектирования

a.k.a: (1) Agentstvo Sotsialnogo Proektirovaniya (2) SDA **Address:** (1) Per. Bolshoi Kislovskiy, d. 1, str. 2, Arbat Municipal Okrug, Moscow, Russia, 125009. (2) Prospekt Novoyasenevskii, d. 23, k. 1, Moscow, Russia, 117463. **Other Information:** (UK Sanctions List Ref): RUS2292. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 28/10/2024. (UK Statement of Reasons): The Social Design Agency (hereafter "SDA") is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) The SDA is obtaining a benefit from or supporting the Government of Russia by carrying on business in a sector of strategic significance, namely the 200 information, communications and digital technologies sector; and 2) the SDA is and has been involved in destabilising or undermining the territorial integrity, sovereignty or independence of Ukraine. **Listed on:** 28/10/2024 **UK Sanctions List Date Designated:** 28/10/2024 **Last Updated:** 28/10/2024 **Group ID:** 16616.

3. STRUCTURA NATIONAL TECHNOLOGIES

Name (non-Latin script): Группа Компаний Структура

a.k.a: (1) Company Group Struktura LLC (2) GK Struktura (non-Latin script: ГК Структура) (3) Gruppya Kompanii Struktura (non-Latin script: Gruppya Kompanii "Структура") (4) Structura (5) Structura National Technology (6) Struktura National Technologies **Address:** (1) Pereulok Bolshoi Kislovskiy, d. 1, str. 2, Arbat Municipal Okrug, Moscow, Russia, 125009. (2) Ulitsa Bolshaya Nikitskaya, d. 12, str. 1, Moscow, Russia, 125009. **Other Information:** (UK Sanctions List Ref): RUS2293. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 28/10/2024. (UK Statement of Reasons): Structura National Technologies (hereafter 'Structura') is an involved person under the Russia (EU Exit) (Sanctions) Regulations 2019 on the basis of the following grounds: (1) Structura is obtaining a benefit from or supporting the Government of Russia by carrying on business in a sector of strategic significance, namely the information, communications and digital technologies sector; and (2) Structura engages in, provides support for, or promotes any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. **Listed on:** 28/10/2024 **UK Sanctions List Date Designated:** 28/10/2024 **Last Updated:** 28/10/2024 **Group ID:** 16617.

Financial Services Commission

28/10/2024