

From: Adams, Andrew (USANYS) 1
Subject: TFKC AG Briefing
To: Goodlander, Margaret V. (OAG); Dickerson, Julie (OAG)
Cc: Atkinson, Lawrence (ODAG); Khoo, Michael (CRM); Lim, David (NSD)
Sent: June 16, 2022 3:39 PM (UTC-04:00)
Attached: Copy of 2022.6.16 AG Case Briefing .xlsx

Maggie and Julie,

Attached is a list of representative active matters under the TFKC ambit. These are not nearly all of the efforts that are currently ongoing, both under our direct supervision and through the efforts of USAOs around the country. Rather, these reflect successes to date and cases that are representative of 1) continuing efforts for short-term seizures, and 2) mid- and long-term priorities focusing on facilitators and evasion networks.

As discussed, I am providing below a handful of talking points for interactions with the French, Czech, and Ukrainian counterparts, as well as some information on HSI's substantial efforts in support of the Task Force to date.

French Counterparts

- We have engaged with France from the outset of the Task Force, both through its leadership of the European Commission's Seize and Freeze Task Force and directly through our MLA and Egmont requests.
- France responded in exceptionally short order to a MLA request targeting (b)(5), (b)(6), (b)(7)(A) [REDACTED]; the case file was provided rapidly and is under review.
- Another MLA request is outstanding and we would appreciate any urging the AG might give his counterparts to expedite the request. This relates to our request for the (b)(5), (b)(6), (b)(7)(A) [REDACTED]. (b)(5) [REDACTED], but there has been no response.
- We would also welcome any support that France might offer with respect to (b)(5), (b)(7)(A) [REDACTED].
 - Specifically: (b)(5), (b)(6), (b)(7)(A) [REDACTED].

Czech Counterparts

- The Czech police and prosecutors have been among the most engaged and helpful partners in this effort, including long before the formation of the TF.
- (b)(5), (b)(6), (b)(7)(A) [REDACTED]
- (b)(5), (b)(6), (b)(7)(A) [REDACTED]

Ukraine Prosecutor General

- We have engaged with the UKR PG and her office on several occasions. Most recently, we have been engaged with them on (b)(5), (b)(6), (b)(7)(A) [REDACTED]

- What we are asking for from Ukraine: (b)(5), (b)(7)(A)

- What we can offer:

- (b)(5), (b)(7)(A)

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HSI Interactions

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

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- If there is an opportunity to praise the work of specific people at HSI, I highly recommend the three primary POCs for the Task Force and a New York-based ASAC who is a force of nature and unfailingly solid partner:
 - POCs are: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI; and John Varrone – each is a day to day contact for any and all TF related needs.
 - NY ASAC (b) (6).

Andrew C. Adams
Director, Task Force KleptoCapture
Office of the Deputy Attorney General
United States Department of Justice
(b) (6)

Lead Subject/Defendant	Component/USAO	Notes
Indicted/Seized		
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) [REDACTED]; and 2) (b) (5) [REDACTED].
Babakov, Alexander	SDNY/CES	Russian legislator/SDN (and two associates) indicted. (b)(5), (b)(7)(A) [REDACTED] is ongoing.
Malofeyev, Konstantin	SDNY	Propagandist/SDN indicted. Jack Hanick also indicted, (b)(5), (b)(6), (b)(7)(A) [REDACTED].
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 <i>Amadea</i> in Fiji. (b)(5), (b)(6), (b)(7)(A) [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].

Vekselberg, Viktor	SDNY (with 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) [REDACTED]
Ongoing Facilitator Criminal Investigations		
Deripaska, Oleg	SDNY/CES	Coordination between HSI/FBI/Commerce led to a critical intervention at the border, disallowing entry for Deripaska's paramour and resulting in the seizure of a trove of electronic devices. With those seizures, we continue to investigate potential sanctions violations by Deripaska and a handful of associates, as well as the forfeitability of several properties and bank accounts.

(b)(5), (b)(6), (b)(7)(A)

(b)(5), (b)(7)(A)

(b)(5), (b)(7)(A)

Seizure-Focused Investigations

(b)(5), (b)(6), (b)(7)(A)

Kostin, Andrey	MLARS/CES	<p><i>Sea Rhapsody</i> currently located (b)(5), (b)(7)(A)</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]; therefore developing additional evidence concerning bank fraud, wire fraud, or other criminality. Kostin is chair of VTB Bank; (b)(5), (b)(7)(A)</p> <p>[REDACTED]</p>
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From: Khoo, Michael (CRM)
Subject: RE: (b)(5)
To: Gammon, Lynda; Lim, David (NSD); Adams, Andrew (ODAG); (b)(6) per Treasury Scheinert, Lawrence (External); Manfull, Alexandre (External)
Cc: (b)(6) per Treasury
Sent: May 31, 2022 6:58 PM (UTC-04:00)

Thank you, Lynda!

From: Gammon, Lynda (b) (6)
Sent: Tuesday, May 31, 2022 6:11 PM
To: Khoo, Michael (CRM) (b) (6); Lim, David (NSD) (b) (6); Adams, Andrew (ODAG) (b) (6); (b)(6) per Treasury; Scheinert, Lawrence (External) (b) (6); Manfull, Alexandre (External) (b) (6)
Cc: (b)(6) per Treasury
Subject: [EXTERNAL] (b)(5)

Greetings-

I hope all is well. I am giving you a heads up that (b)(5) per Treasury

However, if you have any questions/concerns, please do not hesitate to reach out.

Take care,

Lynda

From: Adams, Andrew (ODAG)
Subject: Fwd: [EXTERNAL] HSI Paris Request Re (b) (5)
To: (b)(6) per Treasury; (b)(6) per Treasury (b)(3), (b)(6) per ODNI
Sent: May 10, 2022 3:01 PM (UTC-04:00)
Attached: TM5 à TM6.pdf, TM7 à TM8.pdf, TM9 à TM14.pdf, TM15 à TM16.pdf, TM17 à TM18.pdf

From France. Stand by for Greece.

Sent from my iPhone

Begin forwarded message:

From: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI
Date: May 10, 2022 at 1:43:58 PM EDT
To: "Adams, Andrew (ODAG)" (b) (6)
Cc: "Adams, Andrew (USANYS) 1" (b) (6), "Lim, David (NSD)"
(b) (6), "Khoo, Michael (CRM)" (b) (6), (b)(6), (b)(7)(C), (b)(7)(E) per FBI
(b)(6), (b)(7)(C) per ICE
(b)(6), (b)(7)(C) per ICE
Subject: RE: [EXTERNAL] HSI Paris Request Re (b) (5)

Please see attached from HSI Paris.

(b)(6), (b)(7)(C) per ICE, FBI | Operations Manager
Homeland Security Investigations
TDY to HSI Headquarters Domestic Operations
SIPR: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI
JWICS: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI
Cell: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI

From: Adams, Andrew (ODAG) (b) (6)
Sent: Tuesday, May 10, 2022 12:28 PM
To: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI
Cc: Adams, Andrew (USANYS) 1 (b) (6); Lim, David (NSD)
(b) (6); Khoo, Michael (CRM) (b) (6); (b)(6), (b)(7)(C), (b)(7)(E) per FBI
(b)(6), (b)(7)(C) per ICE; Varrone, John
(b) (6); (b)(6), (b)(7)(C) per ICE
Subject: Re: [EXTERNAL] HSI Paris Request Re (b) (5)

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

Can we get the French filings? Doesn't need to be translated.

Sent from my iPhone

On May 10, 2022, at 11:53 AM, (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI wrote:

All,

(b)(5); (b)(6), (b)(7)(C), (b)(7)(E) per ICE



(b)(5); (b)(6), (b)(7)(C), (b)(7)(E) per ICE



DOJ—Please let me know any initial thoughts from your perspective that I can relay to our folks overseas.

Thanks,

(b)(6), (b)(7)(C) per ICE, FBI

(b)(6), (b)(7)(C) per ICE, FBI

Operations Manager

Homeland Security Investigations

TDY to HSI Headquarters Domestic Operations

SIPR: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI

JWICS: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI

Cell: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI

From: Adams, Andrew (ODAG)
Subject: Re: [EXTERNAL] HSI Paris Request Re (b) (5)
To: (b)(6) per Treasury
Cc: (b)(6) per Treasury; (b)(3), (b)(6) per ODNI; Khoo, Michael (CRM); Lim, David (NSD);
(b)(6) per Treasury
Sent: May 10, 2022 1:56 PM (UTC-04:00)

Hoping that EU will mirror quickly

Sent from my iPhone

On May 10, 2022, at 1:30 PM, (b)(6) per Treasury wrote:

+ (b)(6) per Treasury

Does it help that (b) (5) ?

From: (b)(6) per Treasury
Sent: Tuesday, May 10, 2022 12:42 PM
To: Adams, Andrew (ODAG) (b) (6); (b)(6) per Treasury
Cc: (b)(3), (b)(6) per ODNI; Khoo, Michael (CRM) (b) (6); Lim, David (NSD)
(b) (6) >
Subject: Re: [EXTERNAL] HSI Paris Request Re (b) (5)

Wonder if (b)(5) per Treasury

From: Adams, Andrew (ODAG) (b) (6)
Date: May 10, 2022 at 12:36:36 PM EDT
To: (b)(6) per Treasury
Cc: (b)(3), (b)(6) per ODNI; (b)(6) per Treasury; Khoo, Michael (CRM) (b) (6); Lim, David (NSD) (b) (6)
Subject: Re: [EXTERNAL] HSI Paris Request Re (b) (5)

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

Thanks! Requesting the docs via HSI now.

Sent from my iPhone

On May 10, 2022, at 12:26 PM, (b)(6) per Treasury wrote:

To add: any docs or info we can get on (b)(5), (b)(6) could be useful. Thank you!

From: (b)(6) per Treasury
Sent: Tuesday, May 10, 2022 12:23 PM
To: Adams, Andrew (ODAG) (b)(6); (b)(3), (b)(6) per ODNI
(b)(6) per Treasury
Cc: Khoo, Michael (CRM) (b)(6); Lim, David (NSD)
(b)(6)
Subject: RE: [EXTERNAL] HSI Paris Request Re (b)(5)

Copy, digging in. Thanks!

From: Adams, Andrew (ODAG) (b)(6)
Sent: Tuesday, May 10, 2022 12:04 PM
To: (b)(6) per Treasury; (b)(3), (b)(6) per ODNI
(b)(6) per Treasury
Cc: Khoo, Michael (CRM) (b)(6); Lim, David (NSD)
(b)(6)
Subject: Fwd: [EXTERNAL] HSI Paris Request Re (b)(5)

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

Hi all,
I am reaching out on the issue of fraudulent transfer set out below. The request is for (b)(5)

I won't be able to get to a scif today, but copying David Lim and Mike Khoo.

Sent from my iPhone

Begin forwarded message:

From: (b)(6), (b)(7)(C), (b)(7)(E) per ICE, FBI
Date: May 10, 2022 at 11:53:39 AM EDT
To: "Adams, Andrew (ODAG)" (b)(6), "Adams, Andrew (USANYS) 1" (b)(6), "Lim, David (NSD)" (b)(6), "Khoo, Michael (CRM)" (b)(6), (b)(6), (b)(7)(C), (b)(7)(E) per FBI
Cc: (b)(6), (b)(7)(C) per ICE, "Varrone, John C" (b)(6), (b)(6), (b)(7)(C) per ICE
Subject: [EXTERNAL] HSI Paris Request Re (b)(5)

Duplicative Material, Document ID: 0.7.1197.52692, Bates Number 22cv2656_002504

A few notes to follow up:

1. **ALDAC.** I'm attaching a linked version for State colleagues, and a softcopy for interagency colleagues. **ACTION:** **DOJ/Treasury/all:** please review by OOB Friday (tomorrow) or let us know if you need more time. This is supposed to reflect interagency equities, and we'd like to invite your agencies to disseminate this to your relevant contacts as you see fit once it's sent, if helpful.
 - [ALDAC Launch of Taskforces to Target Russian-Sanctioned Persons and Assets.docx](#)
2. **Active cases / heads up.** State requested, and DOJ agreed, **(b)(5) per State** **(b)(5) per State**. **ACTION: DOJ KCTF and DOJ/OIA.** We are going to need that feedback on an expedited basis (asap). The items that **(b)(6) per** **(b)(6) per** briefed have been moved up. Please call me on secure VOIP **(b)(6)** if that's easier (anybody on this thread is welcome to call for an update).
3. **Interagency coordination (for now).** We tentatively agreed to **(b)(5)** **(b)(5)**. **ACTION: all.** **(b)(5)** **(b)(5)**

Thanks again for the collaboration for this round and as we move forward. Close coordination early and often will up our chances for success.

Best,

(b)(6) per State

SENSITIVE BUT UNCLASSIFIED

From: (b)(6) per State @state.gov>
Sent: Monday, April 18, 2022 4:41 PM
To: (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; 'Smith, Christopher (CRM)'
<(b) (6) (b)(6) per State @state.gov>; (b)(6) per State @state.gov>;
(b)(6) per Treasury (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>; ISN-CPI-Disruption <ISN-CPI-Disruption@state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b) (6) (b)(6) David Lim (NSD); Khoo, Michael (CRM) <(b) (6) Adams, Andrew (USANY) 1 <(b) (6) (b)(6) per State @state.gov>; (b)(6) per State @state.gov>

Subject: ROOM CHANGE update: Invite to State Tuesday, Apr 19 (1:30-2:30pm, rm 3835) for State-DOJ/OIA coordination meeting on Russia sanctions enforcement cases (maritime focus)

HI all:

Thanks in advance for the strong showing of support. To accommodate more people, we're now meeting in rm 3835.

Tentative agenda:

1. Introductions: **[ISN]**
2. Round the room recap of roles and responsibilities (5 minutes each): **[State/EB, DOJ KCTF, DOJ/OIA, HSI, Treasury, others]**
3. **(b)(5) per State** **[State / all]**

4. (b)(5) per State [ONI status update to kick things off, discussion by all]
5. Logistics for coordination [all]
6. Wrap up [ISN]

From: (b)(6) per State @state.gov>

Sent: Monday, April 18, 2022 4:22 PM

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

[@state.gov](#)>; (b)(6) per State [@state.gov](#)>; 'Smith, Christopher (CRM)'

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

(b)(6) per Treasury ; (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>: ISN-CPI-Disruption <ISN-CPI-

Disruption@state.gov>: (b)(6) per State @state.gov>: (b)(6) per State @state.gov>: (b)(6)

(b)(6) David Lim (NSD); Khoo, Michael (CRM) <(b) (6)> Adams, Andrew

(USANY) 1 (b) (6) (b) (6) per State @state.gov>: (b) (6) per State

(b) (6)
@state.gov>

Subject: RE: Invite to State Tuesday, Apr 19 (1:30-2:30pm, rm 3470) for State-DOJ/OIA coordination meeting on Russia sanctions enforcement cases (maritime focus)

Thanks. I have a 2pm call, but I'll try to join this meeting from 1:30 to 2pm.

(b)(6) per State

Attorney Adviser

Office of the Assistant Legal Adviser for Economic and Business Affairs

Work: (b) (6)

Cell: (b) (6) / Pronouns: (he/him)

From: (b)(6) per State @state.gov>

Sent: Monday, April 18, 2022 4:02 PM

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

@state.gov>; 'Smith, Christopher (CRM)' <(b) (6) (b)(6) per State

@state.gov>: (b)(6) per State @state.gov>: (b)(6) per Treasury (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>: |SN-CPI-Disruption <|SN-CPI-

Disruption@state.gov>: (b)(6) per State @state.gov>: (b)(6) per State @state.gov>: (b)(6)

(b)(6) David Lim (NSD); Khoo, Michael (CBM) <(b) (6)> Adams, Andrew

(U.S.A.N.Y.S.) 1 (b) (6) (b) (6) per State @state.gov>: (b) (6) per State

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

Subject: Re: Invite to State Tuesday, Apr 19 (1:30-2:30pm, rm 3470) for State-DOJ/OIA coordination meeting on Russia sanctions enforcement cases (maritime focus)

(b)(6) per State or L/EB

(b)(6) per State

Attorney-Adviser. L/EB

(b) (6)

WHILE TELEWORKING, YOU CAN REACH ME ON MY MOBILE: (b) (6)

From: (b)(6) per State @state.gov>

Sent: Monday, April 18, 2022 3:22 PM

To: (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; 'Smith, Christopher (CRM)' <(b)(6) @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) per Treasury @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>; ISN-CPI-Disruption <ISN-CPI-Disruption@state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) David Lim (NSD) Khoo, Michael (CRM) <(b)(6) @state.gov>; Adams, Andrew (USANYS) 1 <(b)(6) @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>

Subject: Re: Invite to State Tuesday, Apr 19 (1:30-2:30pm, rm 3470) for State-DOJ/OIA coordination meeting on Russia sanctions enforcement cases (maritime focus)

+ (b)(6) per State

(b)(6) per State

Sanctions Policy Officer
Office of Economic Sanctions Policy and Implementation
U.S. Department of State
Cell: (b)(6)

From: (b)(6) per State @state.gov>

Sent: Monday, April 18, 2022 3:19 PM

To: (b)(6) per State @state.gov>; 'Smith, Christopher (CRM)' <(b)(6) @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) per Treasury

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>; ISN-CPI-Disruption <ISN-CPI-Disruption@state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) David Lim (NSD) Khoo, Michael (CRM) <(b)(6) @state.gov>; Adams, Andrew (USANYS) 1 <(b)(6) @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>

Subject: RE: Invite to State Tuesday, Apr 19 (1:30-2:30pm, rm 3470) for State-DOJ/OIA coordination meeting on Russia sanctions enforcement cases (maritime focus)

Adding in (b)(6) per State who is planning to attend for L/LEI.

Thanks.

(b)(6) per State

SENSITIVE BUT UNCLASSIFIED

From: (b)(6) per State @state.gov>

Sent: Friday, April 15, 2022 8:30 AM

To: 'Smith, Christopher (CRM)' <(b)(6) @state.gov>; (b)(6) per State @state.gov>; (b)(6) per Treasury

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>; ISN-CPI-Disruption <ISN-CPI-Disruption@state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>; (b)(6) per State @state.gov>

(b)(6) per State @state.gov>; (b) (6) (b)(6) David Lim (NSD); Khoo, Michael (CRM)
<(b) (6) Adams, Andrew (USANYS) 1 <(b) (6) (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: Invite to State Tuesday, Apr 19 (1:30-2:30pm, rm 3470) for State-DOJ/OIA coordination meeting on Russia sanctions enforcement cases (maritime focus)

Colleagues:

It seems prudent to (b)(5) per State . To that end, ISN would like to invite the State and DOJ/OIA teams working this issue to the Department for a one-hour meeting next Tuesday, April 19, to be held in the ISN/CPI conference room in 3470. I have tentatively penciled it in for 1:30-2:30pm but have reserved the room from 1-3 in case we need to shift. I spoke this morning with Chris Smith who leads this effort for DOJ/OIA and he supports the effort and timing for the meeting.

Treasury REPO colleagues: you are of course leading the charge on all things REPO and we would welcome your participation as well if you'd like to attend.

I will send out an agenda closer to the time, but at minimum we will be looking to (b)(5) per State

Please loop in anyone I may have inadvertently missed.

Best regards,

(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)

SENSITIVE BUT UNCLASSIFIED

SENSITIVE BUT UNCLASSIFIED

SENSITIVE BUT UNCLASSIFIED

SENSITIVE BUT UNCLASSIFIED

SENSITIVE BUT UNCLASSIFIED

From: (b)(6) per Treasury
Subject: [EXTERNAL] FW: Suleiman Kerimov
To: Adams, Andrew (ODAG)
Sent: April 21, 2022 8:50 AM (UTC-04:00)

FYI.

(b)(6) per Treasury

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

From: PEYRAT Eléonore (b) (6)
Sent: Thursday, April 21, 2022 7:23 AM
To: (b)(6) per Treasury CHAMBRE Romain (b) (6)
cc: (b)(6) per Treasury (b)(6) per Treasury
Lieberman, Michael (b)(6) per Treasury (b)(6) (b)(6)
(b) (6) (b) (6) HERRERO Thibaut
(b) (6) ; ROSE Isabelle (b) (6) ;
(b) (6)

Subject: RE: Suleiman Kerimov

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

Dear (b)(6) per Treasury

Many thanks for reaching out to us. We have exchanged on this specific case with our DOJ colleagues (cced in).

Could you formalize a mutual legal assistance request (MLA) so that they can provide you with the information we have? As soon as received, our DOJ will make sure the MLA request is tracked and handled expeditiously as first priority, as REPO issues have been prioritized here. It will enable you to access the information needed.

Should you have any questions on this, please feel free to ask.

Many thanks and speak soon.

Best,

Eléonore

Eléonore PEYRAT
Head of Fight against financial crime and International sanctions Office
Head of the French Delegation for FATF
Treasury - Trésor

Phone : (b) (6)
(b) (6)
Ministry for the Economy and Finance, 139 rue de Bercy, 75572 Paris Cedex 12

Quelle que soit son heure d'envoi, ce message n'appelle pas de réponse en dehors des heures de travail.



De : (b)(6) per Treasury]
Envoyé : lundi 18 avril 2022 15:00
À : CHAMBRE Romain (b) (6) ; PEYRAT Eléonore (b) (6)
Cc : (b)(6) per Treasury ; (b)(6) per Treasury ; (b)(6) Michael Lieberman (Treasury)
Objet : Suleiman Kerimov

Dear Romain and Eléonore,

(b)(5) per Treasury referenced in a recent media article (link and relevant text below),
(b)(5), (b)(7)(A) per Treasury ?

(b)(7)(A) per Treasury

[Redacted content]

I have copied my colleagues from OFAC in case you have additional questions. If there is a better channel for making this request, please let us know.

(b)(6) per Treasury

(b)(6) per Treasury

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

From: (b)(6) per Treasury
Subject: RE: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt
To: Adams, Andrew (ODAG); Swartz, Bruce (CRM)
Cc: Khoo, Michael (CRM); Lim, David (NSD); Smith, Christopher (CRM)
Sent: April 20, 2022 2:26 PM (UTC-04:00)

This is live now: <https://home.treasury.gov/news/press-releases/jy0731>.

(b)(6) per Treasury

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

From: (b)(6) per Treasury
Sent: Wednesday, April 20, 2022 11:38 AM
To: Adams, Andrew (ODAG) <(b) (6)> Swartz, Bruce (CRM) <(b) (6)>
Cc: Khoo, Michael (CRM) <(b) (6)> Lim, David (NSD) <(b) (6)> Smith, Christopher (CRM) <(b) (6)>
Subject: RE: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

We're now planning for a 2pm release.

(b)(6) per Treasury

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

From: Adams, Andrew (ODAG) <(b) (6)>
Sent: Wednesday, April 20, 2022 9:25 AM
To: Swartz, Bruce (CRM) <(b) (6)>
cc: (b)(6) per Treasury Khoo, Michael (CRM) <(b) (6)> Lim, David (NSD) <(b) (6)> Smith, Christopher (CRM) <(b) (6)>
Subject: Re: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

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

Received and thank you

Sent from my iPhone

On Apr 20, 2022, at 8:16 AM, Swartz, Bruce (CRM) <(b) (6)> wrote:

Thanks, (b)(6) per Treasury

Sent from my iPhone

On Apr 20, 2022, at 8:25 AM, (b)(6) per Treasury wrote:

Wanted to make sure you're tracking ... (b)(5) per Treasury

(b)(6) per Treasury

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

From: (b)(6) per Treasury
Sent: Tuesday, April 19, 2022 1:19 PM
To: Bender, Laurie <(b) (6)> (b)(6) per Treasury
Cc: Khoo, Michael (CRM) <(b) (6)> (b)(6) per Treasury
Subject: RE: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

Hello Michael and Laurie,

Please see the attached summary of the action (30 individuals and 40 entities) for this week, which may go tomorrow or Thursday.

It includes the network of Konstantin Malofeyev, who, as you know, was charged by DOJ on April 6.

Thanks,
(b)(6) per Treasury

From: Bender, Laurie (CRM) <(b) (6)>
Sent: Thursday, April 7, 2022 7:46 PM
To: (b)(6) per Treasury
Cc: Khoo, Michael (CRM) <(b) (6)> (b)(6) per Treasury
Subject: Re: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

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

Thank you!

On Apr 7, 2022, at 6:42 PM, (b)(6) per Treasury wrote:

Hello Michael and Laurie,

In (b)(6) per Treasury's absence, to keep you informed, the designations of the entities below will occur tomorrow. My apologies for the late notice

Thanks,

(b)(6) per Treasury

From: (b)(6) per Treasury
Sent: Wednesday, April 6, 2022 11:21 PM
To: Khoo, Michael (CRM) <(b) (6)> Bender, Laurie
<(b) (6)>
cc: (b)(6) per Treasury (b)(6) per Treasury
Subject: RE: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

Another action tomorrow:

- Full blocking on Alrosa, a massive diamond Russian mining company
- Full blocking on UAC, a Russian airplane manufacturing holding company, that will include 21 of its subs

State will also fully block USC, a large Russian shipbuilding conglomerate with about 30-40 subs.

From: Khoo, Michael (CRM) <(b) (6)>
Sent: Tuesday, April 5, 2022 9:39 PM
To: (b)(6) per Treasury Bender, Laurie
<(b) (6)>
cc: (b)(6) per Treasury (b)(6) per Treasury
Subject: RE: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

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

Many thanks, (b)(6) per Treasury No need to apologize the timing of your email!

From: (b)(6) per Treasury
Sent: Tuesday, April 5, 2022 9:34 PM
To: Khoo, Michael (CRM) <(b) (6)> Bender, Laurie (CRM) <(b) (6)>
cc: (b)(6) per Treasury; (b)(6) per Treasury
Subject: RE: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

Hello Michael and Laurie,

Apologies for the late email. We have a sanctions tranche rolling out tomorrow; composition follows below, I will provide an update if there are significant changes:

(b)(5) per Treasury

Thanks,
(b)(6) per Treasury

From: (b)(6) per Treasury
Sent: Monday, March 28, 2022 5:42 PM
To: Khoo, Michael (CRM) <(b) (6)> Bender, Laurie <(b) (6)>
cc: (b)(6) per Treasury; (b)(6) per Treasury
Subject: RE: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

Hello Michael and Laurie,

OFAC will have a designation action this Thursday (3/31) but it will not align with the oligarch/Ru. elites themes of the REPO TF, so in the interest of brevity, please see a broad description below. We will keep you updated if the target composition or designation date changes.

(b)(5) per Treasury

Thanks,
(b)(6) per Treasury

From: Khoo, Michael (CRM) <(b) (6)>
Sent: Thursday, March 24, 2022 7:31 PM
To: Bender, Laurie <(b) (6)> (b)(6) per Treasury
cc: (b)(6) per Treasury (b)(6) per Treasury
Subject: RE: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

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

(b)(6) per Treasury

Yes, for know you can send them to me for KleptoCapture.

Thanks,

Michael

From: Bender, Laurie (CRM) <(b) (6)>
Sent: Thursday, March 24, 2022 2:01 PM
To: (b)(6) per Treasury
Cc: Khoo, Michael (CRM) <(b) (6)> (b)(6) per Treasury
(b)(6) per Treasury
Subject: Re: [EXTERNAL] RE: Question regarding preference of packages vs. target lists receipt

(b)(6) per Treasury - thanks for following up on this. Please still send them to me for equities checks & I'll let Michael respond re the KleptoCapture team.

On Mar 24, 2022, at 1:51 PM, (b)(6) per Treasury wrote:

Michael and Laurie,

Thanks for your views on this. Going forward, we will endeavor to provide unclassified packages or target names (if the packages are classified).

As far as sharing targets and designation dates, we can provide a list of relevant targets and a tentative date of designation as soon as we are aware. Both the final list of targets and the designation date can change, but we will keep you updated.

Should I send this information to both of you? If not, who is a good POC?

Thanks,
(b)(6) per Treasury

From: Bender, Laurie (CRM) <(b) (6)>
Sent: Wednesday, March 23, 2022 12:54 PM
To: Khoo, Michael (CRM) <(b) (6)> (b)(6) per Treasury
Cc: (b)(6) per Treasury
Subject: RE: Question regarding preference of packages vs. target lists receipt

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

Yes, for our operational checks, the names are sufficient, but if it's for assets, like the yachts, planes, etc., then the whole package would be helpful to the extent that it's unclassified & you think it would be relevant. If it's just open source info, then it's probably not necessary. Thanks!

Laurie A. Bender
Sr. Special Investigator
Dept. of Justice - Criminal Division
Asset Forfeiture Money Laundering Section

Phone: (b) (6)
Cell: (b) (6)
Email: (b) (6)
(S): (b) (6)
(TS): (b) (6)

From: Khoo, Michael (CRM) <(b) (6)>
Sent: Wednesday, March 23, 2022 12:51 PM
To: (b)(6) per Treasury; Bender, Laurie (CRM) <(b) (6)>
Cc: (b)(6) per Treasury
Subject: RE: Question regarding preference of packages vs. target lists receipt

Thanks, (b)(6) per Treasury

My preference would be to get the unclassified packages (or target names if packages are classified).

Best,

Michael

From: (b)(6) per Treasury
Sent: Wednesday, March 23, 2022 12:09 PM
To: Khoo, Michael (CRM) <(b) (6)> Bender, Laurie (CRM) <(b) (6)>
Cc: (b)(6) per Treasury

Subject: [EXTERNAL] Question regarding preference of packages vs. target lists receipt

Hello Michael and Laurie,

We are still working on the best pathway to share target names and designation dates.

Meanwhile, do you prefer receiving the actual packages for future designations or are just the target names sufficient?

(b)(5) per Treasury



. But moving forward, I'd like to know your preference going forward to facilitate Task Force efforts.

Thanks,
Igor

- (U) the United States plans to designate the following individuals and entities pursuant to Russia-related Executive Order (E.O.) 14024:
 - (U) **Public Joint Stock Company Transkapitalbank (TKB)** and its subsidiary **Joint Stock Company Investtradebank**. TKB has offered its clients the ability to conduct transactions through its proprietary Internet-based banking system, called TKB Business, as an alternative communication channel to the Society for Worldwide Interbank Financial Telecommunication (SWIFT). TKB has offered this service in part for the purpose of processing U.S. dollar (USD) payments for sanctioned clients. TKB's solicitation of business from sanctioned persons heightens the enforcement risks that TKB poses for third countries. In addition, U.S. businesses are generally shunning exposure to Russia, and continued relationships with TKB absent authorization could threaten business relationships with U.S. firms. TKB is being designated for operating or having operated in the financial services sector of the Russian Federation economy. Joint Stock Company Investtradebank is being designated for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, TKB.
 - (U) **Konstantin Malofeyev** has been designated by OFAC pursuant to E.O. 13660 since 2014 and has also been sanctioned by Australia, Canada, the European Union (EU), Japan, New Zealand, and the United Kingdom (UK). Malofeyev has funded separatist activities in Ukraine and supported pro-Russian activities that have undermined democracy, interfered in elections, and reduced security and stability in several countries. On April 6, the U.S. Department of Justice charged Malofeyev with conspiracy to violate U.S. sanctions and violating U.S. sanctions in connection with his hiring an American citizen to work for him in operating television networks in Russia and Greece and attempting to acquire a television network in Bulgaria. Malofeyev also allegedly conspired to illegally transfer a \$10 million investment he made in a U.S. bank to a business associate in Greece. Malofeyev is being designated under E.O. 14024 for having acted or purported to act for or on behalf of, directly or indirectly, the Government of the Russian Federation (GoR).
 - (U) Treasury will designate an additional 27 entities which are part of Malofeyev's global sanctions evasion and disinformation network:
 - The **Autonomous Noncommercial Organization for the Study and Development of International Cooperation in the Economic Sphere International Agency of Sovereign Development (IASD)**, a financial advisory structure registered in Moscow that pursues deals around the world to facilitate business opportunities for sanctioned Russian companies and enrich Malofeyev himself, is being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Malofeyev.
 - Financial services company **Agent de Asigurare Lider Asig Societate cu Raspundere Limitata**, financial company **Organizatia de Creditare Nebancara Lider Leasing SRL**, diversified company **OKAF Trading Societatea cu**

Raspundere Limitata, and property services company **Societatea cu Raspundere Limitata Project Invest Company**, all located in Chisinau, Moldova, are being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Aleksandr Okulov, who is being designated as described in the points on individuals below.

- **MGI PTE Ltd**, a Singapore-based management consultancy, facilitated IASD's activities in Cuba and is being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, IASD.
- **Joint Stock Company Marshal.Global (MarGlo)**, a Moscow-based financial company linked to a number of Malofeyev associates, provides a wide range of financial services that enables sanctioned Russian companies to attempt to evade U.S. sanctions. MarGlo is being designated for operating or having operated in the financial services sector of the Russian Federation economy and also for being responsible for or complicit in, or having directly or indirectly engaged or attempted to engage in, deceptive or structured transactions or dealings to circumvent any United States sanctions, including through the use of digital currencies or assets or the use of physical assets, for or on behalf of, or for the benefit of, directly or indirectly, the GoR.
- Russia-based **Tsargrad OOO (Tsargrad)** is a cornerstone of Malofeyev's broad malign influence network. Tsargrad, through its affiliated channel Tsargrad TV, spreads pro-Kremlin propaganda and disinformation that is amplified by the GoR. Tsargrad served as an intermediary organization between pro-Russian European politicians and Russian officials, and recently pledged to donate more than \$10 million to support Russia's unprovoked war in Ukraine. Tsargrad is being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Malofeyev.
- **Analiticheski Tsentr Katekhon OOO (Katekhon)**, located in Moscow, purports to be a think tank but actively disseminates anti-Western and pro-Kremlin disinformation, including extreme anti-Ukrainian content. Katekhon is being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Tsargrad.
- The **All-Russian Public Organization Society for the Promotion of Russian Historical Development Tsargrad (Tsargrad Society)** is a Russia-registered organization which has been accused of involvement in espionage on behalf of Russia. Tsargrad Society is being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Malofeyev.
- Several other parts of Malofeyev's Tsargrad network are also being designated. **Teshilovo OOO** and **Spetsinvestservis OOO (Spetsinvestservis)** are being designated for being owned or controlled by, or having acted or purported to act

for or on behalf of, directly or indirectly, Malofeyev. **Imenie Tsargrad OOO (Imenie)**, **Tsargrad-Media OOO (Tsargrad-Media)**, and Crimea, Ukraine-based **Kurort Livadiya OOO** are being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Tsargrad. **Tsargrad Park OOO (Tsargrad Park)**, **Kurort Tsargrad Spas-Teshilovo OOO**, **Zareche-Oka OOO**, **Proizvodstvenno-Stroitel'naya Kompaniya SNM**, **Imperiya 19-31 OOO (Imperiya)**, and **Ekoferma Zareche OOO** are being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Imenie. **Tsargrad-Kultura OOO** is being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Tsargrad-Media. **Kontur OOO** and **Tureya OOO** are being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Imperiya.

- **Limited Liability Company Vladeks Kholding, Limited Liability Company Vladeks**, and **Limited Liability Company Russian Digital Solutions**, all Russia-based companies, are being designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Kirill Konstantinovich Malofeyev, Malofeyev's adult son who is also being designated.
- (U) Treasury will designate an additional 13 individuals which are part of Malofeyev's global sanctions evasion and disinformation network:
 - Six members of IASD's staff of Russian nationals are being designated for having acted or purported to act for or on behalf of, directly or indirectly, IASD. **Mikhail Ilich Yakushev** is IASD's Chief of Staff. **Alexey Anatolyevich Subbotin** traveled with Malofeyev on IASD business to Africa and conducted IASD business in Southeast Asia, in addition to participating in the Russia-Africa Forum, in which IASD was a general partner. Malofeyev relied on French-speaking Moldovan and Russian national **Aleksandr Okulov**, a member of IASD's supervisory board, who traveled to Africa as part of IASD delegations with Malofeyev. Aleksandr Okulov is associated with several companies located in the United Arab Emirates. **Artem Samoylov**, an IASD legal advisor, worked on IASD's behalf in Asia. **Alexey Aleksandrovich Kupriyanov** traveled with Malofeyev on IASD business to Asia, and **Nikita Melikov** traveled to Africa and Asia on IASD business.
 - Russian national **Mikhail Aleksandrovich Leshchenko**, MarGlo's general director, is being designated for being or having been a leader, official, senior executive officer, or member of the board of directors of MarGlo.
 - Russian national **Pavel Vladimirovich Kuzmin** provided legal services to Malofeyev in multiple capacities, including as IASD's legal chief and the director of legal services at Tsargrad. Kuzmin was designated pursuant to E.O. 14024 for having materially assisted, sponsored, or provided financial, material, or

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technological support for, or goods or services to or in support of, Malofeyev, and also for being or having been a leader, official, senior executive officer, or member of the board of directors of Tsargrad.

- Three general directors of companies in Malofeyev's Tsargrad network are being designated for being or having been a leader, official, senior executive officer, or member of the board of directors of an entity whose property and interests in property are blocked pursuant to E.O. 14024. Spetsinvestservis general director **Yevgeniy Yuryevich Gadetskiy** is being designated for being or having been a leader, official, senior executive officer, or member of the board of directors of Spetsinvestservis. MarGlo-affiliated Imperiya general director **Roman Viktorovich Nechiporuk** is being designated for being or having been a leader, official, senior executive officer, or member of the board of directors of Imperiya. Tsargrad-Media and Tsargrad Park general director **Natalya Aleksandrovna Tyurina** is being designated for being or having been a leader, official, senior executive officer, or member of the board of directors of Tsargrad-Media and Tsargrad Park.
- Malofeyev's adult son, **Kirill Konstantinovich Malofeyev**, a Russian national, is being designated for operating or having operated in the technology sector of the Russian Federation economy.
- Russian national **Ilya Anatolyevich Markov** is the general director of Vladeks Kholding. Markov is being designated for being or having been a leader, official, senior executive officer, or member of the board of directors of Vladeks Kholding.
- (U) Treasury is designating **Bitriver AG**, the Switzerland-based holding company for virtual currency mining company Bitriver which was founded in Russia in 2017 and claims three offices in Russia. In 2021, Bitriver shifted legal ownership of its assets to a Switzerland-based holding company, Bitriver AG, which is being designated for operating or having operated in the technology sector of the Russian Federation economy. Due to the distributed nature of blockchain-based assets, virtual currency users typically have no way of discerning whether the energy expended to confirm their transactions also generated revenue for the Russian war machine. The United States is committed to ensuring that no asset, no matter how complex, becomes a mechanism for the Putin regime to offset the impact of sanctions. Treasury is additionally designating 10 Russia-based subsidiaries of Bitriver AG for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Bitriver AG: **OOO Management Company Bitriver, OOO Bitriver Rus, OOO Everest Grup, OOO Siberskie Mineraly, OOO Tuvaasbest, OOO Torgovy Dom Asbest, OOO Bitriver-B, OOO Bitriver-K, OOO Bitriver-North, and OOO Bitriver-Turma.**
- (U) Treasury is designating 16 board members of Public Joint Stock Company Bank Financial Corporation Otkritie (Otkritie) for being or having been leaders, officials, senior executive officers, or members of the board of directors of Otkritie, an entity whose property and interests in property are blocked pursuant to E.O. 14024. Otkritie,

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SENSITIVE BUT UNCLASSIFIED

along with 12 of its subsidiaries, was designated on February 24 for operating or having operated in the financial services sector of the Russian Federation economy. The 16 board members being designated are 15 Russian nationals, **Kseniya Valentinovna Yudayeva, Mikhail Yurevich Alekseev, Anatoly Mikhailovich Karachinskiy, Vladimir Vladimirovich Kolychev, Alexey Yurevich Simanovskiy, Andrey Fedorovich Golikov, Elena Borisovna Titova, Mikhail Mikhaylovich Zadornov, Dmitriy Olegovich Levin, Svetlana Petrovna Emelyanova, Tatyana Gennadevna Nesterenko, Irina Vladimirovna Kremleva, Viktor Andreevich Nikolaev, Sergey Georgievich Rusanov, and Nadia Narimanovna Cherkasova**, and one New Zealand national, **Paul Andrew Goldfinch**.

SENSITIVE BUT UNCLASSIFIED

From: (b)(6) per Treasury
Subject: [EXTERNAL] RE: REQUEST FOR DOJ QUICK REVIEW: State Draft Response to Congressional Multi-Signer Letter on Russia Diamonds
To: Lim, David (NSD); Swartz, Bruce (CRM); Smith, Christopher (CRM); Adams, Andrew (ODAG); Adams, Andrew (USANYS) 1
Cc: (b)(6) (CRM)
Sent: April 20, 2022 12:44 PM (UTC-04:00)

Thanks for the flag. State flagged this for us separately and earlier through a legislative affairs working group, so we've already cleared.

(b)(6) per Treasury

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

From: Lim, David (NSD) <(b)(6)>
Sent: Wednesday, April 20, 2022 12:37 PM
To: Swartz, Bruce (CRM) <(b)(6)> Smith, Christopher (CRM) <(b)(6)>
Adams, Andrew (ODAG) <(b)(6)> Adams, Andrew (USANYS) 1 <(b)(6)>
(b)(6) per Treasury
Cc: (b)(6) (CRM) <(b)(6)>
Subject: FW: REQUEST FOR DOJ QUICK REVIEW: State Draft Response to Congressional Multi-Signer Letter on Russia Diamonds

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

All – Please see below and the attached.

From: (b)(6) per State <(b)(6)@state.gov>
Sent: Wednesday, April 20, 2022 12:17 PM
To: Lim, David (NSD) <(b)(6)> Khoo, Michael (CRM) <(b)(6)>
Cc: (b)(6) per State <(b)(6)@state.gov>
Subject: [EXTERNAL] REQUEST FOR DOJ QUICK REVIEW: State Draft Response to Congressional Multi-Signer Letter on Russia Diamonds

Hello David and Michael,

My leadership has asked me to see if DOJ could take a quick look at our draft response to Congressional Multi-Signer letter on Russia diamonds (both attached). the draft has been cleared by State at the Staff level, Treasury and various parts of the NSC.

Would you be able to take a quick look and flag if there are any red lines today?

Feel free to call me at (b) (6) if you have any questions.

Also pasting most relevant portion below:

(b) (5)

Thank you!

Best,

(b)(6) per State

(b)(6) per State

Foreign Affairs Officer

Bureau of Economic and Business Affairs

U.S. Department of State

Mobile: (b) (6)

(b)(6) per State [@state.gov](#)

Congress of the United States
Washington, DC 20510

April 1, 2022

The Honorable Antony J. Blinken
Secretary of State
U.S. Department of State
2201 C Street, NW
Washington, DC 20520

The Honorable Janet Yellen
Secretary of the Treasury
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

Dear Secretaries Blinken and Yellen,

We write to urge the Biden Administration to examine U.S. sanctions on goods that are produced by or benefit Russian companies or oligarchs close to the Kremlin, specifically in the diamond industry and Alrosa, a company already sanctioned to an initial degree along with its CEO Sergei Sergeevich Ivanov. We commend President Biden's March 11th announcement that the United States would prohibit imports of Russian-origin diamonds and agree that those who personally gain from the Kremlin's policies should share in the pain of a vigorous sanctions regime. With that said, more must be done to make sure that sanctioned Russian companies and the oligarchs that run them cannot exploit loopholes to profit from U.S. consumers and the global economy.

Alrosa is the world's largest diamond mining company, with sales that totaled \$4.2 billion in sales last year, it is responsible for 90 percent of Russia's diamond mining capacity, which accounts for 28 percent globally. It is a company that is one-third owned by the Russian government, and until recently had an office in New York City. Alrosa's CEO is Sergei Sergeevich Ivanov, son of one of Putin's closest allies, Sergei Borisovich Ivanov. Sergei Borisovich Ivanov previously served as the Chief of Staff of the Presidential Executive Office, Deputy Prime Minister, and Defense Minister of Russia and remains a permanent member of the Security Council of the Russian Federation.

We are concerned that the two tranches of sanctions issued by the Treasury Department to target Russia's diamond industry will have a minimal impact on Alrosa and Sergei Ivanov's ability to freely operate on the world market. The February 24th sanctions that listed Alrosa only blocked debt and equity transactions, making a small dent in Russia's oversized stake in the global diamond trade.¹ Although an important initial step, along with the designation of Alrosa's CEO, these have yet to impede trade and revenues that eventually reach the Kremlin.

The administration also announced an import ban on March 11th which would ban "products of Russian Federation origin," including non-industrial diamonds, from entering the United States.² Experts note a "major loophole" remains in the sanctions regime that allows for importation of diamonds manufactured in India or elsewhere because of the interpretation provided in OFAC FAQs.³ Namely, the term "Russian Federation origin" excludes goods "substantially transformed in a third country," and it has long been the view of Customs and Border Protection that the cutting or polishing of diamonds in a third country would qualify as a substantial transformation. A recent report on the diamond industry indicated approximately

¹ U.S. Department of Treasury, "U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs," February 24, 2022

² "Executive Order on Prohibiting Certain Imports, Exports, and New Investment with Respect to Continued Russian Federation Aggression," March 11, 2022

³ Rob Bates, "U.S. Ban on Russian Diamond Imports May Have Major Loophole," *JCK Online*, March 14, 2022

95% of the world's diamonds are cut and polished in India.⁴ Thus, as it stands at this time, a diamond can be mined by an Alrosa subsidiary, polished or cut in India or another country, and sold to the United States without any prohibition, making a profit for the Russian government.

We first ask that the Treasury Department reconsider the interpretation of origin that allows for the importation of diamonds from countries that may cut or polish Alrosa's diamonds. Second, the United States should work with its Indian counterparts, as well as those in trading centers such as Dubai, to ensure they are not being used to line the pockets of those closest to Vladimir Putin. Finally, State and Treasury Departments should provide guidance to Customs and Border Protection (CBP) and the Department of Homeland Security (DHS) to ensure we prohibit the importation of Russian diamonds into the United States.

Vladimir Putin's unprovoked and brazen invasion of the sovereign territory of Ukraine should be met with a forceful response from the United States and its partners. Luxury goods, especially items like diamonds that are used mainly for export to wealthy nations, should be among the first that Treasury and State Departments consider future action. We ask for your consideration of additional actions that would constrain the Kremlin's capacity to access revenue from their diamond industry which could fund the invasion of democratic and sovereign Ukraine.

Sincerely,



Gerald E. Connolly
Member of Congress



Austin Scott
Member of Congress

Brian Fitzpatrick
Member of Congress

Dina Titus
Member of Congress

Neal P. Dunn, M.D.
Member of Congress

Michael Turner
Member of Congress

Young Kim
Member of Congress

Peter Meijer
Member of Congress

David Trone
Member of Congress

James P. McGovern
Member of Congress

Ken Buck
Member of Congress

⁴ Olya Linde, Sophia Kravchenko, Ari Epstein, Karen Rentmeesters, "The Global Diamond Industry 2020–21," *Bain & Company*