

**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal  
**Date:** Friday, May 1, 2015 9:04:39 AM

---

Nice work, (b)(6), (b)(7)(C) Thank you for looking at this so promptly.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, May 01, 2015 8:58 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal

It looks like a BN (ENF 42112) was sent to RWC Group, LLC on July 16, 2014 regarding "Concern Kalashnikov formerly known as IZHMAH" as the designated party.

(b)(5)

Please see attachments.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, May 01, 2015 8:40 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal

After reading the IG, we better do a search for this company too: Izhevsky Mekhanichesky Zavod JSC

Can you please let me know if you find an BN referencing this company? Keep in mind I am not looking for Baikal or Izhevsky Mekhanichesky Zavod JSC as the main target listed in the metadata in OASIS. I'm looking for references to them in the BN.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, May 01, 2015 8:39 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal

Apologies for the wording. Correct: no Blocking Notices issued by ENF in OASIS.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, May 01, 2015 8:36 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal

Oops. I opened the attachment after I sent the email. You sent me the IG (but referred to it as a determination). Sorry about the confusion and thank you for sending the ltr.

So we can confirm that nothing was sent by ENF, correct?

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

# The Black Vault

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

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, May 01, 2015 8:34 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal

It is my understanding that an IG letter was sent to RWC regarding Baikal. Did your search find it (the IG letter would likely have been sent by LIC)

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, May 01, 2015 8:33 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal

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

Please find attached LIC determination document for UKRAINE-EO13661-2014-311648-1.

I could not find any Blocking Notices mentioning "Baikal" issued by ENF.

Thanks,

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Friday, May 01, 2015 8:17 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** Baikal

Hi, (b)(6), (b)(7)(C) in our Counsel's office raised a concern with me yesterday about whether ENF sent any Blocking Notices that referenced "Baikal," a Russian brand of weapons. Can you please conduct a search to determine if we sent any outgoing documents with the reference to this brand of weapons or gun manufacturer?

(b)(6), (b)(7)(C) believes that LIC did send an interpretive guidance letter that referenced Baikal. If your search produces that letter, can you please send me the OASIS number for it (or a copy of the letter)?

(b)(6), (b)(7)(C) may also have some information on the blocking notices that we sent, and therefore, I am ccing her to this msg. (b)(6), (b)(7)(C) ced as our rep for UKR.

Thank you,

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

**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Cc:**  
**Subject:** RE: Baikal  
**Date:** Friday, May 1, 2015 8:58:17 AM  
**Attachments:** [Blocking Notice ENF42112.pdf](#)  
[Redlined case summary.docx](#)

Duplicative of content in Bates Nos. 2018-08-116: 009785-009786



Duplicative of content in Bates No. 2018-08-116: 009786



**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Cc:**  
**Subject:** RE: Baikal  
**Date:** Friday, May 1, 2015 8:33:09 AM  
**Attachments:** [License document .pdf](#)

---

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

Please find attached LIC determination document for UKRAINE-EO13661-2014-311648-1.

I could not find any Blocking Notices mentioning "Baikal" issued by ENF.

Thanks,

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

Duplicative of content in Bates No. 2018-08-116: 009786



Bates Nos. 2018-08-116:

009792-009793

Duplicate Bates Nos.

2018-08-116: 001134-001135



## FW: Ukraine sanctions -- guidance needed

From: (b)(6)  
To: DOJ (b)(6) "Smith, Bradley" (b)(6)  
DOJ (b)(6) ATF (b)(6) DOJ (b)(6)  
State (b)(6) State (b)(6) DOJ (b)(6), (b)(7)(C) State (b)(6)  
(b)(6)

Date: Fri, 18 Jul 2014 13:25:24 -0400

Following up with a smaller group to consider a potential issue that may come up in the next few weeks.

(b)(4), (b)(5)

Please let me know if anyone has any particular thoughts/concerns on this.

Thanks,  
(b)(6)

From: State (b)(6)  
Sent: Friday, July 18, 2014 12:12 PM  
To: Chemali, Hagar; State (b)(6) DOJ (b)(6) (b)(6) DOJ (b)(6)  
Kiran.Raj@usdoj.gov; Smith, Bradley (b)(6) DOJ (b)(6) Charles R. Gross ATF (b)(6) State (b)(6)  
DOJ (b)(6) State (b)(6) DOJ (b)(6), (b)(7)(C) State (b)(6) ATF (b)(6)  
Cc: Arthur W. Herbert ATF (b)(6) (b)(6) State (b)(6) ATF (b)(6)  
Subject: RE: Ukraine sanctions -- guidance needed

Everyone,

I am working on the letter that ATF requires. I will try to have a draft shortly for clearance. I hope nobody minds if I plagiarize what's already been written. ☺

Thank you,

State (b)(6)  
PM/RSAT  
State (b)(6)

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

From: Hagar, Chemali (b)(6)  
Sent: Friday, July 18, 2014 11:31 AM  
To: State (b)(6) DOJ (b)(6) (b)(6) DOJ (b)(6) Kiran.Raj@usdoj.gov;  
Bradley Smith DOJ (b)(6) State (b)(6) Charles R. Gross ATF (b)(6) DOJ (b)(6)  
DOJ (b)(6) State (b)(6) DOJ (b)(6), (b)(7)(C) State (b)(6) ATF (b)(6)  
Cc: Arthur W. Herbert ATF (b)(6) (b)(6)  
Subject: RE: Ukraine sanctions -- guidance needed

Hey guys - sorry, crazy times this week - is this what you need?  
Hagar

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

From: State (b)(6)  
Sent: Friday, July 18, 2014 11:29 AM  
To: 'Bowen, Brigham (CIV)'; Mortlock, David; Kelleher, Diane (CIV); Raj, Kiran (ODAG); Smith, Bradley (b)(6); Berwick, Benjamin L. (CIV); Gross, Charles R. (ATF); Lee, Lynn (CIV); Mei, Vesper (CIV); State (b)(6) Powell, Amy (CIV); State (b)(6) Buckingham, Stephen (CIV); Chemali, Hagar  
Cc: Herbert, Arthur W. (ATF); Nilsson, Brian H.  
Subject: RE: Ukraine sanctions -- guidance needed

Thank you.

State (b)(6)  
D/CSP



Telephone: State (b)(6)

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

From: Bowen, Brigham (CIV) DOJ (b)(6)  
Sent: Friday, July 18, 2014 11:28 AM  
To: Mortlock, David; Kelleher, Diane (CIV); Raj, Kiran (ODAG); Brad Smith: (b)(6); Berwick, Benjamin L. (CIV); Gross, Charles R. (ATF); Lee, Lynn (CIV); Mei, Vesner (CIV); State (b)(6) Powell, Amy (CIV);  
State (b)(6) Buckingham, Stephen (CIV); Chemali, Hagar: State (b)(6)  
Cc: Herbert, Arthur W. (ATF); Nilsson, Brian H.  
Subject: RE: Ukraine sanctions -- guidance needed

That's DOJ (b)(6)

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

From: Bowen, Brigham (CIV)  
Sent: Friday, July 18, 2014 11:28 AM  
To: Mortlock, David; Kelleher, Diane (CIV); Raj, Kiran (ODAG); Brad Smith: (b)(6); Berwick, Benjamin L. (CIV); Gross, Charles R. (ATF); Lee, Lynn (CIV); Mei, Vesner (CIV); State (b)(6) Powell, Amy (CIV);  
State (b)(6) Buckingham, Stephen (CIV); Hagar, Chemali: (b)(6) State (b)(6)  
Cc: Herbert, Arthur W. (ATF); Nilsson, Brian H.  
Subject: RE: Ukraine sanctions -- guidance needed

Diane is at DOJ (b)(6)

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

From: Mortlock, David [mailto: (b)(6)]  
Sent: Friday, July 18, 2014 11:25 AM  
To: Kelleher, Diane (CIV); Raj, Kiran (ODAG); Brad Smith: (b)(6); Berwick, Benjamin L. (CIV); Bowen, Brigham (CIV); Gross, Charles R. (ATF); Lee, Lynn (CIV); Mei, Vesner (CIV); State (b)(6) Powell, Amy (CIV);  
State (b)(6) Buckingham, Stephen (CIV); Hagar, Chemali: (b)(6) State (b)(6)  
Cc: Herbert, Arthur W. (ATF); Nilsson, Brian H.  
Subject: RE: Ukraine sanctions -- guidance needed

Adding State (b)(6) at State, who's going to run this down. Diane, could you send her your phone number?

Thanks,  
David

(b)(6)

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

From: Kelleher, Diane (CIV) DOJ (b)(6)  
Sent: Thursday, July 17, 2014 9:07 PM  
To: Mortlock, David; Raj, Kiran (ODAG); Brad Smith: (b)(6); Berwick, Benjamin L. (CIV); Bowen, Brigham (CIV); Gross, Charles R. (ATF); Lee, Lynn (CIV); Mei, Vesner (CIV); State (b)(6) Powell, Amy (CIV);  
State (b)(6) Buckingham, Stephen (CIV); Hagar, Chemali: (b)(6)  
Cc: Herbert, Arthur W. (ATF); Nilsson, Brian H.  
Subject: RE: Ukraine sanctions -- guidance needed

DOJ (b)(5)

----- Original message -----

From: "Mortlock, David"  
Date: 07/17/2014 8:17 PM (GMT-05:00)  
To: "Raj, Kiran (ODAG)", "Kelleher, Diane (CIV)", Brad Smith: (b)(6), "Berwick, Benjamin L. (CIV)", "Bowen, Brigham (CIV)", "Gross, Charles R. (ATF)", "Lee, Lynn (CIV)", "Mei, Vesner (CIV)", State (b)(6)  
State (b)(6) Powell, Amy (CIV)", State (b)(6) Buckingham, Stephen (CIV)"  
Hagar, Chemali: (b)(6)  
Cc: "Herbert, Arthur W. (ATF)", "Nilsson, Brian H."  
Subject: RE: Ukraine sanctions -- guidance needed

Am copying Hagar, who will have the final press guidance from Treasury's actions yesterday.

Also, here is the link to OFAC's Q&As, which includes two Q&As specifically on Kalashnikov (#s 374 and 375):  
<http://www.treasury.gov/resource-center/faqs/Sanctions/Pages/answer.aspx#370>

Thanks,  
David

(b)(6)

From: Raj, Kiran (ODAG) [mailto:Kiran.Raj@usdoj.gov]  
Sent: Thursday, July 17, 2014 8:11 PM  
To: Kelleher, Diane (CIV); Brad Smith: (b)(6); Berwick, Benjamin L. (CIV); Bowen, Brigham (CIV); Gross, Charles R. (ATF); Lee, Lynn (CIV); Mei, Vesner (CIV); State (b)(6) Powell, Amy (CIV);  
State (b)(6) Buckingham, Stephen (CIV)  
Cc: Herbert, Arthur W. (ATF); Nilsson, Brian H.; Mortlock, David  
Subject: RE: Ukraine sanctions -- guidance needed

+ Arthur (ATF), Brian Nilsson (NSC), David Mortlock (NSC).

From: Kelleher, Diane (CIV)

Sent: Thursday, July 17, 2014 7:35 PM

To: Brad Smith; (b)(6); Berwick, Benjamin L. (CIV); Bowen, Brigham (CIV); Gross, Charles R. (ATF); Lee, Lynn (CIV); Mei, Vesner (CIV); State (b)(6)

State (b)(6) Howell, Amy (CIV); Rai, Kiran (ODAG); State (b)(6) Buckingham, Stephen (CIV)

Subject: Ukraine sanctions -- guidance needed

State and Treasury folks,

DOJ (b)(5)

Thanks,  
Diane

SBU  
This email is UNCLASSIFIED.

19\_011-E3-00018470

2018-08-116: 009797

## RE: RWC - Russia SDN Licenses

---

**From:** (b)(6)  
**To:** "Tuchband, Matthew" (b)(6) "Smith, Bradley" (b)(6)  
**Date:** Fri, 25 Jul 2014 14:17:41 -0400

(b)(5)

---

**From:** Tuchband, Matthew  
**Sent:** Friday, July 25, 2014 1:31 PM  
**To:** (b)(6) Smith, Bradley  
**Subject:** Re: RWC - Russia SDN Licenses

Gentleman,

My view is that (b)(5)  
Your  
thoughts?

- Matthew

---

**From :** (b)(6)  
**Sent:** Friday, July 25, 2014 12:59 PM Eastern Standard Time  
**To:** (b)(6); Smith, John; (b)(6) Smith, Bradley; Tuchband, Matthew  
**Cc:** Gacki, Andrea; (b)(6)  
**Subject:** RE: RWC - Russia SDN Licenses

Duplicative of content in Bates No. 2018-08-116: 0000458

Bates Nos. 2018-08-116:  
009799-009800

Duplicate Content in  
Bates Nos. 2018-08-116:  
000458-000460

## Final Aspen QA

**From:** (b)(6)  
**To:** (b)(6) "Smith, John" (b)(6) FinCEN (b)(6)  
FinCEN (b)(6) (b)(6) "Ballman, Luke"  
<luke.ballman@treasury.gov> (b)(6)  
(b)(6) "Chemali, Haqar"  
FinCEN (b)(6) (b)(6) "Ahern, Paul" (b)(6) (b)(6) FinCEN (b)(6)  
(b)(6)  
(b)(6)  
**Cc:** (b)(6)  
**Date:** Mon, 28 Jul 2014 11:42:21 -0400  
**Attachments:** DSC ASF QA Final 07 23 14.docx (63.24 kB)

Hi all,

Attached is the final Aspen QA for future reference. Thank you again for all of your help!

Best,  
(b)(6)

**From:** (b)(6)  
**Sent:** Tuesday, July 22, 2014 4:09 PM  
**To:** Smith, John; FinCEN (b)(6) (b)(6) Ballman, Luke; (b)(6) (b)(6)  
Chemali, Haqar; Ahern, Paul; FinCEN (b)(6) (b)(6)  
**CC:** (b)(6)  
**Subject:** RE: Flash clearance! 5pm!

Duplicative of content in Bates No. 2018-08-116: 000267-000268

Duplicative of content in Bates No. 2018-08-116: 000268



19\_011-E3-00018868

2018-08-116: 009802



## RE: Question on Russia Sanctions from Sri Lanka

**From:** (b)(6)  
**To:** State (b)(6) (b)(6) (b)(6) EB-RussiaSanctions <eb-russiasanctions@state.gov>  
**Cc:** State (b)(6) "Fisch, Eytan" (b)(6) "Gatjanis, Gregory" (b)(6) "Smith, John" (b)(6) "Baheri, Leila" (b)(6) "Tuchband, Matthew"  
**Date:** Wed, 13 Aug 2014 16:39:18 -0400

(b)(5)

I hope this helps.

(b)(6)

**From:** State (b)(6)  
**Sent:** Wednesday, August 13, 2014 1:07 PM  
**To:** (b)(6) State (b)(6) (b)(6) EB-RussiaSanctions  
**Cc:** State (b)(6) Fisch, Eytan; Gatjanis, Gregory; Smith, John; (b)(6) Baheri, Leila; Tuchband, Matthew;  
**Subject:** Re: Question on Russia Sanctions from Sri Lanka

(b)(5)

**From:** (b)(6)  
**Sent:** Wednesday, August 13, 2014 06:45 PM Sri Lanka Standard Time  
**To:** (b)(6) State (b)(6) (b)(6)  
**Cc:** (b)(6) EB-RussiaSanctions (b)(6) Gregory, Gatjanis (b)(6) Eytan, Fisch (b)(6) John, Smith (b)(6) Matthew, Tuchband (b)(6) Leila, Baheri (b)(6)  
**Subject:** RE: Question on Russia Sanctions from Sri Lanka

State (b)(5)

**From:** (b)(6)  
**Sent:** Wednesday, August 13, 2014 9:09 AM  
**To:** State (b)(6) O'Toole, Brian; EB-RussiaSanctions  
**Cc:** State (b)(6) Fisch, Eytan; Gatjanis, Gregory; Smith, John; (b)(6) Baheri, Leila; Tuchband, Matthew;  
**Subject:** RE: Question on Russia Sanctions from Sri Lanka

Hi State (b)(6)

I have attached the three EOs to this email. For reference, they can always be found at the Treasury website, and the Ukraine section.  
<http://www.treasury.gov/resource-center/sanctions/programs/pages/ukraine.aspx>

State (b)(5)

State (b)(5) Happy to chat further about it if you are interested.

(b)(6)

(b)(6)  
Senior Advisor  
Department of the Treasury

Desk: (b)(6)  
Cell: (b)(6)

**From:** State (b)(6)  
**Sent:** Wednesday, August 13, 2014 8:38 AM  
**To:** State (b)(6); (b)(6); EB-RussiaSanctions; (b)(6)  
**Cc:** State (b)(6); Fisch, Eytan; Gatjanis, Gregory; Smith, John; (b)(6); Baheri, Leila; Tuchband, Matthew; (b)(6)  
**Subject:** Re: Question on Russia Sanctions from Sri Lanka

Ok, thanks. Where is the best place for the GSL to see those EOs?

State (b)(5)

**From :** State (b)(6)  
**Sent:** Wednesday, August 13, 2014 06:01 PM Sri Lanka Standard Time  
**To:** (b)(6); State (b)(6); EB-RussiaSanctions;  
**Cc:** State (b)(6); Eytan.Fisch; (b)(6); Gregory.Gatjanis; (b)(6);  
Leila.Baheri; (b)(6); John.Smith; (b)(6); Matthew.Tuchband; (b)(6)  
**Subject:** RE: Question on Russia Sanctions from Sri Lanka

State (b)(6)

Treasury and State (b)(5); Treasury (b)(6)  
**Treasury and State (b)(5)**

This email is UNCLASSIFIED.

**From:** (b)(6)  
**Sent:** Wednesday, August 13, 2014 7:58 AM  
**To:** State (b)(6); EB-RussiaSanctions; (b)(6)  
**Cc:** State (b)(6); Eytan.Fisch; (b)(6); Gregory.Gatjanis; (b)(6); John.Smith; (b)(6);  
Leila.Baheri; (b)(6); Matthew.Tuchband; (b)(6)  
**Subject:** Re: Question on Russia Sanctions from Sri Lanka

Hi State (b)(6), thanks for reaching out. Treasury and State (b)(5)  
**Treasury and State (b)(5)**

Cheers,  
(b)(6)

**From :** State (b)(6)  
**Sent:** Wednesday, August 13, 2014 04:36 AM Eastern Standard Time  
**To:** EB-RussiaSanctions <[EB-RussiaSanctions@state.gov](mailto:EB-RussiaSanctions@state.gov)>; (b)(6)

Cc: [REDACTED] State (b)(6)  
Subject: Question on Russia Sanctions from Sri Lanka

Dear Colleagues:

State (b)(5)

Thanks very much,

[REDACTED] State (b)(6)

[REDACTED] State (b)(6)  
Economic and Commercial Counselor  
U.S. Embassy Colombo and Maldives  
[REDACTED] State (b)(6)  
<http://sri.lanka.usembassy.gov/business.html>

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

From: Gihan Indraguptha [mailto:[REDACTED] State (b)(6)]  
Sent: Wednesday, August 13, 2014 1:31 PM  
To: [REDACTED] State (b)(6)  
Subject: Re: Hi

Hi [REDACTED] State (b)(6)

I looked at the two statements from the Dept. of the Treasury dated 16th July and 29th July. In fact the list of 2 financial institutes, 2 energy entities and eight defence companies named on 16th had been expanded by the statement on the 29th (under E.O 13622). However both these refer to "US persons and Persons within the United States" as the applicable parties. It would be good if you could share with us a document regarding Non- Russian or Non- US persons and entities having relevance to these sanctions.

Regards  
Gihan

P. S Is there any thing else than the two docs below related to 13622?

<http://www.treasury.gov/press-center/press-releases/Pages/jl2590.aspx>  
<http://www.treasury.gov/press-center/press-releases/Pages/jl2572.aspx>

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

From: [REDACTED] State (b)(6)  
To: "Gihan Indraguptha" [REDACTED] State (b)(6)  
Sent: Wednesday, August 13, 2014 12:59:03 PM  
Subject: RE: Hi

Gihan: I need to check to see if I can give you in writing the demarche I delivered yesterday. But here is the relevant language regarding the designated entities.

19\_011-E3-00018982

2018-08-116: 009805

On July 16, the United States imposed certain sanctions under Executive Order 13662 on eight Russian defense firms, two Russian financial institutions, and two Russian energy companies, in addition to a group of Russian officials and Ukrainian separatists.

• Specifically, the United States took the following actions:

-Designations of:

-- Eight Russian defense companies: JSC Concern Radio-Electronic Technologies, JSC Concern Sozvedie, JSCC Almaz-Antey, Kalashnikov Concern, KBP Instrument Design Bureau, MIC NOP Mashinostroyeniya, Research and Production Corporation "Uralvagonzavod", and State Research and Production Enterprise "Bazalt." These companies – and any subsidiaries owned 50 percent or more by them - will face an asset freeze and a prohibition from doing business with U.S. persons.

-- Nine additional Russian and Ukrainian individuals/ entities: the self-proclaimed separatist group "Luhansk People's Republic," the self-proclaimed separatist group "Donetsk People's Republic;" Alexander Boradai, self-declared prime minister of the "Donetsk People's Republic;" Feodosia Enterprise, a Crimean oil company dealing in misappropriated Ukrainian property; Sergey Beseda, Federal Security Service (FSB) General; Sergei Neverov, Russian Duma Deputy; Oleg Savalyev, Russian Minister for Crimean Affairs; Konstantin Malofeyev, Russian businessman; and Igor Shchegolov, Russian presidential aide. These individuals – and any entities owned 50 percent or more by them - will face an asset freeze and visa ban. Any individual or entity providing material assistance to, or acting on behalf of, sanctioned persons could face similar sanctions.

-Two Russian banks, Gazprombank and Vneshekonombank (VEB), are subject to targeted sanctions that prohibit U.S. persons from transacting in, providing financing for, or otherwise dealing in debt with a maturity of longer than 90 days or equity that is issued on or after July 16, 2014 by, on behalf of, or for the benefit of Gazprombank and VEB, and any subsidiaries owned 50 percent or more by them.

Two Russian energy companies, Rosneft and Novatek, are subject to targeted sanctions that prohibit U.S. persons from transacting in, providing financing for, or otherwise dealing in new debt - issued on or after July 16, 2014 – of greater than 90 days maturity by, on behalf of, or for the benefit of Rosneft and Novatek, and any subsidiaries owned 50 percent or more by them.

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

From: Gihan Indraguptha [mailto:**State (b)(6)**]  
Sent: Wednesday, August 13, 2014 10:21 AM  
To: **State (b)(6)**  
Subject: Re: Hi

Dear **State (b)(6)**

Please see the link below from your Dept. of the Treasury with further entities..Are there more than two banks and eight defence companies under sanction? Please send the comprehensive list. Also I was unable to find the section which dealt with non-russian entities in the proclamations or the press statements issued by the Treasury Dept. It would be useful if you could highlight that part for our clarity.

Regards,  
Gihan

<http://www.treasury.gov/press-center/press-releases/Pages/jl2590.aspx>

This email is UNCLASSIFIED.

SBU

This email is UNCLASSIFIED.



## Re: Question on Russia Sanctions from Sri Lanka

From: (b)(6)  
To: State (b)(6), eb-russiasanctions@state.gov (b)(6)  
Cc: State (b)(6), Fisch, Eytan (b)(6), Gatianis, Gregory (b)(6),  
"Smith, John" (b)(6), (b)(6), "Baheri, Leila"  
(b)(6), "Tuchband, Matthew" (b)(6), State (b)(6)  
Date: Thu, 14 Aug 2014 04:06:47 -0400

(b)(5)

Thanks,

(b)(6)

From: State (b)(6)  
Sent: Thursday, August 14, 2014 12:10 AM Eastern Standard Time  
To: (b)(6) State (b)(6) EB-RussiaSanctions <EB-RussiaSanctions@state.gov>  
Cc: State (b)(6) Fisch, Eytan; Gatianis, Gregory; Smith, John (b)(6) Baheri, Leila; Tuchband, Matthew (b)(6) State (b)(6)  
Subject: RE: Question on Russia Sanctions from Sri Lanka

Ok. What about (b)(5)

This email is UNCLASSIFIED.

From: (b)(6)  
Sent: Thursday, August 14, 2014 1:24 PM  
To: State (b)(6) (b)(6) State (b)(6) EB-RussiaSanctions  
Cc: State (b)(6) Eytan.Fisch (b)(6) Gregory.Gatianis (b)(6) John.Smith (b)(6)  
(b)(6) Leila.Baheri (b)(6) Matthew.Tuchband (b)(6)  
Subject: Re: Question on Russia Sanctions from Sri Lanka

State (b)(6) (b)(5)

(b)(5)

Cheers,

(b)(6)

Duplicative of content in Bates No. 2018-08-116: 009803

Bates Nos. 2018-08-116:  
009808-009811

Duplicate Content in  
Bates Nos. 2018-08-116:  
009803-009806



## RE: You Are Invited: U.S. Government Briefing on Sanctions

**From:** (b)(6)  
**To:** "Fisch, Eytan" (b)(6)  
(b)(6)  
(b)(6)  
**Date:** Tue, 04 Nov 2014 17:49:06 -0500  
**Attachments:** FW\_Materials - Conference of Presidents \_ Sen. Lieberman Task Force.msg (164.86 kB); 100714 OFAC Symposium Script.docx (30.71 kB); DSC ASF QA Final 07 23 14.docx (63.24 kB)

Eytan,

I thought the TPs (b)(6) put together for David for Lieberman's roundtable might be helpful. I also attach the script I used at the financial and trade symposia this year. Script was based on the script from (b)(6) and (b)(6) fall with the Compliance community a while ago on the JPOA.

I am also attaching the QAs we worked on for David Cohen's speech at the Aspen Security Forum in July which covers a host of programs. Let me know if you need anything else. (b)(5)

---

**From:** Fisch, Eytan  
**Sent:** Tuesday, November 04, 2014 11:08 AM  
**To:** (b)(6)  
(b)(6)  
**Subject:** Fw: You Are Invited: U.S. Government Briefing on Sanctions

I already spoke with some of you about this. Can folks pull together for me recent public TPs in each of these areas? Also the top private sector sanctions concerns/issues you've been hearing of late in your programs? If you could get to me by early afternoon tomorrow, that would be great.

Thanks,  
Eytan

---

**From:** State (b)(6)  
**Sent:** Tuesday, November 04, 2014 10:49 AM Eastern Standard Time  
**To:** Harrell, Peter E State (b)(6)  
**Subject:** You Are Invited: U.S. Government Briefing on Sanctions

### U.S. Government Briefing Call on Sanctions Around the Globe

Peter E. Harrell, Deputy Assistant Secretary for Counter Threat Finance and Sanctions in the State Department's Bureau of Economic and Business Affairs will host a conference call with Eytan Fisch, Assistant Director for Policy, Office of Foreign Assets Control in the Department of Treasury at 9:30 AM on Friday, November 7, to brief interested members of the business and compliance communities on recent developments in sanctions related to various sanctions programs. Among others, DAS Harrell and Assistant Director Fisch will discuss Russia/Ukraine, Iran, and Burma. They will provide an update on recent U.S. sanctions actions and the call will include time for Q&A.

#### Call information is:

**DATE:** Friday, November 7

**TIME:** 9:30 AM to 10:30 AM EST

**TOLL-FREE CALLERS:** (800) 288-8968

**INTERNATIONAL CALLERS:** (612) 332-0342

**CALL NAME:** Sanctions Around the Globe (no access number needed)

To be added or removed from the distribution for these calls, please email State (b)(6)

This email is UNCLASSIFIED.

Bates No. 2018-08-116: 009816:

1 Spreadsheet with 1,111 records [rows]:

- 1,108 non-responsive, separate records [rows]

- 3 records [rows] Withheld in Full Pursuant to (b)(4) with Parts

Pursuant to (b)(3) [Gramm-Leach-Bliley Act, Public Law 106-102] and (b)(6)

From: [Fields, Marshall Jr](#)  
To: (b)(6)  
Cc:  
Subject: FW: Request for the administrative record regarding Baikal  
Date: Tuesday, October 20, 2015 12:00:36 PM  
Attachments: [RE Baikal Kalashnikov info.msg](#)  
[RWC license.msg](#)  
[RWC Kalashnikov Article I.pdf](#)  
[RWC Kalashnikov Article II.pdf](#)  
[RWC Kalashnikov Article III.pdf](#)  
[RWC Kalashnikov Article.pdf](#)  
[Baikal Kalashnikov info.msg](#)  
[RWC OGT Response.pdf](#)

---

(b)(6)

(b)(5)

I hope that this helps.

*Marshall*

Marshall Fields  
Assistant Director  
Information Disclosure and Records Division  
Office of Resource Management  
Office of Foreign Assets Control  
U.S. Department of the Treasury

**Confidentiality Notice:**

**This email may contain privileged, confidential and or law enforcement sensitive information which is exempt from disclosure under applicable law. If you have received this communication in error, you are hereby notified that any dissemination, distribution or copying of the communication is strictly prohibited. If you have received this communication in error, please notify the sender.**

2018-08-116: 009817

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**From:** (b)(6)  
**Sent:** Tuesday, October 20, 2015 10:52 AM  
**To:** Fields, Marshall Jr  
**Subject:** FW: Request for the administrative record regarding Baikal

---

**From:** (b)(6)  
**Sent:** Tuesday, October 20, 2015 10:23 AM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** Request for the administrative record regarding Baikal

Hi (b)(6)

We're currently processing a reconsideration request that includes a request for the administrative record regarding OFAC's determination that a particular entity, Baikal, was 50% or more owned by Kalashnikov Concern, an SDN.

(b)(5)

I'm happy to discuss over the phone, if that's easier.

Thanks!  
(b)(6)

(b)(6)  
Sanctions Licensing Officer  
Licensing Division  
Office of Foreign Assets Control  
U.S. Department of the Treasury

From:

(b)(6)

To:

Cc:

(b)(6) [Blackborow, Davin](#)

Subject:

RE: Baikal/ Kalashnikov info

Date:

Friday, March 20, 2015 10:50:13 AM

Duplicative of Content in Bates No. 2018-08-116: 001109



**From:** [Blackborow, Davin](#)  
**To:** (b)(6)  
**Cc:**  
**Subject:** RWC license  
**Date:** Friday, February 6, 2015 1:29:12 PM

---

(b)(6),

I just reviewed and returned the RWC license response in OASIS with a few suggestions. I'm also including a few more links to articles that should be included in the file (apologies for continually adding to this one). I think this is really close and appreciate all the work you've done on it so far. If you'd like to discuss anything, please let me know.

Thanks,  
Davin

<http://www.themoscowtimes.com/business/article/russia-s-kalashnikov-unveils-new-brand-and-plan-for-world-domination/512481.html>

<http://globenewswire.com/news-release/2014/12/02/688118/10110712/en/Kalashnikov-Concern-Launches-New-Brand.html>

<http://rt.com/news/210751-kalashnikov-rifle-new-brand/>



## Fwd: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

From: "Mandelker, Sigal" (b)(6)  
To: "Gacki, Andrea" (b)(6) "Smith, John" (b)(6)  
Cc: (b)(6)  
Date: Wed, 09 Aug 2017 12:30:05 -0400

From: Michael Faucette <michael.faucette@mbassociateslaw.com>  
Date: August 9, 2017 at 11:44:48 AM EDT  
To: Mandelker, Sigal (b)(6)  
Subject: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Dear Ms. Mandelker,

Our firm represents RWC Group, LLC, a U.S. firearms importer and manufacturer. RWC (b)(4) manufactured by the Sanctioned SDN "Baikal." Although (b)(4) arrived in the US and was paid for before the implementation of the sanctions against Baikal, OFAC informed us (b)(4) are blocked.

*It has now been 2 years and 4 months* since we submitted a request for reconsideration (attached) that demonstrates our lawful ownership of (b)(4) prior to the implementation of sanctions. Numerous requests for status updates have either been ignored or responded to with, "the case is under review." Given the nature of the product, we fear this inaction may have been prompted by political considerations.

Greatly encouraged by your record and recent appointment, we were hoping that you may be able to look into this matter for us. Please do not hesitate to reach out to me if I can provide any further information.

Mike Faucette  
Attorney at Law  
Mark Barnes & Associates  
1350 I St. N.W., Suite 260, Washington, D.C. 20005  
Tel. (202) 626-0085

This e-mail is confidential and is legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation. Please contact Mark Barnes & Associates at 202-626-0089 if you need assistance.

Begin forwarded message:

From: Michael Faucette <michael.faucette@mbassociateslaw.com>  
Subject: Re: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1  
Date: April 6, 2015 at 5:42:25 PM EDT  
To: Davin Blackborow (b)(6)  
Cc: (b)(6) mark.barnes@mbassociateslaw.com Barnes" <mark.barnes@mbassociateslaw.com>, "hobby.malek@mbassociateslaw.com" <hobby.malek@mbassociateslaw.com>, John Smith (b)(6) Andrea Gacki (b)(6)

Good afternoon, Mr. Blackborow:

Please find attached our letter requesting reconsideration of the status of (b)(4) as blocked property and a formal request for the full administrative record used by OFAC in determining that Baikal is more than 50% owned by KC. Please do not hesitate to contact me if you have any further questions.

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



2018-08-116: 009880



Bates Nos. 2018-08-116:  
009882-009904

Duplicate Bates Nos.  
2018-08-116:  
001170-001192

**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

---

**From:** (b)(6)  
**To:** "Blackborow, Davin" (b)(6) "Miller, Jeanette" (b)(6)  
**Bcc:** (b)(6)  
**Date:** Wed, 09 Aug 2017 18:47:06 -0400  
**Attachments:** 10012015\_Supplemental\_Information.pdf (867.54 kB)

---

Davin:

(b)(4), (b)(5), (b)(6)

(b)(6)

---

**From:** Blackborow, Davin  
**Sent:** Wednesday, August 09, 2017 5:58 PM  
**To:** Miller, Jeanette  
**Cc:** (b)(6)  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

(b)(6) – do you think this is one that we can move relatively soon or are there still a lot of pending issues to work through.

---

**From:** Miller, Jeanette  
**Sent:** Wednesday, August 09, 2017 1:08 PM  
**To:** Blackborow, Davin  
**Cc:** (b)(6)  
**Subject:** FW: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Davin – do you want to take the first stab?

Jeanette A. Miller  
Deputy Assistant Director for Licensing  
Office of Foreign Assets Control  
U.S. Department of the Treasury

---

**From:** Gacki, Andrea  
**Sent:** Wednesday, August 09, 2017 12:37 PM  
**To:** Blackborow, Davin; Miller, Jeanette  
**Cc:** Mosier, Michael; Smith, John  
**Subject:** FW: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Davin/Jeanette – can you respond to this applicant on behalf of the U/S?

---

**From:** Gacki, Andrea  
**Sent:** Wednesday, August 09, 2017 12:37 PM  
**To:** Mandelker, Sigal; Smith, John  
**Cc:** (b)(6)  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Thank you – we will respond on your behalf. (And I'd be happy to provide background on this at your convenience.)

---

**From:** Mandelker, Sigal  
**Sent:** Wednesday, August 09, 2017 12:30 PM  
**To:** Gacki, Andrea; Smith, John  
**Cc:** (b)(6)  
**Subject:** Fwd: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

2018-08-116: 009905

Bates No. 2018-08-116: 009906  
Duplicates Content in  
Bates No. 2018-08-116: 009880

**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

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**From:** "Mandelker, Sigal" (b)(6)  
**To:** "Smith, John" (b)(6), "Gacki, Andrea" (b)(6)  
**Cc:** (b)(6)  
**Date:** Wed, 09 Aug 2017 21:06:58 -0400

---

Thanks

---

**From:** Gacki, Andrea (b)(6)  
**Date:** August 9, 2017 at 12:36:40 PM EDT  
**To:** Smith, John (b)(6), Mandelker, Sigal (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Thank you – we will respond on your behalf. (And I'd be happy to provide background on this at your convenience.)

---

**From:** Mandelker, Sigal  
**Sent:** Wednesday, August 09, 2017 12:30 PM  
**To:** Gacki, Andrea; Smith, John  
**Cc:** (b)(6)  
**Subject:** Fwd: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Duplicative of content in Bates No. 2018-08-116: 009880





Bates No. 2018-08-116: 009908  
Duplicates Content in  
Bates No. 2018-08-116: 009880

**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

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**From:** [REDACTED] (b)(6)  
**To:** "Miller, Jeanette" [REDACTED] (b)(6)  
**Date:** Thu, 10 Aug 2017 11:00:45 -0400

[That would be great – thanks!](#)

---

**From:** Miller, Jeanette  
**Sent:** Thursday, August 10, 2017 10:59 AM  
**To:** Blackborow, Davin  
**Subject:** FW: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Did you want (b)(6) to tee something up?

---

**From:** Gacki, Andrea  
**Sent:** Thursday, August 10, 2017 10:58 AM  
**To:** Blackborow, Davin; Miller, Jeanette  
**Cc:** Mosier, Michael  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

(minus John)

[Wanted to follow up on this.](#)

---

**From:** Gacki, Andrea  
**Sent:** Wednesday, August 09, 2017 12:37 PM  
**To:** Blackborow, Davin; Miller, Jeanette  
**Cc:** Mosier, Michael; Smith, John  
**Subject:** FW: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

[Davin/Jeanette – can you respond to this applicant on behalf of the U/S?](#)

---

**From:** Gacki, Andrea  
**Sent:** Wednesday, August 09, 2017 12:37 PM  
**To:** Mandelker, Sigal; Smith, John  
**Cc:** [REDACTED] (b)(6)  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

[Thank you – we will respond on your behalf. \(And I'd be happy to provide background on this at your convenience.\)](#)

---

**From:** Mandelker, Sigal  
**Sent:** Wednesday, August 09, 2017 12:30 PM  
**To:** Gacki, Andrea; Smith, John  
**Cc:** [REDACTED] (b)(6)  
**Subject:** Fwd: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

**Duplicative of content in Bates No. 2018-08-116: 009880**



2018-08-116: 009909

Bates No. 2018-08-116: 009910  
Duplicates Content in  
Bates No. 2018-08-116: 009880

# RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

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**From:** "Gacki, Andrea" (b)(6)  
**To:** "Blackborow, Davin" (b)(6), "Miller, Jeanette" (b)(6)  
**Cc:** "Mosier, Michael" (b)(6)  
**Date:** Thu, 10 Aug 2017 12:30:52 -0400

---

Thank you so much!

---

**From:** Blackborow, Davin  
**Sent:** Thursday, August 10, 2017 12:31 PM  
**To:** Gacki, Andrea; Miller, Jeanette  
**Cc:** Mosier, Michael  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Andrea – (b)(6) and Jeanette are working on a response back to the applicant, but we'll send something today.

---

**From:** Gacki, Andrea  
**Sent:** Thursday, August 10, 2017 10:58 AM  
**To:** Blackborow, Davin; Miller, Jeanette  
**Cc:** Mosier, Michael  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

(minus John)

Wanted to follow up on this.

## Duplicative of content in Bates No. 2018-08-116: 009909



Bates No. 2018-08-116: 009912  
Duplicates Content in  
Bates Nos. 2018-08-116:  
009909-009910

**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

---

**From:** (b)(6)  
**To:** "Miller, Jeanette" (b)(6)  
**Cc:** "Blackborow, Davin" (b)(6)  
**Bcc:** (b)(6)  
**Date:** Thu, 10 Aug 2017 13:12:59 -0400

(b)(5)

(b)(6)

---

**From:** Miller, Jeanette  
**Sent:** Thursday, August 10, 2017 11:02 AM  
**To:** (b)(6)  
**Cc:** Blackborow, Davin; (b)(6)  
**Subject:** FW: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Hey (b)(6),

Flagging this one for you to craft a response to the applicant.

Many thanks!  
JM

Jeanette A. Miller  
Deputy Assistant Director for Licensing  
Office of Foreign Assets Control  
U.S. Department of the Treasury

---

**From:** Gacki, Andrea  
**Sent:** Thursday, August 10, 2017 10:58 AM  
**To:** Blackborow, Davin; Miller, Jeanette  
**Cc:** Mosier, Michael  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

(minus John)

Wanted to follow up on this.

Duplicative of content in Bates No. 2018-08-116: 009909

Bates No. 2018-08-116: 009914  
Duplicates Content in  
Bates Nos. 2018-08-116:  
009909-009910



**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

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**From:** (b)(6)  
**To:** "Miller, Jeanette" (b)(6)  
**Cc:** "Blackborow, Davin" (b)(6)  
**Date:** Thu, 10 Aug 2017 18:27:28 -0400  
**Attachments:** Response on behalf of Under Secretary.docx (15.26 kB)

---

Hi Davin and Jeanette:

(b)(5)

Thank you,

(b)(6)

---

**From:** Miller, Jeanette  
**Sent:** Thursday, August 10, 2017 11:02 AM  
**To:** (b)(6)  
**Cc:** Blackborow, Davin; (b)(6)  
**Subject:** FW: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Hey (b)(6),

Flagging this one for you to craft a response to the applicant.

Many thanks!  
JM

Jeanette A. Miller  
Deputy Assistant Director for Licensing  
Office of Foreign Assets Control  
U.S. Department of the Treasury

---

**From:** Gacki, Andrea  
**Sent:** Thursday, August 10, 2017 10:58 AM  
**To:** Blackborow, Davin; Miller, Jeanette  
**Cc:** Mosier, Michael  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

(minus John)

Wanted to follow up on this.

Duplicative of content in Bates No. 2018-08-116: 009909

Bates No. 2018-08-116: 009916  
Duplicates Content in  
Bates Nos. 2018-08-116:  
009909-009910

**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

---

**From:** (b)(6)  
**To:** "Miller, Jeanette" (b)(6)  
**Cc:** "Blackborow, Davin" (b)(6)  
**Bcc:** (b)(6)  
**Date:** Fri, 11 Aug 2017 12:48:37 -0400  
**Attachments:** RWC letter to Adam.pdf (111.31 kB)

---

The more things change... I thought you would find this letter from RWC to be of interest.

**Duplicative of content in Bates No. 2018-08-116: 009915**



Bates Nos. 2018-08-116:  
009918-009919

Duplicate Content in  
Bates Nos. 2018-08-116:  
009915-009916

**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

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**From:** "Blackborow, Davin" (b)(6)  
**To:** (b)(6) "Miller, Jeanette" (b)(6)  
**Cc:** (b)(6)  
**Date:** Fri, 11 Aug 2017 13:39:53 -0400  
**Attachments:** Response on behalf of Under Secretary.docx (17.33 kB)

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(b)(5)

**Duplicative of content in Bates No. 2018-08-116: 009915**



Bates Nos. 2018-08-116:  
009921-009922

Duplicate Content in  
Bates Nos. 2018-08-116:  
009915-009916

**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

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**From:** (b)(6)  
**To:** "Blackborow, Davin" (b)(6) "Miller, Jeanette" (b)(6)  
**Cc:** (b)(6)  
**Bcc:** (b)(6)  
**Date:** Fri, 11 Aug 2017 14:44:15 -0400  
**Attachments:** Response on behalf of Under Secretary.docx (17.44 kB)

---

Hi Davin:

(b)(5)

(b)(6)

Duplicative of content in Bates No. 2018-08-116: 009920



Bates Nos. 2018-08-116:  
009924-009925

Duplicate Content in  
Bates Nos. 2018-08-116:  
009920-009922

**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

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**From:** "Blackborow, Davin" (b)(6)  
**To:** (b)(6) "Miller, Jeanette" (b)(6)  
**Cc:** (b)(6)  
**Date:** Fri, 11 Aug 2017 15:35:31 -0400

(b)(5)

---

**From:** (b)(6)  
**Sent:** Friday, August 11, 2017 3:34 PM  
**To:** Blackborow, Davin; Miller, Jeanette  
**Cc:** (b)(6)  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Okay, so I'll make the changes and send it to Mike. (b)(5)

(b)(5)

(b)(5)

Andrew

---

**From:** Blackborow, Davin  
**Sent:** Friday, August 11, 2017 3:11 PM  
**To:** (b)(6) Miller, Jeanette  
**Cc:** (b)(6)  
**Sub** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

That works for me.

---

**From:** (b)(6)  
**Sent:** Friday, August 11, 2017 2:46 PM  
**To:** Blackborow, Davin; Miller, Jeanette  
**Cc:** (b)(6)  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

(b)(5)

**Duplicative of content in Bates No. 2018-08-116: 009923**

Bates Nos. 2018-08-116:  
009927-009928

Duplicate Content in  
Bates Nos. 2018-08-116:  
009923-009925

**RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1**

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**From:** (b)(6)  
**To:** (b)(6)  
**Bcc:** (b)(6)  
**Date:** Mon, 14 Aug 2017 11:40:27 -0400  
**Attachments:** FW\_OFAC\_RWC-Baikal Advisory Opinion Request\_ Case Number UKRAINE-EO13661-2014-311648-1.msg (58.88 kB)

---

Hi (b)(6)

This is Mike's response to my email to him regarding his request to the Under Secretary. I think it would be a good idea to add it to the case file, so that we have a record that we responded to RWC on her behalf.

Thank you,

(b)(6)

---

**From:** Michael Faucette [mailto:michael.faucette@mbassociateslaw.com]  
**Sent:** Friday, August 11, 2017 5:16 PM  
**To:** (b)(6)  
**Subject:** Re: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Hi (b)(6),

Thank you for your email. Please let us know if you have any questions on what we submitted.

Mike Faucette

Attorney at Law

Mark Barnes & Associates

1350 I St. N.W., Suite 260, Washington, D.C. 20005

Tel. (202) 626-0085

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On Aug 11, 2017, at 4:09 PM, (b)(6) wrote:

**Duplicative of content in Bates No. 2018-08-116: 009337**



## Licensing Inquiry 8/14 - 8/19

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**From:** (b)(6)  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Date:** Mon, 21 Aug 2017 10:21:47 -0400  
**Attachments:** Administrative Record - Global News Wire - Kalashnikov Concern Launches New Brand.pdf (81.52 kB); Administrative Record - Kalashnikov Concern website - Baikal History.pdf (102.02 kB); Administrative Record - Kalashnikov Concern website - Baikal II.pdf (135.56 kB); Administrative Record - Kalashnikov Concern website - Baikal.pdf (163.2 kB); Administrative Record - Kalashnikov Concern website - Kalashnikov Concern Launches New Brand.pdf (48.35 kB); Administrative Record - Kalashnikov website.mht (1.33 MB); Administrative Record - Moscow Times Article.pdf (285.82 kB); Administrative Record - Pravda - Kalashnikov for free II.pdf (371.25 kB); Administrative Record - Pravda - Kalashnikov for free.pdf (38.81 kB); Administrative Record - Product Catalog.pdf (48.64 kB); Administrative Record - Rostec Article - Kalashnikov Concern officially incorporated.pdf (106.2 kB); Administrative Record - Rostec Website - About.pdf (310.75 kB); Administrative Record - Rostec Website - Kalashnikov Promoting Peace and Calm.pdf (460.67 kB); Administrative Record - Rostec Website - Rostec to transfer control over IMZ.pdf (263.26 kB); Administrative Record - RT Article - The New CK.pdf (291.83 kB); Administrative Record - Sputnik News - Kalashnikov Sells 49 percent Stake for \$75M.pdf (198.48 kB); Screen Shot of Kalashnikov Concern Website on Baikal.pdf (75.3 kB); OGT Correspondence on Baikal II.pdf (20.08 kB); OGT Correspondence on Baikal.pdf (45.56 kB); OGT Email with Kalashnikov Articles.pdf (1.69 MB)

---

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

Please see the below and attached Licensing inquiry regarding an application from RWC Group related to Kalashnikov Concern and Baikal. This week there was only one related to Ukraine. Thanks!

(b)(6)

---

**From:** (b)(6)  
**Sent:** Monday, August 14, 2017 11:25 AM  
**To:** (b)(6)  
**Subject:** Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

Hi (b)(6),

I had corresponded with (b)(6) on a license application from RWC Group related to Kalashnikov Concern and Baikal quite some time ago. As this application has been working its way through the review process, the team leader wanted me to send OGT a copy of the administrative record, which the applicant has requested.

Please see attached correspondence with (b)(6) as well as all documents that we plan to provide to the applicant as part of the administrative record. Some of the attached articles came from OGT while others came from Davin or Counsel. If OGT has any concerns with Licensing releasing any of these documents to the applicant as part of their request for the administrative record, please let me know.

Thanks!

(b)(6)

(b)(6)

Sanctions Licensing Officer  
Licensing Division  
Office of Foreign Assets Control  
U.S. Department of the Treasury

## FW: Licensing Inquiry 8/14 - 8/19

**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Mon, 21 Aug 2017 10:23:34 -0400  
**Attachments:** Administrative Record - Global News Wire - Kalashnikov Concern Launches New Brand.pdf (81.52 kB); Administrative Record - Kalashnikov Concern website - Baikal History.pdf (102.02 kB); Administrative Record - Kalashnikov Concern website - Baikal II.pdf (135.56 kB); Administrative Record - Kalashnikov Concern website - Baikal.pdf (163.2 kB); Administrative Record - Kalashnikov Concern website - Kalashnikov Concern Launches New Brand.pdf (48.35 kB); Administrative Record - Kalashnikov website.mht (1.33 MB); Administrative Record - Moscow Times Article.pdf (285.82 kB); Administrative Record - Pravda - Kalashnikov for free II.pdf (371.25 kB); Administrative Record - Pravda - Kalashnikov for free.pdf (38.81 kB); Administrative Record - Product Catalog.pdf (48.64 kB); Administrative Record - Rostec Article - Kalashnikov Concern officially incorporated.pdf (106.2 kB); Administrative Record - Rostec Website - About.pdf (310.75 kB); Administrative Record - Rostec Website - Kalashnikov Promoting Peace and Calm.pdf (460.67 kB); Administrative Record - Rostec Website - Rostec to transfer control over IMZ.pdf (263.26 kB); Administrative Record - RT Article - The New CK.pdf (291.83 kB); Administrative Record - Sputnik News - Kalashnikov Sells 49 percent Stake for \$75M.pdf (198.48 kB); Screen Shot of Kalashnikov Concern Website on Baikal.pdf (75.3 kB); OGT Correspondence on Baikal II.pdf (20.08 kB); OGT Correspondence on Baikal.pdf (45.56 kB); OGT Email with Kalashnikov Articles.pdf (1.69 MB)

[Would you like to jump in on this?](#)

**From:** (b)(6)  
**Sent:** Monday, August 21, 2017 10:22 AM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** Licensing Inquiry 8/14 - 8/19

Duplicative of content in Bates No. 2018-08-116: 009930



## Licensing Inquiry 8/21-8/25

---

**From:** (b)(6)

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

**Cc:** (b)(6)

**Date:** Fri, 25 Aug 2017 12:41:50 -0400

**Attachments:** Administrative Record - Global News Wire - Kalashnikov Concern Launches New Brand.pdf (81.52 kB); Administrative Record - Kalashnikov Concern website - Baikal History.pdf (102.02 kB); Administrative Record - Kalashnikov Concern website - Baikal II.pdf (135.56 kB); Administrative Record - Kalashnikov Concern website - Baikal.pdf (163.2 kB); Administrative Record - Kalashnikov Concern website - Kalashnikov Concern Launches New Brand.pdf (48.35 kB); Administrative Record - Kalashnikov website.mht (1.33 MB); Administrative Record - Moscow Times Article.pdf (285.82 kB); Administrative Record - Pravda - Kalashnikov for free II.pdf (371.25 kB); Administrative Record - Pravda - Kalashnikov for free.pdf (38.81 kB); Administrative Record - Product Catalog.pdf (48.64 kB); Administrative Record - Rostec Article - Kalashnikov Concern officially incorporated.pdf (106.2 kB); Administrative Record - Rostec Website - About.pdf (310.75 kB); Administrative Record - Rostec Website - Kalashnikov Promoting Peace and Calm.pdf (460.67 kB); Administrative Record - Rostec Website - Rostec to transfer control over IMZ.pdf (263.26 kB); Administrative Record - RT Article - The New CK.pdf (291.83 kB); Administrative Record - Sputnik News - Kalashnikov Sells 49 percent Stake for \$75M.pdf (198.48 kB); Screen Shot of Kalashnikov Concern Website on Baikal.pdf (75.3 kB); OGT Correspondence on Baikal II.pdf (20.08 kB); OGT Correspondence on Baikal.pdf (45.56 kB); OGT Email with Kalashnikov Articles.pdf (1.69 MB)

---

Hi (b)(6) and (b)(6)

Please see the attached Licensing inquiry regarding a blocked wire transfer . This week there was only one related to Ukraine. Thanks!

(b)(6)

---

**From:** (b)(6)

**Sent:** Monday, August 14, 2017 11:25 AM

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

**Subject:** Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

Duplicative of content in Bates No. 2018-08-116: 009930





## FW: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

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**From:** (b)(6)  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Date:** Wed, 06 Sep 2017 13:18:11 -0400  
**Attachments:** Administrative Record - Global News Wire - Kalashnikov Concern Launches New Brand.pdf (81.52 kB); Administrative Record - Kalashnikov Concern website - Baikal History.pdf (102.02 kB); Administrative Record - Kalashnikov Concern website - Baikal II.pdf (135.56 kB); Administrative Record - Kalashnikov Concern website - Baikal.pdf (163.2 kB); Administrative Record - Kalashnikov Concern website - Kalashnikov Concern Launches New Brand.pdf (48.35 kB); Administrative Record - Kalashnikov website.mht (1.33 MB); Administrative Record - Moscow Times Article.pdf (285.82 kB); Administrative Record - Pravda - Kalashnikov for free II.pdf (371.25 kB); Administrative Record - Pravda - Kalashnikov for free.pdf (38.81 kB); Administrative Record - Product Catalog.pdf (48.64 kB); Administrative Record - Rostec Article - Kalashnikov Concern officially incorporated.pdf (106.2 kB); Administrative Record - Rostec Website - About.pdf (310.75 kB); Administrative Record - Rostec Website - Kalashnikov Promoting Peace and Calm.pdf (460.67 kB); Administrative Record - Rostec Website - Rostec to transfer control over IMZ.pdf (263.26 kB); Administrative Record - RT Article - The New CK.pdf (291.83 kB); Administrative Record - Sputnik News - Kalashnikov Sells 49 percent Stake for \$75M.pdf (198.48 kB); Screen Shot of Kalashnikov Concern Website on Baikal.pdf (75.3 kB); OGT Correspondence on Baikal II.pdf (20.08 kB); OGT Correspondence on Baikal.pdf (45.56 kB); OGT Email with Kalashnikov Articles.pdf (1.69 MB)

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Hi all,

I just wanted to follow up on the below email. We wanted to make sure that OGT doesn't have any concerns with us releasing the attached documents, as part of the administrative record, to the applicant.

Thanks!

(b)(6)

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**From:** (b)(6)  
**Sent:** Monday, August 14, 2017 11:25 AM  
**To:** (b)(6)  
**Subject:** Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

Duplicative of content in Bates No. 2018-08-116: 009930



**From:** (b)(6)  
**To:** (b)(6)  
**Subject:** RE: Dunn & Bradstreet report on Izhevsk Mechanical Plant  
**Date:** Wednesday, August 20, 2014 3:57:08 PM

---

Hi (b)(6). (b)(5)

Thanks  
(b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, August 20, 2014 8:59 AM  
**To:** (b)(6)  
**Subject:** RE: Dunn & Bradstreet report on Izhevsk Mechanical Plant

Hi (b)(6),

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

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

If that sounds good to you, let me know and I can proceed with the advisory letter.

Thanks!  
(b)(6)

---

**From:** (b)(6)  
**Sent:** Tuesday, August 19, 2014 6:03 PM  
**To:** (b)(6)  
**Subject:** RE: Dunn & Bradstreet report on Izhevsk Mechanical Plant

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

---

**From:** (b)(6)  
**Sent:** Tuesday, August 19, 2014 3:57 PM  
**To:** (b)(6)  
**Subject:** FW: Dunn & Bradstreet report on Izhevsk Mechanical Plant

Hi (b)(6)

More information on Baikal – hope this helps.

Thanks.  
(b)(6)

---

**From:** Michael Faucette [<mailto:michael.faucette@mbassociateslaw.com>]  
**Sent:** Tuesday, August 19, 2014 3:47 PM

To: (b)(6)  
Subject: Re: Dunn & Bradstreet report on Izhevsk Mechanical Plant

Hi (b)(6)

Baikal is a trademark they own. However, The formal company name, which they also use, is as it is stated on the stockholder documents we submitted: "**Joint-Stock Company 'Izhevsky mekhanichesky zavod.'**" But here is how they explain it on their website:

*"For more than 60 years the "Izhevsky Mekhanichesky Zavod" JSC has been manufacturing sporting and hunting guns and ranks high among world's largest producers of weapons as regards the volume of production and variety of gun models and their variations.*

*The products bearing the "BAIKAL" trademark are distributed worldwide in more than 70 countries of the globe."*

<http://imzcorp.com/en/info/production.html>

Do not hesitate to let me know if there is any other clarification you need. Thanks!

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

This e-mail is confidential and is legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation. Please contact Mark Barnes & Associates at 202-626-0089 if you need assistance.

On Aug 19, 2014, at 3:19 PM, (b)(6) wrote:

Mike,

Thank you for the information.

Do you know if Baikal, as the trademark name, is also the formal company name?

Thanks,  
(b)(6)

---

**From:** Michael Faucette [mailto:michael.faucette@mbassociateslaw.com]  
**Sent:** Tuesday, August 19, 2014 2:29 PM

2018-08-116: 010016

To: (b)(6)

Subject: Re: Dunn & Bradstreet report on Izhevsk Mechanical Plant

(b)(6)

The report from Dunn & Bradstreet appears to be several years old as it lists, "GP Izhevski Mekhanicheski Zavod." It is my understanding that this **General Partnership (GP)** was liquidated a few years back. Its assets were then purchased and reorganized by the Russian government corporation, Rostec, into a **Joint Stock Company**: "JSC Izhevski Mekhanicheski Zavod." So we are dealing with two separate companies:

GP Izhevski Mekhanicheski Zavod  
JSC Izhevski Mekhanicheski Zavod.

The JSC is the successor of the GP (which no longer exists) but they are separate companies nonetheless.

Please let me know if this helps at all or if you would like us to get more documents from the company. Thank again for your help.

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

This e-mail is confidential and is legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation. Please contact Mark Barnes & Associates at 202-626-0089 if you need assistance.

On Aug 19, 2014, at 1:57 PM, (b)(6) wrote:

Hi Mike,

Attached is the Dunn & Bradstreet report on Izhevski Mekhanicheski Zavod (named spelled a little differently from your application, but the person looking into this at OFAC mentioned that the address is the same). As it mentions in the report, the company has been liquidated.

Thank you,

(b)(6)

2018-08-116: 010017

(b)(6)

Licensing Division

Office of Foreign Assets Control

U.S. Department of the Treasury

<Business Information Report\_19082014134814.pdf>



## FW: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Wed, 06 Sep 2017 13:50:37 -0400  
**Attachments:** Administrative Record - Global News Wire - Kalashnikov Concern Launches New Brand.pdf (81.52 kB); Administrative Record - Kalashnikov Concern website - Baikal History.pdf (102.02 kB); Administrative Record - Kalashnikov Concern website - Baikal II.pdf (135.56 kB); Administrative Record - Kalashnikov Concern website - Baikal.pdf (163.2 kB); Administrative Record - Kalashnikov Concern website - Kalashnikov Concern Launches New Brand.pdf (48.35 kB); Administrative Record - Kalashnikov website.mht (1.33 MB); Administrative Record - Moscow Times Article.pdf (285.82 kB); Administrative Record - Pravda - Kalashnikov for free II.pdf (371.25 kB); Administrative Record - Pravda - Kalashnikov for free.pdf (38.81 kB); Administrative Record - Product Catalog.pdf (48.64 kB); Administrative Record - Rostec Article - Kalashnikov Concern officially incorporated.pdf (106.2 kB); Administrative Record - Rostec Website - About.pdf (310.75 kB); Administrative Record - Rostec Website - Kalashnikov Promoting Peace and Calm.pdf (460.67 kB); Administrative Record - Rostec Website - Rostec to transfer control over IMZ.pdf (263.26 kB); Administrative Record - RT Article - The New CK.pdf (291.83 kB); Administrative Record - Sputnik News - Kalashnikov Sells 49 percent Stake for \$75M.pdf (198.48 kB); Screen Shot of Kalashnikov Concern Website on Baikal.pdf (75.3 kB); OGT Correspondence on Baikal II.pdf (20.08 kB); OGT Correspondence on Baikal.pdf (45.56 kB); OGT Email with Kalashnikov Articles.pdf (1.69 MB)

[Licensing is following up here.](#)

**From:** (b)(6)  
**Sent:** Wednesday, September 06, 2017 1:18 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** FW: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

Duplicative of content in Bates No. 2018-08-116: 009933

## RE: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

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**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Wed, 06 Sep 2017 14:45:48 -0400

It's gone. Thanks (b)(6). Please let me know if Counsel has any questions.

(b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, September 06, 2017 2:32 PM  
**To:** (b)(6)  
**Subject:** RE: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

Hi (b)(6),

Yep, the email's already in the file, so it's ready to go.

Thanks,

(b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, September 06, 2017 2:30 PM  
**To:** (b)(6)  
**Subject:** RE: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

Excellent news from OGT. Can you please add (b)(6) email to the case file? Then I'll send it to Counsel.

(b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, September 06, 2017 2:08 PM  
**To:** (b)(6)  
**Subject:** FW: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

Hi (b)(6),

This is the RWC Group application, Ukraine-EO13661-2015-318183-1. It looks like you had already reviewed and made some edits to the denial, but we were waiting to hear back from OGT before sending the case along to Counsel.

Thanks,

(b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, September 06, 2017 2:03 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

No problem!

The application is under supervisor review, but will be sent to OCC next for review.

I'm also assuming OFAC names will be redacted, but will make a note of that for the case file.

If you have any other concerns, please let me know.

Thanks,

(b)(6)

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**From:** (b)(6)  
**Sent:** Wednesday, September 06, 2017 1:56 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

Hi (b)(6),



Sorry for the delay.

OGT does not have any concerns as to releasing the admin record here, but we want to make sure this has already been blessed by OCC. Also, I assume OFAC names will be redacted?

---

**From:** (b)(6)  
**Sent:** Wednesday, September 06, 2017 1:18 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** FW: Licensing Request for the Administrative Record - Baikal and Kalashnikov - Ukraine-EO13662-2015-318183-1

Duplicative of content in Bates No. 2018-08-116: 009933



## RE: RWC Group summary for licensing meeting

---

**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Mon, 16 Oct 2017 12:07:16 -0400

Thanks, (b)(6), this is helpful.

---

**From:** (b)(6)  
**Sent:** Monday, October 16, 2017 11:45 AM  
**To:** (b)(6)  
**Subject:** FW: RWC Group summary for licensing meeting

Hi (b)(6),

I'm not sure if the below email helps in your review of the RWC Group application, but I thought I'd pass it along. I can't recall discussing this with John and Andrea at a Licensing meeting, but we must have.

Thanks,

(b)(6)

---

**From:** (b)(6)  
**Sent:** Thursday, October 15, 2015 5:11 PM  
**To:** Blackhorow, Davin; (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: RWC Group summary for licensing meeting

Duplicative of content in Bates No. 2018-08-116: 002290



Bates No. 2018-08-116: 010070  
Duplicates Content in  
Bates Nos. 2018-08-116:  
002290-002291

## Counsel Review of RWC Group application - Ukraine-EO13661-2015-318183-1

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**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Mon, 16 Oct 2017 13:08:51 -0400  
**Attachments:** Counsel Edits to Denial.docx (84.1 kB)

---

Hi (b)(6),

(b)(6) (b)(5)

(b)(5), (b)(6)

Thanks.

(b)(6)

(b)(6)

Sanctions Licensing Officer  
Licensing Division  
Office of Foreign Assets Control  
U.S. Department of the Treasury

**RE: Counsel Review of RWC Group application - Ukraine-EO13661-2015-318183-1**

---

**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Mon, 16 Oct 2017 13:15:49 -0400

---

Great news. Let me take a look at it later this afternoon.

(b)(6)

---

**From:** (b)(6)  
**Sent:** Monday, October 16, 2017 1:09 PM  
**To:** (b)(6)  
**Subject:** Counsel Review of RWC Group application - Ukraine-EO13661-2015-318183-1

**Duplicative of content in Bates No. 2018-08-116: 010071**



**RE: Counsel Review of RWC Group application - Ukraine-EO13661-2015-318183-1**

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**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Tue, 17 Oct 2017 08:20:30 -0400

---

Hi (b)(6),

Okay, will do.

Thanks.

(b)(6)

---

**From:** (b)(6)  
**Sent:** Monday, October 16, 2017 6:12 PM  
**To:** (b)(6)  
**Subject:** RE: Counsel Review of RWC Group application - Ukraine-EO13661-2015-318183-1

---

Hi (b)(6):

(b)(5)

(b)(5)

(b)(5)

(b)(6)

Thank you,

(b)(6)

---

**From:** (b)(6)  
**Sent:** October 16, 2017 1:09 PM  
**To:** (b)(6)  
**Subject:** Counsel Review of RWC Group application - Ukraine-EO13661-2015-318183-1

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**Duplicative of content in Bates No. 2018-08-116: 010071**



## RE: RWC Group Application

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**From:** (b)(6)  
**To:** "Blackborow, Davin" (b)(6)  
**Cc:** (b)(6) "Miller, Jeanette" (b)(6) >  
**Date:** Thu, 25 Jan 2018 15:58:05 -0500  
**Attachments:** FW\_OFAC\_RWC-Baikal Advisory Opinion Request\_ Case Number UKRAINE-EO13661-2014-311648-1.msg (52.74 kB)

---

Hi Davin,

(b)(6) and I just want to remind you that you have the draft denial to the RWC Group *reconsideration request/ request for the administrative record regarding the original denial* in your queue for final review and signature under Case No. Ukraine-EO13661-2015-318183-1. I'm bringing this to your attention because the applicant had contacted the Under Secretary about it last summer (see attached email) and the US had contacted Andrea.

(b)(6)

# FW: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

---

**From:** "Miller, Jeanette" (b)(6)  
**To:** "Blackborow, Davin" (b)(6)  
**Cc:** (b)(6)  
**Date:** Wed, 09 Aug 2017 13:08:14 -0400

---

Davin – do you want to take the first stab?

Jeanette A. Miller  
Deputy Assistant Director for Licensing  
Office of Foreign Assets Control  
U.S. Department of the Treasury

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**From:** Gacki, Andrea  
**Sent:** Wednesday, August 09, 2017 12:37 PM  
**To:** Blackborow, Davin; Miller, Jeanette  
**Cc:** Mosier, Michael; Smith, John  
**Subject:** FW: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1  
[Davin/Jeanette – can you respond to this applicant on behalf of the U/S?](#)

---

**From:** Gacki, Andrea  
**Sent:** Wednesday, August 09, 2017 12:37 PM  
**To:** Mandelker, Sigal; Smith, John  
**Cc:** (b)(6)  
**Subject:** RE: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1  
[Thank you – we will respond on your behalf. \(And I'd be happy to provide background on this at your convenience.\)](#)

**From:** Mandelker, Sigal  
**Sent:** Wednesday, August 09, 2017 12:30 PM  
**To:** Gacki, Andrea; Smith, John  
**Cc:** (b)(6)  
**Subject:** Fwd: OFAC: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Duplicative of content in Bates No. 2018-08-116: 009880





Bates No. 2018-08-116: 010076  
Duplicates Content in  
Bates No. 2018-08-116: 009880