

## Administrative sanction of 2 August 2022

### **Administrative sanction imposed on an investment fund manager**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 5,000 EUR on an investment fund manager (the "Manager") subject to Chapter 16 of the amended Law of 17 December 2010 relating to undertakings for collective investment.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2), letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was submitted to the CSSF and that the Manager immediately remediated the causes for the initial non-submission before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## Administrative sanction of 2 August 2022

### **Administrative sanction imposed on an alternative investment fund manager**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed a reprimand on an investment fund manager (the "Manager"), registered as alternative investment fund manager in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The reprimand was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1) and (2), letter (b) of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was submitted to the CSSF and that the Manager immediately remediated the causes for the initial non-submission before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## Administrative sanction of 2 August 2022

### **Administrative sanction imposed on three alternative investment fund managers**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 5,000 EUR on three investment fund managers (the “Managers”), registered as alternative investment fund managers in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the “Law”) due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Managers within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was submitted to the CSSF and that the Manager immediately remediated the causes for the initial non-submission before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## Administrative sanction of 2 August 2022

### **Administrative sanction imposed on the alternative investment fund manager Bedrock I GP S.à r.l.**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 10,000 EUR on the investment fund manager Bedrock I GP S.à r.l. (the "Manager"), registered as alternative investment fund manager in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was not submitted to the CSSF before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## Administrative sanction of 2 August 2022

### **Administrative sanction imposed on the investment fund manager Eso Management (Luxembourg) Limited Sarl**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 7,500 EUR on the investment fund manager Eso Management (Luxembourg) Limited Sarl (the "Manager") subject to Chapter 16 of the amended Law of 17 December 2010 relating to undertakings for collective investment and registered as alternative investment fund manager according to the provisions of the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was not submitted to the CSSF before the date of imposition of the fine, although the Manager has contacted the CSSF.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## Administrative sanction of 2 August 2022

**Administrative sanction imposed  
on the alternative investment  
fund manager Glacier Capital S.à  
r.l.**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 5,000 EUR on the investment fund manager Glacier Capital S.à r.l. (the “Manager”), registered as alternative investment fund manager in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the “Law”) due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was submitted to the CSSF before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## Administrative sanction of 2 August 2022

### **Administrative sanction imposed on the alternative investment fund manager Gpmg**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 5,000 EUR on the investment fund manager Gpmg (the "Manager"), registered as alternative investment fund manager in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was submitted to the CSSF before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## Administrative sanction of 2 August 2022

### **Administrative sanction imposed on the alternative investment fund manager Historic Car Invest**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 5,000 EUR on the investment fund manager Historic Car Invest (the "Manager"), registered as alternative investment fund manager in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was submitted to the CSSF before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.





## Administrative sanction of 2 August 2022

**Administrative sanction imposed  
on the alternative investment  
fund manager Lia Luxembourg  
Investment Advisors S.à r.l.**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 20,000 EUR on the investment fund manager Lia Luxembourg Investment Advisors S.à r.l. (the "Manager"), registered as alternative investment fund manager in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was not submitted to the CSSF for two consecutive years.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## Administrative sanction of 2 August 2022

**Administrative sanction imposed  
on the alternative investment  
fund manager Max Gain Capital  
S.à r.l.**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 10,000 EUR on the investment fund manager Max Gain Capital S.à r.l. (the "Manager"), registered as alternative investment fund manager in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was not submitted to the CSSF before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## Administrative sanction of 2 August 2022

### **Administrative sanction imposed on the alternative investment fund manager Mbu General Partners**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 5,000 EUR on the investment fund manager Mbu General Partners (the "Manager"), registered as alternative investment fund manager in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was submitted to the CSSF before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.



## **Administrative sanction of 2 August 2022**

### **Administrative sanction imposed on the alternative investment fund manager Voskhod Capital S.à r.l.**

Luxembourg, 19 December 2022

On 2 August 2022, the CSSF imposed an administrative fine of 10,000 EUR on the investment fund manager Voskhod Capital S.à r.l. (the "Manager"), registered as alternative investment fund manager in accordance with the amended Law of 12 July 2013 on alternative investment fund managers.

The administrative fine was imposed on the basis of Article 5, paragraph (1) and Article 8-4, paragraphs (1), (2) letter (f), and (3), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the "Law") due to the fact that the online questionnaire related to the fight against money laundering and terrorist financing for 2021, which was hosted by the CSSF, was not submitted by the Manager within the given deadline.

In determining the amount of the administrative fine, the CSSF, by applying the proportionality principle, took into consideration the fact that the mentioned questionnaire was not submitted to the CSSF before the date of imposition of the fine.

This disclosure is done according to Article 8-6, paragraph (1) of the Law.

