



Sanctions Circular No. 106 of 2025

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

Financial Sanctions Notice

20 October 2025

HAITI

Introduction

1. The Haiti (Sanctions) Regulations 2022 (S.I. 2022/1281) (the Regulations) were made under the Sanctions and Anti-Money Laundering Act 2018 (“the Sanctions Act”) and provide for the imposition of financial sanctions, namely the freezing of funds and economic resources of persons designated by the United Nations as responsible for or complicit in, or having engaged in, directly or indirectly, actions that threaten the peace, security or stability of Haiti.
2. On 20 October 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:
 - **Dimitri HERARD (Group ID: 17199)**
 - **Kempes SANON (Group ID: 17200)**

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 Haiti financial sanctions page on the GOV.UK [website](#).
<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>
10. Further details on the UN measures in respect of Haiti can be found on the relevant UN Sanctions Committee [webpage](#).
<https://www.un.org/securitycouncil/sanctions/information>
11. The UN Consolidated List can be found [here](#).
12. The Consolidated List can be found [here](#).
13. The UK Sanctions List can be found [here](#).

Enquiries

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

Virgin Islands Sanctions Unit

Attorney General's Chambers
TTT Building, Wickham's Cay 1
Road Town, Tortola VG 1110
British Virgin Islands
sanctions@gov.vg

ANNEX TO NOTICE

FINANCIAL SANCTIONS: HAITI

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

ADDITIONS

Individual

1. HERARD, Dimitri

DOB: (1) 04/02/1986. (2) 19/08/1980. POB: Port-au-Prince, Haiti Nationality: Haiti Passport Number: (1) PP4605101 (2) PP5143023 National Identification Number: (1) 003-275-594-6 (2) 1006829931 National Identification Details: (1) Fiscal identity (2) Record from the National Identification Office, issued at Pétion-Ville on 27 December 2019, expires 27 December 2029 Other Information: (UK Sanctions List Ref): HAI0012. (UN Ref): HTi.009. Dimitri Herard is a former Haitian police officer and head of the National Palace General Security Unit (USGPN). From 2017 to 2021, he engaged in actions that threatened the peace, security, and stability of Haiti. In particular, he was charged by the Haitian authorities for complicity in threatening the country's national security, including the assassination of President Jovenel Moïse and attempt to the life of the former First Lady, Martine Moïse. Mr. Herard was arrested in July 2021. He escaped from the National Penitentiary in Port-au-Prince on 2 March 2024 and is currently wanted by the Haitian National Police (HNP) for a range of violent crimes that include homicide, burglary, rape, armed robbery, acts of terrorism and escape from prison. Dimitri Herard represents one of the primary threats to both the political transition in Haiti, as well as to any future government. He has been supporting individuals sanctioned by the United Nations, - including Jimmy Chérizier (alias "Barbeque" – HTi.001); Johnson André (alias "Izo" – HTi.002) and Renel Destina (alias "Ti Lapli" – HTi.003), he has strong ties with some of the most violent gangs in Haiti and has been colluding with the Viv Ansanm alliance, as well as with Guy Philippe and other political, private and security actors with whom he is currently conspiring to seize control of the country by force. Mr. Herard is behind Viv Ansanm's coordinated attacks against State institutions that started in late February 2024, including planning the attacks and providing certain gangs with training and firearms. Since his escape from prison, Mr. Herard has sought refuge with the 5 Segond gang (led by Johnson André, alias "Izo" - HTi.002) in the Village de Dieu neighborhood of Port-au-Prince, and with Guy Philippe in Pestel, Grand'Anse department. During his service at the USGPN, Mr. Herard played a significant role in fuelling the trafficking of illicit arms and drug in the country by diverting HNP weapons, importing arms and ammunition illicitly from abroad, and moving drugs for criminal organizations in the region. Dimitri Herard continues to be involved in significant criminal activities that have fuelled gang violence and instability across Haiti, including human rights

violations and the obstruction of the delivery and distribution of, and access to, critical humanitarian assistance in the country. He was sanctioned by Canada for having committed acts that undermine the peace, security and stability of Haiti on 21 March 2025. He has provided logistical support to criminal gangs and political actors who aim to overthrow the government and is also an associate of Izo, already sanctioned by Canada for reasons concerning serious and systemic human rights violations. (Phone number): +50934371184 (Gender): Male Listed on: 20/10/2025 UK Sanctions List Date Designated: 20/10/2025 Last Updated: 20/10/2025 Group ID: 17199.

2. SANON, Kempes

DOB: 16/06/1979. a.k.a: KEMPES Nationality: Haiti Address: Port-au-Prince, Haiti. Other Information: (UK Sanctions List Ref): HAI0013. (UN Ref): HTi.010. Kempes Sanon, alias “Kempes”, is the leader of the Les Argentins gang (also known as the Bel Air gang), which has around 150 members. The gang’s stronghold is located in the Haut Bel-Air area of Port-au-Prince, Haiti. Kempes has been involved in various actions that threaten the peace, security, and stability of Haiti. In particular, he has engaged in systematic violations of human rights, firearms and ammunition trafficking, and supporting individuals designated by the United Nations Security Council, including Jimmy Chérizier (alias “Barbeque” - HTi.001). Kempes Sanon has been playing a significant role in the consolidation of power by gangsover Port-au-Prince. Kempes was a founding member of the G-Pèp coalition, and has been playing a key role in enabling the growing hegemony of the Viv Ansanm alliance since February 2024. In particular, Kempes and his gang, along with Barbeque, the leader of the Delmas 6 gang and spokesperson of Viv Ansanm, conducted, in the course of several months, repeated assaults against the neighbourhood of Solino. Indiscriminate attacks against civilians and fighting with local self-defence groups resulted in many casualties and thousands of people having to flee their homes as a result of the extensive violence. Kempes and his allies eventually took full control of Solino in late October 2024 and, at the time of writing, are continuing to attack the last free bastions of Port-au-Prince, including Petion Ville and Haut-Delmas. Kempes Sanon and his gang are involved in extortion, illicit taxation and kidnappings. He has a network of people working for him within governmental institutions, including within security agencies, which allow him to avoid arrests, launder money and undertake kidnapping. Kempes Sanon is wanted by the Haitian National Police (HNP) as he escaped prison in 2021 where he was incarcerated for kidnapping, theft and assassination. In September 2022, the Dominican Republic banned Kempes from entering their territory and, on 4 March 2025, they designated the “Haut Bel-Air gang” (Les Argentins) as a terrorist organisation. In May 2025, the United States designated Viv Ansanm as a foreign terrorist organisation. (Gender): Male Listed on: 20/10/2025 UK Sanctions List Date Designated: 20/10/2025 Last Updated: 20/10/2025 Group ID: 17200.

Office of Financial Sanctions Implementation

HM Treasury

20/10/2025