Sanctions Circular No. _109_of 2025

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

Financial Sanctions Notice **22 October 2025**

Global Irregular Migration and Trafficking in Persons

Introduction

1. The Global Irregular Migration and Trafficking in Persons (Sanctions) Regulations 2025 (S.I. 2025/902) ("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 persons who are or have been involved in people smuggling, human trafficking or the instrumentalisation of migration for the purposes of destabalisation.

2. On 22 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 entry has been amended and is still subject to an asset freeze:

- Granit AVDYLI (Group ID: 17207)
- Ali DERAKHSHAN (Group ID: 17202)
- Vahid DERAKHSHAN (Group ID: 17203)
- Sami DURIQI (Group ID: 17208)
- Shkembim ERMELLAHU (Group ID: 17211)

- Endrit ERMELLAHU (Group ID: 17212)
- Flamur KRASNIQI (Group ID: 17204)
- Burim KRASNIQI (Group ID: 17206)
- Valon KRASNIQI (Group ID: 17210)
- Arif KRASNIQI (Group ID: 17214)
- Nusret SEFEROVIC (Group ID: 17213)
- Nexhmije SELMANI (Group ID: 17209)
- ALPA TRADING FZCO (Group ID: 17205)

What you must do in relation to this Financial Sanctions Notice

1. 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)

2. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

3. 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

4. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Iran (Nuclear) financial sanctions page on the GOV.UK website.
5. Further details on the UN measures in respect of Iran can be found on the relevant UN Sanctions Committee webpage.

6. The UN Consolidated List can be found here.

7. The Consolidated List can be found here.

8. The UK Sanctions List can be found here.

9. The Compliance Reporting Form can be found here.

10. 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: GLOBAL IRREGULAR MIGRATION AND TRAFFICKING IN PERSONS

THE GLOBAL IRREGULAR MIGRATION AND TRAFFICKING IN PERSONS (SANCTIONS) REGULATIONS 2025 (S.I. 2025/902)

ADDITIONS

Individual

1. **AVDYLI, Granit**
   DOB: 14/06/1988. **Nationality**: Kosovo **National Identification Number:** 1172966230 **Address:** Rr Fehmi Lladrovci, lagjija Spitalit, Ferizaj, Kosovo. **Other Information:** (UK Sanctions List Ref): GIM0034. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect Granit AVDYLI is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 {"the Regulations") on the basis of the following grounds: (1) He is or has been involved in a relevant activity, namely people smuggling. By producing forged documents, he has been involved in facilitating the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, he worked inside the laboratory of, and advertised forged documents for sale for, the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (2) He is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it. Specifically, he profited from working inside the laboratory of, and advertised forged documents for sale for, the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (Phone number):00383 045630 **Listed on**: 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17207.

2. DERAKHSHAN, Ali

DOB: 26/12/1983. **a.k.a:** DERAKHSHAN, Alireza **Nationality:** Iran **Address:** 204 Nouf Tower, Umm Hurair Road, Deira, Dubai, United Arab Emirates. **Other Information:** (UK Sanctions List Ref): GIM0027. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect Ali DERAKHSHAN is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations") on the basis of the following grounds: (1) He is or has been involved in a relevant activity, namely people smuggling, by facilitating the unlawful arrival in a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, he is in charge of the day-to-day operations of ALPA TRADING FZCO which purchases equipment, namely engines, motors and spare parts, from East Asia for the purpose of facilitating the irregular arrival of migrants across the English Channel into the United Kingdom. 2) He is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful arrival in a country of individuals who are not a national of that country or permanently resident in it. Specifically, he is in charge of the day-to-day operations of ALPA TRADING FZCO and has profited financially from the irregular arrival of migrants across the English Channel into the United Kingdom. (Gender): Male **Listed on**: 22/10/2025 **UK Sanctions List Date Designated**: 22/10/2025 **Last Updated**: 22/10/2025 **Group ID:** 17202.

3. DERAKHSHAN, Vahid

DOB: 10/08/1978. **Nationality:** Iran **Address:** 204 Nouf Tower, Umm Hurair Road, Deira, Dubai, United Arab Emirates. **Other Information:** (UK Sanctions List Ref): GIM0028. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect Vahid DERAKHSHAN is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations") as he is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful arrival in a country of individuals who are not a national of that country or permanently resident in it. Specifically, he is involved in the financial activities of ALPA TRADING FZCO and has profited financially from the irregular arrival of migrants across the English Channel into the United Kingdom. (Gender): Male **Listed on:** 22/10/2025 UK **Sanctions List Date Designated:** 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17203.

4. DURIQI Sami

DOB: 06/03/1968. **POB:** Pristina **Nationality:** Kosovo **National Identification Number:** 1001059161 **Address:** rr Shefki LULETA, Fushe Kosove, Kosovo. **Other Information:** (UK Sanctions List Ref): GIM0035. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect Sami DURIQI is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations") on the basis of the following grounds: (1) He is or has been involved in a relevant activity, namely people smuggling. By producing forged documents, he has been involved in facilitating the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, he facilitated people smuggling as a member of the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (2) He is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it. Specifically, he profited from people smuggling as a member of the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (Phone number):00383 044 611734 **Listed on:** 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17208.

5. ERMELLAHU, Shkembim

DOB: 25/07/1985. **POB:** Presheve (Presevo), Serbia **a.k.a:** ERMELLAHU, Shembim Nationality: Kosovo **National Identification Number**: 1233903872 **Address:** rr Henrik Bariq, no28, Pristina, Pristina, Kosovo. **Other Information:** (UK Sanctions List Ref):GIM0039. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect Shkembim ERMELLAHU is an involved person under the Global Irregula): GIMration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations") on the basis of the following grounds: (1) He is or has been involved in a relevant activity, namely people smuggling. By producing forged documents, he has been involved in facilitating the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, he facilitated people smuggling as a member of the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (2) He is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it. Specifically, he profited from people smuggling as a member of the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (Phone number):00383049533844 (Gender): Male **Listed on:** 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17211.

6. ERMELLAHU, Endrit

DOB: 03/09/2001. **POB:** Pristina, Kosovo **Nationality:** Kosovo National **Identification Number:** 1248074325 **Address:** rr Henrik Bariq, no 28, Pristina, Pristina, Kosovo. **Other Information:** (UK Sanctions List Ref): GIM0040. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect Endrit ERMELLAHU is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations") on the basis of the following grounds: (1) He is or has been involved in a relevant activity, namely people smuggling. By producing forged documents, he has been involved in facilitating the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, he produced forged documents for the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo which contained equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (2) He is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it. Specifically, he profited from the production of forged documents for the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo which contained equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (Phone number):0038304595025 (Gender): Male **Listed on:** 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17212.

7. KRASNIQI, Flamur

DOB: 28/02/2001. **Nationality:** Kosovo **National Identification Number:** 2173186757 **Address:** Sylejman Vokshi, Pristina, Kosovo.**Other Information:** (UK Sanctions List Ref): GIM0029. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect Flamur KRASNIQI is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations") on the basis of the following grounds: (1) He is or has been involved in a relevant activity, namely people smuggling. By producing forged documents, he has been involved in facilitating the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, he facilitated people smuggling as a member of the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (2) He is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it. Specifically, he profited from people smuggling as a member of the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (Phone number):00383 043907920 (Gender):Male **Listed on:** 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated: 22**/10/2025 **Group ID:** 17204.

8. KRASNIQI, Burim

DOB: 23/04/1983. **a.k.a:** KADRIU, Burim **Nationality:** Kosovo **National Identification Number:** 1014591083 **Address:** rr Feim Marina, nr 47, Lagjija Qendresa, Pristina, Kosovo.**Other Information:** (UK Sanctions List Ref): GIM0033. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect Burim KRASNIQI is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations") on the basis of the following grounds: (1) He is or has been involved in a relevant activity, namely people smuggling. By producing forged documents, he has been involved in facilitating the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, he was the leader of the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (2) He is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it. Specifically, he profited as the leader of the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (Phone number):00383 044136175 (Gender): Male **Listed on:** 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated**: 22/10/2025 **Group ID:** 17206.

9. KRASNIQI, Valon

DOB: 13/12/2002. **POB**: Pristina, Kosovo **Nationality:** Kosovo **National Identification Number:** 1173186777 **Address:** Bulevard Zahir Pajaziti, nr 27, Pristina, Kosovo. **Other Information:** (UK Sanctions List Ref): GIM0038. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect Valon KRASNIQI is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations") on the basis of the following grounds: (1) He is or has been involved in a relevant activity, namely people smuggling. By producing forged documents, he has been involved in facilitating the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, he produced forged documents for the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo which contained equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (2) He is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it. Specifically, he profited from the production of forged documents for the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo which contained equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (Phone number):00383045927741 (Gender): Male **Listed on:** 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17210.

10. KRASNIQI, Arif

DOB: 09/05/1971. **Nationality:** Kosovo **National Identification Number:** 1015491015 **Address:** Bulevard Zahir Pajaziti, 27, Pristina, Kosovo. **Other Information:** (UK Sanctions List Ref):GIM0032. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect Ari): GIMMSNIQI is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations"} on the basis of the following grounds: (1) He is or has been involved in a relevant activity, namely people smuggling. By producing forged documents, he has been involved in facilitating the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, he was an intermediary and facilitator who found "buyers" for the documents produced/altered by the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (2) He is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it. Specifically, he profited from people smuggling as part of the KRASNIQI network. Specifically, he profited from his role as an intermediary and facilitator who found "buyers" for the documents produced/altered by the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (Phone number):00383 04933390 (Gender): Male **Listed on:** 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17214.

11. SEFEROVIC, Nusret

Name (non-Latin script): Nusret SEFEROVIĆ

DOB: (1) --/--/1970. (2) --/--/1969. **Nationality:** Croatia **Other Information:** (UK Sanctions List Ref):GIM0047. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect Nusret Seferović is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 as he is or has been involved in a relevant activity, namely people smuggling. By procuring the issuance of fraudulent passports, and with a view of obtaining any gain or benefit, Nusret Seferović engages in facilitating the unlawful entry into different countries of individuals, who are not nationals of those countries nor permanently resident in them. (Gender): Male **Listed on**: 22/10/2025 **UK Sanctions List Date Designated**: 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17213.

12. SELMANI, Nexhmije

DOB: 03/06/1971. **Nationality:** Kosovo **National Identification Number**: 2015090807 **Address**: rr Shefki Luleta, Fushe Kosove, Kosovo.**Other Information:** (UK Sanctions List Ref):GIM0037. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect Nexhmije SELMANI is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 ("the Regulations") on the basis of the following grounds: (1) She is or has been involved in a relevant activity, namely people smuggling. By producing forged documents, he has been involved in facilitating the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, she found premises and equipment for document forgery, and organised a contract to rent the premises, for the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (2) She is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful entry into a country of individuals who are not a national of that country or permanently resident in it. Specifically, she profited from finding premises and equipment for document forgery, and organising a contract to rent the premises, for the KRASNIQI network. The KRASNIQI network created a sophisticated forgery laboratory in Kosovo with equipment to produce false or fraudulently alter "real" passports, identification cards and driving licences for over 50 countries including the United Kingdom. (Phone number):00383045460541 (Gender): Female **Listed on:** 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17209.

Entity

1. ALPA TRADING FZCO

Address: 204 Nouf Tower, Umm Hurair Road, Deira, Dubai, United Arab Emirates. **Other Information**: (UK Sanctions List Ref):GIM0030. (UK Statement of Reasons):The Secretary of State considers that there are reasonable grounds to suspect ALPA TRADING FZCO is an involved person under the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 (""the Regulations"") on the basis of the following grounds:
(1) It is or has been involved in a relevant activity, namely people smuggling, by facilitating the unlawful arrival in a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, it has purchased equipment, namely engines, motors and spare parts, from East Asia for the purpose of facilitating the irregular arrival of migrants across the English Channel into the United Kingdom. (2) It is or has been involved in a relevant activity, namely people smuggling, by profiting financially from the unlawful arrival in a country of individuals who are not a national of that country or permanently resident in it. Specifically, it has profited from the supply of equipment, namely engines, motors and spare parts, from East Asia for the purpose of facilitating the irregular arrival of migrants across the English Channel into the United Kingdom. (3) It is or has been involved in a relevant activity, namely people smuggling, by facilitating the unlawful arrival in a country of individuals who are not a national of that country or permanently resident in it with a view to obtaining any gain or benefit. Specifically, it has provided goods, namely engines, motors and spare parts, from East Asia that could contribute to the irregular arrival of migrants across the English Channel into the United Kingdom.(Business Reg No):11701069 **Listed on:** 22/10/2025 **UK Sanctions List Date Designated:** 22/10/2025 **Last Updated:** 22/10/2025 **Group ID:** 17205

Office of Financial Sanctions Implementation

HM Treasury

22/10/2025