



Sanctions Circular No. 117 of 2025

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

Financial Sanctions Notice

6 November 2025

Counter-Terrorism (Domestic)

Introduction

1. The Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/577) 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 who are or have been involved in terrorist activity.
2. On 6 November 2025 the Consolidated List was updated following HM Treasury’s decision to designate 2 persons.
3. The Foreign, Commonwealth and Development Office have also updated the UK Sanctions List on GOV.UK. This list provides details of those designated under regulations made under the Sanctions Act.
4. A link to the Consolidated List and UK Sanctions List can be found below.

Notice summary

The following entries have been added to the Consolidated List and are now subject to an asset freeze:

- Kieran James GALLAGHER (Group ID: 17216)
- NEW IRISH REPUBLICAN ARMY (Group ID: 17217)

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.

Further Information

8. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Iran (Nuclear) financial sanctions page on the GOV.UK [website](#).
9. Further details on the UN measures in respect of Iran can be found on the relevant UN Sanctions Committee [webpage](#).
10. The UN Consolidated List can be found [here](#).
11. The Consolidated List can be found [here](#).
12. The UK Sanctions List can be found [here](#).
13. The Compliance Reporting Form can be found [here](#).
14. For more information, please see our financial sanctions [guidance](#).

Enquiries

1. 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: COUNTER-TERRORISM (DOMESTIC) THE COUNTER-TERRORISM (SANCTIONS) (EU EXIT) REGULATIONS 2019

ADDITIONS

Individual

1. GALLAGHER, Kieran James

Title: Mr **DOB:** 26/04/1977. **POB:** Londonderry, United Kingdom **Nationality:** (1) United Kingdom (2) Republic of Ireland **Address:** Londonderry, United Kingdom. **Other Information:** (UK Sanctions List Ref): CTD0009. Sanction imposed in addition to an asset freeze: Director Disqualification Sanction was imposed on 06/11/2025 (UK Statement of Reasons): HMT has reasonable grounds to suspect that the Kieran Gallagher is an involved person under the Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 on the basis that he has been, and is, involved in terrorist activity on the basis that: (1) Gallagher is and has been involved in terrorist activity by providing financial services, or making available funds or economic resources, for the purposes of terrorism; and (2) Gallagher is and has been involved in terrorist activity by facilitating terrorism. (Gender): Male **Listed on:** 06/11/2025 **UK Sanctions List Date Designated:** 06/11/2025 **Last Updated:** 06/11/2025 **Group ID:** 17216.

Entity

1. NEW IRISH REPUBLICAN ARMY

a.k.a: (1) New IRA (2) nIRA **Other Information:** (UK Sanctions List Ref): CTD0010. (UK Statement of Reasons): HMT has reasonable grounds to suspect that the New Irish Republican Army ("NIRA") is an involved persons under Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 on the basis that NIRA has been, and is, involved in terrorist activity on the basis that: (1) NIRA has been responsible for, engaged in and provided support for, the commission, preparation and instigation of acts of terrorism. (2) NIRA has facilitated, promoted and encouraged terrorism. (3) NIRA has carried out recruitment activities for a person involved in terrorism. **Listed on:** 06/11/2025 **UK Sanctions List Date Designated:** 06/11/2025 **Last Updated:** 06/11/2025 **Group ID:** 17217.

Office of Financial Sanctions Implementation
HM Treasury
06/11/2025