



PRIVATE SECTOR CONSULTATION
Rule and Regulatory Procedure -
Cancellation of Licences or Registrations
for Virtual Asset Service Providers

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A. Introduction

1. The Cayman Islands Monetary Authority (“CIMA” or “the Authority”) seeks consultation and comment from private sector associations concerning the Rule and Regulatory Procedure—*Cancellation of Licences or Registrations for Virtual Asset Service Providers* (attached as **Appendix I and Appendix II**).
2. Requirements specific to the private sector consultation are outlined in section 4(1) of the Monetary Authority Acts (2020 Revision) (“MAA”) which states :

“(b) before proceeding with the proposed measure, the Authority shall have regard to any representations made by the private sector associations, and shall give a written response, which shall be copied to all the private sector associations.”

3. Section 34(1)(a) of the MAA states that:

“After private sector consultation and consultation with the Minister charged with responsibility for Financial Services, the Authority may -

(a) issue or amend rules or statements of principle or guidance concerning the conduct of licensees and their officers and employees, and any other persons to whom and to the extent that the regulatory laws may apply;”

B. Background and Rationale

4. The Authority is committed to maintaining a clear, transparent, and effective regulatory framework for Virtual Asset Service Providers (“VASPs”). While the Virtual Asset (Service Providers) Act (“VASPA”) sets out requirements for the registration and licensing of VASPs, there are currently no established procedures for the cancellation of a VASP’s license or registration. The absence of a formal framework has led to inconsistencies, inefficiencies, and potential regulatory risks. To address this gap, CIMA is proposing a Rule and Regulatory Procedure (“RPr”) that will introduce clear requirements, conditions, and procedural steps for VASPs seeking to cancel their registration or license.
5. The Authority notes that involuntary revocations, including those resulting from regulatory breaches or enforcement actions, are outside the scope of this Rule and RPr. Involuntary revocations are addressed under the Authority’s enforcement powers vested in the MAA and associated regulations, as outlined in the *Enforcement Manual*.
6. The proposed measures aim to enhance market confidence, protect client interests, and align with international regulatory best practices. The Rule will establish enforceable obligations for VASPs undergoing cancellation, ensuring proper client asset reconciliation, compliance with AML/CFT requirements, and adherence to financial regulations. Additionally, the framework will provide clarity on the

consequences of non-compliance, ensuring that all cancellations are handled in a structured and transparent manner.

7. By formalising the cancellation process, these measures will streamline regulatory procedures, reduce inefficiencies, and strengthen the Cayman Islands' position as a leading jurisdiction for virtual asset oversight. Standardised requirements will support financial stability, mitigate risks associated with incomplete or mismanaged cancellations, and reinforce CIMA's commitment to robust regulatory supervision. Ultimately, the proposed framework will provide greater predictability for industry participants while ensuring that market integrity and consumer protection remain a top priority.

C. International Standards

8. As the global crypto regulatory landscape continues to develop, international standard setters, including the Financial Action Task Force ("FATF"), the Financial Stability Board ("FSB"), and the International Organization of Securities Commissions ("IOSCO"), emphasise the importance of comprehensive regulatory frameworks for VASPs, including during transitional phases such as cancellation. These organisations highlight that robust frameworks governing the cancellation of VASPs are crucial for mitigating risks to financial stability, safeguarding client interests, and maintaining the integrity of financial markets.
9. The FATF, in its [Updated Guidance for a Risk-Based Approach to Virtual Assets and VASPs](#) (October 2021), underscores the necessity of regulatory measures to oversee the entire lifecycle of VASPs, including their cancellation. FATF's **Recommendation 15** highlights that jurisdictions must establish licensing or registration systems for VASPs and ensure effective supervisory frameworks complement these. This extends to monitoring VASPs during their closure to mitigate money laundering and terrorist financing ("ML/TF") risks. FATF emphasises that unresolved obligations, such as incomplete client asset distributions or gaps in record-keeping, can present significant vulnerabilities that illicit actors may exploit. Therefore, regulators must enforce customer due diligence, record-keeping, and compliance measures even during cancellation.
10. The FATF emphasises the role of competent authorities, stating that "*VASPs should be supervised or monitored by a competent authority, not a self-regulatory body ("SRB"), which should conduct risk-based supervision or monitoring.*" This guidance underscores the need for oversight during the cancellation process to ensure compliance with regulatory standards and mitigate risks of ML/TF. The FATF further clarifies that competent authorities must have the power "*to conduct inspections, access books and records, compel the production of information, and impose a range of disciplinary and financial sanctions, including the power to withdraw, restrict, or suspend the VASP's license or registration*".
11. A clear cancellation framework is vital for aligning with best practices that promote regulatory integrity and safeguarding client interests. Moreover, formal cancellation processes reduce inconsistencies, protect against systemic risks, and align jurisdictions with global best practices. The FATF guidance highlights the necessity of effective regulatory measures throughout a VASP's lifecycle, ensuring that "*countries should apply a risk-based approach to ensure that measures to prevent or mitigate ML/TF risks are commensurate with the risks identified in their respective jurisdictions.*" A clear cancellation process ensures that obligations are met and mitigates residual risks during transitional phases, preventing misuse of virtual assets.

12. In its *Final Report with [Policy Recommendations for Crypto and Digital Asset \(CDA\) Markets](#)* published on 16 November 2023, the International Organization of Securities Commissions (“IOSCO”) set out 18 policy recommendations for the regulation of crypto and digital assets. In accordance with IOSCO’s principle of “*same activities, same risks, same regulation/regulatory outcomes*”, the recommendations are principles-based and outcomes-focused. They are aimed at the activities performed by VASPs.
13. The recommendation prioritizes investor protection, market integrity, and regulatory compliance, aligning closely with the requirements for VASP cancellation measures. These recommendations are designed to ensure that regulatory frameworks include provisions for client asset safeguarding and operational transparency, particularly during critical events such as the winding down of operations.
14. More specifically, IOSCO’s *Recommendation 14 on Disclosure of Custody and Safekeeping Arrangements*, recommends robust custody requirements, stating that Crypto-Asset Service Providers (“CASPs”) should implement measures to ensure the safeguarding of client assets. This includes maintaining proper segregation, preventing asset misuse, and providing clear disclosures about custody risks. These protections are essential during the winding-down or cancellation process, ensuring that all client assets are returned or reconciled.
15. IOSCO’s *Recommendation 6* acknowledges the need for international cooperation to address the cross-border nature of crypto markets. For regulators, this means sharing information and ensuring compliance during the cancellation of VASPs that operate across multiple jurisdictions. Such practices can minimize risks to investors during cancellations, especially where operations are global.
16. When VASPs exit the market, the absence of effective governance during this transition phase can lead to risks such as mismanagement of client funds, incomplete asset transfers, or unresolved obligations, which could undermine trust in the regulatory system. To mitigate these risks, the proposed measures for cancellation must incorporate strong governance requirements, ensuring that VASPs demonstrate compliance with obligations up to their final day of operation. This includes providing evidence of proper asset distribution, client notifications, and resolution of disputes, all of which reflect the principles of governance outlined by IOSCO.
17. The Financial Stability Board’s (“FSB”) proposed framework for the [International Regulation of Cryptoasset Activities](#) emphasises the importance of a structured framework. While the framework does not directly address cancellation for VASPs, it highlights how the absence of strong governance exacerbates vulnerabilities. Effective governance frameworks ensure investor protection and bolster market confidence by mitigating risks arising from operational disruptions. These principles are essential for maintaining financial stability as crypto-asset markets integrate with traditional financial systems.
18. The FSB underscores that effective governance and robust risk management are integral to safeguarding market confidence and protecting investors. Though not explicitly covering VASP cancellations, FSB’s principles can guide the design of cancellation frameworks that address liabilities, distribution of client assets, and provide transparent reporting. FSB’s principle of “*same activity, same risk, same regulation,*” highlights the need for crypto-asset entities exiting the market to adhere to standards akin to those of traditional financial institutions. Adopting such governance measures mitigates fraud, reduces mismanagement, and limits systemic disruption.

19. Given the inherently global nature of crypto-assets, the FSB emphasises cross-border cooperation. Jurisdictions must coordinate to address regulatory arbitrage and ensure that information sharing supports seamless oversight when VASPs relocate or cease operations. The FSB also stresses the importance of transparency and accountability. Therefore, it highlights the necessity for VASPs to disclose the status of client assets, conduct final audits, and resolve outstanding obligations to foster trust and accountability in the market.
20. Finally, the FSB underscores the need for proactive and comprehensive regulatory measures to address risks posed by the rapidly evolving crypto-asset market. Structured cancellation frameworks are a crucial part of this approach, enabling jurisdictions to manage the orderly exit of VASPs while mitigating risks to broader financial stability and investor protection. By incorporating these principles, jurisdictions can align with global standards and enhance resilience in financial systems, fostering stability and maintain investor confidence.

D. Purpose of Proposed Measure and Consistency with the Authority’s Functions

21. The proposed measures aim to establish a **clear, enforceable, and transparent framework** for the cancellation of VASP licenses and registrations and are consistent with the Authority’s statutory objectives of the Monetary Authority Act (“MAA”):
 - (i) Section 6(2) (a) and (b), which provides that, among others:

“In performing its functions and managing its affairs, the Authority shall—

 - (a) *act in the best economic interests of the Islands; and*
 - (b) *promote and maintain a sound financial system in the Islands”.*
 - (ii) Furthermore, Section 6(3) of the MAA provides that in performing its regulatory functions and its co-operative functions, the Authority shall, *inter alia*:
 - (a) *endeavour to promote and enhance market confidence, consumer protection and the reputation of the Islands as a financial centre;*
 - (b) *endeavour to reduce the possibility of financial services business or relevant financial business being used for the purpose of money laundering or other crime;”*
 - (iii) While it is not a the statutory obligation, the Authority is taking its customary approach, for good measure, to engage with the private sector associations for consultation before issuance of this RPr. Notwithstanding, the RPr can be implemented without consultation pursuant to 48(3)(b) of the MAA, which states that:

“the regulatory handbook shall include policies and procedures for giving reasons for the Authority’s decisions.”

In addition, pursuant to 48(4), it states:

“In cases where the regulatory handbook would have the effect of creating, directly or indirectly, rules or statements of principle or guidance, the Authority shall consult with the private sector associations and the Minister charged with responsibility for Financial Services.”

E. Jurisdictional Comparison

22. The regulation of VASPs has gained increasing attention worldwide as jurisdictions seek to establish frameworks to manage compliance, enhance consumer protection, and mitigate financial crime risks. An essential aspect of these frameworks is the cancellation of licences or registrations, which ensures that non-compliant or defunct operators are removed from the system in a structured and transparent manner. **Table 1** presents a comparative analysis of the regulatory frameworks in Australia, Bermuda, the Bahamas, Hong Kong, and Jersey.

Consultation

Table 1 – General and Core Component of the Regulatory Framework for the Cancellation of VASPs

Components of Cancellation Framework	Australia	Bahamas	Bermuda	Hong Kong	Jersey
Current regime / Regulator	AML/CTF Act,	Digital Assets and Registered Exchanges ("DARE") Act	Digital Asset Business Act (DABA")	Anti-Money Laundering Ordinance ("AMLO") and Securities and Futures Commission ("SFC") regulations	Financial Services (Jersey) Law 1998 Financial Services (Jersey) Law 1998
	Regulated by the Australian Transaction Reports and Analysis Centre	Supervised by the Securities Commission of The Bahamas	Regulated by the Bermuda Monetary Authority	Overseen by Securities Futures Commission (SFC)	Overseen by Jersey Financial Services Commission
Good standing	✓	✓	✓	✓	✓
AML and Sanctions Compliance	✓	✓	✓	✓	✓
Licence or Registration document	✓	✓	✓	✓	✓
Fees	✓	✓	✓	✓	✓
Resolution Document	X	✓	✓	✓	✓
Final Audit Certification	X	✓	✓	✓	✓
Evidence of Asset Reconciliation and Liability	✓	✓	✓	✓	✓

Australia

23. Australia's framework for the cancellation of VASPs does not have a standalone measure. However, it is embedded within its [Anti-Money Laundering and Counter-Terrorism Financing Act](#) ("AML/CTF Act"), administered by the Australian Transaction Reports and Analysis Centre ("AUSTRAC"). This regulatory approach ensures a robust oversight mechanism for the deregistration process while safeguarding client assets and mitigating financial crime risks. According to the AML/CTF Act, VASPs must adhere to clear obligations during cancellation, such as notifying AUSTRAC and submitting the original registration certificate.
24. The Act emphasises the resolution of obligations and compliance, stating that businesses are required to "*maintain comprehensive records of all transactions*" until their cessation is finalised. This includes submitting compliance reports detailing activities up to the date of deregistration. The Act also mandates the reconciliation of client assets and liabilities, with entities needing evidence that all client accounts are settled before deregistration is approved. Failure to comply with these obligations can lead to penalties under AUSTRAC's enforcement measures.
25. Additionally, entities must clear any outstanding regulatory fees or penalties. These steps collectively ensure that VASPs exiting the market do so orderly and transparently without leaving unresolved risks to the financial system

Bahamas

26. The [Digital Assets and Registered Exchanges \("DARE"\) Act](#), regulated by the Securities Commission of The Bahamas ("SCB"), provides a well-defined framework for the cancellation of VASPs. The Bahamas does not have a specific measure for the cancellation process. However, the Act outlines both voluntary and involuntary mechanisms for cessation, ensuring that VASPs adhere to strict regulatory requirements during the process to protect clients and maintain market integrity.
27. Under section 25 of the Act, the SCB has the authority to suspend or revoke a VASP's registration if there is substantial evidence of non-compliance, insolvency, or the entity poses risks to the broader financial system. The Act reinforces this oversight by stating: "*The Commission may revoke the registration of a digital asset business if it is satisfied that the registrant has contravened any provision of this Act or failed to comply with a directive of the Commission*". This reflects the Bahamas' proactive approach to safeguarding the digital asset market while providing clarity and structure for VASPs exiting the market.
28. For cancellation, section 26 of the Act allows VASPs to surrender their registration; it provides that "*a registrant who is desirous of surrendering its registration shall apply in writing to the Commission for approval to surrender the registration.*" However, this is contingent upon meeting specific obligations. These obligations include notifying the SCB of the intent to cease operations and submitting a comprehensive resolution document that details the steps for an orderly wind-down, "*within seven days of surrendering its registration in accordance with section 26*".

Bermuda

29. Under Bermuda's [Digital Asset Business Act 2018](#) ("DABA") and related guidelines issued by the Bermuda Monetary Authority ("BMA"), the process and requirements for cancellation or deregistration of VASPs are well-defined, with distinct provisions for voluntary and involuntary cases. As stated in the BMA's [Code of Practice](#), the senior representative appointed by the VASP plays a critical role in ensuring compliance during such transitions, acting as "*an 'early warning' role and monitoring the DAB's compliance with the Act on a continuous basis*". VASPs are required to maintain records of client transactions and assets, ensuring proper segregation of client assets to protect against loss during deregistration.
30. VASPs seeking voluntary cancellation must notify the BMA in writing of their intent to surrender their licence. This involves submitting a clear statement outlining the reasons for ceasing operations and ensuring that all obligations to clients, counterparties, and regulatory bodies are settled. The BMA requires the licensee to comply with all statutory requirements, including safeguarding client interests and adhering to sound risk management during the cessation process. Additionally, the VASP must provide a plan for an orderly wind-down to mitigate disruptions to the market or clients.
31. One unique aspect of Bermuda's framework is its emphasis on proportionality, tailoring oversight to the nature, scale, and complexity of a VASP's business. This approach applies to the cancellation process, where the BMA ensures the requirements for cancellation align with the risk profile and operational complexity of the VASP. For smaller or less complex entities, the cancellation requirements are structured to avoid undue administrative burden while still safeguarding client interests and ensuring regulatory compliance. For larger, high-risk VASPs, the BMA enforces more rigorous requirements to protect clients and uphold market integrity.

Hong Kong

32. Hong Kong does not have a stand-alone measure for the cancellation of VASPs; the framework for cancellation is governed by the [Anti-Money Laundering and Counter-Terrorist Financing Ordinance](#) ("AMLO") and enforced by the Securities and Futures Commission ("SFC"). The SFC's approach ensures that a structured process prioritises client protection, financial integrity, and compliance with regulatory standards. VASPs intending to cancel their licences must formally notify the SFC, providing the original licence or registration certificate and detailed documentation outlining their cessation plans. This documentation includes a comprehensive resolution plan that ensures all client assets and liabilities are fully reconciled. SFC's [Licensing Handbook for Virtual Asset Trading Platform Operators](#), asserts that a Platform Operator or Licensed representative should inform the SFC, "at least seven business days before the intended cessation of business".
33. The guidelines explicitly require that client funds and virtual assets be settled and accounted for before the cessation of operations. To verify compliance with these requirements, VASPs must engage an independent professional firm to conduct a final audit certification, which confirms adherence to licensing conditions and regulatory obligations. The SFC Handbook states: "*If a Platform Operator ceases carrying on the Relevant Activities for which it is licensed, it should submit to the SFC its audited accounts and other required documents, made up to the date of cessation, not later than four months after the date of the cessation*".
34. Further, operational reconciliation, all outstanding fees and financial obligations must be cleared as part of the cancellation process. The SFC retains the authority to impose

penalties for non-compliance or failure to meet these exit requirements. The regulatory framework emphasises transparency, orderly exits, and the safeguarding of investor interests.

Jersey

35. The Jersey Financial Services Commission ("JFSC") guidance on the cancellation or deregistration of VASPs is primarily governed by the [*Proceeds of Crime \(Supervisory Bodies\) \(Jersey\) Law 2008*](#), and the [*Financial Services \(Jersey\) Law 1998*](#) ("FSJL"). These legal frameworks clarify the obligations of VASPs and the circumstances under which deregistration may occur.
36. VASPs must apply to the JFSC for cancellation, providing evidence of their operational cessation. This includes fulfilling all customer obligations, settling liabilities, and demonstrating that all regulatory and compliance frameworks, including AML/CFT requirements, have been fully satisfied and appropriately concluded. Comprehensive reports outlining the closure process may also be required to confirm that the closure does not pose risks to Jersey's financial integrity.
37. The JFSC may revoke a registration if a VASP breaches AML/CFT requirements, provides false information, or fails to meet the "fit and proper" criteria for management and governance. Insolvency or actions detrimental to Jersey's financial reputation also warrant such action. Before cancellation, the JFSC informs the entity, allowing opportunities for rectification. However, unresolved issues lead to final deregistration, with avenues for appeal available through legal channels.
38. Jersey's framework emphasises international AML/CFT standards and proactive oversight. It requires comprehensive cessation reports during voluntary deregistration and continuously monitors post-registration to uphold compliance. This strong system ensures that deregistration processes uphold Jersey's reputation as a secure and responsible financial center.

F. Cost and Benefit Analysis

39. **Table 2** provides a summary of the relevant costs and benefits of implementing the proposed measures *on the Cancellation of Licenses or Registrations for VASPs*, highlighting its impact on the Authority, the Cayman Islands, and licensees/registrants.

Table 2 – Estimated Costs and Benefits of the Proposed Measures

	Costs	Benefits
CIMA	Administrative costs associated with: <ol style="list-style-type: none"> 1. Development and enforcement of the measures. 2. Staff training relating to monitoring compliance with the VASP cancellation requirements. 	<ol style="list-style-type: none"> 1. A robust cancellation framework ensures that VASPs exit the market transparently, safeguarding financial stability and consumer interests. 2. An improvement in the VASP division's cancellation process will enhance the Authority's reputation for guidance and efficiency in the VASP industry.

	Costs	Benefits
		<ol style="list-style-type: none"> 3. Reduced Administrative Burden by minimising back-and-forth communication and streamlining guidance on cancellation requirements and timelines. 4. Enhance the Authority's ability to process cancellations promptly and uniformly, contributing to improved operational performance and regulatory consistency.
Cayman Islands	<ol style="list-style-type: none"> 1. Additional resources are needed for legal and enforcement actions against non-compliant entities. 	<ol style="list-style-type: none"> 1. Strengthens the jurisdiction's image as a global hub for secure and regulated digital asset operations. 2. Attracts high-quality VASPs willing to adhere to robust regulatory standards, potentially increasing economic activity in the jurisdiction. 3. It mitigates systemic risks associated with unregulated VASP closures, protecting the economy from ripple effects and promoting consumer protection by safeguarding client assets and maintaining confidence in the financial system. 4. Aligns with global standards and bolsters Cayman's reputation as a well-regulated jurisdiction.
Licensees/ Registrants	<ol style="list-style-type: none"> 1. More stringent measures may complicate or prolong the exit process. 2. Potential financial burden on smaller VASPs as it relates to administrative costs and legal and accounting services relating to the cancellation process. 	<ol style="list-style-type: none"> 1. Standardised measures reduce uncertainty around the cancellation, requirements, timelines and process. 2. Demonstrates a commitment to best practices, enhancing their standing with investors and partners. 3. Transparency in cancellations safeguards client assets, improving overall trust in licensed operators.

40. Based on the cost-benefit analysis, the recommendation is to implement the proposed measures. While there are initial costs for both the Authority and licensees/registrants —such as the administrative burden of developing the proposed measures, the operational costs of compliance, and the potential costs for VASPs— the long-term benefits outweigh these challenges. The key benefits include enhanced market integrity, increased investor protection and confidence, and alignment with global best practices such as FATF recommendations, vital for maintaining the jurisdiction's reputation as a secure and regulated financial hub. Additionally, a standardised Rule and RPr for cancellation ensures that VASPs exit the market transparently, reducing the risk of operational disruptions or legal disputes and ultimately contributing to the stability of the Cayman Islands financial services industry. Furthermore, attracting high-quality VASPs committed to compliance will bolster economic growth and improve the jurisdiction's standing in the international market.

G. Consultation Feedback and Comments

41. Before proceeding with the proposed measures, the Authority shall have regard to any representations made by the private sector associations only. Feedback submitted by individuals, entities, or other bodies, unless acting on behalf of private sector associations, will not be accepted by the Authority. Representations from private sector associations must be submitted as a consolidated document, and a listing of the entities which provided feedback should be included. Private sector associations should ensure that conflicting positions are resolved prior to submission to the Authority. Where positions conflict within or across associations, the Authority will consider all available information in taking a decision, which will be at its sole discretion.
42. To ensure that all responses are given due consideration, it is important that private sector associations make clear reference to the sections of the measure being commented on, and that responses are unambiguous, clearly articulated and based on fact. The consultation process is not designed to address complaints or grievances. Feedback of this nature should be submitted through the established complaints process.
43. In cases where the feedback proposes to change a policy position of the Authority or substantially amend any requirement of the draft measure, information to support the position of the association must be provided. The table below provides an example of the Authority's expectation with regard to feedback for the proposed measures.

Reference	Example of a Helpful Comment	Examples of Comments Needing More Support
Rule 4.2 ¹	In Rule 4.2 the current text omits the fair value measurement of liabilities. Also, as defined it is not asymmetrical with the Market Price definition and thus scenarios exists that fall into neither category. Suggested wording:	<ul style="list-style-type: none"> × This is not what is done in other jurisdictions. × I don't think we should do this. × CIMA is not considering the position of the experts.

¹ This example is not reflective of the content of the proposed measure.

	<i>Hard-to-Value Securities means an asset or liability for which there is no Market Price which is required to be measured at fair value pursuant to 5.2</i>	
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44. All feedback submitted by private sector associations will be given due consideration, nevertheless, the decision to adopt any feedback provided into a proposed measure will be at the sole discretion of the Authority.

H. Notice of Representations

45. The Authority seeks consultation through written comments and representations from the private sector associations concerning the:

Rule—Cancellation of Licences or Registrations for Virtual Asset Service Providers

Regulatory Procedure—Cancellation of Licences or Registrations for Virtual Asset Service Providers

46. The Authority must receive representations by 1700hrs on **April 15, 2025**. Representations received after this deadline may not be considered and will not form part of the collated written response provided to private sector associations.
47. Comments and representations must be addressed to²:

The Chief Executive Officer
Cayman Islands Monetary Authority
P.O. Box 10052
SIX, Cricket Square
Grand Cayman KY1-1001
Cayman Islands
Tel: 345-949-7089
Fax: 345-946-5611
Email:
consultation@cima.ky
and copied to denishasamuels@cima.ky

48. The Authority shall have due regard to any representation made by the private sector associations and industry stakeholders. The Authority shall provide a written response collating the feedback received and the Authority’s position on this feedback. This response shall be copied to all relevant private sector associations only.

² Where the private sector association or industry stakeholder has no comments or representations on the proposed measure, it is recommended that the Authority be informed of this fact.



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