

(b)(4) Advisory Opinion

From: Michael Faucette <michael.faucette@mbassociateslaw.com>
To: "Gacki, Andrea" (b)(6)
Date: Wed, 06 Aug 2014 16:48:50 -0400
Attachments: (b)(4) Advis Op Req (b)(4) 224.62 kB); ATT00001.htm (2.2 kB); ApplicationSummary-1.pdf (69.14 kB); ATT00002.htm (2.7

Hi Andrea,

I just submitted an advisory opinion request on behalf of another one of our clients, (b)(4) The company that we are inquiring about is (b)(4) I attached the docs here as well for your convenience. Thank you!

Kind Regards,

Mike Faucette
Attorney at Law

Mark Barnes & Associates

1350 I St. N.W. , Suite 260
Washington, D.C. 20005
Tel. (202) 626-0085
Fax (202) 626-0088

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(b)(4)

August 6, 2014

Andrea Gacki
Assistant Director for Licensing
Office of Foreign Assets Control
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

RE: Request for Advisory Opinion for (b)(4) **on status of**
(b)(4)

Dear Ms. Gacki:

The purpose of this letter is to request an advisory opinion on the debarment status of (b)(4)
(b)(4)
(hereinafter (b)(4)) under the Specially Designated Nationals List (“SDN”).

On July 16, 2014, the U.S. Department of Treasury’s Office of Foreign Assets Control (“OFAC”) placed Kalashnikov Concern (“KC”) and other Russian arms manufacturers on the SDN list pursuant to Executive Order 13661 of March 16, 2014, “Blocking Property of Additional Persons Contributing to the Situation in Ukraine.” Accordingly, we want to confirm that, based on the documents attached hereto; we are permitted to engage in business with (b)(4)

(b)(4) is a California-based company that is the (b)(4)
(b)(4) While (b)(4) is not named on the SDN list, according to OFAC guidance, “[e]ntities that a person on the SDN List owns (defined as a direct or indirect ownership interest of 50% or more) are also blocked, regardless of whether that entity is separately named on the SDN List.”¹ With this instruction in mind, we requested, (b)(4)
(b)(4) **See Attachment A.** (b)(4)
(b)(4) none of whom are listed on the SDN. Although KC planned on one day holding (b)(4) , this action never materialized. Based on these documents, we do not believe that (b)(4) is owned directly, or indirectly, by KC or any other blocked party.

(b)(4)

¹ <http://www.treasury.gov/resource-center/faqs/Sanctions/Pages/answer.aspx#9>

Although we do not believe (b)(4) is subject to debarment, (b)(4)

(b)(4)

In light of the aforementioned facts and the documents attached hereto, we respectfully request an advisory opinion to confirm whether (b)(4) is a blocked party under the SDN list. (b)(4)

(b)(4)

We also ask that the privileged and confidential trade secret, commercial, and financial information contained in this letter be withheld from public disclosure pursuant to 5 U.S.C. § 522(b)(4) of the Freedom of Information Act.

Again, we wish to express our gratitude to OFAC for the attention that has been shown to this urgent matter. If you require any further information, please do not hesitate to contact (b)(6) (b)(6). Alternatively, you may contact our outside counsel, Michael Faucette of Mark Barnes & Associates at (202) 626-0085 or michael.faucette@mbassociateslaw.com.

Respectfully,

(b)(6)

Vice President

(b)(4)

ATTACHMENT A

(b)(4)

To: (b)(4)

Attn: (b)(6)

Out. # (b)(4)

« 29 » 07 20 14

Dear (b)(6)

(b)(4) we would like to report the following:

- a. The (b)(4) is not owned by the Concern Kalashnikov ("CK")
- b. The (b)(4) is an (b)(4)
- c. The (b)(4) has no stocks of the (b)(4).

Also, please find the list of the registered stockholders of (b)(4) in the attachment.

In addition, (b)(4)
(b)(4)

Attachment:

1. List of the registered stockholders – 1 page.

With the best regards,

(b)(4)

(b)(4)

List of the registered stockholders, on the accounts of which more than 1% of issuer stocks come into account.

Register as of date: 29.07.2014

Issuer of stocks: Joint-Stock Company (b)(4)

Full name: Joint-Stock Company (b)(4)

Number and date of state registration: № (b)(4)

Registration Department: (b)(4)

Location, tel: (b)(4)

Issuer's nominal capital: (b)(4)

Stock denomination	State registration number	Total quantity, pcs	Nominal value of one stock, rub
Common stock (CS)	(b)(4)	(b)(4)	(b)(4)

No.	Stockholder full name, who having more than 1% of stock	Stock (category)	Quantity of stocks, belonging to the stockholder	Share of the nominal capital, %
1	(b)(4)	CS	(b)(4)	(b)(4)
2		CS		
3		CS		
4		CS		
5		CS		
6		CS		
7		CS		
8		CS		
	Total for the juristic person		(b)(4)	(b)(4)
	Total for the list			

Registrar (full name): Joint-Stock Company (b)(4)

Number and date of state registration: series (b)(4)

Registration Department: (b)(4)

Location, tel: (b)(4)

(b)(4)

(b)(4)

Signature, stamp



O F A C

Office of Foreign Assets Control

License Application

Reference Number: (b)(4)

Generated on 8/6/2014

Application Information

Application Type: Transactional
Application Reason: New Application
Program(s): UKRAINE-EO13661
Description of Subject Matter: Request for advisory opinion on whether (b)(4) is a blocked company.

Category: Transactional
Subcategory: Imports
Previous Case ID:

Contact Information

Applicant

Contact Category: Institution
Organization Name: (b)(4)
Point of Contact Name: (b)(6)
Address: Line1: (b)(4)
 Line2:
 Line3:
City: (b)(4) **State:** California
Zip: (b)(4) **Country:** United States
Email Address: (b)(6)
Phone: (b)(6) Office
Principal Place of Business:
Place where Business is Incorporated:

Correspondent

Contact Category: Institution
Organization Name: Mark Barnes & Associates
Point of Contact Name: Michael Faucette
Address: Line1: 1350 I Street NW
 Line2: Suite 260
 Line3:
City: Washington **State:** DC
Zip: 20005 **Country:** United States
Email Address: michael.faucette@mbassociateslaw.com
Phone: 202-626-0085 Office
Principal Place of Business:
Place where Business is Incorporated:

Attachments

Name	Document Type
Advisory Opinion Request	Supplemental Information
Application Summary	License Request

Certification

Signature: Michael Faucette **Date:** 8/6/2014
Email Address: michael.faucette@mbassociateslaw.com

FW: (b)(4) Advisory Opinion

From: "Gacki, Andrea" (b)(6)
To: (b)(6)
Date: Wed, 06 Aug 2014 16:57:10 -0400
Attachments: (b)(4) Advis Op Req (b)(4) 224.62 kB); ATT00001.htm (2.2 kB); ApplicationSummary-1.pdf (69.14 kB); ATT00002.htm (2.74 kB)

Just fyi:

From: Michael Faucette [mailto:michael.faucette@mbassociateslaw.com]
Sent: Wednesday, August 06, 2014 4:49 PM
To: Gacki, Andrea
Subject: (b)(4) Advisory Opinion

Duplicative of content in Bates No. 2018-08-116: 008796



FW: Sanctions address check

From: OFAC Enforcement <ofac enforcement@treasury.gov>

To: (b)(6), (b)(7)(C)

Date: Wed, 20 Dec 2017 11:42:03 -0500

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

I hope you're well. (b)(6), (b)(7)(C) here in Enforcement suggested you might be the right person to review the below email we received via the Enforcement Hotline.

Don't hesitate to let me know if I can get you any other information on this.

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

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

ICE (b)(7)(E)

Respectfully,

(b)(6), (b)(7)(C)
Enforcement Officer
Office of Foreign Assets Control
U.S. Department of the Treasury
(b)(6), (b)(7)(C)
(b)(6), (b)(7)(C)

From: ICE (b)(6), (b)(7)(C)
Sent: Wednesday, December 20, 2017 11:08 AM
To: OFAC Enforcement <ofac enforcement@treasury.gov>
Cc: ICE (b)(6), (b)(7)(C)
Subject: Sanctions address check

OFAC Enforcement team,

ICE (b)(7)(E)

ICE (b)(6), (b)(7)(C), (b)(7)(E) Russia

ICE (b)(5), (b)(7)(E)

ICE (b)(6), (b)(7)(C), (b)(7)(E) RU 426006

ICE (b)(6), (b)(7)(C), (b)(7)(E)

ICE (b)(7)(E)

ICE (b)(7)(E)

Respectfully,

(b)(6), (b)(7)(C) Special Agent

DHS - ICE | Homeland Security Investigations | SAC Chicago

One Tower Lane | (b)(6), (b)(7)(C) | Oakbrook Terrace, Illinois 60181

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

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

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Bates Nos. 2018-08-116:
008892-008893
Withheld by ICE
Pursuant to (b)(7)(E)

FW: Sanctions address check

From: (b)(6), (b)(7)(C)
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Date: Thu, 21 Dec 2017 11:59:32 -0500

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

From: OFAC Enforcement
Sent: Wednesday, December 20, 2017 11:42 AM
To: (b)(6), (b)(7)(C)
Subject: FW: Sanctions address check

Duplicative of content in Bates No. 2018-08-116: 008891



Bates Nos. 2018-08-116:

008895 - 008896

Duplicate Bates Nos.

2018-08-116: 008892 - 008893

Bates Nos. 2018-08-116:
008897 - 008898
Withheld by ICE
Pursuant to (b)(7)(E)

EU sanctions help

From: (b)(6)
To: (b)(6)
Date: Mon, 08 Jan 2018 14:40:28 -0500
Attachments: 20160112 Comparison of Country Sanctions_Russia_Ukraine (2).pdf (284.36 kB)

(b)(6),

Do you have something like that that is up to date? If not, do you have a list of all the EU Russia sanctions? I've never been able to easily look up EU folks on European Council website (OFAC's site is so much easier).

Thank you!

(b)(6)

Bates Nos. 2018-08-116:
008900 – 008907
Non-Responsive Records

FW: Sanctions address check

From: OFAC Enforcement <ofac enforcement@treasury.gov>
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Date: Thu, 15 Feb 2018 10:59:12 -0500

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

Thank you for taking my call. Please see the email below from (b)(6), (b)(7)(C) regarding (b)(7)(E)
(b)(7)(E)

V/r,
Office of 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)
OFACEnforcement@treasury.gov

From: ICE (b)(6), (b)(7)(C)
Sent: Tuesday, February 06, 2018 11:25 AM
To: OFAC Enforcement
Cc: ICE (b)(6), (b)(7)(C)
Subject: RE: Sanctions address check

OFAC Enforcement team,

ICE (b)(6), (b)(7)(C), (b)(7)(E)

Regards,

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

From: ICE (b)(6), (b)(7)(C)
Sent: Thursday, December 21, 2017 4:16 PM
To: 'ofac enforcement@treasury.gov'
Subject: RE: Sanctions address check

ICE (b)(7)(E)

Regards,

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

From: ICE (b)(6), (b)(7)(C)
Sent: Wednesday, December 20, 2017 10:06 AM
To: 'ofac enforcement@treasury.gov'
Cc: ICE (b)(6), (b)(7)(C)
Subject: Sanctions address check

OFAC Enforcement team,

ICE (b)(7)(E)

ICE (b)(6), (b)(7)(C), (b)(7)(E) Russia

ICE (b)(5), (b)(7)(E)

ICE (b)(6), (b)(7)(C), (b)(7)(E) 2U 426006

ICE (b)(6), (b)(7)(C), (b)(7)(E)

ICE (b)(7)(E)

ICE (b)(7)(E)

Respectfully,

ICE (b)(6), (b)(7)(C) *Special Agent*

DHS - ICE | Homeland Security Investigations | SAC Chicago
One Tower Lane, ICE (b)(6), (b)(7)(C) Oakbrook Terrace, Illinois 60181

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

HSI: ICE (b)(6), (b)(7)(C)

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Bates Nos. 2018-08-116:
008997 - 008998

Withheld in Full Pursuant to
(b)(4) with (b)(6) in Part

RE: State's 231 talking points

From: (b)(6)
To: (b)(6) "Swindells, Felicia" (b)(6) "Unger, Seth"
<seth.unger@treasury.gov>
Cc: (b)(6)
Date: Fri, 23 Feb 2018 13:56:34 -0500
Attachments: State Guidance and Q&A on CAATSA Section 231.docx (27.68 kB)

Hi (b)(6) – Here you go. In addition to State's Q&As, this document includes State's summary of sec. 231 and the list of entities identified as operating in the Russian defense or intel sector. Let me know if you have any questions or concerns.

V/r
(b)(6)

From: (b)(6)
Sent: Friday, February 23, 2018 11:15 AM
To: (b)(6) Swindells, Felicia (b)(6) Unger, Seth
Cc: (b)(6)
Subject: RE: State's 231 talking points

(b)(6), it would be great if we could get all of this in a Word doc as you suggest. Thanks!

From: (b)(6)
Sent: Thursday, February 22, 2018 6:14 PM
To: (b)(6) Swindells, Felicia (b)(6) Unger, Seth
Cc: (b)(6)
Subject: RE: State's 231 talking points

Hi (b)(6):

I got this back from State this afternoon, they're arming their folks with this information and these basic points (links pasted below). Let me know what would be useful. Would you like us to plug these into a word doc, or plug them into Sigal's hearing prep?

V/r
(b)(6)

- 1) About CAATSA: <https://www.state.gov/t/isn/caatsa/index.htm>
- 2) Our public facing points: <https://www.state.gov/t/isn/caatsa/275118.htm>
- 3) And a BONUS "If Asked" point we recently developed:

State (b)(5)

From: (b)(6)
Sent: Thursday, February 22, 2018
To: (b)(6) Swindells, Felicia (b)(6) Unger, Seth
Cc: (b)(6)
Subject: Re: State's 231 talking points

Any luck on this one?

From: (b)(6)
Date: February 21, 2018 at 9:00:12 PM EST
To: (b)(6) Swindells, Felicia (b)(6) Unger, Seth
<Seth.Unger@treasury.gov>
Cc: (b)(6)
Subject: Re: State's 231 talking points

I'll reach out to State colleagues for some points.

From: (b)(6)
Date: February 21, 2018 at 7:31:41 PM EST
To: Swindells, Felicia (b)(6) (b)(6) Unger, Seth
<Seth.Unger@treasury.gov>
Cc: (b)(6)
Subject: State's 231 talking points

Hi team,

Sigal asked if we could reach out to State to get their actual public talking points on CAATSA Section 231. Could someone help us with that? Thanks!

(b)(6)
Senior Advisor
Office of the Under Secretary for Terrorism and Financial Intelligence
U.S. Department of the Treasury
Direct: (b)(6) | (b)(6)

Section 231 of the Countering America’s Adversaries Through Sanctions Act of 2017

Section 231 of the Countering America’s Adversaries Through Sanctions Act (“CAATSA,” or “the Act”) (Pub. L. 115-44) was enacted on August 2, 2017. The Act states that the President shall impose five or more of the sanctions described in Section 235 of the Act with respect to a person the President determines knowingly, on or after such date of enactment, engages in a significant transaction with a person that is part of, or operates for or on behalf of, the defense or intelligence sectors of the Government of the Russian Federation. The President delegated to the Secretary of State, in consultation with the Secretary of the Treasury, the authority to implement Section 231 on September 29, 2017.

The Secretary of State has determined that the following persons are part of, or operate for or on behalf of, [the defense or intelligence sectors of the Government of the Russian Federation](#) for the purposes of CAATSA Section 231.

For additional guidance on implementation of Section 231, see the following: [Public Guidance/FAQ](#).

If you have additional questions, please contact RussiaSection231Sanctions@state.gov.

CAATSA Section 231(d) Defense and Intelligence Sectors of the Government of the Russian Federation

October 27, 2017

CAATSA Section 231(d) List Regarding the Defense Sector of the Government of the Russian Federation

Admiralty Shipyard JSC
Almaz-Antey Air and Space Defense Corporation JSC
Dolgoprudny Research Production JSC
Federal Research and Production Center Titan Barrikady JSC (Titan Design Bureau)
Izhevsk Mechanical Plant (Baikal)
Izhmash Concern JSC
Kalashnikov Concern JSC
Kalinin Machine Building Plant JSC (KMZ)
KBP Instrument Design Bureau
MIC NPO Mashinostroyenia
Molot Oruzhie
Mytishchinski Mashinostroitelny Zavod
Novator Experimental Design Bureau
NPO High Precision Systems JSC
NPO Splav JSC
Oboronprom OJSC

Radio-Electronic Technologies (KRET)
Radiotechnical and Information Systems (RTI) Concern
Research and Production Corporation Uralvagonzavod JSC
Rosoboronexport OJSC (ROE)
Rostec (Russian Technologies State Corporation)
Russian Aircraft Corporation MiG
Russian Helicopters JSC
Sozvezdie Concern JSC
State Research and Production Enterprise Bazalt JSC
Sukhoi Aviation JSC
Tactical Missiles Corporation JSC
Tikhomirov Scientific Research Institute JSC
Tupolev JSC
United Aircraft Corporation
United Engine Corporation
United Instrument Manufacturing Corporation
United Shipbuilding Corporation

CAATSA Section 231(d) List Regarding the Intelligence Sector of the Government of the Russian Federation

Autonomous Noncommercial Professional Organization/Professional Association of Designers of Data Processing (ANO PO KSI)
Federal Security Service (FSB)
Foreign Intelligence Service (SVR)
Main Intelligence Directorate of the General Staff of the Russian Armed Forces (GRU)
Special Technology Center
Zorsecurity

State Department Public Guidance/FAQ

October 27, 2017

Public Guidance on Sanctions with Respect to Russia’s Defense and Intelligence Sectors Under Section 231 of the Countering America’s Adversaries Through Sanctions Act of 2017

Summary

- The following guidance pertains to the Countering America’s Adversaries Through Sanctions Act of 2017 (“CAATSA” or “the Act”) (Pub. L. 115-44), which was adopted by the U.S. Congress July 28, 2017 and signed by President Trump August 2, 2017. The Administration will fully implement the Act consistent with the overall national security and foreign policy interests of the United States, as well as our specific policies regarding Russia and its external activities.
- On September 29, 2017, President Trump delegated the authority to implement Section 231 to the Secretary of State, in consultation with the Secretary of the Treasury. Section 231 requires the imposition of certain sanctions on persons determined to have knowingly engaged in a significant transaction, on or after the date the Act was enacted, with a person that is part of or operating for or on behalf of the defense or intelligence sectors of the Government of the Russian Federation.
- Pursuant to Section 231(d), the Department of State is today issuing guidance to specify persons that are part of, or operating for or on behalf of, the defense or intelligence sectors of the Government of the Russian Federation (“Section 231 Guidance” or “the Guidance”).
- The Guidance names certain persons, but it is not a determination regarding imposition of sanctions. No asset freezes are being imposed on these named persons as a result of their inclusion in this Guidance, and inclusion in this Guidance does not, of itself, mean such persons are added to the Department of the Treasury’s List of Specially Designated Nationals List and Blocked Persons or Sectoral Sanctions Identification List.
- The Act requires the imposition of five or more sanctions of the twelve listed in Section 235 of the Act beginning on or after January 29, 2018, with respect to persons determined to have engaged in conduct covered by this Section since enactment of the Act August 2, 2017. Such determinations will be made in a separate notice.

Questions and Answers

Q: How did you arrive at the Section 231 Guidance?

A: The Guidance is to specify, for the purposes of implementing Section 231, the persons – which can be individuals or entities – that are part of, or operating for or on behalf of, the defense or intelligence sectors of the Government of the Russian Federation. This Guidance

was developed, and may in the future be amended or updated as circumstances warrant, based on a robust interagency process.

Q: Is the United States imposing sanctions on these persons by specifying them in this Guidance?

A: No. Specification in this Guidance only indicates that an individual or entity has been identified as part of, or operating for or on behalf of, the defense or intelligence sectors of the Government of the Russian Federation, for purposes of implementing Section 231(d). Some of the individuals or entities named, however, may also be currently subject to U.S. sanctions imposed under other authorities.

Q: Are all transactions with specified persons sanctionable?

A: No. The Act states that sanctions shall be imposed beginning on or after 180 days after enactment on persons that are determined to knowingly engage in a significant transaction with a person specified in the Guidance on or after the date of enactment of the Act.

Q: What is a “significant transaction?”

A: In determining whether a transaction is “significant” for purposes of Section 231 of the Act, the Department of State will consider the totality of the facts and circumstances surrounding the transaction and weigh various factors on a case-by-case basis. The factors considered in the determination may include, but are not limited to, the significance of the transaction to U.S. national security and foreign policy interests, in particular whether it has a significant adverse impact on such interests; the nature and magnitude of the transaction; and the relation and significance of the transaction to the defense or intelligence sector of the Russian government. In this initial implementation stage, our focus is expected to be on significant transactions of a defense or intelligence nature with persons named in the Guidance. If a transaction for goods or services has purely civilian end-uses and/or civilian end-users, and does not involve entities in the intelligence sector, these factors will generally weigh heavily against a determination that such a transaction is significant for purposes of Section 231.

If a transaction is necessary to comply with rules and regulations administered by the Federal Security Service, or law enforcement or administrative actions or investigations involving the Federal Security Service, including rules and regulations administered by the Federal Security Service for the importation, distribution, or use of information technology products in the Russian Federation and the payment of any fees to the Federal Security Service for such licenses, permits, certification, or notifications, then these factors will weigh heavily against a determination that that such transaction is significant for purposes of this section.

Q: Are companies prohibited from conducting transactions with persons named in this Guidance?

A: The Act provides for certain sanctions, including on U.S. persons, in the event of a significant transaction. The Act does not provide for sanctions in cases in which transactions are

not “significant.” Where possible, the United States intends to work with persons considering transactions with persons named in this Guidance to help them identify and avoid engaging in potentially sanctionable activity.

Q: Are you required to sanction allied or partner states that purchase Russian-origin military equipment, spare parts, and related supplies?

A: In implementing Section 231, the Department of State is mindful of the importance of unity and coordination with our allies and partners on these issues. The Act itself acknowledges the importance of these relationships, and these purposes, when providing in Section 212 that we “should continue to uphold and seek unity with European and other key partners on sanctions implemented against the Russian Federation, which have been effective and instrumental in countering Russian aggression in Ukraine.” Where possible, the United States intends to work with our allies and partners to help them identify and avoid engaging in potentially sanctionable activity while strengthening military capabilities used for cooperative defense efforts.

Q: What types of sanctions does the Act authorize?

A: Section 231 of the Act states that five or more of the sanctions described in Section 235 shall be imposed on persons determined to engage in a significant transaction with a person that is part of, or operates for or on behalf of, the defense or intelligence sectors of the Government of the Russian Federation. The sanctions described in Section 235 include, among others, prohibitions concerning property transactions, export license restrictions, Export-Import Bank assistance restrictions, debt and equity restrictions, visa ramifications for corporate officers, and United States government procurement prohibitions. The Act allows for sanctions on persons that engage in covered transactions as well as on the principal executive officer or officers of the sanctioned person (or a person performing similar functions and with similar authorities as such officer or officers).

IF ASKED – NOT PUBLICLY AVAILABLE:

State (b)(5)

Orbis Reports - AB

From:

(b)(6)

To:

(b)(6)

(b)(6)

Cc:

(b)(6)

Date: Thu, 01 Mar 2018 12:33:36 -0500

Attachments: Aeroekspres.pdf (340.76 kB); Mosmetrostroy Corp.pdf (397.54 kB); OAO Kuzbassrazrezugol.pdf (405.04 kB);
Transgrupp AS.pdf (288.77 kB); Transmashholding JSC.pdf (381.53 kB)

Attached

FW: Orbis Reports - AB

From: (b)(6)
To: (b)(6)
Date: Thu, 01 Mar 2018 15:53:34 -0500
Attachments: Aeroekspress.pdf (340.76 kB); Mosmetrostroy Corp.pdf (397.54 kB); OAO Kuzbassrazrezugol.pdf (405.04 kB); Transgrupp AS.pdf (288.77 kB); Transmashholding JSC.pdf (381.53 kB)

From: (b)(6)
Sent: Thursday, March 01, 2018 12:34 PM
To: (b)(6)
Cc: (b)(6)
Subject: Orbis Reports - AB

Attached