

Bates No. 2018-08-116: 009598  
Non-Responsive Record

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# The Black Vault

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The image shows a close-up of a heavy, metallic vault door. The door is partially open, revealing a complex internal mechanism with multiple locking bolts and a central handle. A bright blue light emanates from the gap between the door and its frame, creating a strong glow and casting shadows on the surrounding metal. The overall aesthetic is industrial and mysterious.

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**From:** (b)(6), (b)(7)(C)  
**To:** [REDACTED]  
**Subject:** Kalashnikov  
**Date:** Tuesday, June 12, 2018 10:56:20 AM  
**Attachments:** [List of Entities.docx](#)

---

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

IRS-CI in Miami contacted us about Kalashnikov and its facility in Florida. They specifically looking for any information we may have on the attached individuals and entities. Did Enforcement ever look into Kalashnikov or did they ever come in for a license; would we have any information that we could pass to IRS-CI?

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

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

Sanctions Investigator

Office of Foreign Assets Control

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

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

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

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

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Several individuals and entities related to a Kalashnikov Concern, a Russian company that manufactures firearms and assault rifles, including the AK-47. Alexey Krivoruchko is the CEO of Kalashnikov Concern and the company has a weapons factory in Pompano Beach, FL. In 2014, the United States government sanctioned Kalashnikov and placed it on OFAC list.

**IRS (b)(3): 26 U.S.C. § 6103**



**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: (b)(6), (b)(7)(C)  
**Date:** Friday, May 11, 2018 10:19:00 AM

---

Will do. I have been in touch with (b)(6), (b)(7)(C) during the month. I let them know that all ATF cases should go through me. I will loop back in so that they are aware that ALL firearms import cases should be referred to my attention.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, May 11, 2018 9:39 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** (b)(6), (b)(7)(C)

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

Could you loop back with (b)(6), (b)(7)(C) in the ATF/Century Arm/Kalashnikov matter? Since it came in through the hotline, just let him know that you have been tasked to handle it. I'm not exactly sure what came into the hotline so you may need to have him forward everything to you.

Thanks,

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

Bates Nos. 2018-08-116:  
009615 - 009618

Withheld in Full Pursuant to  
(b)(7)(A) and (b)(7)(E)  
With Portions Pursuant to  
(b)(5), (b)(6), and (b)(7)(C)

**From:** (b)(6)  
**To:** (b)(6)  
**Subject:** RE: Congressional Correspondence - [Non-STM Smith] Deutch on OFAC re Kalashnikov USA  
**Date:** Friday, April 20, 2018 7:33:00 AM

---

Thanks (b)(6)

---

**From:** (b)(6)  
**Sent:** Friday, April 20, 2018 7:15 AM  
**To:** (b)(6)  
**Subject:** FW: Congressional Correspondence - [Non-STM Smith] Deutch on OFAC re Kalashnikov USA

(b)(6) and (b)(6),

POL got the attached inquiry. They will take the pen on the response and will circulate a draft with ENF. I added you two to the chain. We probably (b)(5)

(b)(5)

Thanks,

(b)(6)

---

**From:** (b)(6)  
**Date:** April 19, 2018 at 11:39:53 PM EDT  
**To:** (b)(6)  
**Cc:** Dondarski, Michael (b)(6) Mosier, Michael  
(b)(6)  
(b)(6)

**Subject:** FW: Congressional Correspondence - [Non-STM Smith] Deutch on OFAC re Kalashnikov USA

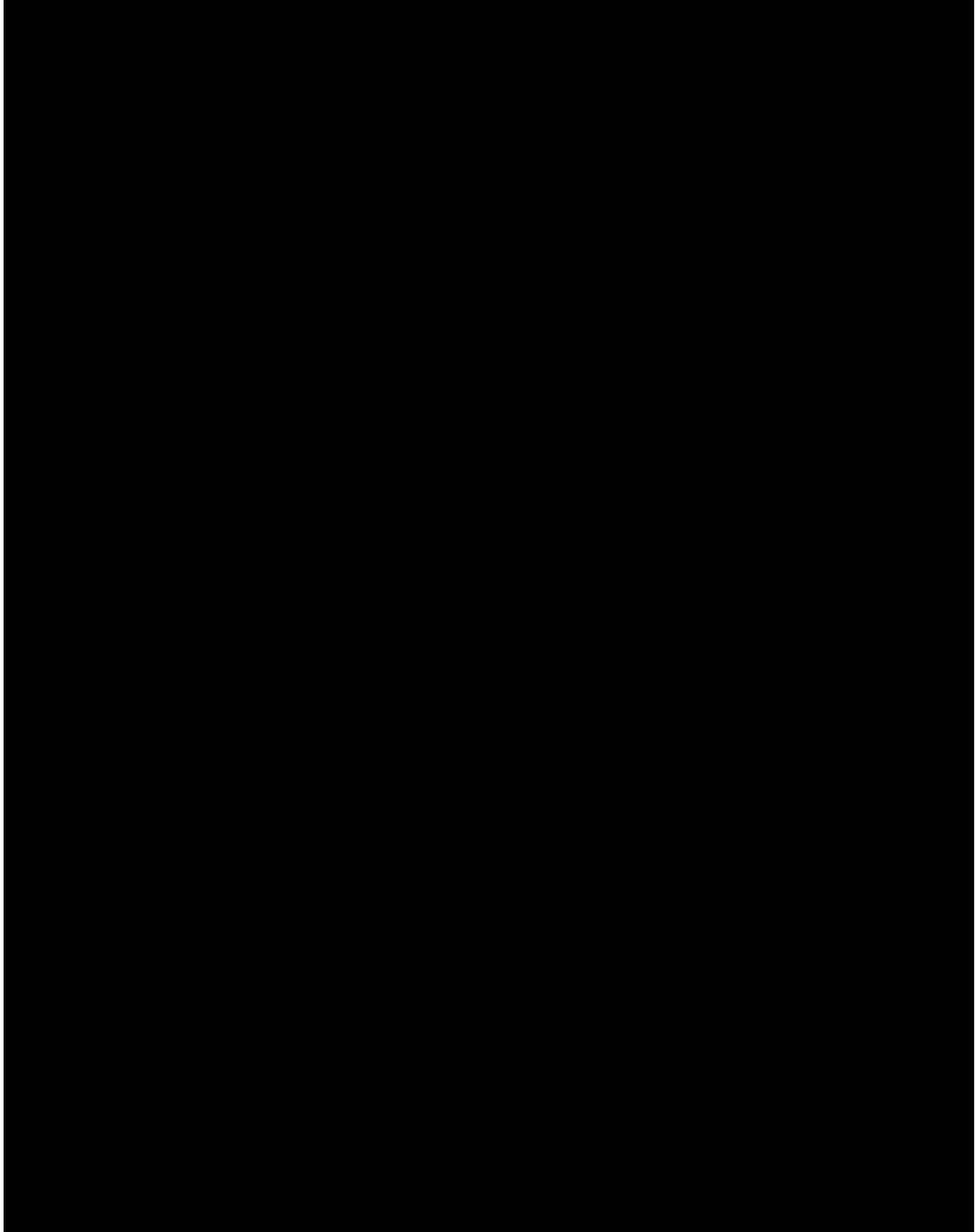
Duplicative of content on pages marked with Bates No. 2018-08-116: 009168

Bates Nos. 2018-08-116:  
009620-009621

Duplicate Content in  
Bates Nos. 2018-08-116:  
009168-009169

**From:** (b)(6)  
**To:** (b)(6)  
**Subject:** FW: Congressional Correspondence - [Non-STM Smith] Deutch on OFAC re Kalashnikov USA  
**Date:** Friday, April 20, 2018 7:15:19 AM  
**Attachments:** [\[Non-STM Smith\] Deutch on OFAC re Kalashnikov.pdf](#)

Duplicative of content on pages marked with Bates Nos. 2018-08-116: 009619-009620



Bates Nos. 2018-08-116:  
009623-009624

Duplicate Content in  
Bates Nos. 2018-08-116:  
009620-009621

**From:**  
**To:**  
**Subject:**  
**Date:**

(b)(6)

Re: Congressional Correspondence - [Non-STM Smith] Deutch on OFAC re Kalashnikov USA  
Friday, April 20, 2018 7:08:35 AM

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Thanks. I'll add them to the string so that when the draft comes the can look at it.

---

**From:** Dondarski, Michael (b)(6)

**Date:** April 20, 2018 at 6:48:53 AM EDT

**To:** (b)(6)

**Subject:** Re: Congressional Correspondence - [Non-STM Smith] Deutch on OFAC re Kalashnikov USA

I think (b)(6) and (b)(6) (b)(5)

Duplicative of content in Bates No. 2018-08-116: 009168



Bates Nos. 2018-08-116:  
009628-009629

Duplicate Content in  
Bates Nos. 2018-08-116:  
009168-009169

Bates Nos. 2018-08-116:  
009632-009637

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(A),  
(b)(7)(C), (b)(7)(E)

Bates Nos. 2018-08-116:  
009646-009648

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(A),  
(b)(7)(C)

Bates Nos. 2018-08-116:  
009649-009653

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(A),  
(b)(7)(C), (b)(7)(E)

Bates Nos. 2018-08-116:  
009654-009657

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(A),  
(b)(7)(C)

Bates Nos. 2018-08-116:  
009658-009661

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(A),  
(b)(7)(C)

**From:** (b)(6), (b)(7)(C)  
**To:**  
**Subject:** RE: 9:20  
**Date:** Tuesday, March 6, 2018 9:02:00 AM

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(b)(7)(A)

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**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, March 06, 2018 9:01 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: 9:20

Can we make it 9:45?

---

**From:** (b)(6), (b)(7)(C)  
**Date:** March 6, 2018 at 7:07:04 AM EST  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: 9:20

I will be there

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Monday, March 05, 2018 4:54 PM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** 9:20

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

Could you stop by my office at 9:20 tomorrow (Tuesday)?

Thanks,

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

Bates Nos. 2018-08-116:  
009667-009669

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(A),  
(b)(7)(C)

**From:** [OFAC Enforcement](#)  
**To:** ICE (b)(6), (b)(7)(C) [OFAC Enforcement](#)  
**Cc:** ICE (b)(6), (b)(7)(C)  
**Subject:** RE: Sanctions address check  
**Date:** Wednesday, December 20, 2017 11:38:07 AM

---

SA ICE (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)

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

Bates No. 2018-08-116: 009672  
Duplicates Content in  
Bates No. 2018-08-116: 008891

**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC License Search  
**Date:** Tuesday, November 14, 2017 10:50:28 AM  
**Attachments:** [RE PLEASE EXPEDITE - License History check.msg](#)

---

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

I actually took care of this one last week and re-sent it to ICE (b)(6), (b)(7)(C) yesterday (see attached).

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

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**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, November 14, 2017 9:11 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** FW: OFAC License Search

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

Would you please process the attached as a License History request.

Thanks

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

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**From:** ICE (b)(6), (b)(7)(C)  
**Sent:** Monday, November 13, 2017 9:34 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** OFAC License Search

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

I am sorry to be hitting you up with this request via e-mail, but it looks like my agency misrouted my request to Commerce rather than OFAC for a license check (see the attached license history request).

ICE (b)(7)(E)

ICE (b)(7)(E)

ICE (b)(7)(E)

Thanks (b)(6), (b)(7)(C) I appreciate your assistance! Please call or e-

mail with any issues — ICE (b)(6), (b)(7)(C)

Regards,

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)**

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**From:** (b)(6), (b)(7)(C) on behalf of [OFAC Enforcement](#)  
**To:** ICE (b)(6), (b)(7)(C)  
**Subject:** RE: PLEASE EXPEDITE - License History check  
**Date:** Monday, November 13, 2017 9:55:00 AM  
**Attachments:** [RE EARS 2017-11-9-ICE-03500.msg](#)

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

Please see attached. This license history check was completed last week. Please let us know if you need anything else.

Kind regards,

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

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**From:** ICE (b)(6), (b)(7)(C)  
**Sent:** Monday, November 13, 2017 9:43 AM  
**To:** OFAC Enforcement  
**Subject:** PLEASE EXPEDITE - License History check  
**Importance:** High  
OFAC Enforcement Team,

ICE (b)(7)(E)

ICE (b)(7)(E) Please contact me at this e-mail or at ICE (b)(6), (b)(7)(C) with any questions. Thank you for your assistance!

Regards,

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)

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**From:** (b)(6), (b)(7)(C) on behalf of OFAC Enforcement  
**To:** ICE (b)(6), (b)(7)(C)  
**Subject:** RE: EARS 2017-11-9-ICE-03500  
**Date:** Thursday, November 9, 2017 4:24:00 PM

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**DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220  
OFFICE OF FOREIGN ASSETS CONTROL  
LICENSE HISTORY CHECK**

November 9, 2017

Date of Request: November 9, 2017

Requestor's Name: ICE (b)(6), (b)(7)(C)

Originating Agency: HSI, Chicago, IL

The Office of Foreign Assets Control (OFAC) has searched its records under the names below.

**ICE (b)(7)(E)**

The search disclosed no responsive records of applications submitted by or on behalf of, or of OFAC licenses issued to, any party named above.

Please be advised that OFAC systems allow general searches for licenses only by name of the actual applicant or party licensed (usually, but not necessarily, the U.S. exporter or importer). Routine searches cannot be conducted specifically by commodity, manufacturer, foreign consignee, broker, or by another party.

Please also note that OFAC does not specifically regulate or license the sales of arms, dual-use commodities, or technology.

Should you have further questions, please contact Senior Enforcement Officer (b)(6), (b)(7)(C) at (b)(6), (b)(7)(C) or at [OFAC.Enforcement@treasury.gov](mailto:OFAC.Enforcement@treasury.gov).

**From:** ICE (b)(6), (b)(7)(C)

**Sent:** Thursday, November 09, 2017 11:38 AM

**To:** OFAC Enforcement

**Subject:** EARS 2017-11-9-ICE-03500

Good afternoon!

**ICE (b)(7)(E)**

Would it be possible to have the response returned to the ICE (b)(6), (b)(7)(C)

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

Exodus Command Center/Field Support

Department of Homeland Security

U.S. Immigration and Customs Enforcement

Counter Proliferation Investigations-ICE HQ

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

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Bates Nos. 2018-08-116:  
009677 - 009690

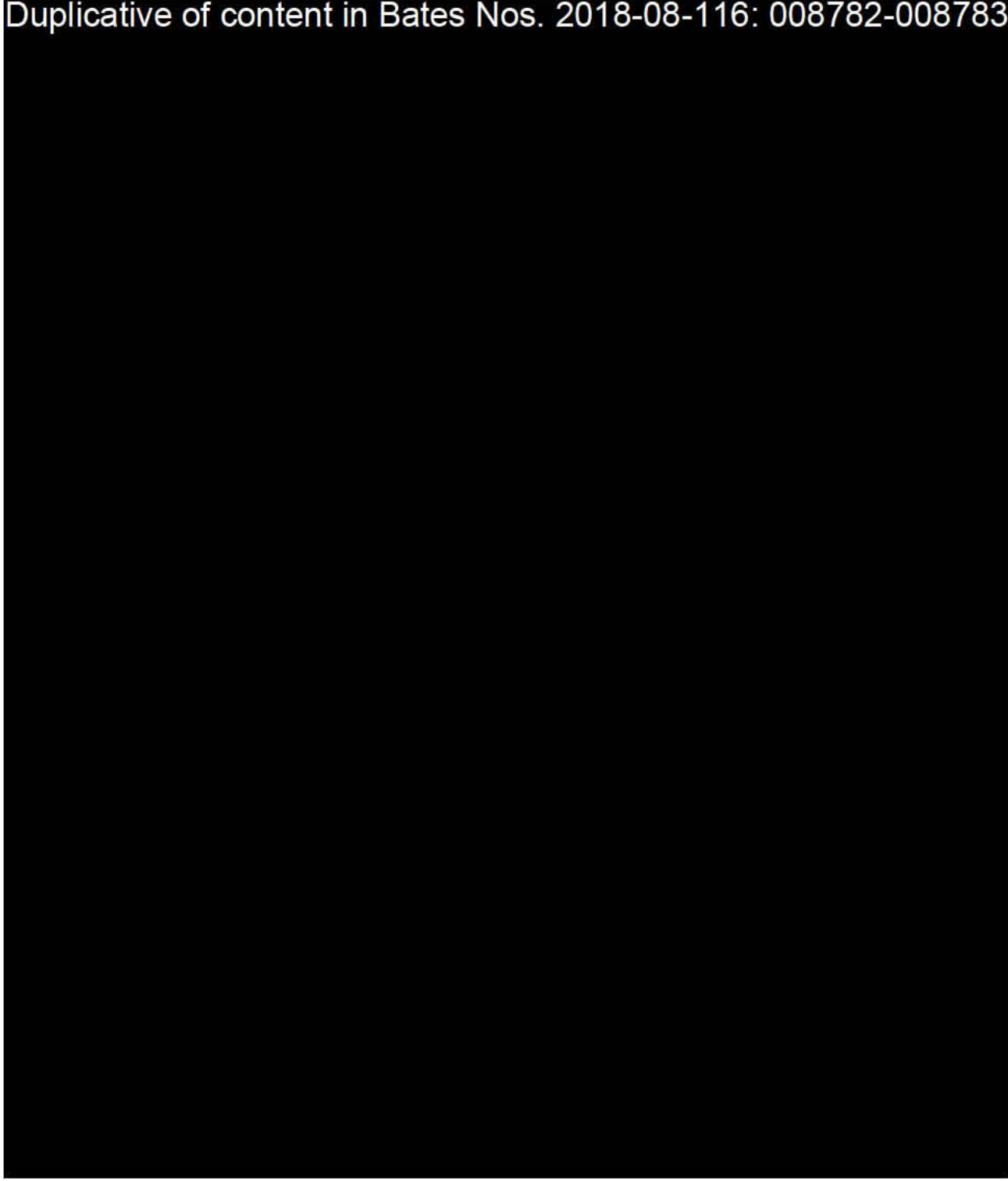
Withheld by USPTO and  
Treasury Pursuant to (b)(5),  
With Portions withheld by  
Treasury Pursuant to (b)(6)

**From:** (b)(6), (b)(7)(C)  
**To:** [REDACTED]  
**Subject:** FW: ATF Inquiry re. Russian Federation Sanctions Implementation (Licensing Determinations)  
**Date:** Monday, July 17, 2017 3:26:21 PM  
**Attachments:** (b)(5)

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, July 14, 2017 10:27 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** FW: ATF Inquiry re. Russian Federation Sanctions Implementation (Licensing Determinations)  
FYSA

Duplicative of content in Bates Nos. 2018-08-116: 008782-008783



Bates Nos. 2018-08-116:  
009692-009693

Duplicate Content in  
Bates Nos. 2018-08-116:  
008783-008784

**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Cc:**  
**Subject:** RE: ATF  
**Date:** Thursday, July 13, 2017 9:53:49 AM

---

Great, thanks.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Thursday, July 13, 2017 9:53 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: ATF

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

Nope, nothing this month related to firearms or ATF at all.

Thanks.  
(b)(6), (b)(7)(C)

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Thursday, July 13, 2017 9:19 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** ATF

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

I just wanted to double check that we don't currently have any pending LD/LHC for ATF?  
(b)(6), (b)(7)(C)

(b)(5)  
(b)(5) This specifically relates to  
firearms that are being imported into the U.S. that may/may not be the property interest of  
SDNs like Kalashnikov, etc.

Thanks,

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

**From:** (b)(6), (b)(7)(C)  
**To:** [Dondarski, Michael](#)  
**Subject:** RE: ATF Question re. OFAC Licensing Determination Process (Russian Federation Sanctions)  
**Date:** Friday, June 9, 2017 1:44:00 PM

I think

(b)(5)

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

(b)(5)

(b)(5)

(b)(5)

(b)(5)

(b)(5)

(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)

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

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

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**From:** Dondarski, Michael  
**Sent:** Friday, June 09, 2017 1:38 PM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: ATF Question re. OFAC Licensing Determination Process (Russian Federation Sanctions)

FYSA – this doesn't mean you or me need to address the issue, but we can route it the appropriate place.

---

**From:** Dondarski, Michael  
**Sent:** Friday, June 09, 2017 1:37 PM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: ATF Question re. OFAC Licensing Determination Process (Russian Federation Sanctions)

Thanks for flagging this (b)(6), (b)(7)(C) and I completely agree on Enforcement taking the lead. If it works for you, feel free to send your contact my information and (b)(6), (b)(7)(C) information – and we can take it from there.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, June 09, 2017 11:45 AM  
**To:** Dondarski, Michael (b)(6), (b)(7)(C)  
**Subject:** FW: ATF Question re. OFAC Licensing Determination Process (Russian Federation Sanctions)

Sir – Sending this your way to route as you see fit. Glad to provide you or whoever else might be

2018-08-116: 009707

working on this whatever background you need. ATF was following up with me for some time, but it works much better for them to work directly with Enforcement.

Thanks,

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

---

**From:** ATF (b)(6)  
**Sent:** Friday, June 09, 2017 11:32 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** ATF Question re. OFAC Licensing Determination Process (Russian Federation Sanctions)

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

We collaborated a little over two years ago on solidifying an ATF-OFAC process for Russian Federation sanctions licensing determinations. Since that time, things have been working very well. We recently learned that (b)(6), (b)(7)(C) is no longer with the group that handles OFAC licensing determinations, and it looks like some of the institutional knowledge on ATF-OFAC Russian Federation sanctions licensing determinations may have gone with him. ATF (b)(5)

ATF (b)(5)

ATF (b)(5)

Please let me know if I should be reaching out to someone else for this sort of question. Otherwise, I can follow up with more of the specifics on the particular matter.

Thank you!

ATF (b)(6)

ATF (b)(6)

Bates Nos. 2018-08-116:

009709-009715

Withheld Pursuant to

(b)(4), (b)(5), (b)(6), (b)(7)(C)

**From:** (b)(6), (b)(7)(C)  
**To:** [REDACTED]  
**Cc:**  
**Subject:** RE: OFAC Question  
**Date:** Wednesday, January 18, 2017 7:52:00 AM

---

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

This of interest to Enforcement.

A law enforcement source that I have been in contact with is currently investigating this subject.

(b)(5)

Thanks

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**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, January 17, 2017 12:50 PM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** FW: OFAC Question

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

(b)(5), (b)(6), (b)(7)(C)  
(b)(5)

Thanks!  
(b)(6), (b)(7)(C)

(b)(6), (b)(7)(C); Federal Reserve Board (b)(4), (b)(5), and (b)(8)

[REDACTED]

Bates No. 2018-08-116: 009717  
Withheld by the  
Federal Reserve Board Pursuant  
to (b)(4), (b)(5), (b)(8)

Bates Nos. 2018-08-116:  
009718-009722

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(A),  
(b)(7)(C), (b)(7)(E)

Bates Nos. 2018-08-116:  
009723-009726

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(A),  
(b)(7)(C), (b)(7)(E)

Bates Nos. 2018-08-116:  
009727-009729

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(A),  
(b)(7)(C), (b)(7)(E)

Bates Nos. 2018-08-116:

009730-009732

Withheld Pursuant to

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

**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: Your request  
**Date:** Thursday, March 24, 2016 11:44:29 AM

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Great. Thank you for the info.

Duplicative of content in Bates No. 2018-08-116: 009735



Duplicative of content in Bates No. 2018-08-116: 009735



**From:** (b)(6), (b)(7)(C)  
**To:** [REDACTED]  
**Subject:** FW: Your request  
**Date:** Thursday, March 24, 2016 11:35:00 AM  
**Attachments:** (b)(7)(A)

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

I should have included this attachment. It appears that (b)(5), (b)(7)(A)  
(b)(5), (b)(7)(A)  
(b)(5)

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

---

**From:** Smith, Bradley  
**Sent:** Thursday, March 24, 2016 10:47 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Your request

I am just looping in (b)(6), (b)(7)(C) for his awareness.

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**From:** (b)(6), (b)(7)(C)  
**Sent:** Thursday, March 24, 2016 10:43 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** Smith, Bradley; (b)(6), (b)(7)(C)  
**Subject:** FW: Your request

So, instead of the previous reporting with all the FISA garbage, how about we just go with this?

Kudos to (b)(6), (b)(7)(C) for researching and finding this!! Will this do? We're pretty sure it's the same company.

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

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**From:** (b)(6), (b)(7)(C)  
**Sent:** Thursday, March 24, 2016 10:40 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** Your request

(b)(6), (b)(7)(C)  
Office of Illicit Finance  
Department of the Treasury  
(b)(6), (b)(7)(C) (Desk)

**From:** (b)(6), (b)(7)(C)  
**To:**  
**Subject:** RE: Kalshnikov - Florida  
**Date:** Wednesday, February 17, 2016 3:31:00 PM

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

(b)(5)

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

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**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 16, 2016 4:47 PM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** FW: Kalshnikov - Florida

Duplicative of Content in Bates No. 2018-08-116: 009738



**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: Kalashnikov  
**Date:** Thursday, February 11, 2016 11:25:00 AM

---

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

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Thursday, February 11, 2016 11:22 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: Kalashnikov

Thanks (b)(6), (b)(7)(C) Do you have a phone # I can reach you at?

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, January 29, 2016 10:17 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Kalashnikov

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

(b)(5)

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Thursday, January 28, 2016 9:58 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** Kalashnikov

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

I have a request from our Deputy A Sec about Kalashnikov. Wondering if you guys have seen anything new regarding their activities in sanctions circumvention and evasion. We've seen most of the reporting, but for due diligence (b)(6), (b)(7)(C) suggested we follow up with you. If you have a moment to discuss, my desk number here is (b)(6), (b)(7)(C)

Thanks,  
(b)(6), (b)(7)(C)  
Treasury OIA/OIF

**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Subject:** Re: Kalashnikov  
**Date:** Wednesday, February 3, 2016 8:12:51 AM

---

Thx.

Sent from my BlackBerry 10 smartphone.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Wednesday, February 3, 2016 7:27 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** FW: Kalashnikov

---

FYSA

Duplicative of content in Bates No. 2018-08-116: 009740



**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Subject:** Out of Office: Kalashnikov  
**Date:** Friday, January 29, 2016 10:16:55 AM

---

I am out of the office the rest of the day and will return Monday. I do have access to my email via my BlackBerry. Please contact (b)(6), (b)(7)(C) with any pressing OIF issues.

**From:** (b)(6), (b)(7)(C)  
**To:**  
**Cc:** Feddo, Thomas  
**Subject:** RE: ATF Contact  
**Date:** Friday, October 2, 2015 4:09:29 PM

---

**Predecisional and Deliberative.**

(b)(5), (b)(6), (b)(7)(C)  
(b)(5) I will keep you in the loop.

Best regards,

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, October 02, 2015 3:24 PM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** Feddo, Thomas  
**Subject:** RE: ATF Contact

Happy to stand down.

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

Acting Section Chief, Enforcement Division  
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)

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

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, October 02, 2015 3:22 PM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** Feddo, Thomas  
**Subject:** RE: ATF Contact

(b)(5), (b)(6), (b)(7)(C)

This issue may be different than the two I referenced above, so please feel free to handle. However, I am happy to make the call to ATF if you'd like.

Thanks,

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

---

**From:** (b)(6), (b)(7)(C)

**Sent:** Friday, October 02, 2015 3:17 PM

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

**Cc:** Feddo, Thomas

**Subject:** RE: ATF Contact

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

I'd be happy to help.

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

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

Acting Section Chief, Enforcement Division

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)

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

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

Duplicative of content in Bates No. 2018-08-116: 001558



Duplicative of content in Bates Nos. 2018-08-116: 001558-001559



**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Subject:** FW: ATF Contact  
**Date:** Friday, October 2, 2015 4:07:52 PM

---

I can't even.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, October 02, 2015 3:25 PM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** Feddo, Thomas  
**Subject:** RE: ATF Contact

I'll call now and circle with everyone if there is something new.

Thx.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, October 02, 2015 3:24 PM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** Feddo, Thomas  
**Subject:** RE: ATF Contact

Happy to stand down.

(b)(6), (b)(7)(C)  
Acting Section Chief, Enforcement Division  
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)  
(b)(6), (b)(7)(C) (SIPR)  
(b)(6), (b)(7)(C) (JWICS)

Duplicative of content in Bates No. 2018-08-116: 009751



Bates Nos. 2018-08-116:  
009755-009756

Duplicate Content in  
Bates Nos. 2018-08-116:  
009751-009753

**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Confusion  
**Date:** Friday, September 4, 2015 8:24:44 AM

---

Sounds good. Please also run a search of the names from the D&B report. We had a large designation package roll out that may have designated one of those individuals.

Thx!

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, September 04, 2015 8:04 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Confusion

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

(b)(5), (b)(6), (b)(7)(C), (b)(7)(E)

(b)(5)

(b)(5), (b)(6), (b)(7)(C)

Please let me know if you foresee any issues with this proposed course of action.

Thank you.

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, September 04, 2015 7:41 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Confusion

Thank you for checking. I wanted to also loop with everyone (hence my first email seeking a status update request) to see if anyone had further correspondence with the agent (b)(6), (b)(7)(C) or (b)(6), (b)(7)(C) can you please inform us if you have additional information (or perhaps clarity) on this matter? Thx!

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** September 04, 2015 7:39 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Confusion

Ok. Will do. Just wanted to check with you before I made a call to the agent.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, September 04, 2015 7:38 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** FW: OFAC Confusion

Hi

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

(b)(5)  
(b)(5)

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

---

**From:** OFAC Enforcement  
**Sent:** Friday, September 04, 2015 7:32 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Confusion

Hi

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

Did you want me to action this and get back to you? Or (b)(6), (b)(7)(C) or (b)(6), (b)(7)(C)?

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Thursday, September 03, 2015 3:34 PM  
**To:** (b)(6), (b)(7)(C) OFAC Enforcement  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Confusion

Looping (b)(6), (b)(7)(C).

Can I please get a status update on this issue?

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, September 01, 2015 12:20 PM  
**To:** OFAC Enforcement  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** FW: OFAC Confusion

(b)(5)

Thanks,

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

---

**From:** CBP (b)(6), (b)(7)(C)

**Sent:** Tuesday, September 01, 2015 12:08 PM

**To:** CBP (b)(6), (b)(7)(C); (b)(6), (b)(7)(C)

**Cc:** CBP (b)(6), (b)(7)(C); (OCC) CBP (b)(6), (b)(7)(C)

**Subject:** OFAC Confusion

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

OFAC should look open source at the Rostec (owner of Kalashnikov) website:

<http://rostec.ru/en/about/holdings/165> page 11. KALASHNIKOV is a holding company made up of JCS NPO IZHMASH, Udmurt Republic (Saiga AK-47) and JSC "MOLOT", Udmurt Republic (Vepr-12) and four other companies. The OFAC Executive Order 13662 identifies on the OFAC SDN list: KALASHNIKOV CONCERN and JCS NPO IZMASH. Clearly, the Executive Order 13662 applies to both firearm manufacturers. What prevents the Department of the Treasury (OFAC) from enforcing Executive Order 13662 in the case of a serious violator, KALASHNIKOV CONCERN ( the manufacturer and shipper of both firearm import shipments).

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

Customs & Border Protection

Cargo Clearance Center

6601 NW 25<sup>th</sup> Street

Miami, FL 33122

CBP (b)(6), (b)(7)(C) desk

private cell

**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** Re: OFAC Confusion  
**Date:** Friday, September 4, 2015 8:00:42 AM

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

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

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

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, September 04, 2015 07:41 AM Eastern Standard Time  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Confusion

Duplicative of content in Bates No. 2018-08-116: 009758

Duplicative of content in Bates Nos. 2018-08-116: 009758-009759



**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Question  
**Date:** Tuesday, July 28, 2015 1:45:00 PM

---

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

I appreciate your help. (b)(6), (b)(7)(C)

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, July 28, 2015 1:36 PM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Question

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

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

Senior Enforcement Officer  
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)  
(b)(6), (b)(7)(C) (SIPR)  
(b)(6), (b)(7)(C) (JWICS)

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, July 28, 2015 1:31 PM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: OFAC Question

+ (b)(6), (b)(7)(C) who is covering for (b)(6), (b)(7)(C) the next couple of days.

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

Senior Enforcement Officer  
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)  
(b)(6), (b)(7)(C) (SIPR)  
(b)(6), (b)(7)(C) (JWICS)

---

**From:** (b)(6), (b)(7)(C)

**Sent:** Tuesday, July 28, 2015 1:30 PM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** [REDACTED]  
**Subject:** RE: OFAC Question

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

(b)(5), (b)(6), (b)(7)(C)

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

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

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

I would appreciate your thoughts and input about this case.

Regards,

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Wednesday, July 22, 2015 3:42 PM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** [REDACTED]  
**Subject:** RE: OFAC Question

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

FYI we haven't received the EARS request yet. We'll work on the response as soon as we receive the request.

Thanks,

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Thursday, July 09, 2015 5:04 PM  
**To:** (b)(6), (b)(7)(C)

Bates Nos. 2018-08-116:  
009764-009765

Duplicate Content in  
Bates Nos. 2018-08-116:  
001447-001448

Bates Nos. 2018-08-116:  
009766-009770

Withheld Pursuant to  
(b)(5), (b)(6), (b)(7)(C),  
(b)(7)(E)

**From:** (b)(6), (b)(7)(C)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: OFAC Question  
**Date:** Tuesday, July 28, 2015 1:29:49 PM  
**Attachments:** (b)(7)(E)  
(b)(7)(A)

Duplicative of content in Bates No. 2018-08-116: 009763



Bates Nos. 2018-08-116:  
009772-009773

Duplicate Content in  
Bates Nos. 2018-08-116:  
009763-009765

**From:** (b)(6), (b)(7)(C)  
**To:** [REDACTED]  
**Cc:**  
**Subject:** RE: OFAC Question  
**Date:** Wednesday, July 22, 2015 3:45:23 PM

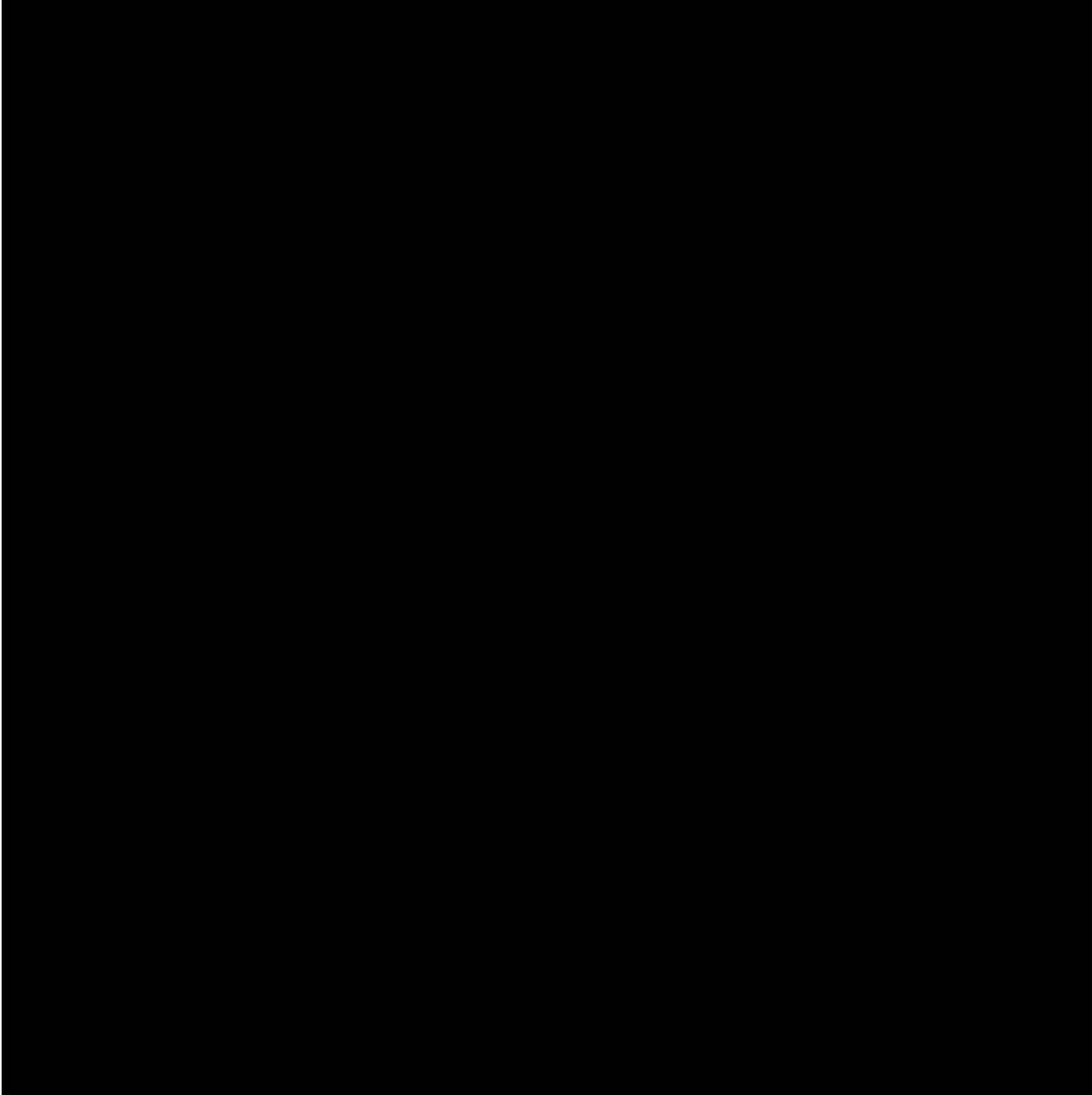
---

That's strange. (b)(5) . Thanks for the info.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Wednesday, July 22, 2015 3:42 PM  
**To:** (b)(6), (b)(7)(C)  
**Cc:**  
**Subject:** RE: OFAC Question

Duplicative of content in Bates Nos. 2018-08-116: 009763-009764



Bates No. 2018-08-116: 009780  
Duplicates Content in  
Bates Nos. 2018-08-116:  
009764-009765

**From:** (b)(6), (b)(7)(C)  
**To:** [REDACTED]  
**Subject:** RE:  
**Date:** Friday, July 10, 2015 11:44:00 AM

---

(b)(5) (b)(5)

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

Senior Enforcement Officer  
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)  
(b)(6), (b)(7)(C) (SIPR)  
(b)(6), (b)(7)(C) (JWICS)

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, July 10, 2015 11:44 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE:

Thanks (b)(6), (b)(7)(C) said the SA will submit a formal EARS request so I'm waiting to receive that to draft it.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, July 10, 2015 11:41 AM  
**To:** (b)(6), (b)(7)(C)  
**Subject:**

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

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

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

Senior Enforcement Officer  
Office of Foreign Assets Control  
U.S. Department of the Treasury

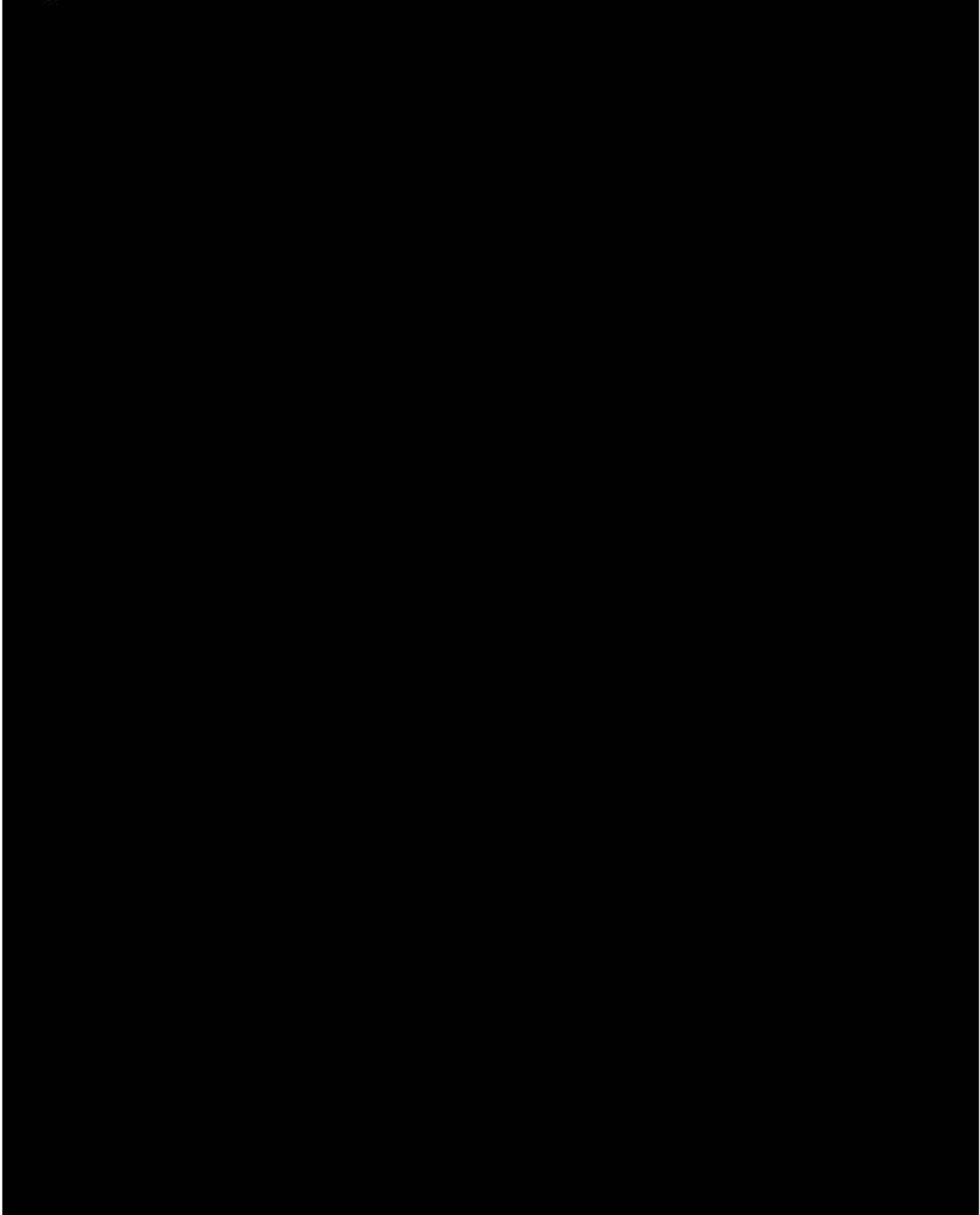
1500 Pennsylvania Avenue, N.W.  
Washington, D.C. 20220  
(b)(6), (b)(7)(C)

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

**From:** (b)(6), (b)(7)(C)  
**To:** [REDACTED]  
**Cc:**  
**Subject:** FW: OFAC Question  
**Date:** Thursday, July 9, 2015 5:04:25 PM  
**Attachments:** [IMG\\_1133.jpg](#)

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Duplicative of content in Bates Nos. 2018-08-116: 001447-001448



Duplicative of content in Bates No. 2018-08-116: 001448

