



## **Sanctions Circular No. 97 of 2025**

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

### **Financial Sanctions Notice**

**8 October 2025**

## **ISIL (Da'esh) and Al-Qaida**

### **Introduction**

1. The ISIL (Da'esh) and Al-Qaida (United Nations Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/466) (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 or economic resources of persons designated by the UN as being associated with ISIL (Da'esh) and Al-Qaida.
2. On 08 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 amended and are still subject to an asset freeze:
  - Ibrahim Ali Abu Bakr TANTOUSH (Group ID: 6927)
  - Al-Azhar Ben Khalifa Ben Ahmed ROUINE (Group ID: 7875)
  - Sulaiman Jassem Sulaiman ALI ABO GHAITH (Group ID: 7996)
  - Shafi Sultan Mohammed AL-AJMI (Group ID: 13135)
  - Gulmurod KHALIMOV (Group ID: 13313)
  - Abd El Kader Mahmoud Mohamed EL SAYED (Group ID: 7128)
  - Aris SUMARSONO (Group ID: 8636)

## **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](mailto:sanctions@gov.vg)

## ANNEX TO NOTICE

### FINANCIAL SANCTIONS: ISIL (DA'ESH) AND AL-QAIDA

#### THE ISIL (DA'ESH) AND AL-QAIDA (UNITED NATIONS SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I. 2019/466)

### AMENDMENTS

Deleted information appears in strikethrough. Additional information appears in italics and is underlined.

#### Individuals

##### 1. TANTOUSH, Ibrahim Ali Abu Bakr

**Name (non-Latin script):** ابراهيم علي أبو بكر تنتوش

**DOB:** 02/02/1966. **POB:** al Aziziyya, Libya **Good quality a.k.a:** (1) ABU BAKR, Ibrahim, Ali, Muhammad (2) AL-MUHSI, 'Abd (3) AL-MUHSIN, Abd (4) AL-RAHMAN, 'Abd (5) ANAS, Abu (6) RAHMAN, Abdul (7) SABRI, Abdel, Ilah (8) TANTOUCHE, Ibrahim, Abubaker (9) TANTOUSH, Ibrahim, Abubaker **Low quality a.k.a:** AL-LIBI **Nationality:** Libya **Passport Number:** (1) 203037 (2) 347834(3) 434021161 **Passport Details:** (1) Libyan. Issued in Tripoli. (2) Libyan. Issued under name Ibrahim Ali Tantoush. Expired on

21 February 2014 (3) South African. Related to alias Abdel Ilah Sabri. Confiscated. **National Identification Number:** 6910275240086 **National Identification Details:** South African. Related to alias Abdel Ilah Sabri. Confiscated. **Address:** ~~Tripoli, Libya~~ *Afghanistan (as at June 2014)* **Other Information:** (UK Sanctions List Ref): AQD0197. (UN Ref): QDi.057. Associated with Afghan Support Committee (ASC) (QDe.069), Revival of Islamic Heritage Society (RIHS)(QDe.070) and the Libyan Islamic Fighting Group (LIFG) (QDe.011). Photograph and fingerprints available for inclusion in the INTERPOL-UNSC Special Notice. Review pursuant to Security Council resolution 1822 (2008) was concluded on 8 Jun. 2010. *Review pursuant to Security Council resolution 2368 (2017) was concluded on 24 November 2020. INTERPOL-UN Security Council Special Notice weblink: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals> INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/1446790>. Tripoli as at Feb. 2014* **Listed on:** 11/01/2002 **UK Sanctions List Date Designated:** 11/01/2002 **Last Updated:** ~~31/12/2020~~ *08/10/2025* **Group ID:** 6927.

##### 2. ROUINE, Al-Azhar Ben Khalifa Ben Ahmed

**Name (non-Latin script):** الأزهر بن خليفة بن احمد روين

**DOB:** 20/11/1975. **POB:** Sfax, Tunisia **Low quality a.k.a:** (1) LAZHAR (2) SALMANE **Nationality:** Tunisia **Passport Number:** P182583 **Passport Details:** Tunisian. Issued on 13 September 2003. Expired on 12 September 2007 **National Identification Number:** 05258253 **Address:** No.2, 89th Street, Zehrouni, Tunis, Tunisia. **Other Information:** (UK Sanctions List Ref): AQD0129. (UN Ref):

QDi.150. Sentenced to six years and ten months of imprisonment for membership of a terrorist association by the Appeal Court of Milan, Italy, on 7 Feb. 2008. Imprisoned in Sfax Prison on 5 June 2007 pursuant to an order issued by the Appeals Tribunal in Tunisia for joining an organization linked to terrorist crimes (case No.9301/207). Sentenced to two years and 15 days' imprisonment and released on 18 June 2008. ⚡ Considered a fugitive from justice by the Italian authorities as at Jul. 2008. *On 20 January 2009, Italian authorities issued a detention order (No.70/2009 S.I.E.P), following a 3 years 4 months and 29 days sentence for terrorism-related crimes.* Under administrative control measure in Tunisia as at 2010. Review pursuant to Security Council resolution 1822 (2008) was concluded on 21 Jun. 2010. *Review pursuant to Security Council resolution 2368 (2017) was concluded on 24 November 2020.* ~~INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals>.~~

~~INTERPOL UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/1419776>~~ **Listed on:** 18/11/2003 **UK Sanctions List Date Designated:** 12/11/2003 **Last Updated:** 31/12/2020 08/10/2025 **Group ID:** 7875.

### 3. ALI ABO GHATH, Sulaiman Jassem Sulaiman

**Name (non-Latin script):** سليمان جاسم سليمان علي أبو غيث

**DOB:** 14/12/1965. **POB:** Kuwait **Low quality a.k.a:** ABO GHATH **Nationality:** Kuwait **Passport Number:** 849594 **Passport Details:** Kuwaiti number, issued on 27 Nov. 1998, issued in Kuwait and expired on 24 Jun. 2003. **Other Information:** (UK Sanctions List Ref): AQD0318. (UN Ref): QDi.154. Left Kuwait for Pakistan in June 2001. *His Kuwaiti citizenship has been revoked since 2001, and he is currently incarcerated in the United States of America.* Review pursuant to Security Council resolution 1822 (2008) was concluded on 21 Jun. 2010. *Review pursuant to Security Council resolution 2368 (2017) was concluded on 24 November 2020.* ~~INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals>.~~ ~~INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/4487587>~~ **Listed on:** 19/01/2004 **UK Sanctions List Date Designated:** 16/01/2004 **Last Updated:** 31/12/2020 08/10/2025 **Group ID:** 7996.

### 4. AL-AJMI, Shafi Sultan Mohammed

**Title:** Doctor **DOB:** 01/01/1973. **POB:** Warah, Kuwait **Good quality a.k.a:** (1) AL-AJMI, Shafi (2) AL-AJMI, Sheikh, Shafi **Low quality a.k.a:** ABU-SULTAN, Shaykh **Nationality:** Kuwait **Passport Number:** 0216155930 **Address:** Area 3, Street 327, Building 41, Al- Uqaylah, Kuwait. **Other Information:** (UK Sanctions List Ref): AQD0314. (UN Ref): QDi.338. Fundraiser for Al-Nusrah Front for the People of the Levant (QDe.137). *In November 2023, he was released from prison in Kuwait as part of the Special Amiri Decree Pardon No. 225/2023.* Review pursuant to Security Council resolution 2368 (2017) was concluded on 24 November 2020. ~~INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals>.~~ ~~INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/5818220>~~ **Listed on:** 09/10/2014 **UK Sanctions List Date Designated:** 23/09/2014 **Last Updated:** 31/12/2020 08/10/2025 **Group ID:** 13135.

### 5. KHALIMOV, Gulmurod

**DOB:** (1) 14/05/1975. (2) --/--/1975. **POB:** (1) Varzob area (2) Dushanbe, (1) Tajikistan (2) Tajikistan **Nationality:** Tajikistan **Address:** Syria: *Afghanistan (Kunar and Nuristan provinces and border areas of Zebok district, Badakhshan province).* **Other Information:** (UK Sanctions List Ref):

AQD0179. (UN Ref): QDi.372. Syria-based military expert, member and recruiter of Islamic State in Iraq and the Levant, listed as Al-Qaida in Iraq (QDe.115). Wanted by the Government of Tajikistan. *Review pursuant to Security Council resolution 2368 (2017) was concluded on 24 November 2020.* *INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals>.* *INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/5930721>.* Address country Syria location as at Sep. 2015. **Listed on:** 07/03/2016 **UK Sanctions List Date Designated:** 29/02/2016 **Last Updated:** ~~31/12/2020~~ 08/10/2025 **Group ID:** 13313.

## 6. EL SAYED, Abd El Kader Mahmoud Mohamed

**Name (non-Latin script):** عبد القادر محمود محمد السيد

**DOB:** 26/12/1962. **POB:** Egypt **Good quality a.k.a:** (1) EL SAYED, Abdel Khader, Mahmoud, Mohamed (2) ES SAYED, Kader **Nationality:** Egypt **National Identification Number:** SSYBLK62T26Z336L **National Identification Details:** Italian Fiscal Code **Other Information:** (UK Sanctions List Ref): AQD0094. (UN Ref): QDi.065. Italian Fiscal Code: SSYBLK62T26Z336L. Sentenced to 8 years imprisonment in Italy on 2 February 2004. Considered a fugitive from justice by the Italian authorities. *Reportedly killed in the border region of Afghanistan and Pakistan in 2012.* Review pursuant to Security Council resolution 1822 (2008) was concluded on 22 Apr. 2010. Review pursuant to Security Council resolution 2253 (2015) was concluded on 21 Feb. 2019. Review pursuant to Security Council resolution 2368 (2017) was concluded on 15 November 2021. *INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals>.*

*INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/1418867>* **Listed on:** 24/04/2002 **UK Sanctions List Date Designated:** 24/04/2002 **Last Updated:** ~~12/01/2022~~ 08/10/2025 **Group ID:** 7128.

## 7. SUMARSONO, Aris

**DOB:** 19/04/1963. **POB:** Gebang village, Masaran, Sragen, Central Java, Indonesia **Good quality a.k.a:** (1) SUNARSO, Arif (2) SUNARSO, Aris (3) ZULKARNAEN, Ustad, Daud (4) ZULKARNAIN (5) ZULKARNAN (6) ZULKARNEN (7) ZULKARNIN **Low quality a.k.a:** (1)

ABDUL (2) ABDULLAH ABDURRAHMAN (3) ABDURRAHMAN (4) DAUD (5) MBAH ZUL (6) MURSHID (7) PAK UD (8) ZAINAL ARIFIN (9) ZUL **Nationality:** Indonesia **Address:** (1) Desa Gebang, Kecamatan Masaran, Kabupaten Sragen, Jawa Tengah, Indonesia. (2) Desa Taman Fajar, Kecamatan Probolinggo, Kabupaten Lampung Timur, Lampung, Indonesia. **Other Information:** (UK Sanctions List Ref): AQD0344. (UN Ref): QDi.187. *He was sentenced to 15 years in prison in Indonesia in January 2022.* Review pursuant to Security Council resolution 1822 (2008) was concluded on 8 Jun. 2010. Review pursuant to

Security Council resolution 2253 (2015) was concluded on 7 Jun. 2018. Review pursuant to Security Council resolution 2368 (2017) was concluded on 15 November 2021. *INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals>* **Listed on:** 18/05/2005 **UK Sanctions List Date Designated:** 16/05/2005 **Last Updated:** ~~14/06/2022~~ 08/10/2025 **Group ID:** 8636.

Office of Financial Sanctions Implementation HM

Treasury

08/10/2025