

THE MAGNITSKY ACT

Why Australia Should Pass Similar Legislation

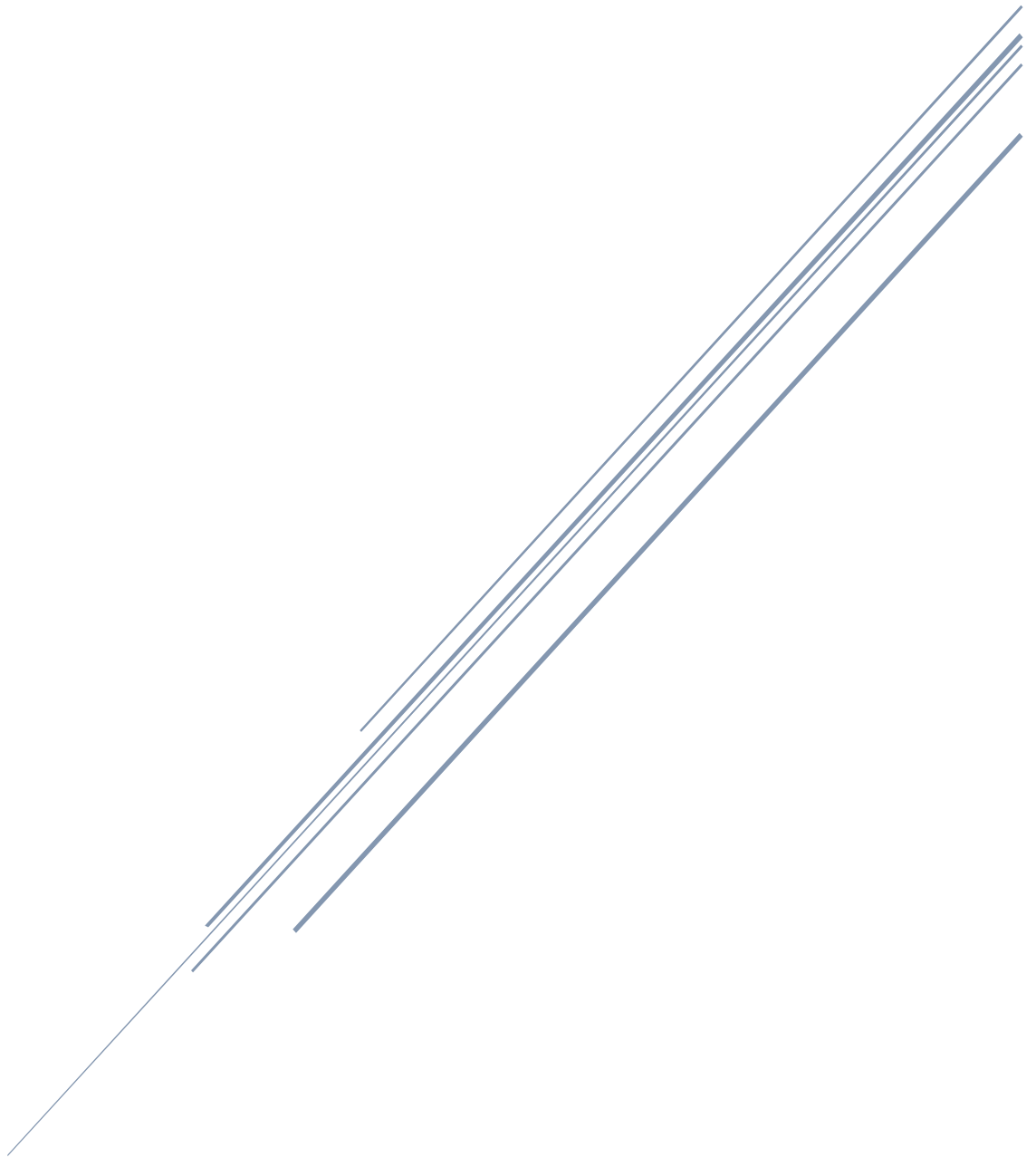


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The Magnitsky Act and Australia

Executive Summary

Serhiy Magnitsky was a Russian lawyer responsible for uncovering the largest tax fraud in Russian history, for which he was jailed without a court sentencing, tortured, and died in 2009. In his memory the United States and seven other nations have passed the Magnitsky Act, which aims to punish human rights abusers around the world and prevent them from using their illegally obtained funds abroad.

Currently Australia does not have such a wide ranging piece of legislation, and relies on country-specific legislation to deal with such human rights abuse. The Magnitsky Act would allow Australia to further enhance its sanctioning ability, preventing human rights abusers from being able to utilise Australia's economy to legalise their illegally obtained monies.



Who was Serhiy Magnitsky?

Serhiy Magnitsky was a Russian tax lawyer employed by Bill Browder, co-founder of Hermitage Capital Management (HCM), to investigate Russian government attacks against one of their subsidiaries. In this capacity, he discovered and exposed a fraud of 230 million USD, the biggest tax fraud in Russian history.

As an investment and asset management company based in Russia, part of HCM's operations involved analysing a potential investment company's books to discern their vulnerability to corruption. Once a threat was identified, they would implement improved management practices that would make the company suitable to western investment. As a result, HCM ruffled many feathers in the Russian establishment, so much so that by 2005, Browder was expelled from Russia and classified as a national threat, forcing him to remove all employees and assets from Russia and run the company from abroad.

On 4 June 2007, HCM's Moscow offices were raided by the Russian Police who claimed that one of the companies they managed, Kamaya, had underpaid its taxes. This was surprising since HCM had received confirmation from the Russian Tax Office that Kamaya had in fact overpaid its taxes and was due for a refund. In this raid the police also confiscated various company documents and seals that were unrelated to Kamaya.

That October, Browder was informed by his contacts in Russia that one of the companies which HCM managed, which also happened to be one of the companies whose documents and seal were confiscated by the Russian Police, had a judgement issued against it. Browder employed Serhiy Magnitsky, a close personal friend, to help investigate this.

Using his contacts, Magnitsky was able to ascertain that the judgement had been issued by a local Saint Petersburg court, and that the money was deposited into an obscure Russian Bank Account. Two days later, this money was transferred out of the country and disappeared from circulation. It was only after the release of the Panama Papers in 2016 that some of this money was rediscovered and linked to accounts operated by high ranking Russian Officials.

In 2009 Magnitsky was arrested on fabricated charges of collusion to commit tax fraud, but in reality his arrest was due to his investigation into that very tax fraud. Magnitsky was held in a Russian pre-trial detention facility for 358 days. During this period he developed a number of medical conditions including pancreatitis and calculous cholecystitis. He was either given inadequate treatment or prison officials refused to provide medical treatment. Detention centre chief Ivan P. Prokopenko stated that treatment was refused because he "*did not consider Magnitsky to be sick... Prisoners often try to pass themselves off as sick, in order to get better conditions.*" He died eight days before the maximum period of incarceration without trial was reached, and his death in custody was linked by a United Nations appointed Human Rights investigator to neglect and various beatings by prison guards.

After his death, Browder started a campaign to obtain justice for Magnitsky. This eventually led to the US Congress passing the Magnitsky Act in 2012. Magnitsky was survived by his wife and two children.

What is the Magnitsky Act?

Initially known as the **Russia and Moldova Jackson–Vanik Repeal and Sergei Magnitsky Rule of Law Accountability Act of 2012**, the Magnitsky Act was passed by the United States Congress in

2012, with a majority of 92–4 in the Senate, and signed by then US President Barack Obama on December 14, 2012. The Act aimed to identify Russian officials responsible for the death of Serhiy Magnitsky and impose targeted sanctions or bans on them. Thus the Act aims to punish the officials responsible for the specific act of violating human rights instead of targeting a nation's whole population. In 2016, due to its success, the Act was expanded to apply globally via the **Global Magnitsky Human Rights Accountability Act**. Since then other nations, including the United Kingdom and Canada, have passed similar legislation.

The Magnitsky Act allows for these governments to implement sanctions against foreign individuals who have committed human rights abuse or been involved in significant corruption. Under the sanctions, individuals have their visas cancelled and their assets frozen.

The United States Magnitsky Act can be found in Appendix A.

Why was it established?

Knowing there would be no justice for Magnitsky's death in Russia, Browder approached two US Senators, John McCain (Republican) and Benjamin Cardin (Democrat), to create legislation that would punish those responsible. Since Magnitsky was targeted for his investigation into the largest tax fraud case in Russia (\$230 million), Browder reasoned that the accused should not be able to enjoy the benefits of such illegally obtained wealth outside of Russia. The legislation would prevent them from being able to enter a country and use those laundered funds to buy properties or send their partners on shopping trips abroad.

Other victims from Russia who had similar stories of murdered relatives made themselves known, leading Browder and legislators to broaden the scope of their proposed Act, looking to impose sanctions on anyone believed to have had committed any human rights abuse.

Putin's adverse reaction to the passing of this Act prompted legislators to consider applying the same sanctions to other dictators and human rights abusers all over the world. These sanctions act as an important safeguard against corruption, making it difficult for individuals to launder dirty money in the US and other similarly legislated countries.

Given that Browder's original legislation was being debated in the US Congress at a time when the US was looking not to upset relations with Russia, these sanctions were important in that they targeted individuals as opposed to the entire country or sectors, to avoid harming the vulnerable general population with broad sanctions. In an increasingly globalised world, this allows international relations to remain intact, while reducing the number of safe havens for dirty money.

In which countries has the Magnitsky Act been approved?

To date, the Magnitsky Act has been approved in the following countries: United States of America, Canada, United Kingdom (including Gibraltar and Jersey), Estonia, Kosovo, Latvia and Lithuania.

The following countries are either yet to pass the Act or have considered the Act: Australia, New Zealand, Moldova, Ukraine, and the EU countries of: Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.

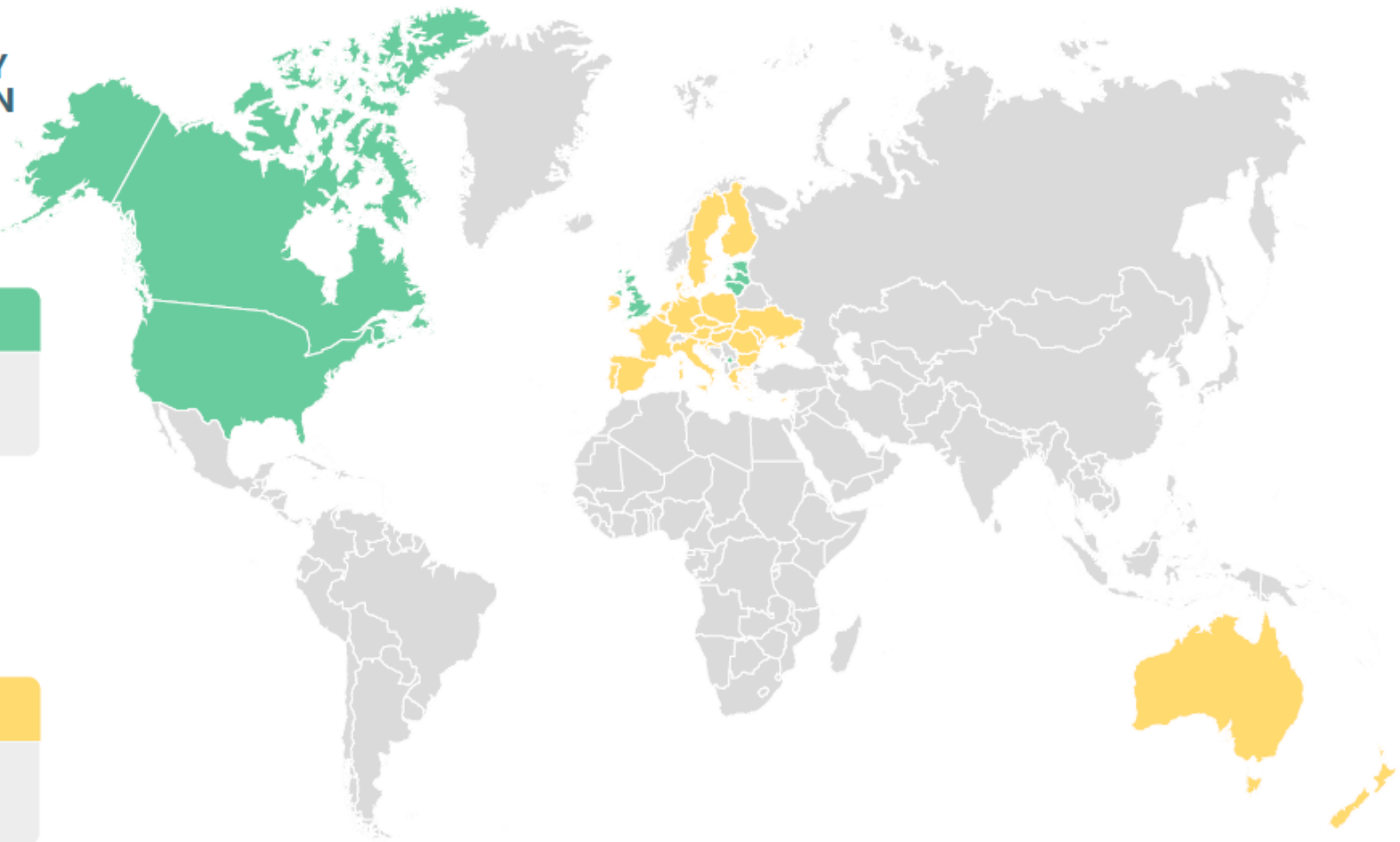
GLOBAL MAGNITSKY LEGISLATION

PASSED MAGNITSKY LEGISLATION

Canada
Estonia
Kosovo
Latvia
Lithuania
UK
Gibraltar
Jersey
USA

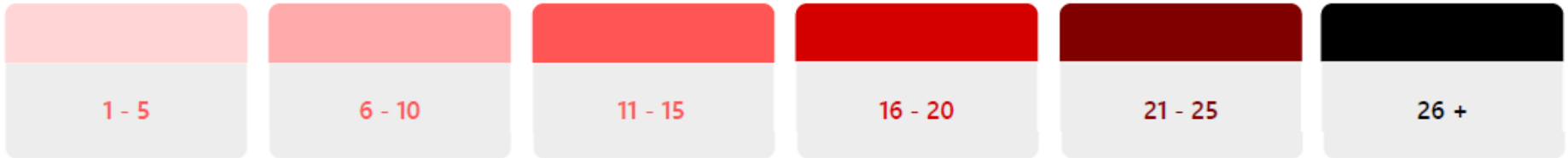
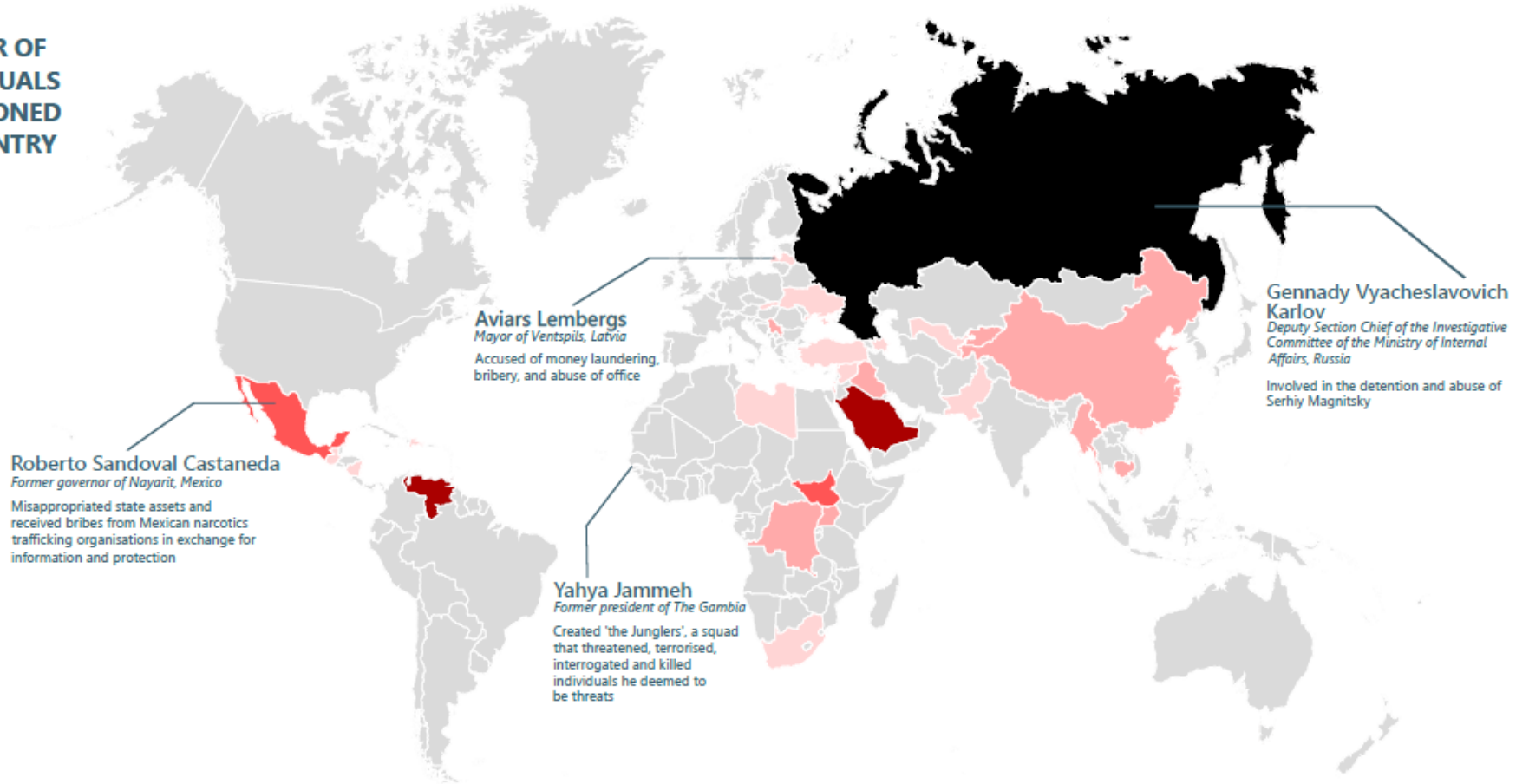
PROPOSED MAGNITSKY LEGISLATION

Australia
The EU
Moldova
New Zealand
Ukraine



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NUMBER OF INDIVIDUALS SANCTIONED BY COUNTRY



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Who are some of the individuals already sanctioned under the Magnitsky Act?

Gennady Vyacheslavovich Karlov, *Deputy Section Chief of the Investigative Committee of the Ministry of Internal Affairs in Russia*

- Karlov participated in efforts to conceal the legal liability for the detention, abuse, or death of Sergei Magnitsky. He made false or misleading claims about Magnitsky's detention and abuse, providing a justification for his detention. He also decided not to respond to complaints made by Magnitsky about his deteriorating health, transferred him to a different prison facility one week prior to a scheduled surgery, and denied Magnitsky's requests to allow a visit by his relatives.

Aviars Lembergs, *Mayor of Ventspils, Latvia*

- Since his appointment to the office of Mayor in 1988, Lembergs has been repeatedly accused of money laundering, bribery, and abuse of office. His political parties and corrupt politicians exploit entities and individuals for his own economic gain, shaping government personnel and placing certain government officials in positions; while corrupting law enforcement officials to subvert those he is unable to control.
- In addition, four Latvia-based entities that are owned or controlled by him are placed under Magnitsky sanctions:
 - Ventspils Freeport Authority
 - Ventspils Attistibas Agentura (AKA Ventspils Development Agency)
 - Biznesa Attistibas Asociacija (AKA Business Development Association)
 - Latvijas Tranzita Biznesa Asociacija (AKA Latvian Transit Business Association)

Slobodan Testic, *Serbian Arms Dealer*

- As one of the biggest Arms and Munitions Dealers in the Balkans, Testic has spent more than a decade on the United Nation's blacklist for violating UN sanctions against arms exports to Liberia. In order to secure arms contracts with various countries, Testic would take potential clients on expensive vacations, pay for their children's education at western schools, and use large bribes.
- Since his designation, Testic has continued to engage in the arms trade and operate as a silent partner in companies he indirectly owns and manages; and thus, nine other associates of his are also placed under sanctions, including:
 - **Goran Andric**, one of Testic's closest associates, who represented Testic in various international sales while Testic was on the UN blacklist
 - **Nebojsa Sarenac**, Testic's nephew, and managing director of Technoglobal and Partizan Tech
 - **Zelimir Petrovic**, owner, managing director, and representative of Araneks DOO, an entity that was used by Testic to finalise weapon contracts in Africa

Roberto Sandoval Castaneda, *former governor of the Mexican state of Nayarit*

- During his tenure as governor of Nayarit, Sandoval Castaneda misappropriated state assets and received bribes from Mexican narcotics trafficking organisations in exchange for information and protection. Three of his complicit family members have also been sanctioned: his wife, and adult son and daughter.

Maung Maung Soe, *former chief of the Burmese Army's Western Command*

- In his former role, Maung Soe oversaw the military operation in Burma's Rakhine State responsible for the ethnic cleansing of the Rohingya people. The allegations against Maung Soe include extrajudicial killings, sexual violence, arbitrary arrest and the widespread burning of villages.

Salah Mohammed Tubaigy, *Head of the Saudi Arabian Forensics Council*

- Together with **Saud Al-Qahtani**, **Maher Mutreb**, and at least 14 other Saudi government officials, Tubaigy was involved with the assassination of journalist Jamal Khashoggi in the Saudi Consulate in Istanbul, Turkey on October 2, 2018.

Mukhtar Hamid Shah, *Pakistani surgeon*

- Pakistani police believe Shah, a surgeon who specialises in kidney transplants, to be involved in kidnapping, wrongful confinement, and the removal of and trafficking in human organs, of Pakistani labourers.

Yahya Jammeh, *former president of The Gambia*

- With a long history of engaging in serious human rights abuse and corruption, Jammeh created a terror and assassination squad called 'the Junglers' that threatened, terrorised, interrogated, and killed individuals he deemed to be threats. Those killed on Jammeh's orders included a local religious leader, journalists, members of the political opposition, and former members of the government. Jammeh also used the Gambia's National Intelligence Agency to torture political opponents and journalists; and used a number of corrupt schemes to siphon off at least \$50 million of state funds for his personal gain.

For a full list of individuals and entities sanctioned under the various Magnitsky Acts, please refer to Appendix B.

How does this relate to Australia?

Australia remains as one of these 'safe havens' for dirty money, and so it is extremely important that we look to implement this legislation in the near future in order to prevent human rights abusers from exploiting Australia to legitimise their ill-gotten wealth.

Australia's current sanction regime comprises two parts. Firstly, as a member of the United Nations, Australia implements United Nations Security Council sanctions regimes as part of our international obligations. Secondly, Australia has its own autonomous sanctions regimes which are implemented to maintain Australia's international obligations and foreign policy objectives. Both of these regimes are maintained by the Australian Sanctions Office (ASO), which works with the Department of Defence, AUSTRAC, the Department of Home Affairs, Australian Border Force (ABF) and the Australian Federal Police (AFP), to promote compliance with Australian sanctions law and respond to possible breaches.

As part of Australia's sanction regime, the government can cancel a sanctioned individual's visa at their discretion, and prevent Australian entities from doing business with sanctioned individuals. By implementing The Magnitsky Act, Australia will be able to maintain a general sanctions list of human rights abusers in addition to its country-specific sanctions lists, allowing for a more expansive set of individuals to be covered. It will also bring Australia further into step with our Five Eyes allies (Canada, New Zealand, the US, and the UK), preventing our economies from being used to legitimise illegally obtained wealth.

Appendices

Appendix A - S.284 Global Magnitsky Human Rights Accountability Act

<https://www.congress.gov/bill/114th-congress/senate-bill/284/text>

AN ACT

To impose sanctions with respect to foreign persons responsible for gross violations of internationally recognized human rights, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE.

This Act may be cited as the “Global Magnitsky Human Rights Accountability Act”.

SEC. 2. DEFINITIONS.

In this Act:

(1) **FOREIGN PERSON.**—The term “foreign person” means a person that is not a United States person.

(2) **PERSON.**—The term “person” means an individual or entity.

(3) **UNITED STATES PERSON.**—The term “United States person” means—

(A) a United States citizen or an alien lawfully admitted for permanent residence to the United States; or

(B) an entity organized under the laws of the United States or of any jurisdiction within the United States, including a foreign branch of such an entity.

SEC. 3. AUTHORIZATION OF IMPOSITION OF SANCTIONS.

(a) **In General.**—The President may impose the sanctions described in subsection (b) with respect to any foreign person the President determines, based on credible evidence—

(1) is responsible for extrajudicial killings, torture, or other gross violations of internationally recognized human rights committed against individuals in any foreign country who seek—

(A) to expose illegal activity carried out by government officials; or

(B) to obtain, exercise, defend, or promote internationally recognized human rights and freedoms, such as the freedoms of religion, expression, association, and assembly, and the rights to a fair trial and democratic elections;

(2) acted as an agent of or on behalf of a foreign person in a matter relating to an activity described in paragraph (1);

(3) is a government official, or a senior associate of such an official, that is responsible for, or complicit in, ordering, controlling, or otherwise directing, acts of significant corruption, including the expropriation of private or public assets for personal gain, corruption related to government contracts or the extraction of natural resources, bribery, or the facilitation or transfer of the proceeds of corruption to foreign jurisdictions; or

(4) has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, an activity described in paragraph (3).

(b) Sanctions Described.—The sanctions described in this subsection are the following:

(1) INADMISSIBILITY TO UNITED STATES.—In the case of a foreign person who is an individual—

(A) ineligibility to receive a visa to enter the United States or to be admitted to the United States; or

(B) if the individual has been issued a visa or other documentation, revocation, in accordance with section 221(i) of the Immigration and Nationality Act ([8 U.S.C. 1201\(i\)](#)), of the visa or other documentation.

(2) BLOCKING OF PROPERTY.—

(A) IN GENERAL.—The blocking, in accordance with the International Emergency Economic Powers Act ([50 U.S.C. 1701 et seq.](#)), of all transactions in all property and interests in property of a foreign person if such property and interests in property are in the United States, come within the United States, or are or come within the possession or control of a United States person.

(B) INAPPLICABILITY OF NATIONAL EMERGENCY REQUIREMENT.—The requirements of section 202 of the International Emergency Economic Powers Act ([50 U.S.C. 1701](#)) shall not apply for purposes of this section.

(C) EXCEPTION RELATING TO IMPORTATION OF GOODS.—

(i) IN GENERAL.—The authority to block and prohibit all transactions in all property and interests in property under subparagraph (A) shall not include the authority to impose sanctions on the importation of goods.

(ii) GOOD.—In this subparagraph, the term “good” has the meaning given that term in section 16 of the Export Administration Act of 1979 ([50 U.S.C. App. 2415](#)) (as continued in effect pursuant to the International Emergency Economic Powers Act ([50 U.S.C. 1701 et seq.](#))).

(c) Consideration Of Certain Information In Imposing Sanctions.—In determining whether to impose sanctions under subsection (a), the President shall consider—

(1) information provided by the chairperson and ranking member of each of the appropriate congressional committees; and

(2) credible information obtained by other countries and nongovernmental organizations that monitor violations of human rights.

(d) Requests By Chairperson And Ranking Member Of Appropriate Congressional Committees.—Not later than 120 days after receiving a written request from the chairperson and ranking member of one of the appropriate congressional committees with respect to whether a foreign person has engaged in an activity described in subsection (a), the President shall—

(1) determine if that person has engaged in such an activity; and

(2) submit a report to the chairperson and ranking member of that committee with respect to that determination that includes—

(A) a statement of whether or not the President imposed or intends to impose sanctions with respect to the person; and

(B) if the President imposed or intends to impose sanctions, a description of those sanctions.

(e) Exception To Comply With United Nations Headquarters Agreement And Law Enforcement Objectives.—Sanctions under subsection (b)(1) shall not apply to an individual if admitting the individual into the United States would further important law enforcement objectives or is necessary to permit the United States to comply with the Agreement regarding the Headquarters of the United Nations, signed at Lake Success June 26, 1947, and entered into force November 21, 1947, between the United Nations and the United States, or other applicable international obligations of the United States.

(f) Enforcement Of Blocking Of Property.—A person that violates, attempts to violate, conspires to violate, or causes a violation of subsection (b)(2) or any regulation, license, or order issued to carry out subsection (b)(2) shall be subject to the penalties set forth in subsections (b) and (c) of section 206 of the International Emergency Economic Powers Act ([50 U.S.C. 1705](#)) to the same extent as a person that commits an unlawful act described in subsection (a) of that section.

(g) Termination Of Sanctions.—The President may terminate the application of sanctions under this section with respect to a person if the President determines and reports to the appropriate congressional committees not later than 15 days before the termination of the sanctions that—

(1) credible information exists that the person did not engage in the activity for which sanctions were imposed;

(2) the person has been prosecuted appropriately for the activity for which sanctions were imposed;

(3) the person has credibly demonstrated a significant change in behavior, has paid an appropriate consequence for the activity for which sanctions were imposed, and has credibly committed to not engage in an activity described in subsection (a) in the future; or

(4) the termination of the sanctions is in the vital national security interests of the United States.

(h) Regulatory Authority.—The President shall issue such regulations, licenses, and orders as are necessary to carry out this section.

(i) Identification Of Sanctionable Foreign Persons.—The Assistant Secretary of State for Democracy, Human Rights, and Labor, in consultation with the Assistant Secretary of State for Consular Affairs and other bureaus of the Department of State, as appropriate, is authorized to submit to the Secretary of State, for review and consideration, the names of foreign persons who may meet the criteria described in subsection (a).

(j) Appropriate Congressional Committees Defined.—In this section, the term “appropriate congressional committees” means—

(1) the Committee on Banking, Housing, and Urban Affairs and the Committee on Foreign Relations of the Senate; and

(2) the Committee on Financial Services and the Committee on Foreign Affairs of the House of Representatives.

SEC. 4. REPORTS TO CONGRESS.

(a) In General.—The President shall submit to the appropriate congressional committees, in accordance with subsection (b), a report that includes—

(1) a list of each foreign person with respect to which the President imposed sanctions pursuant to section 3 during the year preceding the submission of the report;

(2) a description of the type of sanctions imposed with respect to each such person;

(3) the number of foreign persons with respect to which the President—

(A) imposed sanctions under section 3(a) during that year; and

(B) terminated sanctions under section 3(g) during that year;

(4) the dates on which such sanctions were imposed or terminated, as the case may be;

(5) the reasons for imposing or terminating such sanctions; and

(6) a description of the efforts of the President to encourage the governments of other countries to impose sanctions that are similar to the sanctions authorized by section 3.

(b) Dates For Submission.—

(1) INITIAL REPORT.—The President shall submit the initial report under subsection (a) not later than 120 days after the date of the enactment of this Act.

(2) SUBSEQUENT REPORTS.—

(A) IN GENERAL.—The President shall submit a subsequent report under subsection (a) on December 10, or the first day thereafter on which both Houses of Congress are in session, of—

(i) the calendar year in which the initial report is submitted if the initial report is submitted before December 10 of that calendar year; and

(ii) each calendar year thereafter.

(B) CONGRESSIONAL STATEMENT.—Congress notes that December 10 of each calendar year has been recognized in the United States and internationally since 1950 as “Human Rights Day”.

(c) Form Of Report.—

(1) IN GENERAL.—Each report required by subsection (a) shall be submitted in unclassified form, but may include a classified annex.

(2) EXCEPTION.—The name of a foreign person to be included in the list required by subsection (a)(1) may be submitted in the classified annex authorized by paragraph (1) only if the President—

(A) determines that it is vital for the national security interests of the United States to do so;

(B) uses the annex in a manner consistent with congressional intent and the purposes of this Act; and

(C) not later than 15 days before submitting the name in a classified annex, provides to the appropriate congressional committees notice of, and a justification for, including the name in the classified annex despite any publicly available credible information indicating that the person engaged in an activity described in section 3(a).

(d) Public Availability.—

(1) IN GENERAL.—The unclassified portion of the report required by subsection (a) shall be made available to the public, including through publication in the Federal Register.

(2) NONAPPLICABILITY OF CONFIDENTIALITY REQUIREMENT WITH RESPECT TO VISA RECORDS.—The President shall publish the list required by subsection (a)(1) without regard to the requirements of section 222(f) of the Immigration and Nationality Act ([8 U.S.C. 1202\(f\)](#)) with respect to confidentiality of records pertaining to the issuance or refusal of visas or permits to enter the United States.

(e) Appropriate Congressional Committees Defined.—In this section, the term “appropriate congressional committees” means—

(1) the Committee on Appropriations, the Committee on Banking, Housing, and Urban Affairs, the Committee on Foreign Relations, and the Committee on the Judiciary of the Senate; and

(2) the Committee on Appropriations, the Committee on Financial Services, the Committee on Foreign Affairs, and the Committee on the Judiciary of the House of Representatives.

Appendix B - List of Magnitsky Sanctions, worldwide

	Sanctioning country	Type	Sanctioned person/entity	Country of birth	Region	Nationality	Reason
1	USA	Entity	33rd LID			Burmese	Involved in serious human rights abuses in the Rakhine State against the Rohingya people.
2	USA	Entity	7 Makara Phary Co., Ltd.			Cambodian	Owned or controlled by Kim Sophary, who is part of Kun Kim's family network.
3	USA	Entity	99th LID			Burmese	Involved in serious human rights abuses in Mong Ko and elsewhere in Shan State.
4	USA	Entity	A&A Estudio Arquitectonico, S. de R.L. de C.V. (architecture firm)			Mexican	Designated under the Kingpin Act, for involvement with Mexican drug cartels CJNG and Los Cuinis
5	USA, UK, Canada	Individual	ABAHUSSAIN, Mansour Othman M	Saudi Arabia	Majmaa	Saudi Arabian	Mansour Othman M Abahussain held the position of Major General and worked in the office of the Crown Prince. He was involved in the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities. He was involved in the concealment of evidence at the Saudi Consul General's residence following the killing.
6	USA	Entity	ABMC Thai-South Sudan Construction Company Limited			South Sudanese	Owned or controlled by Benjamin Bol Mel.
7	USA	Entity	Africa Horizons Investment Limited				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
8	USA	Entity	Africada Airways				Involved with Yahya Jammeh or corruption in the Gambia.
9	USA	Entity	Africada Financial Service & Bureau de Change Ltd				Involved with Yahya Jammeh or corruption in the Gambia.
10	USA	Entity	Africada Insurance Company				Involved with Yahya Jammeh or corruption in the Gambia.
11	USA	Entity	Africada Micro-Finance Ltd				Involved with Yahya Jammeh or corruption in the Gambia.
12	USA	Individual	AJING ATER, Kur	South Sudan		South Sudanese	Involved in corruption in South Sudan, including bribery, kickbacks and procurement fraud with senior government officials.
13	USA	Individual	AKOUB, Nawfel	Iraq		Iraqi	Former governor of Nineveh Province, involved in corruption.
14	USA, UK	Individual	AL ASIRI, Ahmad Hassan Mohammed	Saudi Arabia		Saudi Arabian	Ahmad Hassan Mohammed Al Asiri held the position of Deputy Head of the Saudi Intelligence services (General Intelligence Presidency, GIP) in Saudi Arabia. He was involved in the unlawful killing of Jamal Khashoggi. He was a senior official involved in commissioning the 15 man team sent to Turkey to kill Jamal Khashoggi.
15	USA, UK, Canada	Individual	AL BALAWI, Fahad Shabib A	Saudi Arabia	Arar	Saudi Arabian	Fahad Shabib A. Albalawi was a Royal Guard in Saudi Arabia. He was directly involved in carrying out the unlawful killing of Jamal Khashoggi at the Saudi Consulate in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities.
16	USA, UK, Canada	Individual	AL BOSTANI, Meshal Saad	Saudi Arabia		Saudi Arabian	Meshal Saad Al Bostani was First Lieutenant in the Saudi Air Force. He was involved in the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities. He was involved in the concealment of evidence at the Saudi General Consul's residence following the killing.
17	USA	Individual	AL CARDINAL, Ashraf Seed Ahmed	South Sudan		South Sudanese	Involved in corruption in South Sudan, including bribery, kickbacks and procurement fraud with senior government officials.
18	USA, Canada	Individual	AL HARBI, Thaar	Saudi Arabia		Saudi Arabian	Involved in the killing of journalist Jamal Khashoggi; held a position in the Saudi Arabian government.

19	USA, UK, Canada	Individual	AL HAWSAWI, Abdulaziz Mohammed	Saudi Arabia	Riyadh	Saudi Arabian	Abdulaziz Mohammed Al Hawsawi was a security official for the Crown Prince of Saudi Arabia. He was involved in the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities. He was involved in the concealment of evidence at the Saudi Consul General's residence following the killing.
20	USA	Individual	AL JUBOURI, Ahmed Abdullah	Iraq		Iraqi	Former governor of Salah al-Din, Iraq, and current member of parliament who has engaged in corruption. He was sentenced to prison in July 2017 for misusing authority and federal funds and appropriating land for personal use.
21	USA	Individual	AL KHANJAR AL ISSAWI, Khamis Farhan	Iraq		Iraqi	Iraqi politician involved with bribing government officials and widespread corruption at the expense of the Iraqi people.
22	USA	Individual	AL KHAZALI, Laith	Iraq		Iraqi	Involved in serious human rights abuse in Iraq
23	USA	Individual	AL KHAZALI, Qais	Iraq		Iraqi	Involved in serious human rights abuse in Iraq
24	USA	Individual	AL KILDANI, Rayan	Iraq		Iraqi	Leader of the 50th Brigade militia; in May 2018 a video circulated of al-Kildani cutting off the ear of a handcuffed detainee. The 50th Brigade has systematically looted homes in Batnaya, which is struggling to recover from ISIS's rule.
25	USA	Individual	AL LAMI, Husayn Falih 'Aziz	Iraq		Iraqi	Involved in serious human rights abuse in Iraq
26	USA, UK, Canada	Individual	AL MADANI, Mustafa Mohammed	Saudi Arabia	Makkah	Saudi Arabian	Mustafa Mohammed Al Madani held the position of Brigadier General and Intelligence Officer in Saudi Arabia. He was present during the unlawful killing of Jamal Khashoggi in the Saudi Consulate in Istanbul on 2 October 2018, and played an active part of the 15 man team sent to Turkey by Saudi authorities, including through the concealment of evidence relating to the killing.
27	USA, UK	Individual	AL MUSLEH, Mufleh	Saudi Arabia		Saudi Arabian	Mufleh Al Musleh was a member of staff in the Saudi Consulate in Istanbul. He was involved in the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, in that he provided support to the 15 man team sent to Turkey by Saudi authorities.
28	USA, UK	Individual	AL MUZAINI, Ahmed Abdullah	Saudi Arabia		Saudi Arabian	Ahmad Abdullah Al Muzaini held the position of Military Attaché at the Saudi Consulate in Istanbul. He was a senior official who facilitated the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018.
29	USA, UK, Canada	Individual	AL OTAIBI, Badr Lafi M	Saudi Arabia	Riyadh	Saudi Arabian	Badr Lafi M Al Otaibi held the rank of Major and was involved in External Intelligence in Saudi Arabia. He was part of the 15 man team sent to Turkey by Saudi authorities and was present during the unlawful killing of Jamal Khashoggi at the Saudi Consulate in Istanbul on 2 October 2018.
30	USA, UK, Canada	Individual	AL OTAIBI, Khalid Aedh G	Saudi Arabia	Afif	Saudi Arabian	Khalid Aedh G Alotaibi was a Royal Guard in Saudi Arabia. He was involved in the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities. He was involved in the concealment of evidence at the Saudi General Consul's residence following the killing.
31	USA, UK, Canada	Individual	AL OTAIBI, Mohammad	Saudi Arabia	Riyadh	Saudi Arabian	Mohammad Al-Otaibi was the Saudi Consul General in Istanbul. He was involved in the unlawful killing of Jamal Khashoggi, in particular in facilitating the killing and in the concealment of evidence.
32	USA, UK, Canada	Individual	AL QAHTANI, Saif Saad Q	Saudi Arabia		Saudi Arabian	Saif Saad Q. Alqahtani was a training officer in the Saudi Air Force who worked in the Office of the Crown Prince in Saudi Arabia. He was in the Consulate during the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, and played an active part of the 15 man team sent to Turkey by Saudi authorities, including through the concealment of evidence relating to the killing.
33	UK, Canada	Individual	AL QAHTANI, Saud Abdullah	Saudi Arabia	Riyadh	Saudi Arabian	Saud Al Qahtani held the position of advisor to the Crown Prince in the royal court. He was involved in the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018. He was a senior official who planned and directed the killing using a 15 man team.
34	UK, Canada	Individual	AL SEHRI, Turki Muserref M	Saudi Arabia		Saudi Arabian	Turki Muserref M. Alsehri was an Intelligence Officer in Saudi Arabia. He was involved in the unlawful killing of Jamal Khashoggi on the 2 October 2018 as part of the 15 man team sent to Istanbul, Turkey, by Saudi authorities.
35	UK, Canada	Individual	AL SEHRI, Waleed Abdullah M	Saudi Arabia	Riyadh	Saudi Arabian	Waleed Abdullah M. Alsehri held the positions of Royal Guard and Major in Saudi Arabia. He was directly involved in the unlawful killing of Jamal Khashoggi in the Saudi Consulate in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities.
36	USA	Individual	AL SHIBL, Luna	Syria		Syrian	A prominent member of Assad's inner circle; former television news anchor, advisor to Assad, his press office, and one of the most senior press officials in the Syrian government. She is being designated for her role in developing Assad's false narrative that he maintains control of the country and that the Syrian people flourish under his leadership.

37	USA	Individual	AL SULTAN, Nofal Hammadi	Iraq		Iraqi	Former governor of Ninewa Province, Iraq, who has been accused of widespread corruption since 1994. Following a ferry accident in Ninewa's capital, Mosul, that killed nearly 100 people, al-Sultan was removed from office for negligence, dereliction of duty, misusing funds and abusing his power.
38	USA	Individual	AL WARFALLI, Mahmud	Libya		Libyan	A commander of the al-Saiqa Brigade (Libya). Since 2016, al-Warfalli has carried out or ordered the killings of 43 unarmed detainees in eight separate incidents.
39	USA, UK, Canada	Individual	AL ZAHIRANI, Mohammad Saad H	Saudi Arabia	Riyadh	Saudi Arabian	Mohammad Saad H. Alzahrani held the position of Intelligence Officer in Saudi Arabia. He was present during the unlawful killing of Jamal Khashoggi in the Saudi Consulate in Istanbul on 2 October 2018, and played an active part of the 15 man team sent to Turkey by Saudi authorities, including through the concealment of evidence relating to the killing.
40	USA, UK, Canada	Individual	ALARIFI, Naif Hassan S	Saudi Arabia	Riyadh	Saudi Arabian	Naif Hassan S Alarifi held the position of First Lieutenant, External Intelligence, and worked in the Office of the Crown Prince in Saudi Arabia. He was involved in the unlawful killing of Jamal Khashoggi in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities. In particular, he was involved in the concealment of evidence at the Saudi Consul General's residence following the killing.
41	USA, Estonia, Latvia, Lithuania	Individual	ALAUDINOV, Apti Kharonovich	Russia	Stavropol, Chechnya	Russian	Chechen Republic Deputy Interior Minister, implicated in the kidnapping, torture, and framing of former Chechen politician Ruslan Kutayev, the leader of a NGO aiming to unite ethnic groups across the North Caucasus.
42	Canada	Individual	ALBISINNI SERRANO, Rocco	Venezuela		Venezuelan	President of the National Center for Foreign Commerce (CENCOEX) in Venezuela, which is a significant engine of corruption involving the black market surrounding the official exchange rate regime.
43	USA	Entity	Alcardinal General Trading Limited			South Sudanese	Owned or controlled by Ashraf Seed Ahmed Al-Cardinal.
44	USA	Entity	Alcardinal General Trading LLC			South Sudanese	Owned or controlled by Ashraf Seed Ahmed Al-Cardinal.
45	USA	Entity	Alcardinal Investments Co. LTD			South Sudanese	Owned or controlled by Ashraf Seed Ahmed Al-Cardinal.
46	USA	Entity	Alcardinal Petroleum Company Limited			South Sudanese	Owned or controlled by Ashraf Seed Ahmed Al-Cardinal.
47	USA, UK	Individual	ALHARBI, Thaar Ghaleb T	Saudi Arabia	Riyadh	Saudi Arabian	Thaar Ghaleb T. Alharbi held the rank of Lieutenant, though it is not clear in which part of the Saudi forces this was and his official role is not clear. He was present during the unlawful killing of Jamal Khashoggi in the Saudi Consulate in Istanbul on 2 October 2018, and played an active part in the 15 man team sent to Turkey by Saudi authorities.
48	USA, Estonia, Latvia, Lithuania	Individual	ALISOV, Igor Borisovich	Russia		Russian	Igor Alisov is a judge in the Moscow municipal court system and oversaw the posthumous trial of Magnitsky. Alisov participated in efforts to conceal the legal liability for the detention, abuse, and death of Magnitsky.
49	USA	Entity	Almerina Properties Limited				Company owned or controlled by Dan Gertler or his companies
50	USA	Individual	ANDRIC, Goran	Serbia		Serbian	Close associate of Slobodan Tescic, and represented him in various international sales, including conducting contract negotiations on Tescic's behalf while Tescic was on the UN Travel Ban list and unable to travel.
51	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	ANICHIN, Aleksey Vasilyevich	Ukraine	Sevastopol	Russian	Aleksey Vasilyevich Anichin, as a deputy Minister in the Russian Interior Ministry and the head of the Investigative Committee, was involved in the mistreatment of Sergei Magnitsky whilst in detention, which contributed significantly to his death on 16 November 2009. Anichin oversaw a 'team' of investigators who failed to investigate complaints made by Magnitsky about his mistreatment and concealed evidence of Magnitsky's deteriorating medical condition.
52	USA, Estonia, Latvia, Lithuania	Individual	ANTONOV, Yevgeni Yuvenalievich	Russia		Russian	Former head of the Chernokozovo prison in Chechnya; implicated in the mistreatment of a Chechen human rights activist, Zura Bitiyeva.

53	USA	Individual	ANWAR KHAN, Rao	Pakistan		Pakistani	Former Senior Superintendent of Police in District Malir, Pakistan, responsible for serious human rights abuse, including alleged involvement in over 400 extra-judicial killings, including the murder of Naqeebullah Mehsood, a Pashtun shopkeeper and aspiring model.
54	USA	Entity	Araneks DOO			Serbian	Owned or controlled by, or acting or purporting to act on behalf of, directly or indirectly, Slobodan Tesic.
55	USA	Entity	Arquitectura y Diseno en Balance, S.A. de C.V. (architecture and real estate firm)			Mexican	Designated under the Kingpin Act, for involvement with Mexican drug cartels CJNG and Los Cuinis
56	USA	Entity	Atlantic Pelican Company Ltd				Involved with Yahya Jammeh or corruption in the Gambia.
57	USA	Individual	AUNG, Aung	Myanmar (Burma)		Burmese	A leader of the 33rd Light Infantry Division (Burma), an entity whose members have engaged in serious human rights abuse under his command.
58	USA	Individual	AVELAR GUTIERREZ, Isidro	Mexico		Mexican	Mexican magistrate judge who received bribes from narcotics trafficking organisations, CJNG and Los Cuinis, in exchange for providing favourable judicial rulings to their senior members.
59	USA	Individual	BADJIE, Yankuba	The Gambia		Gambian	Former Director General of the Gambia's NIA, committing physical trauma and other mistreatment, and being charged with the detention and murder of Solo Sandeng, a member of the political opposition. Prior to his role as Director General of the NIA, Badjie led the Junglers, an elite threat and assassination squad answering to Yahya Jammeh.
60	USA	Individual	BALUKU, Musa	Democratic Republic of the Congo		Ugandan	Leader of the Allied Democratic Forces (ADF) of the Democratic Republic of Congo, an entity or whose members have engaged in serious human rights abuse.
61	USA	Individual	BARAJAS SAHD, Ana Paulina	Mexico		Mexican	Operates business on behalf of her husband, Ulises Jovani Gonzalez Valencia.
62	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	BASTRYKIN, Alexander Ivanovich	Russia		Russian	Alexander Ivanovich Bastrykin was appointed First Deputy Prosecutor General and Head of the Investigative Committee under the Prosecutor's Office on 22 June 2007; he continued as Chairman of the Investigative Committee after it became an independent body in January 2011. In this role Bastrykin was responsible for the investigation of the mistreatment and death of Sergei Magnitsky in detention and intentionally or recklessly failed to fulfil that responsibility.
63	USA	Individual	BAUTISTA, Felix Ramon	Dominican Republic		Dominican Republic	Bautista used his position as senator to engage in corruption, including profiting off of humanitarian efforts related to rebuilding Haiti.
64	USA	Individual	BELTRAN GARCIA, Victor Francisco	Mexico	Guadalajara	Mexican	An attorney who facilitates corruption activities on behalf of CJNG and Los Cuinis.
65	USA	Entity	Biznesa Attistibas Asociacija (Business Development Association)			Latvian	Company owned or controlled by Aviars Lembergs.
66	USA	Entity	Bodecarne, S.A. de C.V.			Mexican	Owned or controlled by Roberto Sandoval Castaneda or a complicit family member.
67	USA, Estonia, Latvia, Lithuania	Individual	BOGATIROV, Letscha	Russia	Atschkoi, Chechnya	Russian	Chechen police officer tied to human rights abuses.
68	USA	Individual	BOL MEL, Benjamin	South Sudan		South Sudanese	President of ABMC Thai-South Sudan Construction Company Limited; Chairman of the South Sudan Chamber of Commerce, Industry, and Agriculture; South Sudanese President Salva Kiir's principal financial advisor, and private secretary. Bol Mel's company ABMC allegedly received preferential treatment from high-level officials, and the Government of South Sudan did not hold a competitive process for selecting ABMC to do roadwork in Juba and throughout South Sudan.
69	USA	Individual	BRKIC, Nikola	Serbia		Serbian	A principal and legal representative of a company associated with Slobodan Tesic.

70	USA	Individual	BUN HIENG, Hing	Cambodia		Cambodian	General Bun Hieng commanded a Cambodian unit that engaged in a series of human rights abuses, and was personally implicated in attacks against a number of individuals, including a US citizen.
71	USA	Entity	Business Diversity Limited			Hong Kong	Owned or controlled by, or acting or purporting to act on behalf of, directly or indirectly, Slobodan Testic.
72	Canada	Individual	CABELLO RONDON, Jose David	Venezuela		Venezuelan	
73	USA	Entity	Cambo Elite Security Force Co., Ltd.			Cambodian	Owned or controlled by Kim Sophary, who is part of Kun Kim's family network.
74	USA	Entity	Caprikat and Foxwhelp SARL				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
75	USA	Entity	Caprikat Limited				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
76	USA	Individual	CHANDY, King	Cambodia		Cambodian	As a member of Kun Kim's family network, acted or purported to act for or on behalf of, directly or indirectly, Kim.
77	USA	Entity	Charso Limited				Owned or controlled by Slobodan Testic.
78	Canada	Individual	CHAVEZ FRIAS, Adan Coromoto	Venezuela		Venezuelan	
79	Canada	Individual	CHAVEZ FRIAS, Argenis de Jesus	Venezuela		Venezuelan	
80	USA	Individual	CHAYKA, Artem	Russia		Russian	Son of the Prosecutor General of the Russian Federation, Chayka has leveraged his father's position and ability to award his subordinates to unfairly win state-owned assets and contracts and put pressure on business competitors.
81	USA	Individual	CVJETKOVIC, Sreten	Serbia		Serbian	50% owner and representative of a company associated with Slobodan Testic.
82	USA	Entity	D.G.D. Investments Ltd.				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
83	USA	Entity	D.G.I. Israel Ltd				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
84	USA, Estonia, Latvia, Lithuania	Individual	DAUDOV, Magomed Khozhakhmedovich	Russia	Stavropol, Chechnya	Russian	Head of Chechen President Ramzan Kadyrov's administration, implicated in the kidnapping, torture, and framing of former Chechen politician Ruslan Kutayev, the leader of a NGO aiming to unite ethnic groups across the North Caucasus.
85	Canada	Individual	DEL PINO DIAZ, Eulogio Antonio	Venezuela		Venezuelan	
86	USA	Individual	DENG GAI, Taban	South Sudan		South Sudanese	Involvement in the disappearance and reported deaths of two human rights activists in 2017.
87	USA	Entity	DGI Mining Ltd				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
88	USA	Individual	DIAZ MADRIZ, Francisco Javier	Nicaragua		Nicaraguan	Under Diaz Madrid's command, Nicaragua's National Police has engaged in serious human rights abuse against the people of Nicaragua.
89	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	DROGANOV, Aleksey O	Russia	Moscow	Russian	Aleksei Droganov was an officer in the Tax Crimes Department in the Moscow directorate of the Interior Ministry and was involved in the detention and mistreatment of Sergei Magnitsky, which contributed significantly to his death. Droganov was part of the 'team' of investigators, led by Artem Kuznetsov, the Deputy Head of the Tax Crimes Department, who were allegedly involved in the initial fraud exposed by Sergei Magnitsky and who falsified evidence to justify his arrest and detention. As part of this investigation team Aleksei Droganov facilitated the mistreatment of Sergei Magnitsky whilst in detention which was designed to force Magnitsky to retract his earlier testimony.
90	USA	Individual	DUGARTE PADRON, Juan Carlos	Venezuela		Venezuelan	Director General of the Government of Venezuela's Administrative Service of Identification, Migration, and Immigration (SAIME), where he received kickbacks, and which was publically implicated in corrupt dealings involving the sale of passports.

91	USA, Estonia, Latvia, Lithuania	Individual	DUKUZOV, Kazbek	Russia	Urus-Martan, Chechnya	Russian	Dukuzov was designated for his role in the extrajudicial killing of journalist Paul Klebnikov, who was working to expose illegal activity carried out by officials of the Russian government.
92	USA	Individual	ECOBU, Patrick	Uganda		Ugandan	Mirembe's husband, who was responsible for assisting Mirembe in her Ugandan adoption scam.
93	Canada	Individual	EL AISSAMI MADDAH, Tareck Zaidan	Venezuela		Venezuelan	Vice-President of Venezuela; responsible for, or complicit in, gross violations of internationally recognised human rights, has committed acts of significant corruption, or both.
94	USA	Entity	Emaxon Finance International Inc.				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
95	USA	Individual	ESSA, Salim	South Africa		South African	Involved in corrupt schemes with government officials and employees in state-owned enterprises for personal gain.
96	USA	Entity	Falcon Strategic Solutions D.O.O.			Serbian	Owned or controlled by, or acting or purporting to act on behalf of, directly or indirectly, Slobodan Testic.
97	USA	Entity	Finrost Limited			Cyprian	Owned or controlled by, or acting or purporting to act on behalf of, directly or indirectly, Slobodan Testic.
98	Canada	Individual	FLEMING CABRERA, Alejandro Antonio	Venezuela		Venezuelan	Vice Minister for Europe of Venezuela's Ministry of Foreign Affairs, and the former President of CENCOEX, a government entity associated with corruption.
99	USA	Entity	Fleurette Africa Resources I B.V.				Company owned or controlled by Dan Gertler or his companies
100	USA	Entity	Fleurette Energy I B.V.				Company owned or controlled by Dan Gertler or his companies
101	USA	Entity	Fleurette Holdings Netherlands B.V.				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
102	USA	Entity	Fleurette Properties Limited				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
103	USA	Entity	Foxwhelp Limited				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
104	USA	Entity	G Y R Arquitectos, S. de R.L. de C.V. (architecture and real estate firm)			Mexican	Designated under the Kingpin Act, for involvement with Mexican drug cartels CJNG and Los Cuinis
105	USA	Individual	GABUKA, Angela Umurisa	Uganda		Ugandan	The spouse of Kale Kayihura.
106	USA	Individual	GARANG, Angelo Kuot	South Sudan		South Sudanese	Associated with the kidnapping of a member of the SPLM-IO and a human rights lawyer, as well as the killings of other individuals.
107	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	GAUSS, Alexandra Viktorovna	Russia		Russian	Alexandra Gauss was a doctor at Matrosskaya Tishina detention centre where Sergei Magnitsky was detained during the final hours of his life on 16 November 2009. She failed to provide or ensure the proper administration of medical care which contributed to his death; she also facilitated the mistreatment of Magnitsky after his transfer to Matrosskaya Tishina, including beating by a security team.
108	USA	Individual	GEREMEYEV, Ruslan	Russia		Russian	Geremeyev is a former deputy of commander of the Sever Battalion in Chechnya, which is considered part of Ramzan Kadyrov's personal guard. Russian investigators twice tried to bring charges against Geremeyev as the possible organiser of Boris Nemtsov's murder, but were blocked by the head of the Investigations Committee.
109	USA	Entity	Gertler Family Foundation				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
110	USA	Individual	GERTLER, Dan	Israel		Israeli	International businessman and close associate of Joseph Kabila, Gertler has amassed his fortune through hundreds of millions of dollars' worth of opaque and corrupt mining and oil deals in the DRC.

111	Canada	Individual	GONZALEZ LOPEZ, Gustavo Enrique	Venezuela	Venezuelan		
112	USA	Individual	GONZALEZ VALENCIA, Abigael	Mexico	Mexican	Leader of Mexican drug cartel Los Cuinis.	
113	USA	Individual	GONZALEZ VALENCIA, Erika	Mexico	Mexican	Engaged in corruption activities on behalf of drug trafficking organisations CJNG and Los Cuinis, including bribing government officials and money laundering.	
114	USA	Individual	GONZALEZ VALENCIA, Ulises Jovani	Mexico	Mexican	Engaged in corruption activities on behalf of drug trafficking organisations CJNG and Los Cuinis, including bribing government officials and money laundering.	
115	USA, Estonia, Latvia, Lithuania, Canada	Individual	GORDIEVSKY, Stanislav Evgenievich	Russia	Russian		
116	USA	Entity	Granatura, S. de P.R. de R.L. de C.V. (organic products company)		Mexican	Designated under the Kingpin Act, for involvement with Mexican drug cartels CJNG and Los Cuinis	
117	USA	Entity	Grawit Limited			Owned or controlled by Slobodan Testic.	
118	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	GRIN, Victor Yakovlevich	Russia	Russian	Victor Yakovlevich Grin was Deputy General Prosecutor of the Prosecutor General's Office of the Russian Federation. In that role he was responsible for overseeing the case of Sergei Magnitsky during his detention, as well as responsible for investigating the claims of mistreatment of Magnitsky and his subsequent death on 16 November 2009. He intentionally or recklessly failed to fulfil that responsibility, including by issuing conclusions stating that there had been no violation of law by Interior Ministry investigators whilst Magnitsky was in detention which were then used to justify not prosecuting those alleged to be responsible for his mistreatment and death.	
119	USA	Individual	GUL, Abdulhamit	Turkey	Turkish	Turkish Minister of Justice; involved in arrest and detention of Pastor Andrew Brunson.	
120	USA	Individual	GUPTA, Ajay	South Africa	South African	Involved in corrupt schemes with government officials and employees in state-owned enterprises for personal gain.	
121	USA	Individual	GUPTA, Atul	South Africa	South African	Involved in corrupt schemes with government officials and employees in state-owned enterprises for personal gain.	
122	USA	Individual	GUPTA, Rajesh	South Africa	South African	Involved in corrupt schemes with government officials and employees in state-owned enterprises for personal gain.	
123	USA	Individual	HAILUN, Zhu	China	Chinese	Human rights abuses targeting Uyghurs, ethnic Kazakhs, and other minorities in Xinjiang, to include forced labour, arbitrary mass detention, and forced population control	
124	USA	Individual	HAMID SHAH, Mukhtar	Pakistan	Pakistani	Pakistani surgeon specialising in kidney transplants involved in the kidnapping, detention of, and removal of kidneys from, Pakistani labourers.	
125	USA	Individual	HLAING, Khin	Myanmar (Burma)	Burmese	Leader of the 99th LID, a military entity which engaged in serious human rights abuses, including detaining ethnic Kachin and Chinese minority villagers and forcing them to serve as human shields, exposed to the elements, gunfire and grenade attacks while 99th LID soldiers sheltered behind them.	
126	USA, UK	Individual	HLAING, Min Aung	Myanmar (Burma)	Tavoy	Burmese	Senior General Min Aung Hlaing is Commander in Chief of the Myanmar Armed Forces (Tatmadaw). In this role, he was responsible for military operations carried out in Rakhine State in 2017 and in 2019 and is responsible for atrocities and serious human rights violations committed against the Rohingya population in Rakhine state by the Tatmadaw. These include unlawful killings, including through systematic burning of Rohingya houses and buildings, massacre, torture, forced labour, systematic rape and other forms of targeted sexual violence, and enforced labour.
127	USA	Entity	Home and Away LTD		South Sudanese	Involved with Benjamin Bol Mel or corruption in South Sudan.	

128	USA	Entity	Hotel Holding, S.R.O.		Slovakian	Owned or controlled by Marian Kocner.	
129	USA	Entity	Interlog DRC			Company owned or controlled by Dan Gertler or his companies	
130	USA	Entity	International Diamond Industries			Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.	
131	USA	Entity	International Investment Development Holding A.S.		Slovakian	Owned or controlled by Marian Kocner.	
132	USA	Entity	International Investment Hotels Holding A.S.		Slovakian	Owned or controlled by Marian Kocner.	
133	USA	Entity	Iron Mountain Enterprises Limited			Company owned or controlled by Dan Gertler or his companies	
134	USA	Entity	Iyari		Mexican	Owned or controlled by Roberto Sandoval Castaneda or a complicit family member.	
135	USA	Entity	Jafelia Boutique, S.A. de C.V. (women's clothing store)		Mexican	Designated under the Kingpin Act, for involvement with Mexican drug cartels CJNG and Los Cuinis	
136	USA	Individual	JAMMEH, Yahya	The Gambia	Gambian	Former president of The Gambia, Jammeh created a terror and assassination squad called the Junglers to threaten, terrorise, interrogate, and kill individuals whom Jammeh assessed to be threats - including a local religious leader, journalists, members of the political opposition, and former members of the government, among others. He also used a number of corrupt schemes to plunder the state's coffers or otherwise siphon off state funds for his personal gain. Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.	
137	USA	Entity	Jarvis Congo SARL			Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.	
138	USA	Individual	JARUI, Peng	China	Chinese	An official connected to serious human rights abuse against ethnic minorities in Xinjiang, which reportedly include mass arbitrary detention and severe physical abuse, among other serious abuses targeting Uyghurs, a Turkic Muslim population indigenous to Xinjiang, and other ethnic minorities in the region.	
139	USA	Individual	JINLONG, Sun	China	Chinese	An official connected to serious human rights abuse against ethnic minorities in Xinjiang, which reportedly include mass arbitrary detention and severe physical abuse, among other serious abuses targeting Uyghurs, a Turkic Muslim population indigenous to Xinjiang, and other ethnic minorities in the region.	
140	USA	Individual	JUAREZ RAMIREZ, Julio Antonio	Guatemala	Guatemalan	Congressman accused of ordering an attack in which two journalists were killed and another injured, one of whose reporting had hurt Juarez's plan to run for reelection.	
141	USA	Entity	K D Rubber Plantation Co., Ltd.		Cambodian	Owned or controlled by King Chandy, who is part of Kun Kim's family network.	
142	USA, Estonia, Latvia, Lithuania	Individual	KADYROV, Ramzan Akhmatovich	Russia	Tsentoroi, Chechnya	Russian	As the head of the Chechen Republic, Kadyrov oversees an administration involved in disappearances and extrajudicial killings. One of Kadyrov's political opponents was believed to have been murdered at his discretion, after making allegations of torture and ill-treatment taking place in Chechnya, including alleged torture carried out by Kadyrov personally.
143	USA	Entity	Kanilai Group International			Involved with Yahya Jammeh or corruption in the Gambia.	
144	USA	Entity	Kanilai Worni Family Farms Ltd			Involved with Yahya Jammeh or corruption in the Gambia.	
145	USA	Individual	KAPIDZIC, Esad	Serbia		Serbian	Director of two companies that are connected to Slobodan Testic.
146	USA	Entity	Karibu Africa Service SA			Company owned or controlled by Dan Gertler or his companies	
147	USA	Individual	KARIMOVA, Gulnara	Uzbekistan		Uzbekistani	Daughter of former Uzbekistan leader Islam Karimov, Karimova headed a powerful organised crime syndicate that leveraged state actors to expropriate businesses, monopolise markets, solicit bribes, and administer extortion rackets.

							She was charged with hiding foreign currency through various means, including the receipt of payoffs, the illegal sale of radio frequencies and land parcels, siphoning off state funds through fraudulent dividend payments and stock sales, the illegal removal of cash, the non-collection of currency earnings, and the import of goods at inflated prices. She was also found guilty of embezzlement of state funds, theft, tax evasion, and concealment of documents.
148	USA, UK	Individual	KARLOV, Gennady Vyacheslavovich	Russia		Russian	Gennady Karlov, as the Head of the Department of Ownership and Financial Crimes in the Investigative Committee of the Russian Ministry of Interior, was involved in the mistreatment of Sergei Magnitsky whilst in detention, which contributed significantly to his death. Karlov was part of a 'team' of investigators who failed to investigate complaints made by Magnitsky about his mistreatment and approved actions to conceal evidence relating to subordinates who were directly involved in that conduct.
149	USA, Estonia, Latvia, Lithuania, Canada	Individual	KARPOV, Pavel	Russia	Moscow	Russian	An Interior Ministry investigator in charge of documents seized from Hermitage Capital. By holding on to the documents and refusing to release them, Karpov played a key role in obstructing the work of lawyers acting on Magnitsky's behalf and allowed the fraud to move forward.
150	USA	Individual	KASADHA, Amisi	Democratic Republic of the Congo		Congolese	A commander of the ADF, who has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in serious human rights abuses.
151	USA, Estonia, Latvia, Lithuania	Individual	KATAEV, Ayub Vakhaevich	Russia		Russian	A Chechen law enforcement official, Kataev is reported to have been involved in abuses against gay men in Chechnya during the first half of 2017.
152	USA	Individual	KAYIHURA, Kale	Uganda		Ugandan	The former Inspector General or the Uganda Police Force and its commanding officer from 2005-2018, Kayihura was involved in torture and/or cruel, inhuman, or degrading treatment or punishment, through command of the Flying Squad, a specialised unit of the Uganda Police Force that reported directly to him.
153	USA	Individual	KHAZALI, Qais	Iraq		Iraqi	
154	USA, Estonia, Latvia, Lithuania, Canada	Individual	KHIMINA, Yelena	Russia	Moscow	Russian	A Moscow tax official, Khimina signed off on a portion of the fraudulent tax returns totalling \$75 million.
155	USA, Estonia, Latvia, Lithuania, Canada	Individual	KHLEBNIKOV, Vyacheslav Georgievich	Russia		Russian	Vyachelsav Khlebnikov is a businessman with a criminal record. Khlebnikov was convicted of participating in the tax fraud uncovered by Magnitsky.
156	USA	Individual	KIBIRIGE, Amigo	Democratic Republic of the Congo		Congolese	A commander of the ADF, who has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in serious human rights abuses.
157	USA, UK, Estonia, Latvia, Lithuania	Individual	KIBIS, Boris Borisovich	Russia		Russian	Boris Borisovich Kibis was an investigator at the Russian Interior Ministry in 2012, at the time of the posthumous trial of Sergei Magnitsky. In this role, he concealed evidence relating to the mistreatment of Magnitsky, which contributed significantly to his death on 16 November 2009, by supporting the actions of his predecessor Oleg Silchenko and the 'team' of investigators who were involved in that conduct.
158	USA	Individual	KIM, Kun	Cambodia		Cambodian	Kim used RCAF soldiers to intimidate, demolish, and clear-out land sought by a People's Republic of China (PRC) state-owned entity. He also did not share profits from his unlawful businesses with senior Cambodian government officials. Company owned or controlled by Dan Gertler or his companies
159	USA	Entity	Kitoko Food Farm				
160	USA, Estonia,	Individual	KLYUEV, Dmitry Vladislavovich	Russia		Russian	Banker accused of helping to launder the proceeds of the \$230 million fraud exposed by Magnitsky.

	Latvia, Lithuania, Canada						
161	USA	Individual	KOCNER, Marian	Slovakia		Slovakian	Charged with ordering the murder of investigative journalist Jan Kuciak and his fiancée, Martina Kusnirova. Kuciak's investigative journalism exposed how Kocner earned millions of Euros through fraudulent tax returns and corrupt deals and highlighted connections to the police and prosecutors.
162	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	KOMNOV, Dmitriy	Russia	Moscow	Russian	Lieutenant Colonel Dmitriy Komnov was the head of Butyrka detention centre where Sergei Magnitsky was detained between 25 July and 16 November 2009. He was responsible for Magnitsky's mistreatment in detention including poor conditions of detention and the denial of, or failure to provide, adequate medical care, which contributed significantly to his death. Komnov was also involved in concealing evidence of that mistreatment, including providing false or misleading information to the Public Oversight Commission for Human Rights Observance in Moscow Detention Centres.
163	USA	Entity	Kora Media Corporation Ltd				Involved with Yahya Jammeh or corruption in the Gambia.
164	USA	Individual	KOSSIEV, Sergey Leonidovich	Russia		Russian	As the head of the Corrective Colony 7 (IK-7) penal colony in the Republic of Karelia, Kossiev oversaw and participated in the beatings and abuse of prisoners, and attempted to conceal the evidence of such abuse.
165	USA, Estonia, Latvia, Lithuania	Individual	KOVTUN, Dmitri	Russia		Russian	
166	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	KRATOV, Dmitry Borisovich	Russia		Russian	Dmitry Borisovich Kratov, who was the chief medical officer and deputy head of Butyrka Prison where Magnitsky was detained until shortly before his death on 16 November 2009, was responsible for the mistreatment of Sergei Magnitsky, including by failing to ensure the proper administration of medical care, which contributed significantly to his death.
167	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	KRECHETOV, Andrei Alexandrovich	Russia		Russian	Andrei Aleksandrovich Krechetov was an officer in the Tax Crimes Department in the Moscow directorate of the Interior Ministry and was involved in the mistreatment of Sergei Magnitsky whilst in detention, which contributed significantly to his death. Krechetov was part of the 'team' of investigators, led by Artem Kuznetsov, the Deputy Head of the Tax Crimes Department, who were allegedly involved in the initial fraud exposed by Sergei Magnitsky and who falsified evidence to justify his arrest and detention. As part of this investigation team, Andrei Krechetov facilitated the mistreatment of Sergei Magnitsky in custody which was designed to force Magnitsky to retract his earlier testimony.
168	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	KRIVORUCHKO, Aleksey	Russia	Moscow	Russian	Aleksey Krivoruchko, as a Judge at Moscow's Tverskoi District Court, was involved in decisions to extend the detention of Sergei Magnitsky, and in particular on 14 September 2009, shortly before his death. In this capacity, Krivoruchko facilitated the mistreatment / denial of medical care to Sergei Magnitsky, which contributed significantly to his death.
169	USA	Individual	KUAIJEN, Michael	South Sudan		South Sudanese	Associated with the kidnapping of a member of the SPLM-IO and a human rights lawyer.
170	USA	Individual	KUSIUK, Sergey	Ukraine		Ukrainian	Former commander of an elite Ukrainian police unit, the Berkut, Kusiuk was identified as a leader of an attack on peaceful protesters on November 30 2013, involved in the killing of activists on Kyiv's Independence Square in February 2014.
171	USA, Estonia, Latvia, Lithuania, Canada	Individual	KUZNETSOV, Artem	Azerbaijan	Baku	Azerbaijani	Kuznetsov participated in the 2007 raid that seized documents used to perpetrate the \$230 million fraud, the ministry's subsequent investigation into the fraud, and the actions that led to Magnitsky's imprisonment.

172	USA	Individual	KYAW ZAW, Aung	Myanmar (Burma)	Burmese	Leader of the Bureau of Special Operations 3, controlling military and border guard police operations in Western, Southern and Southwestern Commands from 2015 to 2018, which involved widespread human rights abuses (ethnic cleansing) against the Rohingya people.	
173	USA	Individual	LAM, John Top	South Sudan	South Sudanese	Associated with the kidnapping of a member of the SPLM-IO and a human rights lawyer.	
174	USA, UK, Estonia, Latvia, Lithuania	Individual	LAPSHOV, Pavel Vladimirovich	Russia	Russian	Pavel Lapshov was the Head of the Investigative Department of the Ministry of Internal Affairs in December 2011 after Sergei Magnitsky's death in detention on 16 November 2009. In this role, Lapshov was responsible for the investigation into the mistreatment and death of Sergei Magnitsky in detention and intentionally or recklessly failed to fulfil that responsibility, in particular by concealing evidence of the circumstances surrounding his death.	
175	USA	Entity	Latvijas Tranzita Biznesa Asociacija (Latvian Transit Business Association)		Latvian	Company owned or controlled by Aviars Lembergs.	
176	USA	Individual	LEMBERGS, Aviars	Latvia	Latvian	Serving as the Mayor of Ventspils, Latvia, since 1988, Lembergs has been repeatedly accused of money laundering, bribery, and abuse of office. He controls entities through political parties and corrupt politicians, and exploits them for his own economic gain. He has used his influence to shape government personnel and place certain government officials in positions, as well as obstruct other officials from obtaining leadership positions. Additionally, Lembergs has leveraged and corrupted law enforcement officials to protect his interests and subvert politicians whom he otherwise was unable to control.	
177	USA	Individual	LEONE MARTINEZ, Miguel Jose	Venezuela	Venezuelan		
178	USA	Entity	L-Inmo, S.A. de C.V.		Mexican	Owned or controlled by Roberto Sandoval Castaneda or a complicit family member.	
179	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	LITVINOVA, Larisa Anatolievna	Russia	Russian	Larisa Anatolievna Litvinova was head of the therapeutic ward at Butyrka Prison where Sergei Magnitsky was detained between 25 July and 16 November 2009. She was involved in the mistreatment of Sergei Magnitsky by failing to ensure the proper administration of medical care to him during this period causing him considerable suffering and contributing significantly to his death.	
180	USA	Individual	LIUJUN, Huo	China	Chinese	Human rights abuses targeting Uyghurs, ethnic Kazakhs, and other minorities in Xinjiang, to include forced labour, arbitrary mass detention, and forced population control	
181	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	LOGUNOV, Oleg	Russia	Irkutsk	Russian	Oleg Logunov, as the Deputy Head of the Investigate Committee of the Russian Interior Ministry, was involved in the mistreatment of Sergei Magnitsky, which contributed significantly to his death on 16 November 2009. Logunov was part of a 'team' of investigators who failed to investigate complaints made by Magnitsky about his mistreatment and provided support to subordinates who were directly involved in that conduct.
182	USA	Individual	LOPEZ CENTENO, Jose Francisco	Nicaragua	Nicaraguan	Vice President of ALBANISA, the President of Petronic, and the Treasurer of the ruling FSLN party and has been accused of leveraging his position to his and his family's benefit by using companies they own to win government contracts.	
183	USA	Individual	LOPEZ TORRES, Ana Lilia	Mexico	Mexican	Wife of Roberto Sandoval Castaneda; acted or purported to act on his behalf by holding his ill-gotten assets in their name.	
184	USA	Entity	Lora Enterprises Limited			Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.	
185	USA	Entity	Lou Trading and Investment Company Limited		South Sudanese	Owned or controlled by Kur Ajing Ater.	
186	USA, Estonia, Latvia, Lithuania	Individual	LUGOVOI, Andrei Konstantinovich	Russia	Russian		

187	USA	Individual	LUMISA, Muhammed	Democratic Republic of the Congo	Congolese	A commander of the ADF, who has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in serious human rights abuses.
188	USA	Entity	M D S Thmorda S E Z Co., Ltd.		Cambodian	Company owned or controlled by Try Pheap.
189	USA	Entity	M.D.S. Import Export Co., Ltd.		Cambodian	Company owned or controlled by Try Pheap.
190	Canada	Individual	MADURO MOROS, Nicolas	Venezuela	Venezuelan	President of Venezuela, who has been accused of steering his country "deeper into dictatorship".
191	USA, Canada	Individual	MAKUEI LUETH, Michael	South Sudan	South Sudanese	Minister of Information and Broadcasting; involved in the violence that has wracked South Sudan since its independence in 2011. Makuei Leuth is also accused for using the country's airwaves to foment ethnic violence, and planning an attack on UN peacekeepers.
192	USA, Canada	Individual	MALONG AWAN, Paul	South Sudan	South Sudanese	Former chief of staff of the Sudanese People's Liberation Army; involved in the violence that has wracked South Sudan since its independence in 2011.
193	Canada	Individual	MARCO TORRES, Rodolfo Clemente	Venezuela	Venezuelan	
194	USA	Individual	MARICIC, Ljubo	Serbia	Serbian	Director of a company associated with Slobodan Testic.
195	USA, Estonia, Latvia, Lithuania, Canada	Individual	MARKELOV, Viktor Aleksandrovich	Kirghiz SSR (Kyrgystan)	Oshkaya Russian	Viktor Markelov confessed to participating in the criminal conspiracy uncovered by Magnitsky. He fraudulently re-registered three subsidiaries of Hermitage Capital in the tax fraud scheme uncovered by Magnitsky.
196	USA	Individual	MAUNG SOE, Khin	Myanmar (Burma)	Burmese	Leader of the Military Operations Command 15, an entity which participated in the Maung Nu massacre on August 27 2017, and other abuses in the Rakhine State.
197	USA, Canada	Individual	MAUNG SOE, Maung	Myanmar (Burma)	Burmese	Former chief of the Burmese Army's Western Command, Maung Soe oversaw the military operation in Burma's Rakhine State responsible for widespread human rights abuse against Rohingya civilians in response to attacks by the Arakan Rohingya Salvation Army.
198	USA, Estonia, Latvia, Lithuania	Individual	MAYOROVA, Yulia	Russia	Russian	Mayorova was involved in the criminal conspiracy uncovered by Magnitsky - she represented Makhaon and Riland (two of the Hermitage Fund subsidiaries illegally re-registered in the fraud uncovered by Magnitsky), even though Hermitage Fund had never hired her or authorised her appointment.
199	USA	Entity	Melvale Corporation D.O.O. Beograd		Serbian	Owned or controlled by Nebojsa Sarenac, a close associate of Slobodan Testic.
200	USA	Individual	MENDOZA GAYTAN, Gonzalo	Mexico	Mexican	Senior CJNG member, responsible for kidnappings and numerous killings; he also controls the Puerto Vallarta, Jalisco "plaza", or sphere of influence, allowing him to oversee this area's drug trafficking and other criminal activities on behalf of CJNG.
201	Canada	Individual	MERENTES DIAZ, Nelson Jose	Venezuela	Venezuelan	
202	USA	Individual	MINGSHANG, Whang	China	Chinese	Human rights abuses targeting Uyghurs, ethnic Kazakhs, and other minorities in Xinjiang, to include forced labour, arbitrary mass detention, and forced population control
203	UK	Entity	Ministry of People's Security (MPS) Correctional Bureau		Chinese	As the entity responsible for running prison camps in the DPRK, the Ministry of People's Security Correctional Bureau is involved in the murder, torture and subjection to forced labour of people held in those camps.
204	UK	Entity	Ministry of State Security (MSS) Bureau 7		Chinese	As the entity responsible for running the DPRK's political prison camps, MSS Bureau 7 is involved in the widespread serious human rights violations committed against prisoners in those camps by camp guards and other DPRK officials. These violations include murder, torture and enslavement.
205	USA	Individual	MIREMBE, Dorah	Uganda	Ugandan	As part of a scheme whereby young children were removed from Ugandan families under promises for "special education" programs and study in the US, and subsequently offered to US families for adoption, Mirembe used her law

							firm to handle the legal aspects of the adoptions, in some cases through the manipulation or falsification of court documents. Further, her firm at times hired intermediaries to seek out vulnerable families in remote Ugandan villages to manipulate parents into giving their children up for adoption under false pretenses.
206	USA	Entity	Moku Goldmines AG				Company owned or controlled by Dan Gertler or his companies
207	USA	Entity	Moku Mines D'or SA				Company owned or controlled by Dan Gertler or his companies
208	Canada	Individual	MOLINA PENALOZA, Ricardo Antonio	Venezuela		Venezuelan	
209	USA	Entity	Moonstorm Enterprises LTD			Cyprian	Owned or controlled by, or acting or purporting to act on behalf of, directly or indirectly, Slobodan Testic.
210	USA	Individual	MORENO BRIONES, Fidel Antonio	Nicaragua		Nicaraguan	Moreno Briones has directed acts of violence committed by the Sandinista Youth and pro-government armed groups which have been implicated in numerous human rights abuses related to the ongoing protests against the Nicaraguan government.
211	Canada	Individual	MOTTA DOMINGUEZ, Luis Alfredo	Venezuela		Venezuelan	
212	USA	Individual	MUHAMMAD, Kayiira	Democratic Republic of the Congo		Congolese	A commander of the ADF, who has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in serious human rights abuses.
213	USA	Individual	MUKIIBI, Moses	Uganda		Ugandan	A Ugandan judge who accepted bribes from Mirembe in order to process and expedite Ugandan scam adoption cases.
214	USA	Individual	MUORWEL, Malual Dhal	South Sudan		South Sudanese	Associated with the killings of a member of the SPLM-IO and a human rights lawyer, and identified as the commander of forces who detained and assaulted three international monitors in December 2018.
215	USA	Individual	MUSENE, Wilson Musalu	Uganda		Ugandan	A Ugandan judge who accepted bribes from Mirembe in order to process and expedite Ugandan scam adoption cases.
216	USA, UK, Canada	Individual	MUTREB, Maher Abdulaziz	Saudi Arabia	Makkah	Saudi Arabian	Maher Abdulaziz Mutreb held the position of Intelligence Officer in Saudi Arabia. He was directly involved in carrying out the unlawful killing of Jamal Khashoggi at the Saudi Consulate in Istanbul on 2 October 2018, as part of the 15 man team sent to Turkey by Saudi authorities.
217	USA	Entity	NILETEL			South Sudanese	Owned or controlled by Ashraf Seed Ahmed Al-Cardinal.
218	USA	Entity	Oil of DR Congo SPRL				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
219	USA	Individual	OO, Than	Myanmar (Burma)		Burmese	A leader of the 99th Light Infantry Division (Burma), an entity whose members have engaged in serious human rights abuse under his command.
220	USA	Entity	Operadora Restaurantera del Sol Naciente, S. de R.L. de C.V. (restaurant management company)			Mexican	Designated under the Kingpin Act, for involvement with Mexican drug cartels CJNG and Los Cuinis
221	USA	Entity	Orama Properties Ltd				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
222	USA	Entity	Oriental Iron Company SPRL				Company owned or controlled by Dan Gertler or his companies
223	USA	Individual	OSEGUERA CERVANTES, Nemesio	Mexico		Mexican	Leader of Mexican drug cartel CJNG.
224	Canada	Individual	OSORIO ZAMBRANO, Carlos Alberto	Venezuela		Venezuelan	

225	USA	Entity	Palm Grove Africa Dev't Corp. Ltd				Involved with Yahya Jammeh or corruption in the Gambia.
226	USA	Entity	Papa Petroleum Co., Ltd.			Cambodian	Company owned or controlled by Try Pheap.
227	USA	Entity	Patriot Insurance Brokers Co. Ltd				Involved with Yahya Jammeh or corruption in the Gambia.
228	USA, Estonia, Latvia, Lithuania	Individual	PAVLOV, Andrei	Russia		Russian	Pavlov was involved in the criminal conspiracy uncovered by Magnitsky - he represented two of the Hermitage Fund subsidiaries illegally re-registered in the fraud uncovered by Magnitsky, even though Hermitage Fund had never hired him or authorised his appointment.
229	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	PECHEGIN, Andrey I	Russia	Moscow	Russian	Andrey Pechegin was Deputy Head of the Division of Supervision of Investigations of the Prosecutor's Office and he was responsible for the investigation of complaints about the ill-treatment of Sergei Magnitsky in detention. The evidence suggests that Pechegin intentionally or recklessly failed to fulfil that responsibility in that he ignored and denied complaints about the ill-treatment of Magnitsky.
230	USA	Individual	PETROVIC, Zelimir	Serbia		Serbian	Owner, managing director and representative of a company associated with Slobodan Testic.
231	USA	Individual	PETROVIC, Zoran	Serbia		Serbian	Managing director and principal of a company associated with Slobodan Testic; has negotiated with foreign entities on Testic's behalf.
232	USA	Individual	PHARA, Kim	Cambodia		Cambodian	As a member of Kun Kim's family network, acted or purported to act for or on behalf of, directly or indirectly, Kim.
233	USA	Individual	PHEAP, Try	Cambodia		Cambodian	Pheap has used his vast network inside Cambodia to build a large scale illegal logging consortium that relies on the collusion of Cambodian officials, to include purchasing protection from the government, including military protection, for the movement of his illegal products. He sells to buyers in Vietnam, China, Europe, and Russia, and the support of these officials makes it difficult for local authorities to take lawful action against him.
234	USA	Entity	Pieter Albert Deboutte				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
235	USA, Estonia, Latvia, Lithuania, Canada	Individual	PLAKSIN, Gennady Nikolaevich	Russia		Russian	
236	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	PODOPRIGOROV, Sergei G	Russia	Moscow	Russian	Sergei Podoprigorov was a judge at Moscow's Tverskoi district court. He made two rulings in relation to Sergei Magnitsky: in November 2008 to approve Magnitsky's arrest and in March 2009 to prolong his detention. In this capacity, Podoprigorov authorised Magnitsky's detention, prolonging his detention without trial without subjecting to challenge the evidence originally provided to justify Magnitsky's detention or exploring other factors relevant to the decision. Podoprigorov therefore facilitated the mistreatment and death of Magnitsky by authorising the extension of his detention.
237	USA	Entity	Preduzece Za Trgovinu Na Veliko I Malo Partizan Tech DOO Beograd-Savski Venac				Owned or controlled by Slobodan Testic.
238	USA	Entity	Proglan Capital Ltd				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
239	USA, UK, Estonia, Latvia,	Individual	PROKOPENKO, Ivan Pavolvitch	Ukraine	Vinnitsa	Russian	Ivan Pavlovitch Prokopenko was the Head of the Russian Penitentiary Service (FSIN) at Matrosskaya Tishina pre-trial detention centre where Magnitsky was detained from 28 November 2008 to 25 July 2009. The FSIN is a federal law enforcement body responsible for the supervision of sentences. Heading the FSIN service at Matrosskaya Tishina, Prokopenko was responsible for the supervision of Magnitsky's sentence. In this role, Prokopenko facilitated the

	Lithuania, Canada					mistreatment of Sergei Magnitsky by transferring him from Matrosskaya Tishina detention centre to Butyrka Prison, ignoring Magnitsky's medical needs which could have been provided for at Matrosskaya Tishina, and depriving Magnitsky of important medical care. This unreasonably put Magnitsky's life in danger and contributed to his death.
240	USA	Individual	QADO, Waad	Iraq	Iraqi	Leader of the 30th Brigade militia, which has extracted money from the population around Bartalla through extortion, illegal arrests, and kidnappings. The 30th Brigade has detained people without warrants, or with fraudulent warrants, and has charged arbitrary customs fees at its checkpoints; and has been accused of physical intimidation, extortion, robbery, kidnapping, and rape.
241	USA	Individual	QANGUO, Chen	China	Chinese	Human rights abuses targeting Uyghurs, ethnic Kazakhs, and other minorities in Xinjiang, to include forced labour, arbitrary mass detention, and forced population control
242	Canada	Individual	RAMIREZ CARRENO, Rafael Dario	Venezuela	Venezuelan	
243	Canada	Individual	RANGEL AVALOS, Jose Vicente	Venezuela	Venezuelan	
244	Canada	Individual	RANGEL GOMEZ, Francisco Jose	Venezuela	Venezuelan	
245	Canada	Individual	REYES REYES, Luis Ramon	Venezuela	Venezuelan	
246	USA, Canada	Individual	RIAK RENGU, Malek Reuben	South Sudan	South Sudanese	Deputy defence chief; involved in the violence that has wracked South Sudan since its independence in 2011.
247	USA	Individual	RIVAS REYES, Roberto J	Nicaragua	Nicaraguan	President of Nicaragua's Supreme Electoral Council, Rivas Reyes has been accused of amassing sizeable personal wealth, including multiple properties, private jets, luxury vehicles, and a yacht. Investigations into his corruption have been blocked by Nicaraguan government officials, and he has also perpetrated electoral fraud undermining Nicaragua's electoral institutions.
248	USA	Entity	Romdoul Capital Pawn Co., Ltd.		Cambodian	Owned or controlled by Kim Phara, who is part of Kun Kim's family network.
249	USA	Entity	Romdoul Development Co., Ltd.		Cambodian	Owned or controlled by Kim Phara, who is part of Kun Kim's family network.
250	USA	Individual	RONDON RIJO, Angel	Dominican Republic	Dominican Republic	Politically connected businessman and lobbyist in the Dominican Republic who funneled money from Odebrecht, a Brazilian construction company, to Dominican officials, who in turn awarded Odebrecht projects to build highways, dams, and other projects.
251	USA	Individual	ROSAS CAMBA, Liliana	Mexico	Mexican	Manages business activities and launders drug proceeds on behalf of her husband, Gonzalo Mendoza Gaytan, and CJNG.
252	USA	Entity	Royal Africa Capital Holding Ltd			Involved with Yahya Jammeh or corruption in the Gambia.
253	USA	Entity	Royal Africa Securities Brokerage Co Ltd			Involved with Yahya Jammeh or corruption in the Gambia.
254	USA	Entity	Rozaro Development Limited			Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.
255	USA	Individual	RUDAHIGWA, Kale	Uganda	Ugandan	The son of Kale Kayihura.
256	USA	Individual	SAATI BIN MOHAMAD NAWZAD, Mohamad Ammar	Syria	Syrian	The husband of Al Shibl, Saati is a long time leader within the Syrian Ba'ath Party, which contains some of the highest-ranking members of the Assad regime and are instrumental in shaping the Syrian government's brutal policies. He is credited with the idea of creating the "Ba'ath Brigades", a group of student volunteer fighters that augmented the Syrian forces.
257	USA	Individual	SAN LWIN, Thura	Myanmar (Burma)	Burmese	Leader of the Border Guard Police between 2016 and 2017, during which time his subordinates engaged in widespread extrajudicial killings, sexual violence, assault, and other human rights abuses.

258	USA	Individual	SANDOVAL CASTANEDA, Roberto	Mexico		Mexican	Former governor of the Mexican state of Nayarit involved in the misappropriation of state assets and the receipt of bribes from Mexican drug trafficking organisations, including CJNG.
259	USA	Individual	SANDOVAL LOPEZ, Lidy Alejandra	Mexico		Mexican	Daughter of Roberto Sandoval Castaneda; acted or purported to act on his behalf by holding his ill-gotten assets in their name.
260	USA	Individual	SANDOVAL LOPEZ, Pablo Roberto	Mexico		Mexican	Son of Roberto Sandoval Castaneda; acted or purported to act on his behalf by holding his ill-gotten assets in their name.
261	USA	Entity	Sanzetta Investments Limites=d				Company owned or controlled by Dan Gertler or his companies
262	USA	Individual	SARENAC, Nebojsa	Serbia		Serbian	Slobodan Testic's nephew and one of his closest associates; Managing Director of two companies that are connected to Testic.
263	USA	Individual	SEGUJJA, Elias	Democratic Republic of the Congo		Congolese	A commander of the ADF, who has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in serious human rights abuses.
264	USA, Estonia, Latvia, Lithuania	Individual	SHESHENYA, Alexei Nikolaevich	Russia		Russian	Sheshenya was the shareholder of Grand Aktiv, the plaintiff in a lawsuit against Parfenion (one of the Hermitage fund subsidiaries that was illegally re-registered as part of the fraud that Magnitsky uncovered).
265	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	SILCHENKO, Oleg F	Uzbekistan	Samarkand	Russian	Oleg Silchenko was an investigator in the Investigative Committee of the Russian Interior Ministry and was directly involved in the mistreatment of Sergei Magnitsky whilst in detention, which contributed significantly to his death on 16 November 2009. Silchenko made six applications to extend Magnitsky's detention period (despite his deteriorating medical condition), refused Magnitsky access to his family and engaged in the oppressive questioning and other mistreatment of Magnitsky to pressurise him to retract his allegations of corruption against Interior Ministry officials.
266	USA	Individual	SOPHARY, Kim	Cambodia		Cambodian	As a member of Kun Kim's family network, acted or purported to act for or on behalf of, directly or indirectly, Kim.
267	USA	Individual	SOYLU, Suleyman	Turkey		Turkish	Turkish Minister of Interior; involved in the arrest and detention of Pastor Andrew Brunson.
268	USA	Entity	Sprava A Inkaso Pohladavok, S.R.O.			Slovakian	Owned or controlled by Marian Kocner.
269	USA	Entity	Sprava A Inkaso Zmeniek, S.R.O.			Slovakian	Owned or controlled by Marian Kocner.
270	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	STASHINA, Yelena	Russia	Tomsk	Russian	Yelena Stashina, as a Judge at Moscow's Tverskoi District Court, was involved in decisions to extend the detention of Sergei Magnitsky, and in particular on 12 November 2009, four days before his death. In this capacity, Stashina facilitated the mistreatment / denial of medical care to Sergei Magnitsky which contributed significantly to his death.
271	USA, Estonia, Latvia, Lithuania, Canada	Individual	STEPANOV, Vladlen Yurievich	Russia		Russian	Vladlen Stepanov is a businessman and the ex-husband of Olga Stepanova, the former head of a Moscow tax office who approved the fraudulent tax returns. Treasury designated Stepanova in April 2013 for her involvement in the criminal conspiracy uncovered by Magnitsky.
272	USA, Estonia, Latvia, Lithuania, Canada	Individual	STEPANOVA, Olga G	Russia	Moscow	Russian	Head of the Moscow tax office, Stepanova signed off on a large portion of the tax returns that dispensed cash from the \$230 million fraud uncovered by Magnitsky to those who profited from it.
273	USA, UK, Estonia, Latvia, Lithuania	Individual	STRIZHOV, Andrei Alexandrovich	Russia		Russian	Andrei Alexandrovich Strizhov, as the acting Head of the Investigative Committee in the Russian Ministry of the Interior after the death of Sergei Magnitsky on 16 November 2009, failed to properly investigate his mistreatment in detention, which contributed significantly to his death and concealed evidence in relation to that conduct.

274	USA	Individual	SUBOTIC, Milan	Serbia		Serbian	Owner and managing director of a company associated with Slobodan Testic.
275	USA, Estonia, Latvia, Lithuania	Individual	SUGAIPOV, Umar	Russia	Chechnya	Russian	Umar Sugaipov participated in the extrajudicial killing of Umar Israilov, who had worked to expose wrongdoing by Russian government officials.
276	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	TAGIYEV, Fikret	Azerbaijan	Baku	Azerbaijani	Fikret Tagiyev was the head of the Matrosskaya Tishina detention centre where Sergei Magnitsky died on 16 November 2009. He was responsible for the mistreatment of Sergei Magnitsky whilst in detention, which contributed significantly to his death including by failing to ensure the provision of adequate medical treatment, ordering the handcuffing and beating of Magnitsky shortly before his death and denying, or failing to provide, timely access for emergency services to provide treatment. Tagiyev was also involved in the concealment of evidence regarding the circumstances relating to Magnitsky's death.
277	USA	Entity	Tardigrade Limited			Cyprian	Owned or controlled by, or acting or purporting to act on behalf of, directly or indirectly, Slobodan Testic.
278	USA	Entity	Technoglobal Systems DOO Beograd				Owned or controlled by Slobodan Testic.
279	USA	Entity	Terek Special Rapid Response Team			Russian	Fighters of the Terek Special Response Team detained and tortured persons they believed to be LGBTI, sometimes after the individuals were lured to meetings using social media.
280	USA	Individual	TESIC, Slobodan	Serbia		Serbian	As one of the biggest Arms and Munitions Dealers in the Balkans, Testic has spent more than a decade on the United Nation's blacklist for violating UN sanctions against arms exports to Liberia. In order to secure arms contracts with various countries, Testic would take potential clients on expensive vacations, pay for their children's education at western schools, and use large bribes. Since his designation, Testic has continued to engage in the arms trade and operate as a silent partner in companies he indirectly owns and manages, relying on trusted associates to sign deals and appear on all public documentation.
281	USA	Individual	THIONGKOL, Abud Stephen	South Sudan		South Sudanese	Commander of the South Sudan detention facility where a member of the Sudan People's Liberation Movement - In Opposition (SPLM-IO) and a human rights lawyer were held before being killed.
282	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	TOLCHINSKIY, Dmitri M	Russia	Moscow	Russian	Dmitri Tolchinskiy was an officer in the Tax Crimes Department in the Moscow directorate of the Interior Ministry and was involved in the mistreatment of Sergei Magnitsky whilst in detention, which contributed significantly to his death. Tolchinskiy was part of the 'team' of investigators, led by Artem Kuznetsov, the Deputy Head of the Tax Crimes Department, who were alleged to be involved in the initial fraud exposed by Sergei Magnitsky and who falsified evidence to justify his arrest and detention. As part of this investigation team, Dmitri Tolchinskiy facilitated the mistreatment of Sergei Magnitsky in custody which was designed to force Magnitsky to retract his earlier testimony.
283	USA	Entity	Tranz-Tel, A.S.			Slovakian	Owned or controlled by Marian Kocner.
284	USA, UK	Individual	TRIKUYLA, Elena Anatolievna	Russia		Russian	Elena Anatolievna Trikulya, as an investigator for the Investigative Committee in the Russian Ministry of the Interior after the death of Sergei Magnitsky on 16 November 2009, failed to properly investigate those responsible for his mistreatment in detention, which contributed significantly to his death, and concealed evidence in relation to that conduct.
285	USA	Entity	Try Pheap Dry Port Co., Ltd.			Cambodian	Company owned or controlled by Try Pheap.
286	USA	Entity	Try Pheap Engineering and Construction Co., Ltd.			Cambodian	Company owned or controlled by Try Pheap.
287	USA	Entity	Try Pheap Grand Royal Co., Ltd.			Cambodian	Company owned or controlled by Try Pheap.
288	USA	Entity	Try Pheap Group Co., Ltd.			Cambodian	Company owned or controlled by Try Pheap.

289	USA	Entity	Try Pheap Import Export Co., Ltd.			Cambodian	Company owned or controlled by Try Pheap.
290	USA	Entity	Try Pheap Oyadav S E Z Co., Ltd.			Cambodian	Company owned or controlled by Try Pheap.
291	USA	Entity	Try Pheap Property Co., Ltd.			Cambodian	Company owned or controlled by Try Pheap.
292	USA	Entity	Try Pheap Travel & Tours Co., Ltd.			Cambodian	Company owned or controlled by Try Pheap.
293	USA, UK, Canada	Individual	TUBAIGY, Salah Muhammed	Saudi Arabia	Jazan	Saudi Arabian	Dr Salah Muhammed Tubaigy held the position of Forensic doctor with the Ministry of Interior in Saudi Arabia and Professor in the Department of Criminal Evidence at Naif Arab University. He was involved in the unlawful killing of Jamal Khashoggi in the Saudi Consulate in Istanbul on 2 October 2018 as part of the 15 man team sent to Turkey by Saudi authorities. Dr Tubaigy was present at the time of Jamal Khashoggi's death and held a direct role in Jamal Khashoggi's killing and in the concealment of evidence relating to his death.
294	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	UKHNALYOVA, Svetlana	Russia	Moscow	Russian	Svetlana Ukhnyalova, as a Judge at Moscow's Tverskoi District Court, was involved in decisions to extend the detention of Sergei Magnitsky, and in particular on 15 June 2009. In this capacity, Ukhnyalova facilitated the mistreatment / denial of medical care to Sergei Magnitsky which contributed significantly to his death on 16 November 2009.
295	USA, Estonia, Latvia, Lithuania	Individual	URZHUMTSEV, Oleg Vyacheslavovich	Russia		Russian	Involved in the posthumous prosecution of Magnitsky.
296	USA	Individual	UWIBAMBE, Tesi	Uganda		Ugandan	The daughter of Kale Kayihura.
297	USA, Estonia, Latvia, Lithuania	Individual	VAKHAYEV, Musa	Russia	Urus-Martan, Chechnya	Russian	Musa Vakhayev participated with Kazbek Dukuzov in the extrajudicial killing of journalist Paul Klebnikov, who was working to expose illegal activity carried out by officials of the Russian government.
298	USA	Entity	Valory Principio de Dar, A.C.			Mexican	Owned or controlled by Roberto Sandoval Castaneda or a complicit family member.
299	USA	Entity	Vectura Trans DOO			Serbian	Owned or controlled by, or acting or purporting to act on behalf of, directly or indirectly, Slobodan Testic.
300	USA	Entity	Velcom Trade D.O.O. Beograd			Serbian	Owned or controlled by Goran Andric, a close associate of Slobodan Testic.
301	USA	Entity	Ventora Development SASU				Company owned or controlled by Dan Gertler or his companies
302	USA	Entity	Ventspils Attistibas Agentura (Ventspils Development Agency)			Latvian	Company owned or controlled by Aviars Lembergs.
303	USA	Entity	Ventspils Freeport Authority			Latvian	Company owned or controlled by Aviars Lembergs.
304	Canada	Individual	VIELMA MORA, Jose Gregorio	Venezuela		Venezuelan	
305	USA, UK, Estonia, Latvia, Lithuania, Canada	Individual	VINOGRADOVA, Natalya V	Russia	Michurinsk	Russian	Natalya Vinogradova, as the Deputy Head of the Ownership and Financial Crimes Department in the Investigative Committee of the Russian Interior Ministry, was involved in the mistreatment of Sergei Magnitsky, which contributed significantly to his death on 16 November 2009. Vinogradova was part of a 'team' of investigators, who failed to investigate complaints made by Magnitsky about his mistreatment and provided support to subordinates who were directly involved in that conduct.

306	USA	Individual	VISMURADOV, Abuzayed	Russia	Chechnya	Russian	Vismuradov was responsible for extrajudicial killings, torture, or other gross violations of internationally recognised human rights committed against individuals seeking to expose illegal activity carried out by officials of the Government of the Russian Federation. As the commander of the Terek Special Rapid Response Team in the Chechen Republic, he was in charge of an operation that illegally detained and tortured individuals based on the basis of their actual or perceived LGBTI status.
307	USA	Individual	VIZCAINO GIL, Gustavo Adolfo	Venezuela		Venezuelan	Dugarte's replacement as Director General of SAIME, charging passport applicants thousands of dollars for passports and transferring those funds to his personal foreign bank accounts.
308	USA, UK	Individual	WIN, Soe	Myanmar (Burma)		Burmese	Vice Senior General Soe Win, as Deputy Commander-in-Chief of the Myanmar Armed Forces (Tatmadaw) and Commander-in-Chief of the Myanmar Army, had responsibility for the Tatmadaw troops who carried out serious human rights violations against the Rohingya population in Rakhine State in 2017 and 2019 including unlawful killings, torture, forced labour, systematic rape and other forms of targeted sexual violence. As Deputy Commander-in-Chief of the Tatmadaw and Commander-in-Chief of the Army, Soe Win also has responsibility for the serious human rights violations by the Tatmadaw in connection with its business interests in the extractive industries in Myanmar. Soe Win was also involved in the financing of the Tatmadaw military operations in Rakhine State during which these violations took place, knowing that this financing would contribute to the commission of these violations.
309	USA	Entity	Xinjiang Production and Construction Corps			Chinese	The entity and officials are being designated for their connection to serious human rights abuse against ethnic minorities in Xinjiang, which reportedly include mass arbitrary detention and severe physical abuse, among other serious abuses targeting Uyghurs, a Turkic Muslim population indigenous to Xinjiang, and other ethnic minorities in the region.
310	USA	Individual	YAN, Gao	China		Chinese	Former Beijing Public Security Bureau Chaoyang Branch Director, where human rights activist Cao Shunli was detained, fell into a coma and died from organ failure, her body showing signs of emaciation and neglect.
311	USA	Entity	Zuppa Holdings Limited				Involved with Dan Gertler or corruption in the Democratic Republic of the Congo.

Appendix C – Recent developments

Lithuania have recently added Belarusian President Alexander Lukashenko and 29 of his officials to their Magnitsky sanctions blacklist, with room to add another 118 individuals in the future. The Belarusian community in Canada is making calls for the Canadian government to add Lukashenko and these officials to Canada's Magnitsky sanctions list.