

## RE: E.O. 13661 Question

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**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Mon, 05 Mar 2018 16:38:01 -0500

Don't add those, but just make a note of it in your email.

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**From:** (b)(6)  
**Date:** March 5, 2018 at 2:44:39 PM EST  
**To:** (b)(6)  
**Subject:** RE: E.O. 13661 Question

I've more or less covered all the designations on the SND for EO13661 and there are only about a dozen entities listed that are related to the defense sector. However, a lot of important contractors (like Rostec and its subsidiaries) are listed on the SSI under EO13662. Would you like me to include these as well?

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**From:** (b)(6)  
**Sent:** Monday, March 05, 2018 11:39 AM  
**To:** (b)(6)  
**Subject:** RE: E.O. 13661 Question

Thanks. Send directly to (b)(6) and the rest of us, (b)(6), (b)(6), myself.

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**From:** (b)(6)  
**Sent:** Monday, March 05, 2018 11:36 AM  
**To:** (b)(6)  
**Subject:** RE: E.O. 13661 Question

Sounds good. I'll start pulling this together.

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**Subject:** RE: E.O. 13661 Question

Yes, if you could, but only those that are related to the defense sector. 13661 also targets Russian officials and oligarchs.

So entities like Kalashnikov, Dolgoprudny, Kalinin, etc...

Here is a press release of a big one we did that included Russian defense sector entities:

<https://www.treasury.gov/press-center/press-releases/Pages/jl2629.aspx>

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**Sent:** Monday, March 05, 2018 10:48 AM  
**To:** (b)(6)  
**Subject:** RE: E.O. 13661 Question

I'm not quite sure what they need me to do here. Do they just want me to build a spread sheet with designations under EO 13661?

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**From:** (b)(6)  
**Sent:** Monday, March 05, 2018 9:59 AM  
**To:** (b)(6)  
**Subject:** FW: E.O. 13661 Question

Hey, can one of you guys work this?

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**From:** (b)(6)  
**Sent:** Monday, March 05, 2018 9:57 AM  
**To:** (b)(6)  
**Subject:** FW: E.O. 13661 Question

Could one of you ask the interns to pull together this information? You'll probably have to point them in the right direction, but

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and research of John Greenewald, Jr., creator of:

# The Black Vault

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document clearinghouse in the world. The research efforts here are  
responsible for the declassification of hundreds of thousands of pages  
released by the U.S. Government & Military.

**Discover the Truth** at: **<http://www.theblackvault.com>**

hopefully it won't be too hard. It's not an urgent priority, but I'd like to follow up by the end of the week.

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**From:** (b)(6)  
**Sent:** Friday, March 02, 2018 2:41 PM  
**To:** (b)(6)  
**Subject:** RE: E.O. 13661 Question

Hi (b)(6):

That would be great. Yes, I'll let her know.

Thank you,

(b)(6)

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**From:** (b)(6)  
**Sent:** Thursday, March 01, 2018 9:42 PM  
**To:** (b)(6)  
**Subject:** RE: E.O. 13661 Question

(b)(6), sorry for not following up sooner. We can get this information but since we don't track defense-related designations specifically we don't have this information saved in one place and it would take some time to pull it together. Could you tell her that we can follow up with a list of entities next week?

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**From:** (b)(6)  
**Date:** March 1, 2018 at 5:35:15 PM EST  
**To:** (b)(6) (b)(6)  
**Subject:** RE: E.O. 13661 Question

Hi all:

Greetings. I was wondering if you've had a chance to consider Commerce's question below. Any thoughts on what I could tell them or in which direction to point them.

Thank you,

(b)(6)

-----Original Message-----

**From:** (b)(6)  
**Sent:** Monday, February 26, 2018 7:40 PM  
**To:** (b)(6)  
**Subject:** RE: E.O. 13661 Question

Hi OGT:

As described in greater detail below, is there information that you could share with Commerce regarding Russian entities designated because of their involvement in the Russian defense sector?

Thanks you,

(b)(6)

-----Original Message-----

**From:** BIS (b)(7)(C)  
**Sent:** Monday, February 26, 2018 7:33 PM  
**To:** (b)(6)  
**Cc:** BIS (b)(7)(C)  
**Subject:** RE: E.O. 13661 Question

(b)(6),

We've corresponded on a few different occasions, including a conference call with the U.S. company BIS (b)(3)

If possible, I had a specific request to see if OFAC maintains a list of not only the Russian entities designated under each EO (which we also track and maintain), but more specifically which entities are designated because of their involvement in the Russian defense sector (under EO 13661

because they operate in the defense or related materiel sector in Russia or Directive 3 of EO 13662)

BIS (b)(5)

BIS (b)(5)

BIS (b)(5)

Those entities designated under EO 13661

for example only indicate that they are either:

"Persons determined by the Secretary of the Treasury, in consultation with the Secretary of State to have either materially assisted, sponsored or provided financial, material or technological support for, or goods and services to or in support of a senior official of the Russian government or operate in the defense or related materiel sector in Russia."

We would be very interested in obtaining any kind of official and/or working document you may have that provides any further background on these designations, so we don't have to "recreate the wheel" per se.

Thank you ahead of time.

Sincerely,

BIS (b)(7)(C)

-----Original Message-----

From: (b)(6)

Sent: Friday, May 05, 2017 6:31 PM

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

Cc: BIS (b)(7)(C)

Subject: RE: E.O. 13661 Question

Hi BIS (b)(7)(C)

Greetings. In terms of BIS (b)(5), OFAC (b)(7)(E) under the Russia-related sanctions, I suggest sending a writing to the attention of John Smith, Director, OFAC. That would give him something to study and to discuss with senior management here at OFAC.

(b)(6)

-----Original Message-----

From: BIS (b)(7)(C)

Sent: Friday, May 05, 2017 12:04 PM

To: (b)(6)

Cc: BIS (b)(7)(C)

Subject: RE: E.O. 13661 Question

(b)(6).

I wanted to follow-up on BIS (b)(7)(C) last email and BIS (b)(5), OFAC (b)(7)(E) Russian entities designated by OFAC under EO 13661, as well as those entities that are 50% or more owned by a designated entity.

Please let us know what your schedule looks like and I look forward to hearing from you.

Sincerely,

BIS (b)(7)(C)

-----Original Message-----

From: BIS (b)(7)(C)

Sent: Saturday, April 22, 2017 12:23 PM

To: (b)(6)

Cc: BIS (b)(7)(C)

Subject: RE: E.O. 13661 Question

Thank you! (b)(6)

BIS (b)(3)

BIS (b)(3)

Finally, we would welcome BIS (b)(5), OFAC (b)(7)(E) Russian entities with a military nexus. My Russia POCs are BIS (b)(7)(C) (enforcement policy, license review, end-use check targeting) and BIS (b)(7)(C) intelligence analyst in

2018-08-116: 009123



our Information Triage Unit).

BIS (b)(7)(C)

-----Original Message-----

From: (b)(6)  
Sent: Friday, April 21, 2017 5:10 PM  
To: BIS (b)(7)(C); (b)(6) BIS (b)(7)(C)  
Cc: BIS (b)(7)(C)  
Subject: RE: E.O. 13661 Question

Hi BIS (b)(7)(C)

Greetings. I manage Russia/Ukraine sanctions in OFAC's Licensing Division, so my team would evaluate any license request submitted under the Ukraine-Related Sanctions Regulations. BIS (b)(3) has been designated by OFAC under EO 13661, Section 1 of which blocks all property and interests in property of persons designated under the authorities of the EO that come within the possession or control of any US person. In addition, Section 4 of the EO prohibits the provision of any goods or services to or for the benefit of any person whose property and property interests are blocked pursuant to the EO. As (b)(6) has pointed out, persons who are 50% or more owned by a designated person are also considered by OFAC to be blocked even if they themselves are not designated. In order to make an official licensing determination regarding the case described below, we would need to review a formal application, but I would strongly recommend that one be submitted by the US exporter. I hope this is helpful. Please let me know if you have additional questions.

Thank you,

(b)(6)

Chief/Licensing Division  
OFAC

-----Original Message-----

From: BIS (b)(7)(C)  
Sent: Friday, April 21, 2017 1:43 PM  
To: (b)(6) BIS (b)(7)(C)  
Cc: BIS (b)(7)(C); (b)(6)  
Subject: RE: E.O. 13661 Question

Thanks (b)(6) Could we get a confirm that 13661 imposes an OFAC export license requirement for any US-origin item to BIS (b)(3)  
BIS (b)(3)

BIS (b)(7)(C)

-----Original Message-----

From: (b)(6)  
Sent: Friday, April 21, 2017 11:49 AM  
To: BIS (b)(7)(C)  
Cc: BIS (b)(7)(C); (b)(6)  
Subject: RE: E.O. 13661 Question

Hi BIS (b)(7)(C)

Good to see you too! Thanks for reaching out on this. I've cc'd (b)(6), who works in our licensing division. I'll let him jump in with more information.

From your description, I'd look at the 50% rule:

The property and interests in property of entities directly or indirectly owned 50 percent or more in the aggregate by one or more blocked persons are considered blocked regardless of whether such entities appear on OFAC's Specially Designated Nationals and Blocked Persons List (SDN List) or the annex to an Executive order. ([https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq\\_general.aspx](https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_general.aspx))

Again, I'll let (b)(6) more authoritatively speak on this as his office would be evaluating the licensing request (if they need one or apply for one).

Thanks. Let me know if you need anything else.

(b)(6)

-----Original Message-----

From: BIS (b)(7)(C)  
Sent: Friday, April 21, 2017 8:57 AM  
To: (b)(6)  
Cc: BIS (b)(7)(C)  
Subject: E.O. 13661 Question

Hi (b)(6),

2018-08-116: 009124

It was good to see you at State on Wednesday. We have a question regarding licensing requirements for Russian defense sector entities designated under E.O. 13661. I'm not sure if you're the right person to answer this, but if you could pass me to someone who can, that would be great.

**BIS (b)(3)**

Section 4 of E.O. 13661 prohibits the provision of goods to any person designated by Treasury under that executive order. We believe this would prohibit exports to **BIS (b)(3)**. The question is whether that prohibition would also apply to entities more than 50% owned by **BIS (b)(3)**. **BIS (b)(3)** If so, we'll advise the U.S. company that any export to **BIS (b)(3)** would require an OFAC license.

Thanks for helping us confirm this!

**BIS (b)(7)(C)**

## RE: E.O. 13661 Question

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**From:** (b)(6)  
**To:** (b)(6) (b)(6)  
**Date:** Wed, 07 Mar 2018 09:19:56 -0500  
**Attachments:** UKRAINE2 Arms entitites.xlsx (17.78 kB)

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Hi all,

I've attached a spreadsheet with entities listed under EO13661 that are related to the Russian defense sector. Of the 120 individuals and entities listed under EO13661, I've found 18 entities that were listed for operating in the arms and related materiel sector in the Russian Federation.

Additionally, I've included 7 individuals who appear to have been listed under EO13661 for their involvement in the Russian defense sector.

I also want to note that a large number of Russian defense-related contractors (like Rostec and its subsidiaries) are listed on the SSI under EO13662, not EO13661. These are not included in this list.

Hope this helps, and let me know if I can do more,

(b)(6)

---

**From:** (b)(6)  
**Sent:** Monday, March 05, 2018 11:39 AM  
**To:** (b)(6)  
**Subject:** RE: E.O. 13661 Question

Thanks. Send directly to (b)(6) and the rest of us, (b)(6), (b)(6), myself.

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**Sent:** Monday, March 05, 2018 11:36 AM  
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**Subject:** RE: E.O. 13661 Question

Sounds good. I'll start pulling this together.

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So entities like Kalashnikov, Dolgoprudny, Kalinin, etc...

Here is a press release of a big one we did that included Russian defense sector entities:

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Hey, can one of you guys work this?

Bates Nos. 2018-08-116:

009129 – 009132

Duplicative of Content in Pages

Marked with Bates Nos:

009121 – 009125



## RE: E.O. 13661 Question

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From: (b)(6)  
To: (b)(6)  
Bcc: (b)(6)  
Date: Wed, 07 Mar 2018 09:25:39 -0500

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Fantastic. Thank you, (b)(6). I'll get this over to (b)(6) at BIS pronto.

(b)(6)

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From: (b)(6)  
Sent: Wednesday, March 07, 2018 9:20 AM  
To: (b)(6)  
Subject: RE: E.O. 13661 Question

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Subject: RE: E.O. 13661 Question

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Bates Nos. 2018-08-116:

009135 – 009138

Duplicative of Content in  
Pages Marked with Bates Nos:

009121 – 009125

## RE: E.O. 13661 Question

From: (b)(6)  
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Cc: (b)(6)  
Bcc: (b)(6)  
Date: Wed, 07 Mar 2018 09:40:52 -0500  
Attachments: UKRAINE2 Arms entities.xlsx (17.78 kB)

Hi (b)(7)(C)

Good morning. Folks in OGT have created a spreadsheet (attached) with entities listed under EO13661 that are related to the Russian defense sector. Of the 120 individuals and entities listed under EO13661, they've found 18 entities that were listed for operating in the arms and related materiel sector in the Russian Federation.

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There are also a large number of Russian defense-related contractors (like Rostec and its subsidiaries) listed on the SSI List under EO13662, not EO13661; however, these are not included in the attached spreadsheet.

Please let me know if you have additional questions.

Sincerely,

(b)(6)

Chief  
Licensing Division/OFAC

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From: BIS (b)(7)(C)  
Sent: Saturday, March 03, 2018 10:53 AM  
To: (b)(6)  
Cc: BIS (b)(7)(C)  
Subject: Re: E.O. 13661 Question

(b)(6), that would be incredibly helpful and we're very appreciative for the assistance.

Looking forward to hearing from you next week.

BIS (b)(7)(C)

\*\*\*\*\*  
This Message was sent from my Mobile Device.  
\*\*\*\*\*

On: 02 March 2018 14:39, (b)(6) wrote:

Hi (b)(7)(C)

Good afternoon. It doesn't appear that we have this information in one document, but I talked to some folks who will try to conduct some research and put together a list next week. Would that work for you?

(b)(6)

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Sent: Monday, February 26, 2018 7:33 PM  
To: (b)(6)  
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Bates Nos. 2018-08-116:

009140 – 009142

Duplicative of Content in Pages

Marked with Bates Nos:

009123 – 009125