



Sanctions Circular No 146 of 2025

International sanctions in force in the Virgin Islands are the same as those in force in the UK.

Financial Sanctions Notice

19 December 2025

Syria

Introduction

1. The Syria (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) ("the Russia Regulations") were made under the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act) and provide for the imposition of financial sanctions, including asset freezes and other financial and investment restrictions, on persons who are or have been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine; or obtaining a benefit from or supporting the Government of Russia.
2. On 19 December 2025 the Foreign, Commonwealth and Development Office updated the UK Sanctions List on GOV.UK. This list provides details of those designated under regulations made under the Sanctions Act. A link to the UK Sanctions List can be found below.
3. Following the publication of the UK Sanctions List, information on the Consolidated List has been updated.

Notice Summary

4. The following entries have been added to the Consolidated List and are now subject to an asset freeze:
 - Mohammed Hussein AL-JASIM (Group ID: 17250)
 - Sayf Al-Din BOULAD (Group ID: 17251)
 - Ghaith Suleiman DALLA (Group ID: 17249)
 - Miqdad Loay FATIHA (Group ID: 17248)
 - Mudallal KHOURY (Group ID: 17255)
 - Imad Mtanyus KHOURY (Group ID: 17256)
 - HAMZA DIVISION (Group ID: 17254)
 - SULTAN MURAD DIVISION (Group ID: 17252)
 - SULTAN SULEIMAN SHAH DIVISION (Group ID: 17253)

What you must do in relation to this Financial Sanctions Notice

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

- ii. freeze such accounts, and other funds or economic resources.
 - iii. refrain from dealing with the funds or assets or making them available (directly or indirectly) to such persons unless licensed by the Virgin Islands Sanctions Unit;
 - iv. report any findings to the Virgin Islands Sanctions Unit, together with any additional information that would facilitate compliance with the Regulation; and
 - v. provide any information concerning the frozen assets of designated persons that the Virgin Islands Sanctions Unit may request. Information reported to the Virgin Islands Sanctions Unit may be passed on to other regulatory authorities or law enforcement.
6. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.
7. For further assistance, persons should refer to the [Virgin Islands Sanctions Guidelines](#). Additionally, a copy of the relevant Overseas Territories Order may be found on the Financial Services Commission's website.
8. The Compliance Reporting Form can be found [here](#).

Further Information

9. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Syria financial sanctions page on the GOV.UK website:
<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>.
10. The Consolidated List can be found [here](#).
11. The UK Sanctions List can be found [here](#).

Enquiries

12. All enquiries, reports and license applications should be addressed to:

Virgin Islands Sanctions Unit.

Attorney General's Chambers
TTT Building, Wickham's Cay I
Road Town, Tortola VG1110
British Virgin Islands
sanctions@gov.vg

ANNEX TO NOTICE

FINANCIAL SANCTIONS: SYRIA

THE SYRIA (SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I. 2019/792)

ADDITIONS

Individuals

1. AL-JASIM, Mohammed Hussein

Name (non-Latin script): محمد حسين الجاسم

Title: Brigadier General **DOB:** (1) --/--/1985. (2) --/--/1987. (3) --/--/1986. (4) --/--/1988. **POB:** Jousa, Hama Governorate, Syria **a.k.a:** AMSHA, Abu (non-Latin script: أبو عمشة) **Nationality:** (1) Syria (2) Turkey **Other Information:** (UK Sanctions List Ref): SYR0420. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Mohammed al-Jasim is an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: AL-JASIM is or has been involved in repressing the civilian population of Syria and, during the civil war, the commission of violations of International Humanitarian Law. (Gender): Male **Listed on:** 19/12/2025 **UK Sanctions List Date Designated:** 19/12/2025 **Last Updated:** 19/12/2025 **Group ID:** 17250.

2. BOULAD, Sayf Al-Din

Name (non-Latin script): سيف الدين بولاد

DOB: (1) --/--/1988. (2) --/--/1987. **POB:** Bza'ah, al-Bab District, Syria **a.k.a:** BAKR, Abu (non-Latin script: أبو بكر) **Nationality:** (1) Turkey (2) Syria **Other Information:** (UK Sanctions List Ref): SYR0421. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Sayf BOULAD is an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: BOULAD is or has been involved in repressing the civilian population of Syria and, during the civil war, the commission of violations of international humanitarian law. (Gender): Male **Listed on:** 19/12/2025 **UK Sanctions List Date Designated:** 19/12/2025 **Last Updated:** 19/12/2025 **Group ID:** 17251.

3. DALLA, Ghaith Suleiman

Name (non-Latin script): غياث دلا

DOB: 31/07/1971. **POB:** Beit Yashout, Latakia, Syria **a.k.a:** (1) DALLA, Ghaith, Suleiman (non-Latin script: غيث دلة) (2) DALLA, Ghayath, Suleiman (3) DALLA, Ghayth, Suleiman (4) DALLA, Ghiath, Suleiman (5) DALLA, Gyath, Suleiman **Nationality:** Syria **Other Information:** (UK Sanctions List Ref): SYR0419. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Ghaith DALLA is an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: DALLA is or has been involved in repressing the civilian population of Syria and committing violations of international humanitarian law during the civil war. (Gender): Male **Listed on:** 19/12/2025 **UK Sanctions List Date Designated:** 19/12/2025 **Last Updated:** 19/12/2025 **Group ID:** 17249.

4. FATIHA, Miqdad Loay

Name (non-Latin script): مقداد لؤي فتيحة

POB: Jableh, Syria **a.k.a:** JAAFAR, Abu **Nationality:** Syria **Other Information:** (UK Sanctions List Ref): SYR0418. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Miqdad Fatiha is an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: FATIHA is or has been involved in repressing the civilian population of Syria. (Gender): Male **Listed on:** 19/12/2025 **UK Sanctions List Date Designated:** 19/12/2025 **Last Updated:** 19/12/2025 **Group ID:** 17248.

5. KHOURY, Mudallal

Name (non-Latin script): مدلل خوري

DOB: 18/06/1957. **POB:** Homs, Syria **a.k.a:** (1) KHOURI, Mudallal (2) KHOURY, Madalal (3) KHOURY, Mtanyus (4) KHOURY, Mudalal (5) KHURI, Mudallal **Nationality:** (1) Russia (2) Syria **Address:** Moscow, Russia. **Other Information:** (UK Sanctions List Ref): SYR0425. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Mudallal KHOURY is an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: KHOURY is or has been involved in activities supporting or benefitting from the Assad regime, namely by carrying on prohibited activities related to chemical weapons in Syria, providing financial services, or making available funds or economic resources, and being involved in the supply to Syria of goods or technology or in providing financial services relating to such supply. (Gender): Male **Listed on:** 19/12/2025 **UK Sanctions List Date Designated:** 19/12/2025 **Last Updated:** 19/12/2025 **Group ID:** 17255.

6. KHOURY, Imad Mtanyus

Name (non-Latin script): عماد خوري

DOB: 03/10/1964. **a.k.a:** (1) KHOURI, Imad (2) KHOURY, Emad (3) KHURI, Imad (4) KHURI, Imad, Mtanyus (5) KHURI, Mtanyus (6) KHURY, Imad (7) KHURY, Mtanyus **Nationality:** (1) Russia (2) Syria **Other Information:** (UK Sanctions List Ref): SYR0426. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Imad KHOURY is an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: KHOURY is or has been involved in activities supporting or benefitting from the Assad regime, namely by providing financial services, or making available funds or economic resources, that could contribute to these activities. (Gender): Male **Listed on:** 19/12/2025 **UK Sanctions List Date Designated:** 19/12/2025 **Last Updated:** 19/12/2025 **Group ID:** 17256.

Entities

1. HAMZA DIVISION

Name (non-Latin script): فرقة الحمزة

a.k.a: (1) al-Hamza Division (2) Hamzat Division **Other Information:** (UK Sanctions List Ref): SYR0424. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that the Hamza Division is an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: the Hamza Division is or has been involved in repressing the civilian population in Syria. (Type of entity): Militia **Listed on:** 19/12/2025 **UK Sanctions List Date Designated:** 19/12/2025 **Last Updated:** 19/12/2025 **Group ID:** 17254.

2. SULTAN MURAD DIVISION

Name (non-Latin script): فرقة السلطان مراد

Other Information: (UK Sanctions List Ref): SYR0422. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that the Sultan

Murad Division is an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: the Sultan Murad Division is or has been involved in repressing the civilian population in Syria. (Type of entity): Militia **Listed on:** 19/12/2025 **UK Sanctions List Date Designated:** 19/12/2025 **Last Updated:** 19/12/2025 **Group ID:** 17252.

3. SULTAN SULEIMAN SHAH DIVISION

Name (non-Latin script): فرقة السلطان سليمان شاه

a.k.a: Amshat (non-Latin script: عمشات) **Address:** Afrin District, Aleppo Governate, Afrin District, Aleppo Governate, Syria. **Other Information:** (UK Sanctions List Ref): SYR0423. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that the Sultan Suleiman Shah Division is an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: the Sultan Suleiman Shah Division is or has been involved in repressing the civilian population in Syria. (Type of entity): Militia **Listed on:** 19/12/2025 **UK Sanctions List Date Designated:** 19/12/2025 **Last Updated:** 19/12/2025 **Group ID:** 17253.

Office of Financial Sanctions Implementation HM Treasury

19/12/2025