

NEW CANADIAN SANCTIONS TARGET INDIVIDUALS INVOLVED IN MURDER OF JAMAL KHASHOGGI

December 05, 2018

The Government of Canada announced sanctions on November 29, 2018 against 17 Saudi nationals linked to the murder of Jamal Khashoggi. This follows on the heels of similar sanctions announced by the United States on November 15th. The sanctions were made pursuant to Canada's Sergei Magnitsky Law, known officially as the Justice for Victims of Corrupt Foreign Officials Act. The law was named after the Russian lawyer who uncovered the largest tax fraud in Russian history but was later detained, tortured, and died while in custody. The names of all 17 individuals have been posted by the Government of Canada. The list of sanctioned individuals does not include Saudi Crown Prince Mohammed bin Salman.

The sanctions have three primary impacts. First, any Canadian assets of the sanctioned individuals are effectively frozen and the Government may by cabinet order seize such assets that are located in Canada.

Second, Canadian individuals and corporations are prohibited from engaging in the following activities involving sanctioned individuals anywhere in the world:

- dealing in property of a sanctioned individual;
- entering into or facilitating a financial transaction related to a sanctioned individual's property;
- providing services for the benefit of or at the direction of a sanctioned individual;
- acquiring any services for the benefit of or at the direction of a sanctioned individual; and
- making available any property, anywhere in the world, to a sanctioned individual or anyone acting on their behalf.

Third, the sanctions impose reporting obligations for Canadian financial institutions and other entities to determine and disclose to their regulator, on a continuing basis, whether they are in possession or control of any property that they have reason to believe belongs to a sanctioned individual or entity.

The Magnitsky Law is one of the few Canadian statutes that has extraterritorial effect, meaning that it applies to Canadians and activities anywhere in the world. It is part of a

broader suite of Canadian measures that allows the Government to impose sanctions targeted at products, places, or persons (including individuals, legal entities, and organizations).

BLG's international trade and investment team regularly advises financial institutions and other businesses on their unique obligations related to Canada's comprehensive sanctions regime. For further information or advice, please contact a member of our [international trade and investment group](#).

By

[Milos Barutciski, Jacob Mantle](#)

Expertise

[International Trade & Investment](#)

BLG | Canada's Law Firm

As the largest, truly full-service Canadian law firm, Borden Ladner Gervais LLP (BLG) delivers practical legal advice for domestic and international clients across more practices and industries than any Canadian firm. With over 800 lawyers, intellectual property agents and other professionals, BLG serves the legal needs of businesses and institutions across Canada and beyond – from M&A and capital markets, to disputes, financing, and trademark & patent registration.

[blg.com](#)

BLG Offices

Calgary

Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3
T 403.232.9500
F 403.266.1395

Ottawa

World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9
T 613.237.5160
F 613.230.8842

Vancouver

1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2
T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4
T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3
T 416.367.6000
F 416.367.6749

The information contained herein is of a general nature and is not intended to constitute legal advice, a complete statement of the law, or an opinion on any subject. No one should act upon it or refrain from acting without a thorough examination of the law after the facts of a specific situation are considered. You are urged to consult your legal adviser in cases of specific questions or concerns. BLG does not warrant or guarantee the accuracy, currency or completeness of this publication. No part of this publication may be reproduced without prior written permission of Borden Ladner Gervais LLP. If this publication was sent to you by BLG and you do not wish to receive further publications from BLG, you may ask to remove your contact information from our mailing lists by emailing unsubscribe@blg.com or manage your subscription

preferences at blg.com/MyPreferences. If you feel you have received this message in error please contact communications@blg.com. BLG's privacy policy for publications may be found at blg.com/en/privacy.

© 2026 Borden Ladner Gervais LLP. Borden Ladner Gervais LLP is an Ontario Limited Liability Partnership.