

Bates No. 2018-08-116: 008411
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Bates No. 2018-08-116: 008412

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RE: S 722 defense sector facts_20170719 (2).docx

From: (b)(6)
To: (b)(6)
Date: Fri, 21 Jul 2017 11:38:50 -0400

Maybe there aren't good figures in open source? Secret squirrels

From: (b)(6)
Sent: Friday, July 21, 2017 11:38 AM
To: (b)(6)
Subject: Re: S 722 defense sector facts_20170719 (2).docx

(b)(5)

From: (b)(6)
Date: July 21, 2017 at 11:36:20 AM EDT
To: (b)(6)
Subject: Re: S 722 defense sector facts_20170719 (2).docx

(b)(5)

Also I think (b)(5)

From: (b)(6)
Date: July 21, 2017 at 11:33:14 AM EDT
To: (b)(6)
Subject: Re: S 722 defense sector facts_20170719 (2).docx

(b)(5), right? (b)(5)

From: (b)(6)
Date: July 21, 2017 at 11:29:02 AM EDT
To: (b)(6)
Subject: Re: S 722 defense sector facts_20170719 (2).docx

(b)(5)

From: (b)(6)
Date: July 21, 2017 at 11:21:45 AM EDT
To: (b)(6)
Subject: Fwd: S 722 defense sector facts_20170719 (2).docx

From: State (b)(6)
Date: July 19, 2017 at 2:09:45 PM EDT
To: State (b)(6) Ballman, Luke <Luke.Ballman@treasury.gov>, (b)(6)
(b)(6)
Cc: State (b)(6) (b)(6) (b)(6)
Subject: S 722 defense sector facts_20170719 (2).docx

Folks: This is our cleaned up purely factual piece on defense sector involvement of US trading partners, which I was comfortable sharing with the Friday meeting participants if you are too. Let me know. Thanks State (b)(6)

FW: ATF Inquiry re. Russian Federation Sanctions Implementation (Licensing Determinations)

From: (b)(6), (b)(7)(C)
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Date: Tue, 10 Oct 2017 10:16:30 -0400
Attachments: (b)(5)

From: (b)(6), (b)(7)(C)
Sent: Friday, July 14, 2017 9:45 AM
To: ATF (b)(6)
Cc: Dondarski, Michael (b)(6), (b)(7)(C)
Subject: RE: ATF Inquiry re. Russian Federation Sanctions Implementation (Licensing Determinations)

ATF (b)(6) and ATF (b)(6):

ATF does not currently have any pending requests with OFAC. (b)(5)

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(b)(5)

(b)(5)

As clarification, OFAC Enforcement does not conduct an investigation to respond to license determination requests. We rely upon the information any agency submits for our review, relay the general prohibitions/exemptions of the sanctions program, and then conduct a search within our system for relevant specific licenses, etc. Our responses provide information about the contours of OFAC's Regulations and are meant to be of assistance to partners in law enforcement in carrying out their respective missions.

(b)(5)

I'm including a couple of FAQs that you may find useful when you receive questions from the industry. If you need assistance in the future or have leads for OFAC outside of the context of the license determination process, or would like to have a follow-up call next week on this matter, please contact me directly via telephone.

Thanks and have a good weekend,

(b)(6), (b)(7)(C)
Senior Advisor, Enforcement
Office of Foreign Assets Control

U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

(b)(6), (b)(7)(C)

(b)(6), (b)(7)(C) (unclassified)
(SIPR)
(JWICS)

374. If I own a Kalashnikov product, is that product blocked by sanctions? Am I able to resell a Kalashnikov product at a gun show or other secondary market?

If a U.S. person is in possession of a Kalashnikov Concern product that was bought and fully paid for prior to the date of designation (i.e., no payment remains due to Kalashnikov Concern), then that product is not blocked and OFAC sanctions would not prohibit the U.S. person from keeping or selling the product in the secondary market, so long as Kalashnikov Concern has no interest in the transaction. New transactions by U.S. persons with Kalashnikov Concern are prohibited, however, and any property in which Kalashnikov Concern has an interest is blocked pursuant to OFAC's designation of Kalashnikov Concern on July 16, 2014. If a U.S. person has an inventory of Kalashnikov Concern products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment), we advise that U.S. person to contact OFAC for further guidance on handling of the inventory. [7-16-2014]

375. If I have Kalashnikov products in my inventory, can I sell them?

If a U.S. person has an inventory of Kalashnikov Concern products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment), we advise that U.S. person to contact OFAC for further guidance on handling of the inventory. [7-16-2014]

From: ATF (b)(6)
Sent: Monday, July 10, 2017 2:59 PM
To: Dondarski, Michael (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C) | ATF (b)(6)
Subject: ATF Inquiry re. Russian Federation Sanctions Implementation (Licensing Determinations)

Hello Mike,

I am writing to follow up on our active inquiry regarding the matter described below in more detail. Please let me know if you require additional information.

Thank you!
ATF (b)(6)

ATF (b)(6)

From: ATF (b)(6)
Sent: Friday, June 23, 2017 12:42 PM
To: 'Michael.Dondarski' (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C) | ATF (b)(6)
Subject: ATF Inquiry re. Russian Federation Sanctions Implementation (Licensing Determinations)

Hello Mike,

ATF (b)(5)

ATF (b)(5) (b)(6), (b)(7)(C) has been very responsive and helpful, but we seem to be snagged on one aspect of this matter.

ATF (b)(5)

ATF does not possess the legal authority or jurisdiction to verify or dispute any importer claims about whether a prospective

import implicates an SDN's active property interest such that the transaction is or is not subject to (prohibited by) sanctions. We understand that OFAC investigates such claims in order to make OFAC licensing determinations. ATF (b)(5)

ATF (b)(5)

Thank you!

ATF (b)(6)

From: ATF (b)(6)
Sent: Wednesday, June 14, 2017 11:35 AM
To: 'Michael.Dondarski' (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C) | ATF (b)(6)
Subject: ATF Inquiry re. Russian Federation Sanctions Implementation (Licensing Determinations)

Hello Mike,

(b)(6), (b)(7)(C) suggested that I contact you with the following ATF Russian Federation sanctions question. I worked with (b)(6), (b)(7)(C) and several people from OFAC a little over two years ago to establish a process for ATF to coordinate with OFAC in implementing Russian Federation sanctions licensing determinations for applicable ATF permanent import applications. OFAC Enforcement Section Chief (b)(6), (b)(7)(C) fielded many of the ATF inquiries on behalf of import applicants, but I understand that he has relatively recently left OFAC. ATF (b)(5)

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ATF (b)(5)

ATF (b)(5)

After 3:30 pm today, I will be out of the office until Monday, so I have copied my colleague, ATF (b)(6) in the event you have additional documentation (b)(5)

Thank you!
ATF (b)(6)

ATF (b)(6)