

From: [Dondarski, Michael](#)
To: (b)(6)
Subject: RE: Congressional Correspondence - [Non-STM Gacki] Wyden on Russian Arms Manufacturers and [Non-STM Gacki] McGovern on Venezuelan Sanctions
Date: Wednesday, August 8, 2018 6:32:26 PM

Sounds good – thanks for flagging on the front end and now again.

From: (b)(6)
Sent: Wednesday, August 8, 2018 6:30 PM
To: Dondarski, Michael (b)(6)
Subject: Fwd: Congressional Correspondence - [Non-STM Gacki] Wyden on Russian Arms Manufacturers and [Non-STM Gacki] McGovern on Venezuelan Sanctions

Looks like the letter I found will be making its way to us soon. (b)(6) hopes to have a plan of action done by tomorrow.

Duplicative of content in Bates No. 2018-08-116: 009214



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Bates Nos. 2018-08-116:
009291-009292

Duplicate Content in Bates
Nos. 2018-08-116:
009214-009215

From: [Dondarski, Michael](#)
To: [Palluconi, Lisa](#)
Subject: Re: NEWS: Wyden Questions Top Sanctions Enforcer on Ties Between US, Russian Arms Manufacturers and Russian Oligarchs
Date: Friday, August 3, 2018 6:36:29 AM

Thanks for flagging. We haven't been looped in at all as far as I know. Would you mind?

From: Palluconi, Lisa (b)(6)
Date: August 2, 2018 at 5:40:21 PM EDT
To: Dondarski, Michael (b)(6)
Subject: FW: NEWS: Wyden Questions Top Sanctions Enforcer on Ties Between US, Russian Arms Manufacturers and Russian Oligarchs

Just catching up on emails...See Wyden questions. Has ENF been engaged on this? Happy to loop if chain continues.

From: (b)(6)
Sent: Thursday, August 2, 2018 5:27 PM
To: (b)(6) Unger, Seth <Seth.Unger@treasury.gov>; Palluconi, Lisa (b)(6) Ballman, Luke <Luke.Ballman@treasury.gov>; (b)(6) (b)(6) Ahern, Paul (b)(6) Trew, Heather (b)(6)
Subject: RE: NEWS: Wyden Questions Top Sanctions Enforcer on Ties Between US, Russian Arms Manufacturers and Russian Oligarchs

Looks good here. Probably sent but just to say.

From: (b)(6)
Date: August 2, 2018 at 1:27:00 PM EDT
To: Unger, Seth <Seth.Unger@treasury.gov>, Palluconi, Lisa (b)(6) Ballman, Luke <Luke.Ballman@treasury.gov>, (b)(6) (b)(6) (b)(6) Ahern, Paul (b)(6) Trew, Heather (b)(6)
Subject: RE: NEWS: Wyden Questions Top Sanctions Enforcer on Ties Between US, Russian Arms Manufacturers and Russian Oligarchs

Response Looks good.

From: Unger, Seth <Seth.Unger@treasury.gov>

Date: August 2, 2018 at 1:23:02 PM EDT

To: (b)(6) Palluconi, Lisa (b)(6)
(b)(6) Ballman, Luke <Luke.Ballman@treasury.gov>,
(b)(6)
(b)(6)

Ahern, Paul (b)(6) Trew, Heather (b)(6)

Subject: RE: NEWS: Wyden Questions Top Sanctions Enforcer on Ties Between US, Russian Arms Manufacturers and Russian Oligarchs

Seeing none, I'll presume good to deploy this relatively routine response.

Thanks,

(b)(6)

From: Unger, Seth

Sent: Thursday, August 02, 2018 11:14 AM

To: (b)(6) Lisa Palluconi (b)(6)
(b)(6) Ballman, Luke
<Luke.Ballman@treasury.gov>; (b)(6)

(b)(6)
Ahern, Paul (b)(6) Trew, Heather (b)(6)

Subject: FW: NEWS: Wyden Questions Top Sanctions Enforcer on Ties Between US, Russian Arms Manufacturers and Russian Oligarchs

Hey Team, please ++ as appropriate. I presume response will be along the lines of:

On background: Treasury responds as appropriate to Congressional inquiries. Treasury's OFAC does not publicly discuss investigations, including to confirm whether or not one exists, and does not telegraph sanctions or comment on prospective actions.

Please let me know of additional thoughts or if clear.

Thanks,

(b)(6)

From: Madden, Pete A. [[\(b\)\(6\)](mailto:(b)(6))]

Sent: Thursday, August 02, 2018 11:05 AM

To: Unger, Seth <Seth.Unger@treasury.gov>

Subject: FW: NEWS: Wyden Questions Top Sanctions Enforcer on Ties Between US, Russian Arms Manufacturers and Russian Oligarchs

2018-08-116: 009294

Hi (b)(6)

Does OFAC have a comment on this?

pm

From: McCleery, Rachel (Finance) [mailto:Rachel_McCleery@finance.senate.gov]
Sent: Thursday, August 02, 2018 10:38 AM
To: McCleery, Rachel (Finance) <Rachel_McCleery@finance.senate.gov>
Subject: NEWS: Wyden Questions Top Sanctions Enforcer on Ties Between US, Russian Arms Manufacturers and Russian Oligarchs



FOR IMMEDIATE RELEASE

Contact: Rachel McCleery or Keith Chu (202) 224-4515

August 2, 2018

WYDEN QUESTIONS TOP SANCTIONS ENFORCER ON TIES BETWEEN US, RUSSIAN ARMS MANUFACTURERS AND RUSSIAN OLIGARCHS

Washington, D.C. – Senate Finance Committee Ranking Member Ron Wyden, D-Ore., this week asked the Office of Foreign Assets Control (OFAC) Acting Director Andrea Gacki whether OFAC is looking into possible relationships between US arms manufacturers and Russian arms manufactures with ties to sanctioned Russian nationals and oligarchs, including Alexander Torshin. Torshin, who reportedly has extensive ties to the National Rifle Association (NRA), was sanctioned by the United States in April due to his close relationship with Vladimir Putin.

Wyden inquired about arms manufacturers Kalashnikov USA and Tulammo USA and their ties to state-owned Russian arms manufacturers Kalashnikov Concern and Tula Cartridge Plant, respectively. The United States sanctioned Kalashnikov Concern in 2014.

Wyden requested answers to the following questions:

On Kalashnikov USA and Kalashnikov Concern

- 1.) Can you confirm whether OFAC has investigated the publicly reported business relationship between Kalashnikov USA and Mr. [Michael] Tiraturian, and Kalashnikov Concern and Mr. [Alexey] Krivoruchko?
- 2.) If so, did the domestic Kalashnikov entity maintain a business relationship with the

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- sanctioned arms manufacturer as indicated by public reporting?
- 3.) While Mr. Krivoruchko may not currently be a specially designated national and blocked person does his recent position as CEO of a sanctioned foreign arms manufacturer, current position within the Russian Federation's Ministry of Defense, and affiliation to a domestic arms manufacturer with a prior and potentially existing business relationship raise additional concerns for your office?
 - 4.) If your office has made a determination that Kalashnikov USA was not working for or on behalf of sanctioned Kalashnikov Concern, please explain the reasoning for that determination.

On Tulammo USA and Tula Cartridge Works (aka Tula Cartridge Plant)

- 1) Has your office performed an analysis of whether Tula Cartridge Works and Tula Cartridge Plant are in fact, one entity under partial state control?
- 2) Can you confirm whether OFAC has considered sanctioning Tula Cartridge Works due to its apparently relationship with Rostec and sanctioned oligarch Igor Rotenberg?
- 3) If yes, please explain why the company has not been added to the Specially Designated Nationals List or Sectoral Sanctions Identifications List pursuant to OFAC guidance on the 50 Percent Rule?
- 4) If no, do the public facts cited above warrant an investigation? Please explain.
- 5) Can you confirm whether OFAC has investigated the relationship between Tulammo USA and Tula Cartridge Works, and whether a determination to sanction Tula Cartridge Works would have any bearing on Tulammo USA?

You can read Wyden's full letter [here](#).

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Bates No. 2018-08-116: 009297
Withheld in Full by FinCEN
Pursuant to (b)(3)
[31 U.S.C. § 5319], with Parts
Withheld by Treasury Pursuant
to (b)(6)

Bates Nos. 2018-08-116:

009298-009301

Withheld in Full by FinCEN

Pursuant to (b)(3)

[31 U.S.C. § 5319]

Bates Nos. 2018-08-116:
009323-009324,
009325-009326,
009327,
009328-009331,
009332

Non-responsive Records

Bates Nos. 2018-08-116:

009338-009342

Duplicate Bates Nos.

2018-06-192: 000691-000694

Bates Nos. 2018-08-116:

009343-009348

Duplicate Bates Nos.

2018-06-192: 000721-000726

As a follow-up to our conversation . . .

From: "Smith, Bradley" (b)(6)
To: (b)(6) Buckingham,
Stephen (CIV) DOJ (b)(6), (b)(7)(C)
Date: Thu, 24 Apr 2014 18:22:59 -0400

we found this on Google: <http://www.janes.com/article/32283/kalashnikov-takes-aim-at-us-civilian-markets>.