From: Adams, Andrew (ODAG)

Subject: Re: (OLA WF 124967) Request for Views on SFR for a July 19th SJC Hearing on Kleptocracy.

To: Maxey, Peter (JMD)

Cc: Khoo, Michael (CRM); Pondell, Robert (JMD); Sharp, Garland S. (JMD)

Sent: July 14, 2022 4:26 PM (UTC-04:00)

Thank you! (b)(6), (b)(7)(A), (b)(7)(C), (b)(7)(E) per FBI . Will get the cats asap

Sent from my iPhone

On Jul 14, 2022, at 10:52 PM, Maxey, Peter (JMD) (b) (6) wrote:

Thank you,

(b)(5) per JMD; (b)(6), (b)(7)(C), (b)(7)(A) per FBI

From: Adams, Andrew (ODAG)(b) (6)

Sent: Thursday, July 14, 2022 3:29 PM

To: Maxey, Peter (JMD) (b) (6)

Cc: Khoo, Michael (CRM)(b) (6); Pondell, Robert (JMD)

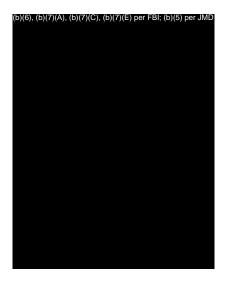
(b) (6) ; Sharp, Garland S. (JMD) (b) (6)

Subject: Re: (OLA WF 124967) Request for Views on SFR for a July 19th SJC Hearing on Kleptocracy.

Info from DDC below. Following up with SDNY now.

(b)(5), (b)(7)(A) per JMD (b)(6), (b)(7)(A), (b)(7)(C), (b)(7)(E) per FBI; (b)(5) per JMD

CATS # Asset
(b)(6), (b)(7)(A), (b)(7)(C), (b)(7)(E) per FBI; (b)(5) per JMD



Sent from my iPhone

wrote:

On Jul 13, 2022, at 11:36 PM, Maxey, Peter (JMD) (6) wrote: Andrew, (b)(5) per JMD Peter From: Maxey, Peter (JMD) Sent: Monday, July 11, 2022 2:59 PM To: Adams, Andrew (ODAG) (b) (6) Cc: Khoo, Michael (CRM)(b) (6) Pondell, Robert (JMD) ; Sharp, Garland S. (JMD) (b) (6) Subject: RE: (OLA WF 124967) Request for Views on SFR for a July 19th SJC Hearing on Kleptocracy. (b)(5) per JMD From: Adams, Andrew (ODAG) (b) (6) Sent: Monday, July 11, 2022 1:30 PM To: Maxey, Peter (JMD) (b) (6) Cc: Khoo, Michael (CRM) (b) (6) ; Pondell, Robert (JMD) ; Sharp, Garland S. (JMD) (b) (6) Subject: Re: (OLA WF 124967) Request for Views on SFR for a July 19th SJC Hearing on Kleptocracy. Still compiling these. (b)(5) per JMD Sent from my iPhone On Jul 11, 2022, at 11:27 AM, Maxey, Peter (JMD) (6)

Andrew,

We had a briefing from the (b)(5) per JMD a couple of weeks ago and they mentioned that (b)(5) .

(b)(5) per JMD

It may be helpful to have a meeting (b)(5) per JMD

Thanks

Peter

From: Adams, Andrew (ODAG) (b) (6)

Sent: Friday, July 8, 2022 11:49 AM

To: Maxey, Peter (JMD) (b) (6)

Cc: Khoo, Michael (CRM) (b) (6) ; Pondell, Robert (JMD)

(b) (6) ; Sharp, Garland S. (JMD) (b) (6)

Subject: Re: (OLA WF 124967) Request for Views on SFR for a July 19th SJC Hearing on Kleptocracy.

Tell me more.

Sent from my iPhone

On Jul 8, 2022, at 11:44 AM, Maxey, Peter (JMD) **(b) (6)** wrote:

That would be great.

We also have heard (b) (5) . Is that true?

Thanks

From: Adams, Andrew (ODAG) (b) (6)

Sent: Friday, July 8, 2022 11:40 AM

To: Maxey, Peter (JMD) (b) (6)

Cc: Khoo, Michael (CRM) (b) (6)

Robert (JMD) (b) (6)

; Pondell,

; Sharp, Garland S.

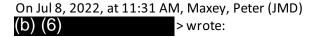
(JMD) (b) (6)

Subject: Re: (OLA WF 124967) Request for Views on SFR for a July

19th SJC Hearing on Kleptocracy.

Seized accounts, but yes I can get this. It's from the and a handful of DDC seizures.

Sent from my iPhone



Good morning Andrew,





I'm happy to have a call or teams meeting to further discuss if you have any questions.

Thanks

Peter

Peter Maxey
Director
Asset Forfeiture Management Staff (AFMS)
Justice Management Division
Department of Justice
145 N Street, NE, Room 5W725
Washington, DC 20530

(Office)
(Mobile)

(b) (6)

Please consider the environment before printing this e-mail

From: Pondell, Robert (JMD)
(b) (6)
Sent: Friday, July 8, 2022 11:07 AM
To: Sharp, Garland S. (JMD)
(b) (6)
(b) (6)
Subject: Fwd: (OLA WF 124967) Request for Views on SFR for a July 19th SJC Hearing on Kleptocracy.

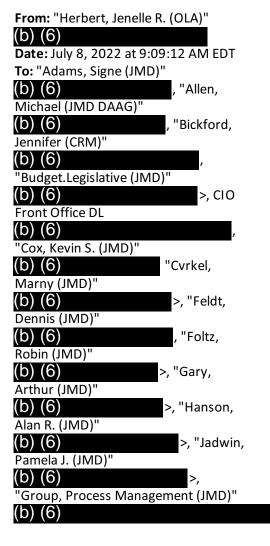
Garland and Peter,

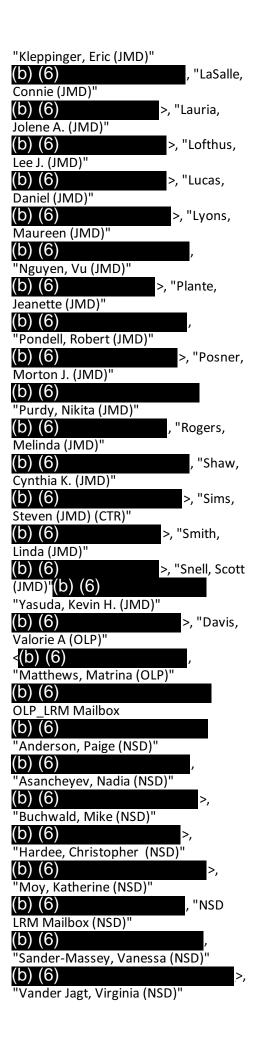
We have received a request to view a Statement for the Record for an upcoming Senate Judiciary Committee meeting where Andrew Adams will be speaking. I will take a look on Monday when I am in the office, but wanted to send this to you two in case you have any comments as well.

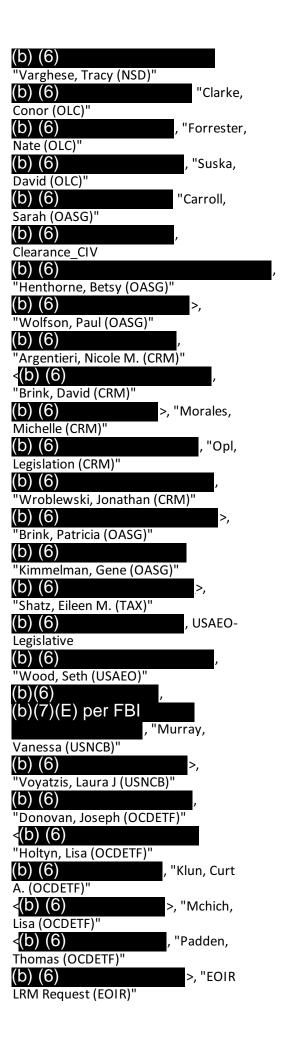
Thanks, Rob

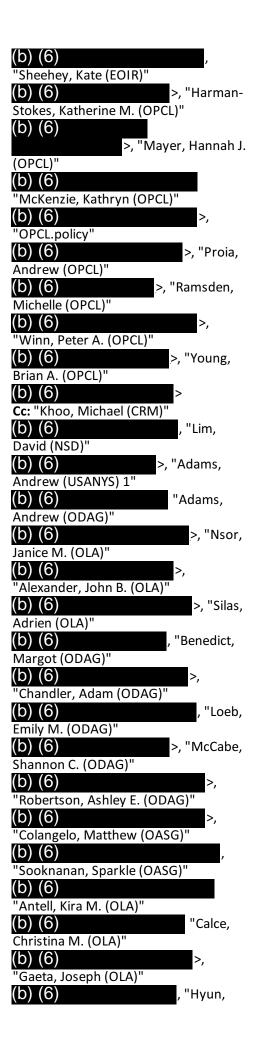
Sent from my iPhone

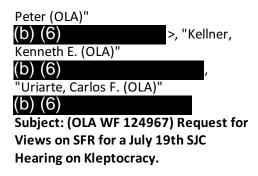
Begin forwarded message:











Due: 5:30pm, 7/11/2022.

COMMENTS TO: Adrien Silas

(OLA)

TYPE: SFR

REQUESTER: OLA

DETAILS:

 Request for Views on DOJ Andrew Adams, Director of Task Force KleptoCapture, Statement for the Record for a July 19, 2022, Senate Committee on the Judiciary Hearing on kleptocracy.

22cv2656_002207

From: Atkinson, Lawrence (ODAG)

Subject: 2022.06.17 - DAG Briefer - TFKC Chart.docx

To: Suero, Maya A. (ODAG); Brockman, Audrey (ODAG)

Cc: Newman, David A. (ODAG); Chandler, Adam (ODAG); Babaeva, Leila (ODAG)

Sent: June 17, 2022 9:29 AM (UTC-04:00)

Attached: 2022.06.17 - DAG Briefer - TFKC Chart.docx

Can you include in the DAG's weekend book?

22cv2656_002208

Law Enforcement Sensitive - Contains 6(e)

BRIEFING MEMORANDUM FOR THE DEPUTY ATTORNEY GENERAL

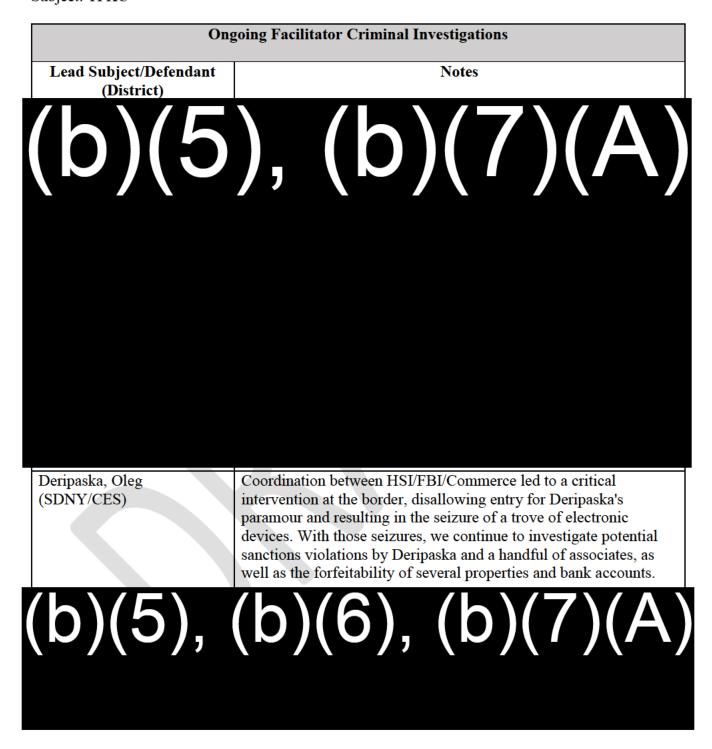
FROM: Rush Atkinson

SUBJECT: Task Force KleptoCapture: Update

DATE: June 17, 2022

The following is a chart summarizing the current TFKC investigations. The chart is divided into three sections: (1) cases indicted; (2) facilitator investigations; and (3) open seizure-focused investigations.

Indicted Cases/Investigations with Seized Assets		
Lead Subject/Defendant (District)	Notes	
Abramovich, Roman (SDNY)	Warrants obtained for two luxury aircraft valued at \$400 million; MLA to Dubai transmitted for seizure. Larger impact likely to be 1) (b) (5) ; and 2) (b) (5)	
Babakov, Alexander (SDNY/CES)	Russian legislator/SDN (and two associates) indicted.	
Malofeyev, Konstantin (SDNY)	Propagandist/SDN indicted. Jack Hanick also indicted, [DIG). (DIG). (DIG). (DIG). (DIG). (DIG). (DIG).	
By Trade OU (DCT/CES)	Indictment of Stanislav Romanyuk and By Trade OU, relating to Commerce Department export control violations aimed at sale of technologies to Russian nuclear weapons production company. Remains under seal as Romanyuk is considering cooperation.	
(b)(5), (b)(6), (b)(7)(A) / Kerimov, Suleyman (MLARS/CES)	Seizure of the Amadea in Fiji. (b)(5), (b)(6), (b)(7)(A)	
Vekselberg, Viktor (SDNY & DDC on <i>Tango</i>)	Seizure of the Tango is now subject of litigation in Spanish courts. SDNY is investigating multiple facilitators of sanctions evasion relating to purchase of properties around the country. (b)(5)	



Seizure-Focused Investigations		
Lead Subject/Defendant		Notes
(b)(5),	(b)(6),	(b)(7)(A)
Kostin, Andrey (MLARS/CES)	Sea Rhapsody currently local additional evidence concernic criminality. Kostin is chair of	; therefore developing ng bank fraud, wire fraud, or other

From: Adams, Andrew (ODAG)
Subject: Re: KleptoCapture proposals q

To: Nsor, Janice M. (OLA)

Cc: Benedict, Margot (ODAG); Newman, David A. (ODAG); Hyun, Peter (OLA)

Sent: June 4, 2022 11:20 AM (UTC-04:00)

And on the Fijian yacht question, it would most likely be under civil asset forfeiture, with soMe slim chance that we would use criminal forfeiture if we develop a charge on Kerimov. Would not be through admin forfeiture.

Sent from my iPhone

On Jun 4, 2022, at 11:08 AM, Adams, Andrew (ODAG) (b) (6) wrote:

Thank you, Janice. I can provide responses:

- 1. Yes, admin forfeiture has certain value caps on certain types of property, civil/criminal forfeiture does not.
- 2. Correct. So long as the crime carries forfeiture as a consequence, crime proceeds of whatever form are subject to civil/criminal forfeiture.
- 3. We are. See, e.g., the seizures announced with the Malofeyev indictment and the Tango seizure.

The third question raises two points worth emphasizing: First, bank accounts that are simply blocked under OFAC sanctions, but do not represent funds moved following the imposition of those sanctions, are not susceptible to any form forfeiture because the funds are not crime proceeds. The proposed language would not change anything in that respect.

Second, I am aware of at least one example of a bank account that we would pursue via admin forfeiture if that were available (the amount is \$5 million, and this too large to pursue in current admin forfeiture), but presents a specific risk in a civil forfeiture context that we are not willing to take given that the funds are otherwise blocked and not going anywhere. In addition to luxury items like yachts, this proposal would allow us to take a run at that account and potentially other similarly situated accounts.

Sent from my iPhone

On Jun 4, 2022, at 10:23 AM, Nsor, Janice M. (OLA) (b) (6) wrote:

Hi all,

We received the following questions re forfeiture from Malinowski's office. Would you be able to provide responses or should I share with MLARS?

Thanks,
Janice

From: McDaniel, Philip (b) (6)

Sent: Friday, June 3, 2022 10:15 AM

To: Nsor, Janice M. (OLA) (b) (6)

Subject: [EXTERNAL] KleptoCapture proposals q

Hi Janice,

A couple follow-up questions for today.

Are seizure/forfeitures like this one happening under civ asset forfeiture or administrative forfeiture?

https://www.justice.gov/opa/pr/300-million-yacht-sanctioned-russian-oligarch-suleimankerimov-seized-fiji-request-united

And a couple more follow-ups:

- 1. Was it only admin forfeiture that had the asset type limitations that KleptoCapture was concerned about?
- 2. So civ asset forfeiture could technically go after bank accounts as well... not just yachts?
- 3. And if these seizures are currently taking place under civ asset forfeiture—and civ asset forfeiture doesn't have the same asset type limitations as admin forfeiture then why aren't we seeing bank accounts also forfeited? ie. the entire chain of accounts linked to the money laundering mentioned in this seizure case—funds routed through the US to support maintenance of the yacht in Fiji?

Thanks!

Philip McDaniel | Foreign Policy Advisor Congressman Tom Malinowski (NJ-7) 1318 Longworth House Office Building

(b) (6) / Cell: (b) (6)

From: Adams, Andrew (ODAG)

Subject: Re: [EXTERNAL] Fwd: Thank you for joining us for BSAAG!

To: (b)(6) per Treasury

Sent: May 19, 2022 9:48 PM (UTC-04:00)

Sounds good to me

Sent from my iPhone

On May 19, 2022, at 9:42 PM, (b)(6) per Treasury wrote:

This reminded me that we should (b)(5) per Treasury

From: Harris, Anthony (b) (6) Date: May 19, 2022 at 7:34:31 PM EDT To: Adams, Andrew (External) (b) (6) (b)(6), (b)(7)(C), (b)(7)(E) per FBI, Welch, Thomas (External) , 'Deniz Muslu' (b) (6) , Sausser, Jeremy R. (b) (6) Cc: Bishoff, Noah H. (b) (6) Maesen, Betsy B. (b) (6) , Homicile-Banks, Pearlie L. (b) (6) (b)(6), (b)(7)(C), (b)(7)(E) per FBI Richardson, Stephen (External) (b) (6) , Dan Clutch (b) (6) , Khoo, Michael , Lim, David (External) (b) (6) (External) (b) (6) Subject: Thank you for joining us for BSAAG! , Tom, and Deniz. (b)(3), 10 U.S.C § 130c, 31 U.S.C § 5319, (b)(5) per Treasur Good evening, Andrew,

Thank you again,

Regards,

Tony Harris

Section Chief, Domestic Engagement

22cv2656_002214

From: (b)(6) per Treasury

Subject: [EXTERNAL] FW: O'brien REPO points

To: Swartz, Bruce (CRM); Adams, Andrew (ODAG)

Sent: May 19, 2022 11:20 AM (UTC-04:00)

See below for my tweaks to what State wants AMB O'Brien to say about REPO. They're reasonably anodyne, and I'm happy to have him raise (b) (5) but wanted to (b) (5).

(b)(6) per Treasury

Department of the Treasury (Office) (b) (6)

From: (b)(6) per Treasury

Sent: Thursday, May 19, 2022 11:16 AM

To:(b)(6) per Treasury
Subject: RE: O'brien REPO points

(b)(5) per Treasury

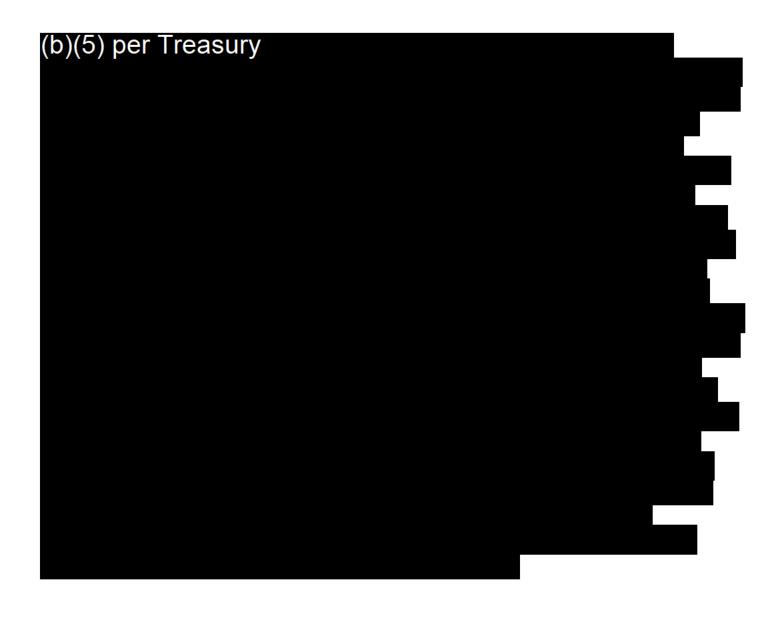
I'd suggest(b)(5) per Treasury

. I also added(b)(5) per Treasury

. Let me know what you think.

(b)(5) per Treasury

22cv2656_002215



(b)(6) per Treasury

Department of the Treasury (Office) (b) (6)

From: (b)(6) per Treasury

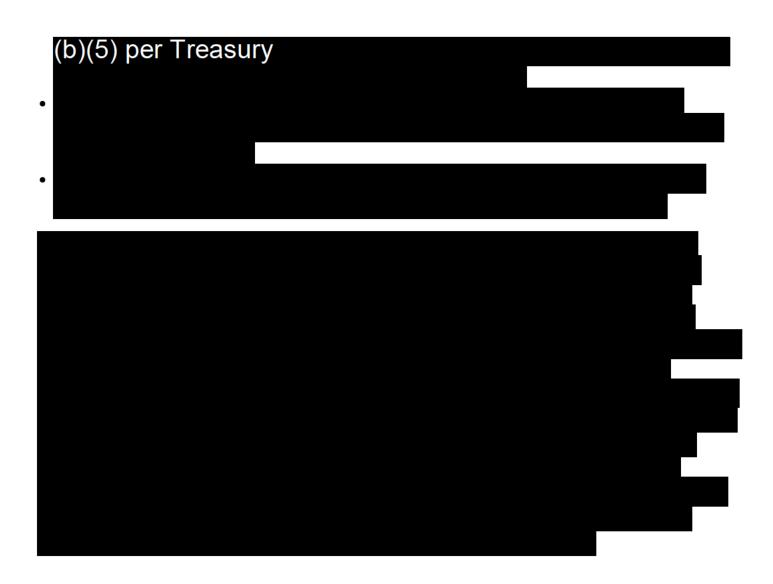
Sent: Thursday, May 19, 2022 10:46 AM

To:(b)(6) per Treasury
Subject: O'brien REPO points

Hey – below are O'Brien's REPO points. They're pretty high level and don't look objectionable to me. Any concerns?

(b)(5) per Treasury

Document ID: 0.7.1197.56624 22cv2656_002216



(b)(6) per Treasury

Director for Europe/Eurasia
Office of Terrorist Financing & Financial Crimes
U.S. Department of the Treasury

o:(b) (6) M:(b) (6) (b) (6) From: (b)(6) per Treasury
Subject: [EXTERNAL] RE: Introduction

To: (b)(6) per State @state.gov; Lim, David (NSD)

Cc: Swartz, Bruce (CRM); (b)(6) per State @state.gov; (b)(6) per State @state.gov; Khoo, Michael (CRM); Adams,

Andrew (ODAG)

Sent: May 12, 2022 12:55 PM (UTC-04:00)

Ambassador -

I am not tracking any REPO engagement for 24 May, or any REPO engagement in Brussels. Our next meeting of the technical leads is 17 May, via Zoom. Nonetheless, we would still be happy to brief you on what's going on in these channels and what we are planning to do.



(b)(6) per Treasury Department of the Treasury (Office) (b) (6)

** Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Thanks, David. Hi, Bruce. What's the plan on the 24th? No need for us to horn in, but things might go well if we coordinate.

Jim

Sent from my iPhone

On May 12, 2022, at 11:37 AM, Lim, David (NSD) (b) (6) > wrote:

Thank you, Amb. O'Brien.

I've cc'd Deputy Assistant Attorney General Bruce Swartz of DOJ and (b)(6) per Treasury of the Treasury Department, who are co-leading the REPO Task Force. I've also copied my colleagues Director Andrew

Adams and Deputy Director Michael Khoo of Task Force KleptoCapture. We would be happy to coordinate with you in advance of the May 24th meeting and will work with of the May 24th meeting and will work with week. Thank you. Best, David From: O'Brien, James C (b)(6) per State @state.gov> Sent: Thursday, May 12, 2022 10:22 AM To: Lim, David (NSD) (6) McConaha, Erin C(b)(6) per State @state.gov>; Cc: Thea Kendler (b) (6) @state.gov> Subject: [EXTERNAL] Re: Introduction Hey David -Looking forward to getting together. In the meantime, the Ukrainian sanctions folks mentioned this morning that they are meeting the Repo or KleptoCapture Task Force in Brussels on May 24. Is that you guys? I'm scheduled to be in Brussels then anyway for sanctions consultations and will see the Ukrainians. Should we coordinate on all this? **Thanks** Jim Sent from my iPhone On May 12, 2022, at 9:16 AM, Lim, David (NSD) (6) wrote: Thank you, sir! I will send a separate email shortly. From: O'Brien, James C (b)(6) per State @state.gov> **Sent:** Wednesday, May 11, 2022 11:26 PM **To:** Lim, David (NSD) (b) (6) McConaha, Erin C(b)(6) per State @state.gov>; Cc: Thea Kendler (b) (6) (b)(6) per State @state.gov> Subject: [EXTERNAL] Re: Introduction to schedule. Looking forward to it. Here's , it'd be good for to join if possible. and

Document ID: 0.7.1197.21575 22cv2656_002219

Thanks!

Sent from my iPhone

On May 11, 2022, at 6:49 PM, Lim, David (NSD) (b) (6) wrote:

Thanks very much for the introduction, Thea.

Ambassador O'Brien and Erin – It's a pleasure to meet you via e-mail. My colleagues - Director Andrew Adams and Deputy Director Michael Khoo - and I would appreciate the opportunity to meet with you and your staff to discuss the collaborative work that the Task Force and State Department have done to date, and explore new ways to strengthen the partnership moving forward. Please let me know if there is a convenient time in the coming weeks to meet. Thank you.

Regards, David Lim

David Lim
Deputy Director, Task Force KleptoCapture
U.S. Department of Justice
(o) (b) (6)
(c): (b) (6)

From: Thea Kendler (b) (6)

Sent: Wednesday, May 11, 2022 6:24 PM

To: (b)(6) per State @state.gov; (b)(6) per State @state.gov

Cc: Lim, David (NSD) (b) (6)

Subject: [EXTERNAL] Introduction

Jim and Erin,

Thank you again for coming by my office last week. I appreciated the chance to discuss our shared priorities, and look forward to working closely with you.

Please let me introduce a former colleague from the Justice Department's National Security Division, David Lim. David is Deputy Director of the Klepto Capture task force – on loan from the Counterintelligence and Export Control Section – and is interested in meeting with you. I hope you all do some great work together!

Best regards, Thea

Thea D. Rozman Kendler

Assistant Secretary for Export Administration Bureau of Industry and Security Department of Commerce



Our schedules are all different. Unless this message is marked as high priority, please do not feel obliged to respond outside of your working hours.

From: (b)(6) per Treasury
Subject: Re: [EXTERNAL] Re: Switzerland

To: Swartz, Bruce (CRM)

Cc: Adams, Andrew (USANYS) 1; Adams, Andrew (ODAG)

Sent: May 6, 2022 11:11 AM (UTC-04:00)

Bruce,

Here are the points Wally delivered yesterday:

If Needed: Talking Points on Helsinki Commission Event "Russia's Swiss Enablers"

(b)(5) per Treasury

Helsinki Commission Event

SIF State Secretary Daniela Stoffel voiced Swiss government displeasure to Ambassador Miller on Tuesday, May 2, due to a scheduled event hosted by the Helsinki Commission entitled "Helsinki Commission Briefing to Examine Swiss Enabling of Russian Oligarchs." The Commission on Security and Cooperation in Europe, or "Helsinki Commission," is a Congress-affiliated but independent arm that conducts advocacy work and holds hearings. The event's description includes unvetted statements about Switzerland's activity which "enables" corrupt Russian elites and describes Switzerland as "compromised." We understand that the Department of State is coordinating a call with Swiss Foreign Minister and President Ignazio Cassis this week.

https://www.csce.gov/international-impact/press-and-media/press-releases/helsinki-commission-briefing-examine-swiss

From: Swartz, Bruce (CRM) (b) (6)

Date: May 6, 2022 at 9:17:32 AM EDT

To: (b)(6) per Treasury

Cc: Adams, Andrew (USANYS) 1 (b) (6)

, Adams, Andrew (ODAG)

(n) (a)

Subject: Re: [EXTERNAL] Re: Switzerland

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Thanks, yes.

(b) (5) can send you the point that we gave our DepSec if helpful.	. I don't have the points but I
As of last week, (b) (5)	
•	
From: Swartz, Bruce (CRM) (b) (6)	
Date: May 6, 2022 at 7:54:39 AM EDT	
To: (b)(6) per Treasury	
Cc: Adams, Andrew (USANYS) 1 (b) (6)	, Adams, Andrew (ODAG)
(b) (6)	
Subject: Switzerland	

I am at the European Prosecutors Conference, and the Swiss prosecutors have asked to speak to me about yesterday's Helsinki Committee hearing regarding Switzerland's alleged facilitation of Russian oligarchs. They also mentioned something to me about OFAC. Are you tracking the latter, and has anyone in the Administration said anything about the former (ie, Helsinki)? And where are we on the Thanks, B

Sent from my iPhone

^{**} Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

From: (b)(6) per Treasury Subject: (TERNAL) REPO and Trusts b)(6) per Treasury (b)(6) per Treasury ; (b)(6) per Treasury To: (b)(6) per Treasury Adams, Andrew (ODAG); Khoo, Michael (CRM); Lim, Treasury (b)(6) per Treasury (b)(6) per Treasury (b)(6) per Treasury David (NSD); (b)(6) per Treasury (b)(6) Laura Ferris (FinCEN) (b)(6) per Treasury (b)(6) per Treasury (b)(6) per Treasury

May 2, 2022 12:33 PM (UTC-04:00) Sent: **Topic: REPO and Trusts** Time: May 5, 2022 10:00 AM Eastern Time (US and Canada) Join ZoomGov Meeting (b) (6) Meeting ID: (b) (6) Passcode: (b) (6) One tap mobile (b) (6) US (San Jose) **US (New York)** Dial by your location US (San Jose) US (New York) US (San Jose) US US Toll-free Meeting ID: (b) (6) Find your local number: (b) (6)

Join by SIP

(b) (6)

Join by H.323

(b) (6) (US West) (b) (6) (US East) Meeting ID: (b) (6) Passcode: (b) (6)

From: (b)(6) per Treasury

Subject: (TERNAL] RE: Update for U/S Fernandez on TFKC and REPO TF

(b)(6) per State @state.gov, Adams, Andrew (ODAG); Lim, David (NSD); Smith, Christopher (CRM); Khoo, To:

Michael (CRM); (b)(6) per State @state.gov (b)(6) per State @state.gov (b)(6) per State @state.gov; (c)(6) per State.gov; Cc:

April 28, 2022 2:42 PM (UTC-04:00) Sent:

Sure:

We've met three times as a full group – once at the Ministerial level – and will meet again 17 May. Information sharing among members is working efficiently through existing channels, and members are expediting requests from other REPO members. Members have sought assistance on active cases bilaterally and trilaterally, and they have also sought technical assistance. Our most immediate challenge is reconciling asset tallies.

(b)(6) per Treasur Department of the Treasury (Office)(b)(6)

From: (b)(6) per State	@state.gov>
Sent: Thursday, April 28, 2022 2:35 PM	
To:(b)(6) per Treasury	(b)(6) Andrew Adams (ODAG); (b)(6) David Lim (NSD)
(b)(b) Christopher Smith (CKM) (b)(b) Michae	el Knoo (CRM);(b)(6) per State @state.gov>
	(b)(6) per State @state.gov>; (b)(6) per State
@state.gov>;(b)(6) per State	@state.gov>
Subject: RE: Update for U/S Fernandez on TFI	C and REPO TF

** Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **



This is all very helpful. Thank you. Any forward-looking points or current issues you can add?

- · We've met this many times and are meeting again on XX
- · We are facing challenge XX and hope to address it by YY
- We will launch XX new initiative to streamline YY by ZZ

Just hoping to give the U/S a sense of how and where things are going.

Thanks again.

(b)(6) per State

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From:(b)(6) per Treasury

Sent: Thursday, April 28, 2022 12:30 PM

To:(b)(6) per State

@state.gov>;(b)(6) Andrew Adams (ODAG);(b)(6) David Lim (NSD);
(b)(6) Christopher Smith (CRM);(b)(6) Michael Khoo (CRM);(b)(6) per State

@state.gov>;(b)(6) per State
```

Drew,

Sorry for being late. I had this queued to send but then got pulled into a meeting. Our points are below. Feel free to reach out if you have any questions.



- (U) In March, the U.S., led by the Department of the Treasury and Department of Justice, launched the Russian Elites, Proxies, and Oligarchs Task Force with international partners to coordinate the freezing and seizing of Russian assets around the world.
- (U) So far, member states in the European Union have reported freezing over \$30 billion in assets, including almost \$7 billion in boats, helicopters, real estate, and artwork.
- (U) Dozens of yachts have been seized by REPO Task Force member countries. The U.S. Treasury has sanctioned and blocked vessels and aircraft worth over \$1 billion, as well as frozen hundreds of millions of dollars of assets belonging to Russian elites in U.S. bank accounts.
- (U//FOUO) Finance ministries have been very active in sharing information, which has yielded leads and other valuable insights into Russian financial activity.
- (U//FOUO) Finance ministries also have shared expertise to help each other immobilize Russian assets.
- (U) Last week, in the wake of criminal charges, Treasury designated a global sanctions evasion network associated with Konstantin Malofeyev, crack downing on the movement of illicit assets.

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(b)(6) per Treasur
   Department of the Treasury
   (Office) (b) (6)
   From:
   Sent: Thursday, April 28, 2022 9:15 AM
                                           @state.gov>; (b)(6) Andrew Adams (ODAG); (b)(6) David Lim (NSD); Smith,
   To:(b)(6) per State
                                                      (b)(6) Michael Khoo (CRM);(b)(6) per State
   Christopher (CRM) < (b) (6)
               @state.gov>
                                                                         @state.gov>; (b)(6) per State
   cc:(b)(6) per State
                                  @state.gov>;(b)(6) per State
            @state.gov>; (b)(6) per State
                                                 @state.gov>
   Subject: RE: Update for U/S Fernandez on TFKC and REPO TF
(b)(6) per State
```

I'll have you something at the FOUO level on this system by noon.

(b)(6) per Treasury

22cv2656_002226

(b)(6) per Treasury

Department of the Treasury

(Office)(b)(6)

From: (b) (6) per State

Sent: Thursday, April 28, 2022 8:28 AM

To: (b) (6) Andrew Adams (ODAG); (b) (6) David Lim (NSD); (b) (6) per Treasury

Christopher (CRM) < (b) (6) (b) (6) Michael Khoo (CRM); (b) (6) per State

@state.gov>

Cc: (b) (6) per State

@state.gov>; (b) (6) per State

@state.gov>; (b) (6) per State

@state.gov>; (b) (6) per State

@state.gov>

Subject: Update for U/S Fernandez on TFKC and REPO TF

** Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Hi All,

U/S Jose Fernandez has asked us to put together **today** an Info Memo for him on U.S. efforts to identify, freeze and seize Russian oligarch assets. If you have any updates you can share on the TFKC and REPO TF's progress that would be great. Happy to adapt anything you already have off the shelf. We would need inputs **by noon** in order to blend them into the paper. The memo will also cover (b) (5) as well as IC support for the broader effort.

The paper will be on the ClassNet/SIPR system given the IC input and we would welcome any input at the Secret-level but also happy to transfer over any inputs that are SBU or lower if you email me at this address. Alternatively, my ClassNet address is (b)(6) per State @state.sgov.gov

Best, (b)(6) per State

(b)(6) per State (teleworking)
Director, Office of Threat Finance Countermeasures
Bureau of Economic and Business Affairs
U.S. Department of State
O. (b) (6)
M (b) (6)

SENSITIVE BUT UNCLASSIFIED

Document ID: 0.7.1197.38569 22cv2656_002227

SENSITIVE BUT UNCLASSIFIED

SENSITIVE BUT UNCLASSIFIED

(b)(6) per Treasury From:

EXTERNAL] FW: greets from Hall again at OCCRP, quick follow Subject:

Adams, Andrew (ODAG) To:

April 28, 2022 11:24 AM (UTC-04:00) Sent:

Andrew – FYI. OCCRP is fishing around the Amadea. (b)(5) per Treasury assume the OCCRP will reach out to your folks if they haven't already.

(b)(6) per Treasury

Department of the Treasury

(Office) (b) (6)

From: (b)(6) per Treasury

Sent: Thursday, April 28, 2022 11:05 AM

то:(b)(6) per Treasury

Subject: Re: greets from Hall again at OCCRP, quick follow

Any questions about (b)(5) per Treasury

From: (b)(6) per Treasury

Date: April 28, 2022 at 10:37:11 AM EDT

To:(b)(6) per Treasury

Subject: FW: greets from Hall again at OCCRP, quick follow

If I say (b) (5)

is that accurate or (b) (5)

(b)(6) per Treasury Spokesperson, TFI

(b) (6)

From: Kevin Hall <(b) (6)

Sent: Wednesday, April 27, 2022 4:12 PM

To:(b)(6) per Treasury

Subject: greets from Hall again at OCCRP, quick follow

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Still pulling threads on the Amadea in Fiji, talked with authorities, warrant comes from US District Court for the District of Columbia but I can't find any reference in court filings. Is there some OFAC process where things are handled without an actual indictment when you seek to seize assets. Is there somewhere else I should be looking?

I've looked at the OFAC search page the vessel, and the Putin-linked Scheranadze, both appear to be owned by Eduard Khudainatov, former head of Rosneft and now owner of Coalstar LLC ... he does not appear on any sanctions list. He is believed the proxy for vessels belonging to Igor Sechin and Vlad Putin, but I can find zilch on Treasury/OFAC.

22cv2656 002229 Document ID: 0.7.1197.36614

Any guidance on process and places that I might be missing is greatly appreciated kgh

Kevin G. Hall-North America Editor Organized Crime and Corruption Reporting Project

https://hyperlink.services.treasury.gov/agency.do?origin=https://www.occrp.org/en

Twitter: @KevinGHall (b) (6) (b) (6) (b) (6) Subject: TERNAL] RE: URGENT clearance of ALDAC b)(6) per State @state.gov, Smith, Christopher (CRM); (b)(6) per State @state.gov, (b)(6) per State @state.gov; Lim, To: David (NSD); Khoo, Michael (CRM); Adams, Andrew (ODAG) b)(6) per State@state.gov; (b)(6) per State@state.gov; (Cc: @state.gov; Swartz, Bruce (CRM) April 22, 2022 4:31 PM (UTC-04:00) Sent: Clear for Treasury. From: (b)(6) per State @state.gov> Date: April 22, 2022 at 4:18:40 PM EDT To: Smith, Christopher (CRM) < (b) (6) (b)(6) per State @state.gov>, (b)(6) per State (a)state.gov>, Lim, David (NSD) < (b)Khoo, Michael (b)(6) per Treasur (CRM) < (b) (6)Adams, Andrew (ODAG) < (b) (6 @state.gov>, (b)(6) per State @state.gov>, (b)(6) per State Cc: (b)(6) per State @state.gov>, (U) Swartz, Bruce < (b) (6) Subject: RE: URGENT clearance of ALDAC ** Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to (b) (6) Hi -- Gentle reminder to those who have not cleared to please do so as soon as possible. Thanks. From: Smith, Christopher (CRM) <(b) (6) Sent: Friday, April 22, 2022 2:29 PM то:(b)(6) per State @state.gov>;(b)(6) per State @state.gov>;(b)(6) per State @state.gov>; Lim, David (NSD) <(b) (6) Khoo, Michael (CRM) Adams, Andrew (ODAG) <(b) (6) (b)(6) per Treasury ∢(b) (6) (b)(6) per State cc:(b)(6) per State @state.gov>;(b)(6) per State @state.gov>; @state.gov>; (U) Swartz, Bruce <(b) (6) Subject: RE: URGENT clearance of ALDAC Please find attached minor edits from DOJ/OIA to the last sentence of the cable to (1) (b) (5) , and (2)(b) (5) Thanks, Chris Christopher J. Smith **Acting Deputy Director** Senior Counsel for Multilateral Affairs Office of International Affairs **U.S Department of Justice** (b) (6)

From:

b)(6) per Treasury

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From: (b)(6) per State
                                  @state.gov>
 Sent: Friday, April 22, 2022 2:24 PM
 то:(b)(6) per State
                                     @state.gov>;(b)(6) per State
                                                                                       @state.gov>; Lim, David
 (NSD) < (b) (6)
                                Khoo, Michael (CRM) \lt (b) (6)
                                                                                 Adams, Andrew (ODAG)
  ∢(b) (6)
                               (b)(6) per Treasury
                                @state.gov>;(b)(6) per State
 cc:(b)(6) per State
                                                                                 (b)(6) per State
                                                                    @state.gov>;
         <u>@state.gov</u>>; Smith, Christopher (CRM) \langle 0 \rangle (6)
                                                                                 Swartz, Bruce (CRM)
 Subject: [EXTERNAL] RE: URGENT clearance of ALDAC
 I clear with attached edits. I also had one question toward the end on some wording that I found unclear.
 From: (b)(6) per State
                                       @state.gov>
 Sent: Friday, April 22, 2022 12:58 PM
                                          @state.gov>; (b)(6) David Lim (NSD); (b)(6) Michael Khoo (CRM)
 To:(b)(6) per State
 (b)(6) Andrew Adams (ODAG);(b)(6) per Treasury
                                                        ;(b)(6) per State
                                                                                     @state.gov>
                                                                    @state.gov> (b)(6) per State
 cc:(b)(6) per State
                                @state.gov>;(b)(6) per State
         <u>@state.gov</u>>; Smith, Christopher (CRM) \triangleleft (6)
                                                                                 (U) Swartz, Bruce
 Subject: RE: URGENT clearance of ALDAC
 Drew -
 My edits in the attached. Adding CPI Office Director (b)(6) per State for review. And Bruce Swarz and Chris Smith as I've
 added them as POCs for MLAs.
(b)(6) per State
 ******
 (b)(6) per State
 Team Chief, Disruption Operations & Transport
 Office of Counterproliferation Initiatives
 Bureau of International Security & Nonproliferation
 U.S. Department of State
 (o) (b) (6) (m) (b) (6)
 From: (b)(6) per State
                                            @state.gov>
 Sent: Friday, April 22, 2022 12:38 PM
 To: (b)(6) David Lim (NSD); (b)(6) Michael Khoo (CRM)
                                                    (b)(6) Andrew Adams (ODAG);(b)(6) per Treasury
 (b)(6) per State
                                 @state.gov>
 cc:(b)(6) per State
                                 @state.gov>;(b)(6) per State
                                                                    @state.gov>
 Subject: URGENT clearance of ALDAC
 Hi All,
```

We streamlined and reorganized slightly some of the content in the ALDAC in response to last-minute input. <u>Please clear on this version by 3:30.</u>

Let me know if you have any questions or want to discuss.

(b)(6) per State

(b)(6) per State | Director | Office of Threat Finance Countermeasures
Bureau of Economic & Business Affairs | U.S. Department of State

O. (b) (6) | M. (b) (6) | | (b)(6) per State @state.gov

From: (b)(6) per Treasury

Subject: Re: [EXTERNAL] FW: Greece seizes Russian tanker, at U.S. behest?

To: Adams, Andrew (ODAG)

Sent: April 20, 2022 7:54 PM (UTC-04:00)

Well played. But I hear your oil is so old that it might have turned back into dinosaurs.

From: Adams, Andrew (ODAG) < (b) (6)

Date: April 20, 2022 at 7:36:11 PM EDT

To: (b)(6) per Treasury

Subject: Re: [EXTERNAL] FW: Greece seizes Russian tanker, at U.S. behest?

** Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

You mean the EU's oil tanker!

Sent from my iPhone

On Apr 20, 2022, at 6:33 PM, (b)(6) per Treasury wrote:

Thanks! Good luck with your oil tanker.

From: Adams, Andrew (ODAG) < (b) (6)

Date: April 20, 2022 at 6:50:08 PM EDT

To: (b)(6) per Treasury

Cc: Swartz, Bruce (CRM) < (b) (6)

Subject: Re: [EXTERNAL] FW: Greece seizes Russian tanker, at U.S. behest?

** Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Contact below. Thanks!

Sent from my iPhone

On Apr 20, 2022, at 5:18 PM, (b)(6) per Treasury wrote

22cv2656_002250

From: Adams, Andrew (ODAG) <(b) (6)

Date: April 20, 2022 at 6:03:16 PM EDT

To: (b)(6) per Treasury

Cc: Swartz, Bruce (CRM) <(b) (6)

Subject: Re: [EXTERNAL] FW: Greece seizes Russian tanker, at U.S. behest?

** Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Thank you. Our OPA is up to speed, too

Sent from my iPhone

On Apr 20, 2022, at 4:56 PM (b)(6) per Treasury wrote

FYI—(b)(5), (b)(6) per Treasury

From: Gardner, Timothy (Reuters) < (b) (6)

Sent: Wednesday, April 20, 2022 9:42 AM

To:(b)(6) per Treasury

Subject: RE: Greece seizes Russian tanker, at U.S. behest?

** Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Hi (b)(b) per Treasury

We are on this story again today with sources telling us that the US encouraged Greece to impound the tanker.

Here are some questions for a today story:

Did Treasury or US officials press Greece to impound the tanker as part of specific US sanctions on the Pegas vessel after Treasury designated it on Feb 22?

Was Treasury or US officials aware of the Iranian oil on board?

When did officials first discover the ship was floating in the Mediterranean and when did they contact Greece about it?

What will officials ask Greece to do with the tanker and cargo? What does the US think they should do with it?

Thanks, Tim

From: Gardner, Timothy (Reuters)
Sent: Tuesday, April 19, 2022 9:49 AM
To:(b)(6) per Treasury

Subject: Greece seizes Russian tanker, at U.S. behest?

Hi (b)(6) per Treasury

We are tracking the seizure today by Greece of a Russian oil tanker, the Pegas

It's interesting because it was one of the five Russian tankers that the U.S. Treasury designated on Feb. 22.

In addition, we understand that it is carrying Iranian oil.

We have heard from one source that this was done at the behest of the United States. Wonder if there's anything I could say attributable to US official or otherwise

saying this was done at the behest of the United States, or that Washington supports Greece's move to seize the tanker.

We understand it was seized as part of EU sanctions but are not sure if that's being done under Iran or Russia sanctions.

Any other comments or information about the Pegas would be appreciated.

Thanks, Tim

Here is the developing story out of Greece:

ATHENS, April 19 (Reuters) - Greece has seized a Russian oil tanker off the island of Evia as part of European Union sanctions imposed on Moscow over its invasion of Ukraine, the Greek coast guard said on Tuesday.

Earlier this month the EU banned Russian-flagged vessels from the 27-nation bloc's ports, with some exemptions, as it adopted new sweeping sanctions against Russia.

The Russian-flagged Pegas, with 19 Russian crew members on board, was seized near Karystos on the southern coast of Evia, which lies just off the Greek mainland near the capital Athens.

"It has been seized as part of EU sanctions," a shipping ministry official said. A coastguard official said the ship's oil cargo had not been confiscated.

The Pegas had earlier reported an engine problem. Rough seas forced it to moor just off Karystos where it was seized, the Athens News Agency reported.

(Reporting by Renee Maltezou Editing by Mark Heinrich)

Many thanks, Tim

Timothy Gardner

Reuters

(b) (6)

https://hyperlink.services.treasury.gov/agency.do? origin=https://twitter.com/TimoGard

22cv2656_002253

Kelsey Pietranton

(b) (6) (Preferred Internet)

Version

3.0

PRODID

(b) (6)

Name

Family: Pietranton

First: Kelsey

Middle: Prefix: Suffix:

Formatted Name

Kelsey Pietranton

<u>Electronic Mail Address</u> (Preferred Internet)

(b) (6)

X-ABLabel

(b) (6)

From: Adams, Andrew (ODAG)

Subject: Re: [EXTERNAL] FW: Reuters query

To: (b)(6) per Treasury

Sent: May 23, 2022 3:52 PM (UTC-04:00)

Thank you!

Sent from my iPhone

On May 23, 2022, at 3:43 PM, (b)(6) per Treasury wrote:

FYI. (b)(5) per Treasury

. Will let you know if I hear differently.

(b)(6) per Treasury

Department of the Treasury

(Office) (b) (6)

From: (b)(6) per Treasury

Date: May 23, 2022 at 2:56:45 PM EDT

To: (b)(6) per Treasury

>,(b)(6) per Treasury

(b)(6) per Treasury

per Treasury

Subject: RE: Reuters query

Hi all – just connected again with Sean from NSC Press, (b)(5) per Treasury

I also just heard from this guy with Lloyd's List (a maritime intelligence outlet...?):

A sanctioned crude oil tanker LANA (IMO: 9256860) (formerly PEGAS) is currently transferring its cargo of Iranian to the tanker ICE ENERGY (9301732) off Greece. I understand from senior shipping sources that this is part of a US coordinated seizure of the oil and the ICE ENERGY has been chartered by the DOJ to transport the oil to the US.

I will run story regardless of US comment, but I would appreciate the opportunity to speak to somebody to clarify some of the context surrounding this case. Although I understand that the charter was made via DoJ I would like to speak to treasury to understand the context of the seizure. LANA was sanctioned by the US for ties to Russia and the vessel is carrying oil from Iran.

(b)(6) per Treasury

Spokesperson, TFI

(b) (6)

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From: (b)(6) per Treasury
Sent: Monday, May 23, 2022 12:19 PM
                                          (b)(6) per Treasury
To:(b)(6) per Treasury
                                 >;(b)(6) per Treasury
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                          >;(b)(6) per Treasury
                                                                     >; (b)(6) per Treasury
                              (b)(6) per Treasury
                                                                         (b)(6) per Treasury
                                  (b)(6) per Treasury
Subject: RE: Reuters query
(b)(6) per Treasury from press wasn't tracking, can you ask your person what the latest thinking is
over there?
(b)(6) per Treasury
Spokesperson, TFI
(b) (6)
From: (b)(6) per Treasury
Sent: Monday, May 23, 2022 11:27 AM
                                               (b)(6) per Treasury
то:(b)(6) per Treasury
(b)(6) per Treasury
(b)(6) per Treasury
(b)(6) per Treasury
                                                    (b)(6) per Treasury
                                           (b)(6) per Treasury
                                         (b)(6) per Treasury
                                  >(b)(6) per Treasury
                                           (b)(6) per Treasury
Subject: RE: Reuters query
                                                      . Im not saying (b)(5)
This is a good news story and (b) (5)
         but(b) (5)
From: (b)(6) per Treasury
Date: May 23, 2022 at 5:51:11 PM GMT+3
то: (b)(6) per Treasury
                                          (b)(6) per Treasury
                                         (b)(6) per Treasury
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                              (b)(6) per Treasury
                                                                       >(b)(6) per Treasury
                                >,(b)(6) per Treasury
(b)(6) per Treasury
Subject: RE: Reuters query
(b)(5) per Treasury
From: (b)(6) per Treasury
Sent: Monday, May 23, 2022 10:48 AM
то: (b)(6) per Treasury
                                             (b)(6) per Treasury
                                                                           (b)(6) per Treasury
                                  ;(b)(6) per Treasury
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Document ID: 0.7.1197.23420 22cv2656_002256



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Hi (b)(6) per Treasury

22cv2656_002257

Hope you had a nice weekend.

We're hearing that there will be a ship-to-ship transfer of the Iranian oil cargo onboard the Pegas to another tanker, believed to be the Ice Energy vessel operated by Greek company Dynacom, and that the expected transfer is being done at the behest of the U.S. government. We have also heard that there is an arrest warrant in place. Can you confirm? Will the U.S. sail the cargo to the U.S. once it has been transferred?

Thanks!



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