

Name: Alert ID: TMML2024038899481 Under the terms of Executive Order 13581, the US Treasury has been seeking to locate and freeze assets associated with key organized crime kingpins, a range of Japanese, Latin American, Italian and Russian/Eurasian ne'er-do-wells. On 30 October, a new set of targets was announced, including six people and four businesses "linked to the Brothers' Circle, a Eurasian crime syndicate." I've written elsewhere (here and here) that I still do not believe that the Brothers' Circle, as a specific crime group or "coordinating body", actually exists and instead that it is a—perfectly reasonable—fiction-of-convenience to allow this Order to be applied against criminals operating within the very loose and often mutable networks of Russian/Eurasian crime. The latest targets are all reportedly associated with two specific figures, Vladislav Leontyev and Gafur Rakhimov, who were designated back in 2012, both of whom are definitely bad news and especially involved in transnational drug trafficking in Asia, the Middle East and Europe. These newer designated targets are also essentially lesser figures: agents, messengers, money-movers and the like (not a bad thing, for reasons I go into below). These are Treasury's claims: Vadim Lyalin serves as a conduit for passing messages on behalf of Vladislav Leontyev. He is based in Dubai. Grigory Lepsveridze (known as 'Grisha' or 'Grigory Leps') couriers money on behalf of Vladislav Leontyev. Igor Shlykov ('Shlyk') has worked to get identification documents and to develop business opportunities in Africa on Vladislav Leontyev's behalf. Igor Shlykov also owns or controls MS Group Invest OOO and Meridian Jet Management GmbH based in Russia and Austria respectively (both businesses are also designated). Gurgun House FZCO is owned or controlled by Lazar Shaybazian who was designated in February 2012, for acting for or on behalf of Vladislav Leontyev. Gurgun House FZCO has offices in the U.A.E., Uzbekistan, and Russia. Lazar Shaybazian uses Gurgun House FZCO to move money. Sergey Moskalenko and Yakov Rybalskiy act for or on behalf of Gafur Rakhimov. Moskalenko is an Uzbek citizen now resident in Switzerland, Rybalskiy is Israeli. Artur Badalyan and his company Fasten Tourism LLC are used by key members of the Brothers' Circle to courier money and make travel arrangements. Artur Badalyan is the owner and CEO of Fasten Tourism LLC, which is based in Dubai. Here is a handy chart the Treasury also provided, also again it probably makes the relationships and groupings rather too neat: 20131030_brothers_circle Overall, I'm a fan of this approach, especially as it now extends to associates and agents. The real aim in my opinion is not just freezing individuals' assets—that's a good thing, of course—but also making designated figures toxic within their networked underworld, such that no one wants to do business with them, organize joint criminal ventures, launder their money or launder money with them, for fear of their assets also getting locked. Anything that strikes at the connections that make these networks effective is very good news indeed. On the other hand, I was quite surprised about Lepsveridze's name being on the list, as ■■■■ is one of Russia's highest grossing singers, whose music started in the Russky shanson style—rooted in criminal ballads—but has since progressed into more mainstream directions. Of course there is nothing new about criminals and entertainers being connected, just as Frank Sinatra or—reportedly—Losif Kobzon. But I do wonder about the political fallout that may ensue. Maybe it's not something about which Treasury really cares (and I can see the temptation in not caring), but I suspect this will cause quite an uproar in Russia. As is, police cooperation between the USA and Russia is quite tricky and sometimes politically-complex. I do hope that this does not raise further obstacles. But that said, if Treasury are sure of their facts, then it shouldn't matter if the criminal associates are famous or not, they ought to be on the list.