

From: [Unger, Seth](#)
To: (b)(6); [Swindells, Felicia](#); (b)(6)
Subject: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS
Date: Thursday, April 5, 2018 12:10:41 PM
Attachments: [2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS.docx](#)

Please do a FLASH CLEAR, and review in case there were any additional edits that SPM suggested that I missed. Ideally, we'd like to get her a tracked changes and CLEAN by her 12:30 call with STM in the IOC (b)(6), if you're able to bring that would be perfect).

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From: (b)(6)
To: [Unger, Seth](#); [Swindells, Felicia](#); (b)(6)
Subject: RE: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS
Date: Thursday, April 5, 2018 12:24:27 PM
Attachments: [2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS v2 clean.docx](#)
[2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS v2.docx](#)

Tracked and clean.

From: Unger, Seth
Sent: Thursday, April 05, 2018 12:11 PM
To: (b)(6); Swindells, Felicia; (b)(6)
Subject: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS

Please do a FLASH CLEAR, and review in case there were any additional edits that SPM suggested that I missed. Ideally, we'd like to get her a tracked changes and CLEAN by her 12:30 call with STM in the IOC (b)(6), if you're able to bring that would be perfect).

From: [Swindells, Felicia](#)
To: (b)(6); [Unger, Seth](#); (b)(6)
Subject: RE: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS
Date: Thursday, April 5, 2018 12:32:44 PM
Attachments: [2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS v2_FS.docx](#)

Some nit edits which I highlighted in yellow. (b)(5) I got the sense that (b)(5)
(b)(5). (b)(6), can you confirm that is
accurate and if so I assume we should make the change. Thanks.

From: (b)(6)
Sent: Thursday, April 05, 2018 12:24 PM
To: Unger, Seth; Swindells, Felicia; (b)(6)
Subject: RE: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS

Tracked and clean.

From: Unger, Seth
Sent: Thursday, April 05, 2018 12:11 PM
To: (b)(6); Swindells, Felicia; (b)(6)
Subject: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL EDITS

Please do a FLASH CLEAR, and review in case there were any additional edits that SPM suggested that I missed. Ideally, we'd like to get her a tracked changes and CLEAN by her 12:30 call with STM in the IOC (b)(6), if you're able to bring that would be perfect).

From: [Unger, Seth](#)
To: (b)(6); [Swindells, Felicia](#); [Conklin, Todd](#); (b)(6)
Subject: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL
Date: Thursday, April 5, 2018 12:58:47 PM
Attachments: [2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL.docx](#)

Attached is the clean version I'd like to provide. She asked that counsel review, have they looked at this yet?

I've got a meeting for the next hour in a SCIF, but if we could get a CLEAR by 2:00 PM we should be in good shape.

Thanks!

Seth

From: (b)(6)
To: (b)(6)
Cc: (b)(6); [Swindells, Felicia](#); (b)(6); [Unger, Seth](#); [Conklin, Todd](#); (b)(6)
Subject: RE: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL - FLASH CLEARANCE
Date: Thursday, April 5, 2018 2:01:00 PM
Attachments: [2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL \(b\)\(6\).docx](#)

I had some thoughts for consideration in the attached which can be taken or left, (b)(5)

From: (b)(6)
Sent: Thursday, April 05, 2018 1:07 PM
To: (b)(6)
Cc: (b)(6); [Swindells, Felicia](#); (b)(6); [Unger, Seth](#); [Conklin, Todd](#); (b)(6)
Subject: FW: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL - FLASH CLEARANCE
Importance: High

(b)(6)

Sorry for the quick turn, but please Sigal asked that Counsel take a look at the attached script for tomorrow's press calls. The text is drawn primarily from the press release. We need to send a clean version back to Seth Unger by 2 pm, so let me know of any edits as soon as you can.

Thank you,
(b)(6)

From: Unger, Seth
Sent: Thursday, April 05, 2018 12:59 PM
To: (b)(6); [Swindells, Felicia](#); [Conklin, Todd](#); (b)(6)
Subject: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL

Attached is the clean version I'd like to provide. She asked that counsel review, have they looked at this yet?

I've got a meeting for the next hour in a SCIF, but if we could get a CLEAR by 2:00 PM we should be in good shape.

Thanks!
Seth

From: (b)(6)
To: (b)(6)
Cc: Swindells, Felicia; (b)(6) Unger, Seth; Conklin, Todd; (b)(6)
Subject: RE: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL - FLASH CLEARANCE
Date: Thursday, April 5, 2018 2:07:12 PM
Attachments: [2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL \(b\)\(6\) .docx](#)

I had one comment for OFAC/Treasury's consideration on top of (b)(6) (b)(5)

From: (b)(6)
Sent: Thursday, April 05, 2018 2:01 PM
To: (b)(6)
Cc: (b)(6) Swindells, Felicia
(b)(6) Unger, Seth <Seth.Unger@treasury.gov>;
Conklin, Todd (b)(6)
Subject: RE: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL - FLASH CLEARANCE

Duplicative of content in Bates 2018-06-192: 000678



Duplicative of content in Bates 2018-06-192: 000678



From: (b)(6)
To: (b)(6)
Cc: Swindells, Felicia; (b)(6) Unger, Seth; Conklin, Todd; (b)(6)
Subject: RE: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL - FLASH CLEARANCE
Date: Thursday, April 5, 2018 2:20:46 PM
Attachments: [2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL OFAC.docx](#)

Seth U:

Updated Press and Surrogate Call Script with additions in tracked changes. Thanks to OCC for their helpful additions, much appreciated. (b)(6) was right to flag (b)(5) here, but I don't think (b)(5) and I think (b)(5) (b)(5)

V/r,

(b)(6)

From: (b)(6)
Sent: Thursday, April 05, 2018 2:07 PM
To: (b)(6)
Cc: (b)(6) Swindells, Felicia; (b)(6) Unger, Seth; Conklin, Todd; (b)(6)
Subject: RE: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL - FLASH CLEARANCE

I had one comment for OFAC/Treasury's consideration on top of (b)(6), (b)(5)

From: (b)(6)
Sent: Thursday, April 05, 2018 2:01 PM
To: (b)(6)
Cc: (b)(6) Swindells, Felicia (b)(6)
(b)(6) Unger, Seth <Seth.Unger@treasury.gov>;
Conklin, Todd (b)(6)
(b)(6)
Subject: RE: 2018-04-06 Russian Oligarchs Sanctions - Press and Surrogate Call Script SIGAL - FLASH CLEARANCE

Duplicative of content in Bates 2018-06-192: 000678

Duplicative of content in Bates 2018-06-192: 000678



Bates Nos. 2018-06-192:
000688 - 000690
Withheld in Full
Pursuant to (b)(5)

RE: Comment for ABC News

From: (b)(6)
To: (b)(6) Unger, Seth <seth.unger@treasury.gov>, (b)(6)
(b)(6) Conklin, Todd (b)(6)
Cc: (b)(6)
Date: Fri, 06 Apr 2018 14:50:03 -0400

The proposed response (b)(5)
(b)(5) (b)(6) (b)(5)

From: (b)(6)
Sent: Friday, April 06, 2018 2:44 PM
To: Unger, Seth <Seth.Unger@treasury.gov>, (b)(6)
(b)(6) Swindells, Felicia Conklin, Todd (b)(6)
Cc: (b)(6)
Subject: RE: Comment for ABC News

The only thing I'd potentially add would be (b)(5):

(b)(5)

From: Unger, Seth <Seth.Unger@treasury.gov>
Date: April 6, 2018 at 2:36:38 PM EDT
To: (b)(6)

Swindells, Felicia Conklin, Todd
(b)(6)

Subject: RE: Comment for ABC News

Thanks. I'm hoping to get this off shortly, please let me know.

From: (b)(6)
Sent: Friday, April 06, 2018 1:57 PM
To: Unger, Seth <Seth.Unger@treasury.gov>, (b)(6)
(b)(6) Swindells, Felicia Conklin, Todd (b)(6)
Cc: (b)(6)
Subject: RE: Comment for ABC News

This looks comprehensive to me, but adding Counsel for a quick look.

From: Unger, Seth
Sent: Friday, April 06, 2018 1:56 PM
To: (b)(6) Swindells, Felicia; Conklin, Todd; (b)(6)
Subject: FW: Comment for ABC News

Hey Team, see questions from ABC below. Proposed answer, please revise/edit/improve:

On background: (b)(5)

(b)(5)

(b)(5)

From: Madden, Pete A. [mailto:(b)(6)]
Sent: Friday, April 06, 2018 1:30 PM
To: Unger, Seth <Seth.Unger@treasury.gov>
Subject: Comment for ABC News

Hi Seth,

Pete Madden from ABC News here. Reaching out for comment on the US Treasury Department designation of Alexander Torshin. Can you share any more information about what activities led to his sanction? What does this mean for any potential activities or transactions in the United States? Torshin is an NRA supporter and donor. Would the NRA be barred from accepting donations from Torshin in the future? What about money they've received from him in the past?

I can be reached here or at (b)(6)

Thanks for your help.
Pete

Pete Madden // Investigative Unit // (b)(6) // [@pamadden](#)

RE: Comment for ABC News

From: "Unger, Seth" <seth.unger@treasury.gov>

To: (b)(6)
"Swindells, Felicia"
(b)(6) Conklin, Todd"

Cc: (b)(6)

Date: Fri, 06 Apr 2018 16:01:25 -0400

OK, thanks all. Here's what I'm going with:

On background: Alexander Torshin is the State Secretary – Deputy Governor of the Central Bank of the Russian Federation. Torshin is being designated pursuant to E.O. 13661 for being an official of the Government of the Russian Federation. We do not have additional details to share publicly beyond what is in the press release. As a result of being placed on OFAC's Specially Designated National list, all assets subject to U.S. jurisdiction of the designated individuals and entities, and of any other entities blocked by operation of law as a result of their ownership by a sanctioned party, are frozen, and U.S. persons are generally prohibited from dealings with them. Additionally, non-U.S. persons could face sanctions for knowingly facilitating significant transactions for or on behalf of the individuals or entities blocked today. Treasury's sanctions apply prospectively, and generally would not impact previous transactions, provided the blocked person no longer has a property interest in the previous transaction.

From: (b)(6)

Sent: Friday, April 06, 2018 2:44 PM

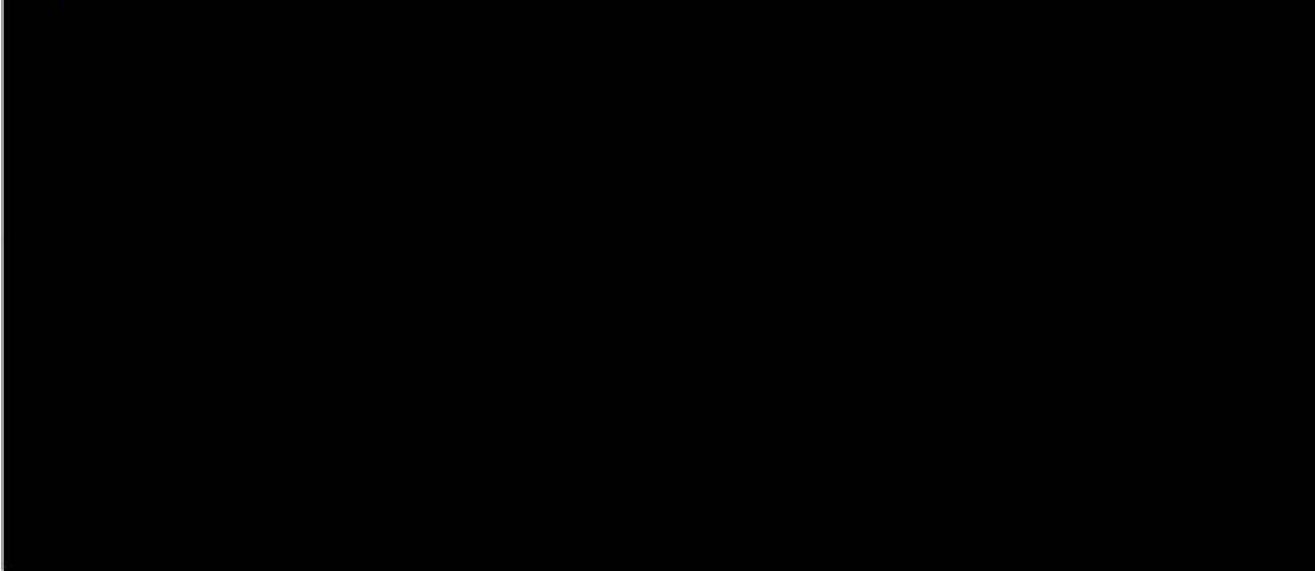
To: Unger, Seth <Seth.Unger@treasury.gov>; (b)(6)
(b)(6) Swindells, Felicia Conklin, Todd (b)(6)
(b)(6)

Cc: (b)(6)

Subject: RE: Comment for ABC News

Duplicative of content in Bates No. 2018-06-192: 000691

Duplicative of content in Bates Nos. 2018-06-192: 000691-000692



19_011-E3-00001659

2018-06-192: 000694

RE: Wyden staff classified briefing

From: (b)(6)
To: (b)(6)
Cc: (b)(6), Ballman, Luke <luke.ballman@treasury.gov>, "Swindells, Felicia", "Baheri, Leila", (b)(6)
Date: Mon, 07 May 2018 13:30:55 -0400

+Leila

From: (b)(6)
Sent: Monday, May 07, 2018 1:30 PM
To: (b)(6)
Cc: (b)(6), Swindells, Felicia; Ballman, Luke; Thannhauser, Sara
Subject: FW: Wyden staff classified briefing

Good afternoon,

Just wanted to flag the incoming briefing request from the Hill on Torshin. This is unscheduled, but I wanted to put on your radar.

(b)(6), Senior Advisor, Office of Foreign Assets Control, U.S. Treasury Department, (b)(6) (O),
(b)(6) (M)

From: Ballman, Luke
Sent: Friday, May 04, 2018 11:56 AM
To: Mandelker, Sigal (b)(6)
Cc: McGlynn, Dan (b)(6); Maloney, Drew <Drew.Maloney@treasury.gov>; (b)(6)
(b)(6)
Subject: Wyden staff classified briefing

Sigal,

Wyden's staff has requested a classified briefing on Alexander Torshin. You might remember we just responded to a letter from Wyden, partially about the same subject. We don't have a ton to share but I'd suggest we go ahead and do an DIA/OFAC briefing. Do you have any concerns?

Thanks,
Luke

RE: Wyden staff classified briefing

From: "Ballman, Luke" <luke.ballman@treasury.gov>

To: "Mandelker, Sigal" (b)(6)

Cc: "McGlynn, Dan" (b)(6), "Maloney, Drew" <drew.maloney@treasury.gov>, (b)(6)
(b)(6)

Date: Wed, 09 May 2018 11:12:43 -0400

Sigal, I'm just following up on this. I mentioned it in the meeting the other day. I'd like to go ahead and schedule this. Who from OFAC/OIA would you like to send up?

From: Ballman, Luke

Sent: Friday, May 4, 2018 11:56 AM

To: Mandelker, Sigal (b)(6)

Cc: McGlynn, Dan (b)(6); Maloney, Drew <Drew.Maloney@treasury.gov>; (b)(6)

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

Subject: Wyden staff classified briefing

Sigal,

Wyden's staff has requested a classified briefing on Alexander Torshin. You might remember we just responded to a letter from Wyden, partially about the same subject. We don't have a ton to share but I'd suggest we go ahead and do an OIA/OFAC briefing. Do you have any concerns?

Thanks,
Luke

RE: Briefing Request

From: "Smith, Bradley" (b)(6)
To: "Trew, Heather" (b)(6)
Date: Thu, 10 May 2018 14:14:16 -0400

(b)(5)

I hope that helps!

From: Trew, Heather
Sent: Thursday, May 10, 2018 2:11 PM
To: Smith, Bradley (b)(6)
Subject: FW: Briefing Request

(b)(5) ? I can talk to (b)(6) about any specific issues, unless you had other thoughts.

From: Ahern, Paul (b)(6)
Date: May 10, 2018 at 2:05:40 PM EDT
To: Trew, Heather (b)(6)
Subject: FW: Briefing Request

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

I did suggest (b)(5)
(b)(5)

From: Ballman, Luke
Sent: Thursday, May 10, 2018 2:03 PM
To: Ahern, Paul (b)(6)
Subject: FW: Briefing Request

From: Ballman, Luke
Sent: Tuesday, May 1, 2018 1:48 PM
To: (b)(6)
Subject: RE: Briefing Request

(b)(6), let me find out what, if anything, we have on him. He was designated because of his position in the government as I recall.

In the interests of managing expectations, I've seen the media reports about NRA ties. To the extent there is any investigation related to that, we wouldn't be able to comment on it.

I'll let you know what else I find out.

Best,
Luke

From: (b)(6)
Sent: Tuesday, May 1, 2018 12:45 PM
To: Pavlick, Stephen <Stephen.Pavlick@treasury.gov>
Cc: Ballman, Luke <Luke.Ballman@treasury.gov>
Subject: RE: Briefing Request

Great – thanks Stephen. Luke – could you set up the briefing described below?

Thanks,

(b)(6)

From: Stephen.Pavlick@treasury.gov [mailto:Stephen.Pavlick@treasury.gov]
Sent: Tuesday, May 01, 2018 12:43 PM
To: (b)(6)
Cc: Luke.Ballman@treasury.gov
Subject: Re: Briefing Request

Hi (b)(6)

I'm connecting you with my colleague Luke Ballman who handles sanctions issues for us. Have ccd him here.

Best,

Steve

From: (b)(6)
Date: May 1, 2018 at 12:35:39 PM EDT
To: Pavlick, Stephen <Stephen.Pavlick@treasury.gov>
Subject: Briefing Request

Stephen –

We would like to get a briefing for cleared finance committee staff and the Senator's Intel staffer on why Alexander Torshin was named in the sanctions lists, and the justification. Could you help set that up?

(b)(6)

(b)(6)
International Trade Counsel
Senate Finance Committee
Senator Ron Wyden
219 Dirksen Senate Building
(b)(6)

RE: Wyden staff briefing

From: "Ballman, Luke" <luke.ballman@treasury.gov>
To: (b)(6)
Date: Tue, 22 May 2018 12:28:46 -0400

Next week

From: (b)(6)
Date: May 22, 2018 at 12:24:23 PM EDT
To: Ballman, Luke <Luke.Ballman@treasury.gov>
Subject: RE: Wyden staff briefing

Are there any notional dates for this yet?

(b)(6), Senior Advisor, Office of Foreign Assets Control, U.S. Treasury Department, (b)(6) (O),
(b)(6) (M)

From: Gacki, Andrea
Sent: Tuesday, May 22, 2018 10:45 AM
To: McGlynn, Dan (b)(6); Ballman, Luke <Luke.Ballman@treasury.gov> (b)(6)
(b)(6)
Subject: RE: Wyden staff briefing

And (b)(6) is good for OFAC.

From: McGlynn, Dan
Sent: Tuesday, May 22, 2018 10:38 AM
To: Ballman, Luke <Luke.Ballman@treasury.gov>; Gacki, Andrea (b)(6)
(b)(6)
Subject: RE: Wyden staff briefing

(b)(6) is on military leave. (b)(6) can do it though.

From: Ballman, Luke
Sent: Tuesday, May 22, 2018 9:20 AM
To: Gacki, Andrea (b)(6); McGlynn, Dan (b)(6)
(b)(6)
Subject: Wyden staff briefing

Andrea and Danny,

Who would you like to have brief Wyden staff on Torshin. Are (b)(6) and (b)(6) my best bets?

Thanks,
Luke

RE: Wyden staff briefing

From: "Ballman, Luke" <luke.ballman@treasury.gov>
To: (b)(6)
Date: Tue, 29 May 2018 12:56:34 -0400

They just came in. how about next Tuesday afternoon?

From: (b)(6)
Sent: Tuesday, May 22, 2018 12:24 PM
To: Ballman, Luke <Luke.Ballman@treasury.gov>
Subject: RE: Wyden staff briefing

Are there any notional dates for this yet?

(b)(6), Senior Advisor, Office of Foreign Assets Control, U.S. Treasury Department, (b)(6) (O),
(b)(6) (M)

From: Gacki, Andrea
Sent: Tuesday, May 22, 2018 10:45 AM
To: McGlynn, Dan (b)(6); Ballman, Luke <Luke.Ballman@treasury.gov> (b)(6)
Subject: RE: Wyden staff briefing

And (b)(6) is good for OFAC.

From: McGlynn, Dan
Sent: Tuesday, May 22, 2018 10:38 AM
To: Ballman, Luke <Luke.Ballman@treasury.gov>; Gacki, Andrea (b)(6)
Subject: RE: Wyden staff briefing

(b)(6) is on military leave. (b)(6) can do it though.

From: Ballman, Luke
Sent: Tuesday, May 22, 2018 9:20 AM
To: Gacki, Andrea (b)(6); McGlynn, Dan (b)(6)
Subject: Wyden staff briefing

Andrea and Danny,

Who would you like to have brief Wyden staff on Torshin. Are (b)(6) and (b)(6) my best bets?

Thanks,
Luke

RE: Torshin briefing

From: "Ballman, Luke" <luke.ballman@treasury.gov>

To: (b)(6)

Cc: (b)(6)

Date: Tue, 29 May 2018 13:30:05 -0400

I'll confirm Tuesday. Thanks.

From: (b)(6)

Sent: Tuesday, May 29, 2018 1:28 PM

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

Cc: (b)(6)

Subject: RE: Torshin briefing

Either day is ok for me.

From: (b)(6)

Sent: Tuesday, May 29, 2018 1:19 PM

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

Cc: (b)(6)

Subject: RE: Torshin briefing

Luke,

I'm available next Tuesday afternoon. This Thursday is not good for me.

Thanks,

(b)(6)

From: Ballman, Luke

Sent: Tuesday, May 29, 2018 1:07 PM

To: (b)(6)

Cc: (b)(6)

Subject: Torshin briefing

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

Are you available to do the Torshin briefing next Tuesday afternoon? The staff also suggested this Thursday at 3 or 4 which works if (b)(6) can cover for me.

Thanks,
Luke

RE: Torshin briefing

From: (b)(6)
To: "Ballman, Luke" <luke.ballman@treasury.gov> (b)(6)
Cc: (b)(6)
Date: Tue, 29 May 2018 13:39:57 -0400

I'm quite flexible. Happy to work around anyone else's schedule.

From: Ballman, Luke
Sent: Tuesday, May 29, 2018 1:35 PM
To: (b)(6) (b)(6)
Cc: (b)(6)
Subject: RE: Torshin briefing

What times work best for you two?

From: (b)(6)
Sent: Tuesday, May 29, 2018 1:28 PM
To: (b)(6) Ballman, Luke <Luke.Ballman@treasury.gov>
Cc: (b)(6)
Subject: RE: Torshin briefing

Either day is ok for me.

From: (b)(6)
Sent: Tuesday, May 29, 2018 1:19 PM
To: Ballman, Luke <Luke.Ballman@treasury.gov>; (b)(6)
Cc: (b)(6)
Subject: RE: Torshin briefing

Luke,

I'm available next Tuesday afternoon. This Thursday is not good for me.

Thanks,
(b)(6)

From: Ballman, Luke
Sent: Tuesday, May 29, 2018 1:07 PM
To: (b)(6)
Cc: (b)(6)
Subject: Torshin briefing

(b)(6),

Are you available to do the Torshin briefing next Tuesday afternoon? The staff also suggested this Thursday at 3 or 4 which works if (b)(6) can cover for me.

Thanks,
Luke

RE: Torshin briefing

From: (b)(6)
To: "Ballman, Luke" <luke.ballman@treasury.gov>, (b)(6)
Date: Wed, 30 May 2018 11:39:07 -0400

Thanks. I'll take a look at the email. I would prefer a quick chat today if possible so I can get a steer for my prep.

From: Ballman, Luke
Sent: Wednesday, May 30, 2018 11:38 AM
To: (b)(6)
Subject: RE: Torshin briefing

I'm out after today but happy to meet today or Monday. I'll shoot you my email with them so you have a sense of the expectations I've been trying to set.

From: (b)(6)
Sent: Wednesday, May 30, 2018 11:26 AM
To: (b)(6) Ballman, Luke <Luke.Ballman@treasury.gov>; (b)(6)
Subject: RE: Torshin briefing

Sure. Could we meet up this week to discuss expectations?

From: (b)(6)
Sent: Wednesday, May 30, 2018 11:26 AM
To: Ballman, Luke <Luke.Ballman@treasury.gov> (b)(6)
Subject: RE: Torshin briefing

Fine for me. Thanks.

From: Ballman, Luke
Sent: Wednesday, May 30, 2018 11:25 AM
To: (b)(6)
Subject: RE: Torshin briefing

They have asked to shift to 4:30. Does that work for everyone?

From: (b)(6)
Date: May 29, 2018 at 5:17:52 PM EDT
To: (b)(6) Ballman, Luke <Luke.Ballman@treasury.gov>, (b)(6)
Subject: RE: Torshin briefing

Luke,

I am also available to staff. Happy to pass all our clearances once a time is set.

(b)(6), Senior Advisor, Office of Foreign Assets Control, U.S. Treasury Department, (b)(6) (O),
(b)(6) (M)

From: (b)(6)
Sent: Tuesday, May 29, 2018 1:40 PM
To: Ballman, Luke <Luke.Ballman@treasury.gov>; (b)(6)
Cc: (b)(6)
Subject: RE: Torshin briefing

I prefer later in the afternoon (i.e. around 4 pm), but I can do earlier if it's better for others.

From: Ballman, Luke
Sent: Tuesday, May 29, 2018 1:35 PM
To: (b)(6)

Duplicative of content in Bates No. 2018-06-192: 000717



19_011-E3-00004687

2018-06-192: 000719

From: [Ballman, Luke](#)
To: (b)(6)
Subject: FW: Briefing Request
Date: Wednesday, May 30, 2018 11:44:38 AM
Attachments: [Treasury Response Senator Wyden 4.26.2018.pdf](#)

See some of my interactions below and the attached response where we discuss Torshin.

From: Luke.Ballman@treasury.gov [<mailto:Luke.Ballman@treasury.gov>]
Sent: Thursday, May 17, 2018 4:23 PM
To: (b)(6)
Subject: RE: Briefing Request

(b)(6),

Just following up on our Tuesday discussion. I'm hopeful that I can offer dates tomorrow. I'm just waiting on one last thing before I can confirm the briefing. Again, I want to flag for you that this was a status based designation rather than a conduct based one. As such, we have limited information to share and you all likely already have access to it. Also, do you have access to CAPNET?

Best,
Luke

From: Ballman, Luke
Sent: Tuesday, May 1, 2018 1:48 PM
To: (b)(6)
Subject: RE: Briefing Request

(b)(6), let me find out what, if anything, we have on him. He was designated because of his position in the government as I recall.

In the interests of managing expectations, I've seen the media reports about NRA ties. To the extent there is any investigation related to that, we wouldn't be able to comment on it.

I'll let you know what else I find out.

Best,
Luke

From: (b)(6)
Date: May 1, 2018 at 12:35:39 PM EDT

2018-06-192: 000721

To: Pavlick, Stephen <Stephen.Pavlick@treasury.gov>

Subject: Briefing Request

Stephen –

We would like to get a briefing for cleared finance committee staff and the Senator's Intel staffer on why Alexander Torshin was named in the sanctions lists, and the justification. Could you help set that up?

(b)(6)

(b)(6)

International Trade Counsel
Senate Finance Committee
Senator Ron Wyden
219 Dirksen Senate Building

(b)(6)



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

April 26, 2018

The Honorable Ron Wyden
Ranking Member
Committee on Finance
United States Senate
Washington, DC 20510

Dear Senator Wyden:

I write in response to your recent letters to Secretary Mnuchin regarding Section 241 of the Countering America's Adversaries Through Sanctions Act (CAATSA); ties between Russian officials, namely Alexander Torshin, and the National Rifle Association; and the 2008 sale of a property owned by President Trump.

With regard to your question about sanctions, we share your concern about the "undisputed and urgent" threat posed by the Russian regime, including those officials and oligarchs who promote and enable its corruption, repression, and efforts to destabilize democratic societies. While the Department of the Treasury does not openly telegraph future sanctions actions, Secretary Mnuchin has made it clear that we are focused on countering Russia's malign conduct and those who enable it as evidenced by Treasury's robust use of the full range of available authorities.¹

In 2017, Treasury's Office of Foreign Assets Control (OFAC) imposed targeted sanctions on 58 individuals and entities related to Russia and Ukraine. On January 26, 2018, OFAC sanctioned 42 additional individuals and entities under four Executive Orders codified under CAATSA for their conduct in connection with Ukraine. In addition to targeting actions related to Ukraine, on December 20, 2017, OFAC designated five individuals pursuant to the Sergei Magnitsky Rule of Law Accountability Act of 2012, which brings the total designated under this program to forty-nine.

Also, on March 15, 2018, Treasury designated five entities and 19 individuals under CAATSA as well as Executive Order (E.O.) 13694 for malign Russian cyber activity, including their attempted interference in the U.S. elections.

Most recently, on April 6, 2018, OFAC, in consultation with the Department of State, designated seven Russian oligarchs and 12 companies they own or control, 17 senior Russian government

¹ These authorities include the Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014 and the Global Magnitsky Human Rights Accountability Act, as well as the Sergei Magnitsky Rule of Law Accountability Act of 2012 (the Magnitsky Act), the Ukraine Freedom Support Act of 2014, and the Countering America's Adversaries Through Sanctions Act (CAATSA) of 2017, and Executive Orders 13660, 13661, 13662, and 13685.

officials, and a state-owned Russian weapons trading company and its subsidiary, a Russian bank. This action targeted a number of the individuals listed in the Section 241 Report on Senior Foreign Political Figures and Oligarchs in the Russian Federation, including those who benefit from the Putin regime and play a key role in advancing Russia's malign activities.

Among those designated was Alexander Torshin, the State Secretary—Deputy Governor of the Central Bank of the Russian Federation. Torshin was designated pursuant to E.O. 13661, which CAATSA codified, for being an official of the Government of the Russian Federation. As this action made clear, Russian oligarchs and elites who profit from this corrupt system will no longer be insulated from the consequences of their government's destabilizing activities.


These targeted actions bring the total Russia and Ukraine-related sanctions designations to date by this administration to 136—in addition to nine Russians targeted for malign activities related to the North Korea sanctions program, two under E.O. 13582 (Syria), 24 under E.O. 13694 (Cyber) as amended, 11 under E.O. 13581 (Transnational Criminal Organizations), and two under the Global Magnitsky Human Rights Accountability Act. We welcome support from the Congress in our efforts to deter human rights abuses and other egregious acts in Russia and around the world.

As for the real estate transaction you reference, Treasury does not comment on specific cases. Furthermore, FinCEN must maintain the confidentiality of Suspicious Activity Reports to protect filers and potentially named individuals, among others, and to ensure that financial institutions continue to provide valuable lead information to law enforcement.

As you know, FinCEN engages in a "follow the money" approach. Its close collaboration with law enforcement is aimed at holding criminals accountable, including perpetrators of fraud, tax evaders, narcotics traffickers and terrorist groups. The primary objective of the Geographical Targeting Orders requiring title insurance companies to identify the natural persons behind shell companies used to pay for high-end residential real estate properties in Manhattan and Miami is to assess and combat the potential money laundering risks associated with luxury real estate purchases. I can assure you that we take our responsibilities in these areas extremely seriously as we work together to protect the national security of the United States.

If you have any further questions or concerns, please contact the Office of Legislative Affairs.

Sincerely,



Drew Maloney
Assistant Secretary for Legislative Affairs

cc: The Honorable Orrin G. Hatch

RE: Briefing Request

From: "Ballman, Luke" <luke.ballman@treasury.gov>

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

Date: Wed, 30 May 2018 12:12:31 -0400

Just invited you all.

From: (b)(6)

Sent: Wednesday, May 30, 2018 12:05 PM

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

(b)(6)

Subject: RE: Briefing Request

Thanks for forwarding. It's probably most efficient for us to meet as a group. I'm flexible all afternoon other than a 1-2pm meeting. Please let me know a good time. I can come to you or host in our space if you think we need a SCIF.

From: Ballman, Luke

Sent: Wednesday, May 30, 2018 11:45 AM

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

Subject: FW: Briefing Request

See some of my interactions below and the attached response where we discuss Torshin.

Duplicative of content in Bates Nos. 2018-06-192: 000721-000722



Duplicative of content in Bates No. 2018-06-192: 000722



RE: Torshin - Wyden

From: "Ballman, Luke" <luke.ballman@treasury.gov>

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

Date: Wed, 30 May 2018 12:13:46 -0400

I do, thanks.

From: (b)(6)

Sent: Wednesday, May 30, 2018 12:13 PM

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

Subject: RE: Torshin - Wyden

I can transfer clearances today, if you think that this time will stick.

(b)(6), Senior Advisor, Office of Foreign Assets Control, U.S. Treasury Department, (b)(6) (O),
(b)(6) (M)

-----Original Appointment-----

From: Ballman, Luke

Sent: Wednesday, May 30, 2018 12:12 PM

To: (b)(6)

Subject: Torshin - Wyden

When: Wednesday, May 30, 2018 3:30 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: 3124 MT

RE: Torshin - Wyden

From: (b)(6)
To: "Ballman, Luke" <luke.ballman@treasury.gov>, (b)(6)
Date: Wed, 30 May 2018 12:14:45 -0400

Any chance we could do 3 pm instead of 3:30? My afternoon is pretty booked and 3:00 to 3:25 is really the best window for me, unless we can meet after 4:30 pm.

-----Original Appointment-----

From: Ballman, Luke
Sent: Wednesday, May 30, 2018 12:12 PM
To: (b)(6)
Subject: Torshin - Wyden
When: Wednesday, May 30, 2018 3:30 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: 3124 MT

Torshin Briefing to Wyden

From: (b)(6)
To: "Trew, Heather" (b)(6)
Date: Thu, 31 May 2018 10:42:30 -0400

Dear Heather, (b)(6), and (b)(6),

Luke asked me (b)(5) next Tuesday to discuss the Torshin designation with Wyden's staff. I defer to you all on who should attend. I can pass their clearances.

Best,

(b)(6)
Senior Advisor
Office of Foreign Assets Control
U.S. Treasury Department

(b)(6)
(b)(6) (O)
(M)

TFI LEGISLATIVE AFFAIRS WEEK AHEAD
6/4 to 6/8/2018

Hearings:

- HFSC TIF has requested FinCEN to testify at a June 20th hearing titled, “Law Enforcement Response to Illicit Use of Virtual Currency.” FinCEN witness still TBD. Other witnesses on the panel will include: Deputy Assistant Director Robert Novy, Criminal Investigative Division and Cyber Policy, USSS; Deputy Assistant Director Gregory Nevano, Illicit Trade, Travel, and Finance Division, HSI; and an FBI witness that is still TBD.

Meetings and briefings:

Staff:

- Monday, June 4: OFAC staff will discuss the Iranian Leadership Assets Transparency Act with Senator Coons’ staff.
- Tuesday, June 5: OFAC Associate Director Lisa Palluconi will brief House Ways and Means staff in response to a recent letter.
- Tuesday, June 5: OIA and OFAC staff will brief Senator Wyden’s Trade Counsel on the recent designation of Alexander Torshin.
- During the week of June 4: TFI staff will hold a call with HFAC Majority staff on Treasury’s efforts to address wildlife trafficking, following up on the Committee’s hearing last week.

Clearances - Monday 6/4

From: (b)(6)
To: "Gacki, Andrea" (b)(6) "Smith, Bradley" (b)(6) "Palluconi, Lisa"
(b)(6) "Gatjanis, Gregory" (b)(6) "Conklin, Todd"
(b)(6) "Dondarski, Michael" (b)(6)
(b)(6) "Manfull, Alexandre" (b)(6) "Battie, John"
(b)(6) "Trew, Heather" (b)(6)
Date: Mon, 04 Jun 2018 09:17:25 -0400

CLEARANCES/REVIEWS Monday

- Cyber secondary sanctions chart (b)(6)

ADDITIONAL PENDING ITEMS

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

OTHER MEETINGS/FYI

- June 5: OFAC/State meeting with Amb. Mulhall (Andrea)
- May 31: Meeting with Danish Ambassador (Andrea)
- June 7: (b)(6) PCC (Andrea)
- June 9-15: Possible SPM Africa Trip
- June 12: Meeting with Australian Ambassador to Iran (Andrea/Brad)

ACTIONS - TENTATIVE TIMING

(b)(5)

SPEAKING ENGAGEMENTS

- June 4: U.S. Chamber of Commerce Iran Meeting

LEGISLATIVE

- Tuesday, June 5: OFAC Associate Director Lisa Palluconi will brief House Ways and Means staff in response to a recent letter.
- Tuesday, June 5: OIA and OFAC staff will brief Senator Wyden's Trade Counsel on the recent designation of Alexander Torshin.

(b)(6)
Senior Advisor
Office of Foreign Assets Control
U.S. Treasury Department

(b)(6)

(b)(6) (U)
(M)

RE: Torshin - Wyden

(b)(5)

From: (b)(6)
Sent: Monday, June 04, 2018 4:55 PM
To: (b)(6) Ballman, Luke
Subject: RE: Torshin - Wyden

Are any of you returning to MT after the meeting tomorrow afternoon? If not, is there a place I could destroy my notes? I would like to head directly home from the meeting if possible.

From: (b)(6)
Sent: Wednesday, May 30, 2018 1:38 PM
To: (b)(6) Ballman, Luke <Luke.Ballman@treasury.gov>; (b)(6)
Subject: RE: Torshin - Wyden

Clearances are passed for next Tuesday at 4:30pm

(b)(6), Senior Advisor, Office of Foreign Assets Control, U.S. Treasury Department. (b)(6) (O),
(b)(6) (M)

From: (b)(6)
Sent: Wednesday, May 30, 2018 12:46 PM
To: Ballman, Luke <Luke.Ballman@treasury.gov>; (b)(6)
Subject: RE: Torshin - Wyden

All,

I'm very sorry for this, but I have another conflict at 3 pm (I thought I could get out of it, but just spoke to my manager and she was insistent that I attend). Any chance we could do 4:30 instead? Again, apologies for backtracking on my previous time change.

-----Original Appointment-----

From: Ballman, Luke
Sent: Wednesday, May 30, 2018 12:43 PM
To: (b)(6)
Subject: Torshin - Wyden
When: Wednesday, May 30, 2018 3:00 PM-3:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: 3124 MT

19_011-E3-00005182

2018-06-192: 000735

RE: Torshin - Wyden

From: "Ballman, Luke" <luke.ballman@treasury.gov>

To: (b)(6)

Date: Mon, 04 Jun 2018 18:23:12 -0400

Most likely. I'll try to confirm.

From: (b)(6)

Date: June 4, 2018 at 5:49:01 PM EDT

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

Subject: RE: Torshin - Wyden

Is there a shredder or somewhere I can trash my stuff?

From: Ballman, Luke <Luke.Ballman@treasury.gov>

Date: June 4, 2018 at 5:45:12 PM EDT

To: (b)(6)

Subject: RE: Torshin - Wyden

I will not be. Sorry!

From: (b)(6)

Date: June 4, 2018 at 5:34:12 PM EDT

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

Subject: RE: Torshin - Wyden

I'm hoping I won't have to go back to Treasury, but there's a pretty good chance I will and I'd be happy to bring your bag back if I do.

From: (b)(6)

Sent: Monday, June 04, 2018 5:33 PM

To: (b)(6) Ballman, Luke

Subject: RE: Torshin - Wyden

Luke is going to take this one for us. I bet that one of them may be coming back here first.

From: (b)(6)

Sent: Monday, June 04, 2018 4:55 PM

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

Subject: RE: Torshin - Wyden

Are any of you returning to MT after the meeting tomorrow afternoon? If not, is there a place I could destroy my notes? I would like to head directly home from the meeting if possible.

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

Subject: RE: Torshin - Wyden

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(b)(6) (M)

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Subject: Torshin - Wyden
When: Wednesday, May 30, 2018 3:00 PM-3:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: 3124 MT

CLEARANCES - Tuesday 6/5

From: (b)(6)
To: "Gacki, Andrea" (b)(6) "Smith, Bradley" (b)(6) "Palluconi, Lisa"
(b)(6) "Gajanis, Gregory" (b)(6) "Donkins, Todd"
(b)(6) "Dondarski, Michael" (b)(6)
(b)(6) "Manfull, Alexandre" (b)(6) "Battie, John"
(b)(6) "Trew, Heather" (b)(6) (b)(6)
(b)(6)

Date: Tue, 05 Jun 2018 07:26:00 -0400

CLEARANCES/REVIEWS TUESDAY

- None

ADDITIONAL PENDING ITEMS

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

OTHER MEETINGS/FYI

- June 5: OFAC/State meeting with Amb. Mulhall (Andrea)
- June 6: (b)(5) sub-CSG/PCC (b)(6)
- June 6: (b)(5) Small Group (TBC)
- June 7: (b)(5) PCC (Lisa) (b)(6)
- June 7: (b)(5) PCC (TBC)
- May 31: Meeting with Danish Ambassador (Andrea)
- June 7: (b)(6) PCC (Andrea)
- June 9-15: SPM Africa Trip
- June 12: Meeting with Australian Ambassador to Iran (Andrea/Brad)

ACTIONS - TENTATIVE TIMING

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(b)(6)

Senior Advisor
Office of Foreign Assets Control
U.S. Treasury Department

(b)(6)
(b)(6) (U)
(M)