

## RE: Calls from counsel for RWC Group

---

**From:** "Gacki, Andrea" (b)(6)  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Date:** Tue, 21 Oct 2014 16:17:52 -0400

Thank you, (b)(6)! This is enough for me to call him back.

---

**From:** (b)(6)  
**Sent:** Tuesday, October 21, 2014 4:17 PM  
**To:** Gacki, Andrea  
**Cc:** (b)(6)  
**Subject:** RE: Calls from counsel for RWC Group

Hi Andrea,

RWC Group has two applications with us – one is a request for authorization to import KC products. (b)(6) and I spoke with Mike a few weeks ago and, to my recollection, he was going to email me supplemental material updating us on the status of the goods in question. He mentioned that they were (b)(4). (b)(4) He has yet to send me the updated information, so Ukraine2-2014-311316-1 is pending with me. (b)(5)  
(b)(5)

They have a separate application requesting guidance on Baikal (Ukraine-EO13661-2014-311648-1). Mike did recently send me updated information on this request and the IG letter is now under review.

If you need any other information, let me know.

Thanks!  
(b)(6)

---

**From:** Gacki, Andrea  
**Sent:** Tuesday, October 21, 2014 4:05 PM  
**To:** (b)(6)  
**Subject:** Calls from counsel for RWC Group

Hi, guys – I got a call from both Mike Faucette and Mark Barnes regarding (b)(4) RWC's existing request for guidance (or is it authorization?).

Mark Barnes in particular has asked for a call back (at 202-626-0070) from me.

Happy to make the call, if you guys could tell me the latest, at your convenience?

Andrea

Andrea Gacki  
Assistant Director for Licensing  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
(b)(6) (o)

This document is made available through the declassification efforts  
and research of John Greenewald, Jr., creator of:

# The Black Vault

---



The Black Vault is the largest online Freedom of Information Act (FOIA)  
document clearinghouse in the world. The research efforts here are  
responsible for the declassification of hundreds of thousands of pages  
released by the U.S. Government & Military.

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

## RE: Calls from counsel for RWC Group

---

**From:** (b)(6)  
**To:** "Gacki, Andrea" (b)(6)  
**Date:** Tue, 21 Oct 2014 16:28:33 -0400

---

Hi Andrea,

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

Thanks!  
(b)(6)

---

**From:** Gacki, Andrea  
**Sent:** Tuesday, October 21, 2014 4:26 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Calls from counsel for RWC Group

Thanks again, (b)(6). Here's what Mark Barnes said:

- They hope to send the new requested info on the (b)(4) request (Ukraine2-2014-311316-1) very shortly, perhaps as early as today.
- On the Baikal request, (b)(4)

(b)(4) I also thanked him for the additional info on the Baikal request and let him know our response was under review.

Also adding (b)(6) who has prior association with this matter, (b)(5)?

---

**From:** (b)(6)  
**Sent:** Tuesday, October 21, 2014 4:17 PM  
**To:** Gacki, Andrea  
**Cc:** (b)(6)  
**Subject:** RE: Calls from counsel for RWC Group

Duplicative of content in Bates No. 2018-08-116: 000558

[REDACTED]

**RE: Calls from counsel for RWC Group**

---

**From:** (b)(6)  
**To:** "Gacki, Andrea" (b)(6)  
**Cc:** (b)(6) "Smith, Bradley" (b)(6)  
**Date:** Tue, 21 Oct 2014 17:36:32 -0400

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

---

**From:** Gacki, Andrea  
**Sent:** Tuesday, October 21, 2014 4:26 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Calls from counsel for RWC Group

Duplicative of content in Bates No. 2018-08-116: 000559





RE: State Referral for Ukraine2-2014-311316-1 - revised request - Livelink  
1183 KB

From: (b)(6)  
To: non-isra@state.gov, State (b)(6)  
Cc: State (b)(6)  
(b)(6)  
"Smith, Bradley" (b)(6)  
Andrea (b)(6) "Gacki,  
(b)(6)  
Date: Thu, 23 Oct 2014 20:28:43 -0400  
Attachments: Ukraine2-2014-311316-1\_Updated Request.pdf - 210 KB (0 bytes); Ukraine2-2014-311316-1\_Original Request.pdf - 785 KB (0 bytes); State Memo.pdf - 173 KB (0 bytes)

OFAC has received a revised request from the Russian Weapon Company Group LLC ("RWC") (the "Application") (attached) for authorization to sell on consignment, rather than import into the U.S. as requested in their initial application, (b)(4) from Kalashnikov Concern ("KC"), an entity designated under Executive Order 13661 ("E.O. 13661") on July 16, 2014, to (b)(4)

According to the Application, (b)(4) the "Cargo") were in transit to the U.S. when KC was designated. According to RWC's updated request, the Cargo was initially offloaded in (b)(4) in order to allow OFAC time to consider RWC's initial import request (attached); however, (b)(4) only allows goods to be held in port for (b)(4) before they must be imported or moved. Currently, the Cargo is in (b)(4)

(b)(4)

(b)(4) has been granted (b)(4) import permit for the Cargo; however, RWC will not draw up a contract or enter into an official agreement with (b)(4) regarding the sale of the Cargo until OFAC authorization is received. (b)(4)

(b)(4) RWC also notes that it continues to explore a possible sale of (b)(4) but, in the interest of national security, would like the Cargo to be secured in (b)(4) as quickly as possible.

State (b)(5), Treasury (b)(4)

If you have any questions about the Application, please feel free to contact (b)(6), Case Officer, or (b)(6) (b)(6), Ukraine Program Manager.

Duplicative of content in Bates No. 2018-08-116: 000424

Duplicative of content in Bates No. 2018-08-116: 000424





Russlan Weapon Company Group LLC  
www.rwcgroupllc.com

911 William Leigh Dr. - Tullytown, PA 19007 • phone: 1.866.611.9576 • phone: 215.949.9944 • fax: 215.949.9191

October 22, 2014

Andrea Gacki  
Assistant Director for Licensing  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

**RE: Supplemental Request of OFAC License for RWC Group, LLC: Case Number  
UKRAINE2-2014-311316-1**

Dear Ms. Gacki:

The purpose of this letter is to request a license to allow the shipment and sale of goods that may otherwise be prohibited by OFAC, to (b)(4) as a supplement to license request Case Number UKRAINE2-2014-311316-1."

On July 16, 2014, the U.S. Department of Treasury's Office of Foreign Assets Control ("OFAC") placed Kalashnikov Concern ("KC") on the Specially Designated Nationals List ("SDN") pursuant to Executive Order 13661 of March 16, 2014, "Blocking Property of Additional Persons Contributing to the Situation in Ukraine." This action by OFAC effectively prohibits RWC Group, LLC ("RWC") from engaging in any future commercial dealings with KC.

2018-08-116: 000563



Russian Weapon Company Group LLC  
www.rwcgroupllc.com

911 William Leigh Dr. - Tullytown, PA 19007 • phone: 1.866.611.9576 • phone: 215.949.9944 • fax: 215.949.9191

RWC Group, LLC ("RWC") is the exclusive U.S. importer of products from KC. (b)(4)

(b)(4)

## I. Background

Before OFAC sanctions were imposed on July 16, 2014, RWC had (b)(4) from KC in transit and on the water. KC immediately relinquished its interest in the (b)(4). In order to give OFAC time to process a license, we had the (b)(4) offloaded in (b)(4). (b)(4) only allows goods to be held in port for (b)(4) before they must be imported or moved. We then asked that the goods continue on to the U.S. (b)(4)

(b)(4)

(b)(4)

## II. Request to Sell to Third Party

RWC would like to sell the containers on a consignment basis to (b)(4)

(b)(4)

We





Russian Weapon Company Group LLC  
www.rwcgroupllc.com

911 William Leigh Dr. - Tullytown, PA 19007 • phone: 1.866.611.9576 • phone: 215.949.9944 • fax: 215.949.9191

have yet to draw up any contract or enter into an official agreement with (b)(4) until OFAC indicates this is something that may be permissible. In the meantime, (b)(4) has received the (b)(4) import permit and is awaiting final approval in the event OFAC allows us to proceed with such a plan.

(b)(4)

In addition to this potential consignment sale to (b)(4) RWC continues to explore a possible sale to (b)(4). However, in the interests of national security we think it is most important that these (b)(4) be secured in (b)(4) as quickly as possible.

### III. Conclusion

(b)(4) We appreciate and respect that these are blocked goods that OFAC has ultimate transfer authority over. (b)(4)  
(b)(4)

(b)(4)

For the aforementioned reasons, we respectfully request that OFAC approve a specific license for the sale of these (b)(4) on a consignment basis to (b)(4)

(b)(4)



Russian Weapon Company Group LLC  
www.rwcgroupllc.com

911 William Leigh Dr. - Tullytown, PA 19007 • phone: 1.866.611.9576 • phone: 215.949.9944 • fax: 215.949.9191

We also would like to respectfully request that the privileged and confidential trade secret, commercial, and financial information contained in this letter be withheld from public disclosure pursuant to 5 U.S.C. § 522(b)(4) of the Freedom of Information Act.

If you require any further information, please do not hesitate to contact Jay Portz at (215) 949-9944 x106 or [jay@rwcgroupllc.com](mailto:jay@rwcgroupllc.com). Alternatively, you may contact our outside counsel, Michael Faucette of Mark Barnes & Associates at (202) 626-0085 or [michael.faucette@mbassociateslaw.com](mailto:michael.faucette@mbassociateslaw.com).

Respectfully,

(b)(6)

Jay Portz

Vice President

RWC Group, LLC



United States Department of State

Washington, D.C. 20520

August 4, 2014

UNCLASSIFIED  
**MEMORANDUM**

TO: Adam Szubin  
Director  
Office of Foreign Assets Control  
Department of the Treasury

FROM: **State (b)(6)**  
Director  
Office of Sanctions Policy and Implementation

SUBJECT: UKRAINE2-2014-311316

**State (b)(5)**

**State (b)(5)** We have since learned that the shipment has not arrived, and it is unclear when it will arrive.

**Recommendation**

**State (b)(5)**

UNCLASSIFIED

2018-08-116: 000570



**FW: State Referral for Ukraine2-2014-311316-1 - revised request - Livelink  
1181 KB**

---

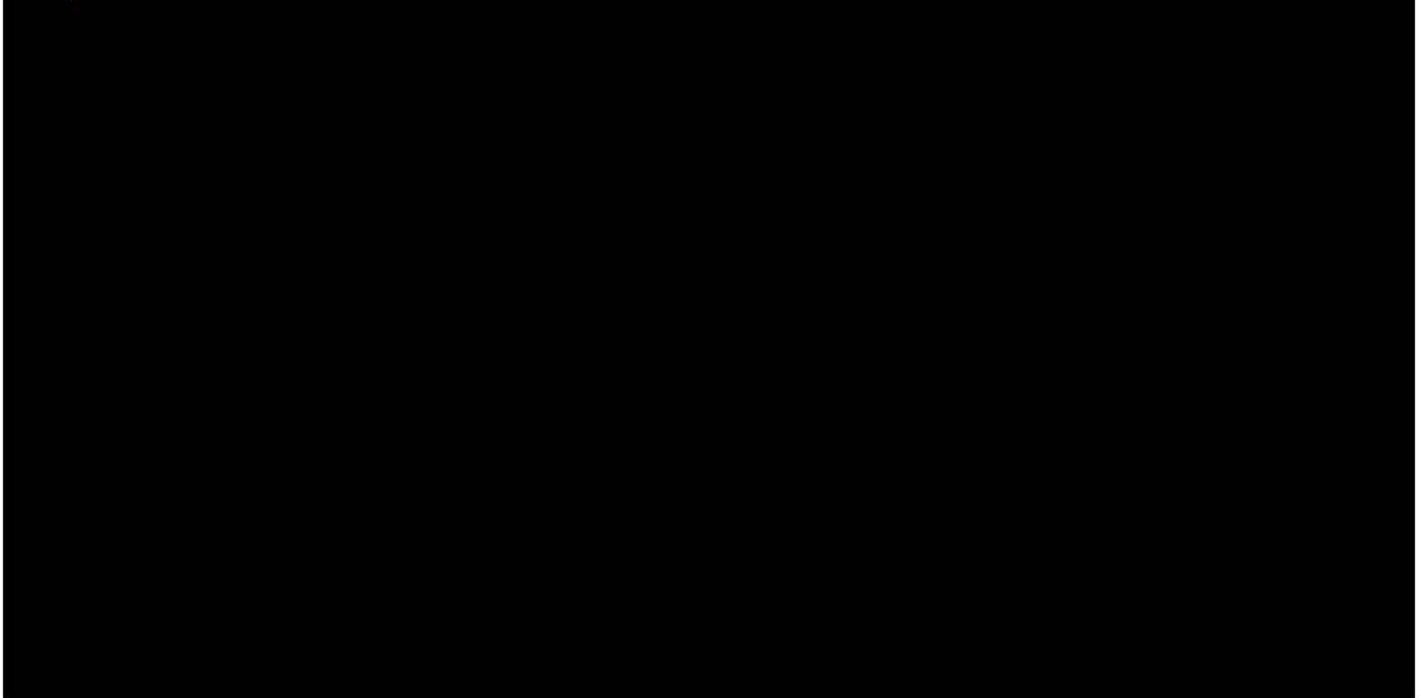
**From:** "Gacki, Andrea" (b)(6)  
**To:** (b)(6) >  
**Date:** Mon, 27 Oct 2014 09:58:12 -0400  
**Attachments:** Ukraine2-2014-311316-1\_Updated Request.pdf - 210 KB (0 bytes); Ukraine2-2014-311316-1\_Original Request.pdf - 785 KB (0 bytes); State Memo.pdf - 173 KB (0 bytes)

Hi, (b)(6) and (b)(6) — hope you had great weekends. I just got a call from Mike Faucette (202-626-0085). He says (b)(4)  
(b)(4)

Andrea

**Duplicative of content in Bates No. 2018-08-116: 000561**

Duplicative of content in Bates Nos. 2018-08-116: 000561-000562



**RE: State Referral for Ukraine2-2014-311316-1 - revised request**

---

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

**To:** "Gacki, Andrea" (b)(6)

**Date:** Mon, 27 Oct 2014 09:59:14 -0400

---

Will do.

Duplicative of content in Bates No. 2018-08-116: 000571



Duplicative of content in Bates Nos. 2018-08-116: 000571-000572



**Fw:**

(b)(5)

**From:** "Smith, John" (b)(6)

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

**Cc:** "Gacki, Andrea" (b)(6)

**Date:** Tue, 28 Oct 2014 14:45:09 -0400

Fyi

**From:** Gacki, Andrea

**Sent:** Tuesday, October 28, 2014 02:40 PM

**To:** Chemali, Hagar

**Cc:** (b)(6) Smith, John; Szubin, Adam; (b)(6)

**Subject:** (b)(5)

Hi, Hagar

(b)(5)

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

Let me know if you need anything further—

Andrea

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

**Sent:** Monday, October 27, 2014 10:04 AM

**To:** non-TSRA@state.gov; State (b)(6) State (b)(6)

**Cc:** (b)(6); Smith, Bradley; Gacki, Andrea; Tuchband, Matthew

**Subject:** RE: State Referral for Ukraine2-2014-311316-1 - revised request

Hi State;

Mike Faucette just called OFAC to tell us

(b)(4)

(b)(4)

Can you tell us where things stand with your review?

Thank you,

(b)(6)

Duplicative of content in Bates No. 2018-08-116: 000561



RE:

(b)(5)

From: "Chemali, Hagar" (b)(6)

To: "Gacki, Andrea" (b)(6)

Cc: (b)(6) "Smith, John" (b)(6) "Szubin, Adam" (b)(6)

Date: Tue, 28 Oct 2014 16:25:42 -0400

(b)(5)

HHH

From: Gacki, Andrea

Sent: Tuesday, October 28, 2014 2:41 PM

To: Chemali, Hagar

Cc: (b)(6); Smith, John; Szubin, Adam; (b)(6)

Subject: (b)(5)

Duplicative of content in Bates No. 2018-08-116: 000575





## RE: FP for Ukraine2-2014-311316-1

**From:** (b)(6)  
**To:** (b)(6)  
"Smith, Bradley" (b)(6)  
**Cc:** (b)(6) Gacki, Andrea" (b)(6)  
**Date:** Wed, 29 Oct 2014 12:33:43 -0400  
**Attachments:** FP\_Ukraine2\_2014\_311316-1.pdf (340.54 kB)

Hi Counsel:

I cleared on the draft cover letter/license for RWC regarding the (b)(4) (b)(4) and sent the file to Counsel with a request for expedited review. Please let me know if you have any questions.

Thank you,

(b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, October 29, 2014 10:39 AM  
**To:** (b)(6)  
**Subject:** FW: FP for Ukraine2-2014-311316-1

Hi (b)(6),

I've sent the RWC draft license for you to review. Also, I kept the cover letter in there, but just updated it a bit.

Thanks  
(b)(6)

---

**From:** State (b)(6)  
**Sent:** Wednesday, October 29, 2014 9:23 AM  
**To:** State (b)(6) (b)(6) non-TSRA: State (b)(6)  
**Cc:** (b)(6) Smith, Bradley; Gacki, Andrea; Tuchband, Matthew State (b)(6)  
**Subject:** FP for Ukraine2-2014-311316-1

Hi all- see attached.

Thanks for the patience and the opportunity!

State (b)(6)

SBU  
This email is UNCLASSIFIED.

---

**From:** State (b)(6)  
**Sent:** Monday, October 27, 2014 10:11 AM  
**To:** (b)(6) non-TSRA: State (b)(6)  
**Cc:** (b)(6) (b)(6) (b)(6) State (b)(6) Bradley, Smith (b)(6)  
'andrea.gacki' (b)(6) 'Matthew.Tuchband' (b)(6) State (b)(6)  
**Subject:** Re: State Referral for Ukraine2-2014-311316-1 - revised request

Adding State (b)(6) and State (b)(6), who can give you the latest.

---

**From :** (b)(6)  
**Sent:** Monday, October 27, 2014 10:04 AM Eastern Standard Time  
**To:** non-TSRA: State (b)(6)  
**Cc:** (b)(6) (b)(6) Bradley, Smith (b)(6)  
(b)(6) Andrea.Gacki; Matthew.Tuchband (b)(6)  
**Subject:** RE: State Referral for Ukraine2-2014-311316-1 - revised request

Hi State:

Mike Faucette just called OFAC to tell us (b)(4) (b)(4) Can you tell us where things stand with your review?

2018-08-116: 000579

Thank you,

(b)(6)

Duplicative of content in Bates Nos. 2018-08-116: 000561-000562



Duplicative of content in Bates No. 2018-08-116: 000562





United States Department of State

Washington, D.C. 20520

Oct 29, 2014

**UNCLASSIFIED**  
**MEMORANDUM**

TO: Adam Szubin  
Director  
Office of Foreign Assets Control  
Department of the Treasury

FROM: **State (b)(6)**  
Director  
Office of Sanctions Policy and Implementation

SUBJECT: Ukraine2-2014-311316-1 ("RWC")

**Background:**

OFAC has received a revised request from the Russian Weapon Company Group LLC ("RWC") for authorization to sell on consignment, rather than import into the U.S. as requested in their initial application, (b)(4)

(b)(4) from Kalashnikov Concern ("KC"), an entity designated under Executive Order 13661 ("E.O. 13661") on July 16, 2014, to (b)(4)  
(b)(4)

According to the Application, (b)(4)  
(b)(4) (the "Cargo") were in transit to the U.S. when KC was designated. Currently, the Cargo is in (b)(4)

**(b)(4)**

(b)(4) has been granted (b)(4) import permit for the Cargo; however, RWC will not draw up a contract or enter into an official agreement with (b)(4) regarding the sale of the Cargo until OFAC authorization is received. (b)(4)

(b)(4)  
(b)(4) RWC also notes  
that it continues to explore a possible sale of (b)(4)

UNCLASSIFIED

2018-08-116: 000582

UNCLASSIFIED

(b)(4) but, in the interest of national security, would like the Cargo to be secured in (b)(4) as quickly as possible.

**Recommendation:**

**State (b)(5), Treasury (b)(4)**

## RE: RWC - Case Number UKRAINE2-2014-311316-1

---

**From:** (b)(6)  
**To:** "Gacki, Andrea" (b)(6)  
**Cc:** (b)(6)  
**Date:** Tue, 04 Nov 2014 09:26:41 -0500  
**Attachments:** RWC - (b)(4) Sale.pdf (208.88 kB); ATT00001.htm (6.08 kB)

---

Hi Andrea:

Fyi, (b)(6) has sent the RWC draft license to dispose of the Kalashnikov (b)(4) to you for final review and signature and marked it as a priority.

(b)(6)

---

**From:** Michael Faucette [mailto:michael.faucette@mbassociateslaw.com]  
**Sent:** Wednesday, October 22, 2014 5:40 PM  
**To:** (b)(6)  
**Cc:** (b)(6); Gacki, Andrea  
**Subject:** RWC - Case Number UKRAINE2-2014-311316-1

Good afternoon, (b)(6)

Please find attached an amendment to our license for the (b)(4). We are requesting that they be sold to (b)(4).  
(b)(4)  
(b)(4) Please do not hesitate to contact me with any further information you require. Thank you again for all the help you have provided!



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.

Bates Nos. 2018-08-116:  
000586-000589

Duplicate Document at  
Bates Nos. 2018-08-116:  
000563-000566

RE: RWC - Case Number UKRAINE2-2014-311316-1

---

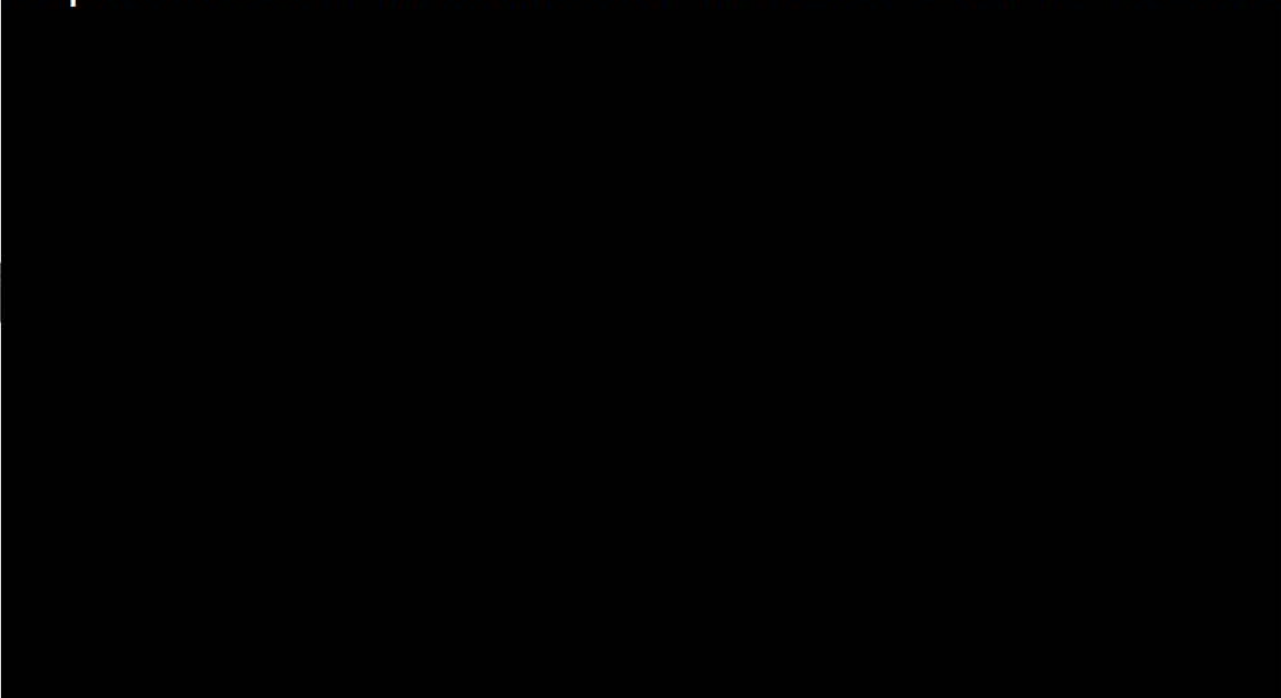
From: "Gacki, Andrea"  
To: (b)(6)  
Cc: (b)(6)  
Date: Tue, 04 Nov 2014 09:31:54 -0500

(b)(6)

---

Thx!

Duplicative of content in Bates No. 2018-08-116: 000584



## RE: Kalashnikov / Trademarks Question

From: "Manfull, Alexandre" (b)(6)

To: (b)(6)

Date: Wed, 12 Nov 2014 15:21:49 -0500

I'd (b)(5)

From: (b)(6)

Sent: Wednesday, November 12, 2014 2:36 PM

To: Manfull, Alexandre; (b)(6)

Subject: FW: Kalashnikov / Trademarks Question

Hello Everyone-

We had this question come in recently.

I think it's (b)(5) Anyone have any thoughts?

best-

(b)(6)

From: Michael Faucette [mailto:michael.faucette@mbassociateslaw.com]

Sent: Friday, November 07, 2014 2:59 PM

To: (b)(6)

Cc: caroline.watson@mbassociateslaw.com Watson

Subject: Kalashnikov / Trademarks Question

Hi (b)(6),

Thanks again for discussing the "Kalashnikov Concern" trademark matter with me last week. As you mentioned over the phone, I have written up a two-part question concerning the use of trademarks and compliance with the Ukraine-related sanctions:

It is clear that trademarks are a kind of property which may be blocked under the Ukraine-related sanctions. 31 C.F.R. § 589.308. However, our question concerns (1) the use of trademarks not legally owned by a sanctioned entity on the SDN List, and (2) the use of trademarks registered to a sanctioned entity but which does not involve any transaction with or benefit to the sanctioned entity.

1. First, if a trademark/logo used by the sanctioned entity is not legally registered or owned by the sanctioned entity in the United States or internationally (or even in the Russian Federation), can a U.S. entity independently register and use that trademark/logo on its own products without engaging in a prohibited transaction?

The Executive Orders 13360, 13361, and 13362 provide that "[a]ll property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the following persons are blocked and **may not be transferred, paid, exported, withdrawn, or otherwise dealt in...**" Section 1. (a) (emphasis added). The orders further clarify that "[t]he prohibitions in section 1...include but are not limited to: (a) the **making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked** pursuant to this order." Section 4 (emphasis added).

In this particular situation involving an unregistered trademark, we believe that the U.S. entity would not engage in any prohibited transactions with the sanctioned entity. While the sanctioned entity may use (or have used) the trademark on its products, it never registered or obtained the trademark in the United States or internationally. Consequently, the sanctioned entity has no recognized legal interest in the property as a trademark in the United States, meaning the trademark is not covered by the Ukraine-related sanctions. While not necessary, the U.S. entity could legally obtain the trademark by registering the previously unregistered trademark in the United States with the USPTO. Furthermore, because it would be the first to register and legally own the trademark in the United States, the U.S. entity's use of the trademark on its own products would not violate the sanctions, as it would hold the sole legal interest in the property. The U.S. entity would not pay or deal with the sanctioned

entity to obtain or use the trademark, would not transfer anything to the sanctioned entity, and would not be contributing funds, goods, or services to or for the benefit of the sanctioned entity. Therefore we find that such registration and use of the trademark would not violate any aspect of the Ukraine-related sanctions. Please confirm if you can concur with this analysis.

**2. Secondly**, if the sanctioned entity does own a trademark in the United States, can a U.S. entity still use the trademark on its own products independently without violating the sanctions as long as there is no transaction involving the sanctioned entity?

OFAC gave the following guidance concerning products of a certain sanctioned entity Kalashnikov Concern (in response to the question "If I own a Kalashnikov product, is that product blocked by sanctions? Am I able to resell a Kalashnikov product at a gun show or other secondary market?"): "If a U.S. person is in possession of a Kalashnikov Concern product that was bought and fully paid for prior to the date of designation (i.e., no payment remains due to Kalashnikov Concern), then that product is not blocked and **OFAC sanctions would not prohibit the U.S. person from keeping or selling the product in the secondary market, so long as Kalashnikov Concern has no interest in the transaction. New transactions by U.S. persons with Kalashnikov Concern are prohibited**, however, and **any property in which Kalashnikov Concern has an interest is blocked pursuant to OFAC's designation of Kalashnikov Concern** on July 16, 2014. If a U.S. person has an inventory of Kalashnikov Concern **products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment)**, we advise that U.S. person to contact OFAC for further guidance on handling of the inventory." OFAC Frequently Asked Questions and Answers, Questions Related to Sectoral Sanctions under Executive Order 13662 at 374 (emphasis added).

We believe the independent use of a trademark, registered to a sanctioned entity, by a U.S. entity on independently manufactured products is equivalent to the resale of products obtained from the sanctioned entity prior to the imposition of sanctions, which is allowed by OFAC. Just like the permitted sale of such products on a secondary market by a U.S. entity, the use of the trademark in this situation where a U.S. entity independently marks its own products with a trademark registered to a sanctioned entity and then sells these products without any payment, compensation, or consignment to the sanctioned entity, would not violate the sanctions, because the sanctioned entity has no interest in the U.S. entity's transaction(s). If the sanctioned entity is deemed to have no sanctioned interest in the trademark on its own product sold on the secondary market by a U.S. entity, then it should not have a sanctioned interest in the trademark independently used on a U.S. entity's product and sold by the U.S. entity. Therefore, in our opinion, even if a sanctioned entity owns a trademark in the United States, a U.S. entity may still independently use the trademark on its own products without violating the sanctions as long as there is no transaction involving the sanctioned entity. Please let us know if you agree with this position.

We would greatly appreciate any guidance or thoughts you or your office may have on this issue.

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.

**RE: ATF issues related to Russian arms sector sanctions - Livelink 148 KB**

**From:** (b)(6)  
**To:** "Buckingham, Stephen (CIV)" DOJ (b)(6), (b)(7)(C) "Smith, Bradley" (b)(6)  
**Cc:** "Kelleher, Diane (CIV)" DOJ (b)(6) "Lee, Lynn (CIV)" DOJ (b)(6) "Mei, Vesper (CIV)"  
DOJ (b)(6) "Powell, Amy (CIV)" DOJ (b)(6) "Bowen, Brigham (CIV)"  
DOJ (b)(6) "Berwick, Benjamin L. (CIV)" DOJ (b)(6) (b)(6)  
**Date:** Sat, 15 Nov 2014 15:59:29 -0500  
**Attachments:** RWC lic.pdf - 77 KB (0 bytes); RWC cl.pdf - 51 KB (0 bytes)

Steve,

Apologies for the delayed response on this.

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

If there's any additional information that you need or would like to discuss, please let us know.

Thanks,

(b)(6)

**From:** Buckingham, Stephen (CIV) DOJ (b)(6), (b)(7)(C)  
**Sent:** Wednesday, November 05, 2014 11:15 AM  
**To:** Smith, Bradley; (b)(6)  
**Cc:** Kelleher, Diane (CIV); Lee, Lynn (CIV); Mei, Vesper (CIV); Powell, Amy (CIV); Bowen, Brigham (CIV); Berwick, Benjamin L. (CIV)  
**Subject:** RE: ATF issues related to Russian arms sector sanctions

One clarification – we may end up attempting to resolve this through the inter-agency process rather than convening a formal IPC.

Best,

Steve

**From:** Buckingham, Stephen (CIV)  
**Sent:** Wednesday, November 05, 2014 9:42 AM  
**To:** Bradley, Smith (b)(6)  
**Cc:** Kelleher, Diane (CIV); Lee, Lynn (CIV); Mei, Vesper (CIV) DOJ (b)(6) Powell, Amy (CIV); Bowen, Brigham (CIV); Berwick, Benjamin L. (CIV)  
**Subject:** ATF issues related to Russian arms sector sanctions

DOJ (b)(5), Treasury (b)(6)



# DOJ (b)(5), Treasury (b)(6)



Best,

Steve

Stephen J. Buckingham  
Trial Attorney  
United States Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Avenue NW  
Washington, DC 20530  
Telephone: DOJ (b)(6)  
Fax: (202) 616-8470  
E-mail: DOJ (b)(6), (b)(7)(C)





DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

**LICENSE No. UKRAINE2-2014-311316-1**

**LICENSE**

**Ukraine-Related Sanctions Regulations**

Granted under the authority of one or more of 50 U.S.C. §§ 1701-06, 50 U.S.C. §§ 1601-1651, Executive Orders 13660, 13661, and 13662, and 31 C.F.R. Parts 501 and 589

**To: RWC Group, LLC**  
**c/o Mark Barnes & Associates**  
**1350 I Street, NW**  
**Suite 260**  
**Washington, D.C. 20005**  
**Attn: Michael Faucette, Esq.**

1. Pursuant to your request of July 18, 2014, as supplemented on July 28, 2014, July 29, 2014, July 30, 2014, August 1, 2014, and October 22, 2014 to the Office of Foreign Assets Control (collectively, the "Application"), the transactions and activities delineated herein are hereby authorized.
2. This License is granted upon the statements and representations made in the Application, or otherwise filed with or made to the Treasury Department as a supplement to the Application, or is based on information otherwise available to the Treasury Department, and is subject to the condition, among others, that the Licensee will comply in all respects with all regulations, rulings, orders, and instructions issued by the Secretary of the Treasury under the authority of Section 203 of the International Emergency Economic Powers Act (50 U.S.C. § 1702), the National Emergencies Act (50 U.S.C. §§ 1601 *et seq.*), and the terms of this License.
3. The Licensee shall furnish and make available for inspection any relevant information, records or reports requested by the Secretary of the Treasury or any other duly authorized officer or agency.
4. This License **expires on November 30, 2015**, and is not transferable. This License is subject to the authorities cited above, and any regulations and rulings issued pursuant thereto. It may be revoked or modified at any time at the discretion of the Secretary of the Treasury. If this License was issued as a result of willful misrepresentation on the part of the applicant, it may, at the discretion of the Secretary of the Treasury, be declared void from the date of its issuance or from any other date.
5. This License does not excuse compliance with any law or regulation (including reporting requirements) administered by the Office of Foreign Assets Control or another agency applicable to the transactions herein licensed, nor does it release the Licensee or third parties from civil or criminal liability for violation of any law or regulation.

Issued on behalf of the Secretary of the Treasury:

**OFFICE OF FOREIGN ASSETS CONTROL**

By \_\_\_\_\_

**(b)(6)**

**Andrea Gacki**  
**Assistant Director for Licensing**

*November 4, 2014*

\_\_\_\_\_  
**Date**

**Attention is directed to, *inter alia*, 18 U.S.C. § 1001 and  
50 U.S.C § 1705 for provisions relating to penalties.**

2018-08-116: 000595

**SECTION 1 - AUTHORIZATION:** Subject to the terms and conditions stated herein, RWC Group, LLC (the “Licensee”) is hereby authorized to sell and ship (b)(4) (the “Cargo”) obtained from Kalashnikov Concern, an entity whose property and interests in property are blocked, that are currently being held at the (b)(4) (b)(4) or to a buyer in (b)(4) as described in the Application.

**SECTION 2 – CONDITIONS:** (a) The sale and shipment of the Cargo authorized in **SECTION 1** may not provide any financial benefit to Kalashnikov Concern or to any other person whose property and interests in property are blocked pursuant to any Executive order, statute, or 31 C.F.R. Chapter V.

(b) The Licensee must comply with the appropriate legal requirements of the destination country with respect to the importation of the Cargo.

**SECTION 3 - WARNINGS:** (a) Except as authorized by **SECTION 1** hereof, or otherwise by the Office of Foreign Assets Control, this License does not authorize the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any Executive order, statute, or 31 C.F.R. Chapter V.

(b) Except as authorized by **SECTION 1** hereof, or otherwise by the Office of Foreign Assets Control, this License does not authorize transactions prohibited by any Executive order or by any other laws and regulations administered by the Office of Foreign Assets Control, including the Ukraine-Related Sanctions Regulations, 31 C.F.R Part 589.

(c) The authorization set forth in this License applies only to laws and regulations administered by the Office of Foreign Assets Control, and should not be interpreted to excuse the Licensee from compliance with other laws, regulations, orders, or rulings to which it may be subject.

(d) Any transfer of funds through the U.S. financial system pursuant to the authority set forth in **SECTION 1** hereof should reference the number of this License to avoid the blocking or rejection of the transfer.

**SECTION 4 - RECORDKEEPING AND REPORTING REQUIREMENTS:** (a) The Licensee is subject to the recordkeeping and reporting requirements of, inter alia, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken pursuant to this License for a period of five years from the date of each transaction.

(b) The Licensee is required to submit, **no later than 30 days following the completion of the authorized transactions, or on December 30, 2015**, whichever comes first, a detailed report providing information on the funds received pursuant hereto. Such report shall specify (i) the individual or entity from which the funds originated, the method of transfer, and the amount of funds received; and (ii) if applicable, the names of any individuals or entities providing related services to the Licensee in connection with the authorization in **SECTION 1** hereof, a general description of the services provided, and the amount of funds paid in connection with such services. In the event that no transactions occur or no funds are received during the reporting period, a statement is to be filed to that effect. The Report is to be mailed to: Licensing Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Annex, Washington, D.C. 20220, and is to refer to this License No. **UKRAINE2-2014-311316-1**.

**SECTION 5 - PRECEDENTIAL EFFECT:** The authorization contained in this License is limited to the facts and circumstances specified in the Application.

\*\*\*\*\*



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

**Case No. Ukraine2-2014-311316-1**

Michael Faucette, Esq.  
Mark Barnes & Associates  
1350 I Street NW, Suite 260  
Washington, D.C. 20005

Dear Mr. Faucette:

This is in response to a request of July 18, 2014 as supplemented on July 28, 2014, July 29, 2014, July 30, 2014, August 1, 2014, and October 22, 2014 (collectively, the "Application"), on behalf of RWC Group LLC (RWC), a company based in Tullytown, Pennsylvania, to the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), for authorization to sell and ship (b)(4) (the "Cargo") obtained from Kalashnikov Concern (KC), an entity whose property and interests in property are blocked pursuant to the Ukraine-Related Sanctions Regulations, 31 C.F.R. Part 589 and Executive Order 13661 of March 16, 2014, "Blocking Property of Additional Persons Contributing to the Situation in Ukraine" ("E.O. 13661"), to (b)(4) (b)(4) or to a buyer in (b)(4) as described in the Application.

According to the Application, RWC is the exclusive U.S. importer of products from KC. Further, the Application indicates that the Cargo is currently being held at the (b)(4). The Application represents that RWC has made a payment to KC of (b)(4) related to three outstanding invoices for the Cargo in the amounts of (b)(4). Additionally, the Application indicates that KC has agreed to write off any payments owed on the Cargo and give RWC full ownership of any KC interest in the Cargo. Thus, RWC maintains that it possesses full ownership of the Cargo and that no funds will be transferred between RWC and KC.

In response to your Application, please find enclosed **License No. Ukraine2-2014-311316-1**, which, subject to certain terms and conditions, authorizes RWC to sell and ship the Cargo to (b)(4) or to a buyer in (b)(4).

If you have any additional questions, you may refer to the OFAC website at [www.treasury.gov/ofac](http://www.treasury.gov/ofac) or call our office at (202) 622-2480.

Sincerely,

(b)(6)

November 4, 2014

Andrea Gacki  
Assistant Director for Licensing  
Office of Foreign Assets Control

Date

Enclosure

**FW: ATF issues related to Russian arms sector sanctions - Livelink 147 KB**

---

**From:** (b)(6)  
**To:** (b)(6) Gacki, Andrea" (b)(6)  
**Cc:** "Smith, Bradley" (b)(6)  
**Date:** Sat, 15 Nov 2014 16:02:12 -0500  
**Attachments:** RWC lic.pdf - 77 KB (0 bytes); RWC cl.pdf - 51 KB (0 bytes)

---

FYI. I'll let you know if there's any additional follow up on this.

**Duplicative of content on Bates Nos. 2018-08-116: 000593-000594**





**Re: ATF issues related to Russian arms sector sanctions**

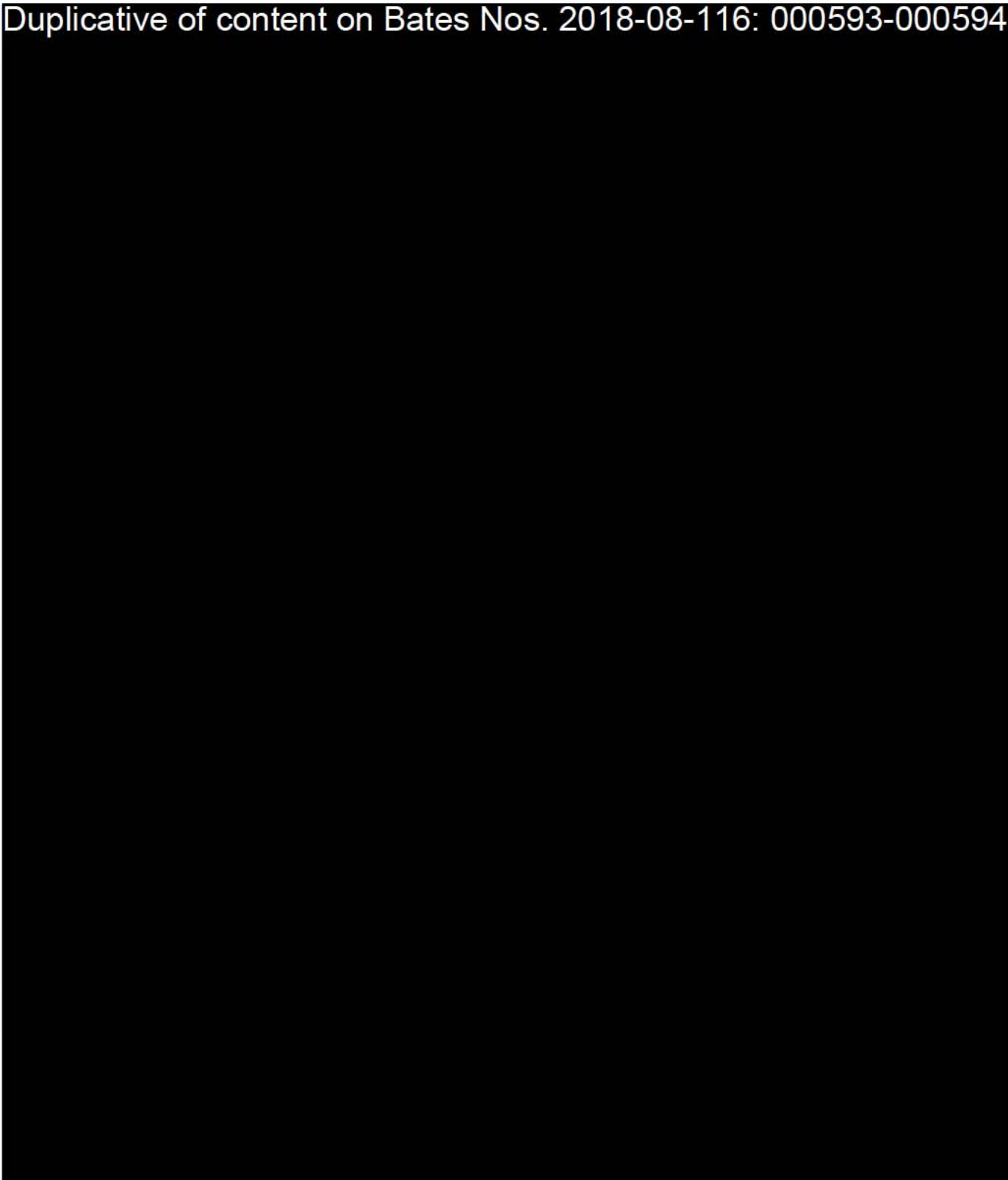
---

**From:** "Smith, Bradley" (b)(6)  
**To:** (b)(6)  
**Date:** Sun, 16 Nov 2014 00:23:03 -0500

---

Thanks, (b)(6).

Duplicative of content on Bates Nos. 2018-08-116: 000593-000594







## RE: Telephone Inquiry re: 2014-311648-1

---

From: (b)(6)  
To: (b)(6)  
Cc: (b)(6) "Gacki, Andrea"  
Date: Mon, 01 Dec 2014 11:39:57 -0500

---

Thank you (b)(6)

---

From: (b)(6)  
Sent: Monday, December 01, 2014 11:39 AM  
To: (b)(6)  
Cc: (b)(6) Gacki, Andrea; (b)(6)  
Subject: RE: Telephone Inquiry re: 2014-311648-1

Hi (b)(6)

Thank you for the message. I'll give Mark Barnes a call with a status update.

(b)(6) Ukraine-EO13661-2014-311648-1 is RWC's request on Baikal – it is currently with Counsel.

Thanks!

(b)(6)

---

From: (b)(6)  
Sent: Monday, December 01, 2014 11:25 AM  
To: (b)(6)  
Cc: (b)(6) Gacki, Andrea; (b)(6)  
Subject: Telephone Inquiry re: 2014-311648-1

Hi (b)(6)

I am contacting you based on information in OASIS.

I received a call today from Mark Barnes with a firm representing RWC regarding their case no. Ukraine-EO 13661-2014-311648-1.

(b)(5) He also mentioned he is prepared to contact the Under Secretary of TFI if they do not hear from OFAC soon.

His number is 202-626-0070.

Thank you,

(b)(6)

## RE: Telephone Inquiry re: 2014-311648-1

---

**From:** "Blackborow, Davin" (b)(6)  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Date:** Mon, 01 Dec 2014 17:06:23 -0500

---

Thanks (b)(6) – I'll try to turn this one out tomorrow or Wed.

---

**From:** (b)(6)  
**Sent:** Monday, December 01, 2014 11:59 AM  
**To:** Blackborow, Davin  
**Cc:** (b)(6)  
**Subject:** RE: Telephone Inquiry re: 2014-311648-1

Hi Davin:

Good morning. Just wanted to let you know that RWC has called about the status of Ukraine-EO13661-2014-311648-1. Also, they may reach out to Main Treasury.

Thank you,

(b)(6)

---

**From:** (b)(6)  
**Sent:** Monday, December 01, 2014 11:39 AM  
**To:** (b)(6)  
**Cc:** (b)(6) Gacki, Andrea; (b)(6)  
**Subject:** RE: Telephone Inquiry re: 2014-311648-1

Duplicative of content in Bates No. 2018-08-116: 000602



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

---

**From:** "Blackborow, Davin" (b)(6)  
**To:** (b)(6)  
**Date:** Mon, 15 Dec 2014 18:21:54 -0500  
**Attachments:** Szubin-RWC Baikail Adv Op Letter.pdf (108.56 kB); ATT00001.htm (6.17 kB)

---

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

I was going to provide the below info to Adam regarding the RWC case. Please let me know if you think this looks right – feel free to make edits or add information as appropriate.

Thanks,  
Davin

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

---

**From:** Szubin, Adam  
**Sent:** Monday, December 15, 2014 11:17 AM  
**To:** Blackborow, Davin; Fisch, Eytan; Manfull, Alexandre  
**Cc:** (b)(6) Smith, John; (b)(6)  
**Subject:** FW: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

See attached.

---

**From:** Michael Faucette [<mailto:michael.faucette@mbassociateslaw.com>]  
**Sent:** Monday, December 15, 2014 9:27 AM  
**To:** Szubin, Adam  
**Cc:** Cohen, David; (b)(6)  
**Subject:** RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Dear Mr. Szubin,

Re: Case Number UKRAINE-EO13661-2014-311648-1

On behalf of RWC Group, LLC, please find attached a letter inquiring as to the status of our OFAC Advisory Opinion Request for Baikai that was submitted to OFAC Licensing on July 30, 2014. (b)(4)

(b)(4)

(b)(4)

Please do not hesitate to contact me if you have any

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.

MARK BARNES\*  
CHRISTOPHER THOMAS\*  
TERRI BARSTIS\*\*  
REGINA GONZALEZ†  
JOANNA C. LEWIS\*\*  
MICHAEL FAUCETTE††

\* Also Admitted in Arizona and Alaska  
\* Also Admitted in Arizona



**Mark Barnes & Associates**  
**A T T O R N E Y S**

HEATHER HAMILTON \*\*  
OF COUNSEL

\*\* Also Admitted in Virginia  
† Only Admitted in Ohio  
†† Only Admitted in Maryland

December 12, 2014

Adam Szubin  
Director  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Room 2240  
Washington, DC 20220

**RE: Irreparable Damage to RWC Group, LLC for non-response from  
OFAC: Case Number UKRAINE-EO13661-2014-311648-1**

Dear Mr. Szubin:

Our law firm represents RWC Group, LLC ("RWC"), a small company that was the exclusive importer of products from Kalashnikov Concern and Izhevsky Mekhanichesky Zavod ("Baikal") in Russia. When OFAC placed Kalashnikov Concern on the Specially Designated Nationals ("SDN") List on July 16, 2014, (b)(4)

(b)(4)

(b)(4)

Therefore, we submitted a request for an advisory opinion to OFAC on July 30, 2014 to determine whether or not Baikal was a subsidiary of Kalashnikov Concern and therefore a blocked entity.

To assist OFAC in their analysis, we acquired from Baikal, and provided to OFAC, lists of registered stockholders for the company. The information provided shows that no portion of Baikal's shares are held by Kalashnikov Concern or any other SDN. While we believe we have completed our due diligence, (b)(4)

(b)(4)

(b)(4)

(b)(4)

Rather, OFAC Licensing is continually telling us that the advisory opinion is being processed and reviewed. We reached out to Under Secretary David Cohen's office on December 2, 2014 in an attempt to find answers and were directed to your office.



(b)(4)

(b)(4)

On behalf of RWC, we respectfully request that OFAC provide either RWC or ATF guidance on how to proceed with Baikal.

If you require any further information, please do not hesitate to contact me at (202) 626-0070 or mark.barnes@mbassociateslaw.com.

Respectfully,

(b)(6)

Mark Barnes  
Outside Counsel to  
RWC Group, LLC

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

---

From: "Blackborow, Davin" (b)(6)

To: (b)(6)

Date: Mon, 15 Dec 2014 18:53:14 -0500

---

(b)(5)

---

From: (b)(6)

Sent: Monday, December 15, 2014 6:53 PM

To: Blackborow, Davin; (b)(6)

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

Hi Davin:

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

(b)(6)

Duplicative of content in Bates No. 2018-08-116: 000619



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

---

**From:** "Blackborow, Davin" (b)(6)  
**To:** "Szubin, Adam" (b)(6) Fisch, Eytan (b)(6) "Manfull, Alexandre"  
**Cc:** (b)(6) "Smith, John"  
**Date:** Mon, 15 Dec 2014 18:58:41 -0500

[Just a quick update on this case.](#)

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

If you need anything else, please let us know.

Thanks,  
Davin

---

**From:** Szubin, Adam  
**Sent:** Monday, December 15, 2014 11:17 AM  
**To:** Blackborow, Davin; Fisch, Eytan; Manfull, Alexandre  
**Cc:** (b)(6) Smith, John; (b)(6)  
**Subject:** FW: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

[See attached.](#)

Duplicative of content in Bates No. 2018-08-116: 000619

## RWC Group Ukraine-EO13661-2014-311648-1

---

From:

(b)(6)

To:

(b)(6)

Cc:

(b)(6)

Date: Tue, 13 Jan 2015 08:50:17 -0500

Attachments: RWC Group.docx (84.38 kB)

---

Hello,

We wanted to let OGT know that we intend to

(b)(5)

(b)(5)

This case is currently with Davin for final review and signature.

If you have any questions about this application, 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

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

---

**From:** "Smith, John" (b)(6)  
**To:** Michael Faucette <michael.faucette@mbassociateslaw.com>  
**Cc:** (b)(6) "Blackborow, DavinDisabled" (b)(6)  
**Date:** Wed, 14 Jan 2015 15:14:03 -0500  
**Attachments:** RWC-Smith\_Baikal Advisory Opinion Status.pdf (110.94 kB)

---

Dear Mr. Faucette,

Thank you for your inquiry. I'm copying Davin Blackborow, our Assistant Director for Licensing, who can provide any update on this matter. Regards.

John

John E. Smith  
Deputy Director  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue N.W.  
Washington, DC 20220

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

---

**From:** Michael Faucette [mailto:michael.faucette@mbassociateslaw.com]  
**Sent:** Wednesday, January 14, 2015 2:05 PM  
**To:** Smith, John  
**Cc:** (b)(6) barbara.hammerie (b)(6) Szubin, Adam  
**Subject:** RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Dear Mr. Smith,

Re: Case Number UKRAINE-EO13661-2014-311648-1

On behalf of RWC Group, LLC, please find attached a letter inquiring as to the status of our OFAC Advisory Opinion Request for Baikal that was submitted to OFAC Licensing on July 30, 2014. (b)(4)

(b)(4) We would greatly appreciate any information on when this opinion will be released. Please do not hesitate to contact me if you have any questions. Thank you.

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

MARK BARNES\*  
CHRISTOPHER THOMAS\*  
TERRI BARSTIS\*\*  
REGINA GONZALEZ\*  
JOANNA C. LEWIS\*\*  
MICHAEL FAUCETTE\*\*

\* Also Admitted in Arizona and Alaska  
\* Also Admitted in Arizona



**Mark Barnes & Associates**  
ATTORNEYS

HEATHER HAMILTON \*\*  
OF COUNSEL

\*\* Also Admitted in Virginia  
† Only Admitted in Ohio  
†† Only Admitted in Maryland

January 14, 2015

John E. Smith  
Acting Director  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Room 2240  
Washington, DC 20220

**RE: Irreparable Damage to RWC Group, LLC for non-response from  
OFAC: Case Number UKRAINE-EO13661-2014-311648-1**

Dear Mr. Smith:

Our law firm represents RWC Group, LLC ("RWC"), a small company that was the exclusive importer of products from Kalashnikov Concern and Izhevsky Mekhanichesky Zavod ("Baikal") in Russia. When OFAC placed Kalashnikov Concern on the Specially Designated Nationals ("SDN") List on July 16, 2014, (b)(4)

(b)(4)

(b)(4)

Therefore, we submitted a request for an advisory opinion to OFAC on July 30, 2014 to determine whether or not Baikal was a subsidiary of Kalashnikov Concern and therefore a blocked entity.

To assist OFAC in their analysis, we acquired from Baikal, and provided to OFAC, lists of registered stockholders for the company. The information provided shows that no portion of Baikal's shares are held by Kalashnikov Concern or any other SDN. (b)(4)

(b)(4)

(b)(4)

Rather, OFAC Licensing

1350 I Street NW Suite 260 • Washington, DC 20005 • 202.626.0089 phone • 202.626.0088 fax

2018-08-116: 000633



is continually telling us that the advisory opinion is being processed and reviewed. We reached out to Under Secretary David Cohen's office on December 2, 2014 in an attempt to find answers and were directed to your office. We sent a letter to Mr. Szubin on December 12, 2014, but did not receive a reply.

(b)(4)  
(b)(4) On behalf of RWC, we respectfully request that OFAC provide either RWC or ATF guidance on how to proceed with Baikal.

If you require any further information, please do not hesitate to contact me at (202) 626-0070 or mark.barnes@mbassociateslaw.com. Alternatively, you may contact my associate attorney, Michael Faucette, at (202) 626-0085.

Respectfully,

(b)(6)

Mark Barnes  
Outside Counsel to  
RWC Group, LLC

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

---

**From:** Michael Faucette <michael.faucette@mbassociateslaw.com>  
**To:** "Smith, John" (b)(6)  
**Cc:** (b)(6) "Blackborow, Davin" (b)(6), Mark Barnes <mark.barnes@mbassociateslaw.com>  
**Date:** Wed, 14 Jan 2015 15:23:45 -0500

---

Dear Mr. Smith,

Thank you for your prompt response. We look forward to hearing from Mr. Blackborow on the matter.

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 Jan 14, 2015, at 3:14 PM, <[John.Smith](#) (b)(6)> wrote:

**Duplicative of content in Bates No. 2018-08-116: 000632**







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

---

**From:** "Smith, John" (b)(6)  
**To:** "Blackborow, Davin" (b)(6)  
**Date:** Wed, 14 Jan 2015 20:45:30 -0500

---

Ack – sorry!

---

**From:** Blackborow, Davin  
**Sent:** Wednesday, January 14, 2015 8:35 PM  
**To:** Smith, John  
**Subject:** FW: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

FYI – I don't think you actually cc'd me, but wanted you to know that I responded (without keeping you on the chain).

---

**From:** Blackborow, Davin  
**Sent:** Wednesday, January 14, 2015 8:34 PM  
**To:** 'Michael Faucette'  
**Cc:** (b)(6) Mark Barnes  
**Subject:** RE: RWC-Baikal Advisory Opinion Request: Case Number UKRAINE-EO13661-2014-311648-1

Mr. Faucette,

Thank you for your email regarding the status of your application. We are actively working through the issues and appreciate the urgency of your request. We will certainly follow up if additional information or a meeting would be beneficial in resolving the case. If you have additional questions or concerns, please do not hesitate to reach out to me.

Regards,  
Davin

Davin Blackborow  
Assistant Director for Licensing  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

**Duplicative of content in Bates No. 2018-08-116: 000635**



Duplicative of content in Bates Nos. 2018-08-116: 000635-000636



## RE: Kalashnikov / Trademarks Question

---

From: [REDACTED] (b)(6)  
To: [REDACTED] (b)(6)  
Date: Fri, 16 Jan 2015 17:01:19 -0500

Thanks (b)(6) I will take a look.

---

From: [REDACTED] (b)(6)  
Sent: Friday, January 16, 2015 4:55 PM  
To: [REDACTED] (b)(6)  
Subject: FW: Kalashnikov / Trademarks Question

Hi (b)(6)-

This is the Kalashnikov name issue.

best-  
[REDACTED] (b)(6)

---

From: [REDACTED] (b)(6)  
Sent: Monday, December 01, 2014  
To: [REDACTED] (b)(6) Smith, Bradley; [REDACTED] (b)(6)  
Subject: RE: Kalashnikov / Trademarks Question

Hello Everyone-

I was just wondering [REDACTED] (b)(5)

best-  
[REDACTED] (b)(6)

---

From: [REDACTED] (b)(6)  
Sent: Thursday, November 13, 2014 9:36 AM  
To: [REDACTED] (b)(6)  
Cc: Manfull, Alexandre; [REDACTED] (b)(6) Smith, Bradley; [REDACTED] (b)(6)  
Subject: RE: Kalashnikov / Trademarks Question

(b)(6),

Thanks for letting us know. I've looped in Brad (b)(6) and (b)(6) who cover Ukraine-related sanctions for our office. [REDACTED] (b)(5)

Best regards,  
[REDACTED] (b)(6)

---

From: [REDACTED] (b)(6)  
Sent: Thursday, November 13, 2014 9:23 AM  
To: [REDACTED] (b)(6)  
Cc: Manfull, Alexandre; [REDACTED] (b)(6)  
Subject: FW: Kalashnikov / Trademarks Question

Hello (b)(6) & (b)(6).

(b)(5)

Please let me know if you want me to come down and discuss, or if there's someone else who should be in on the discussion.

best-  
[REDACTED] (b)(6)



---

**From:** Michael Faucette [<mailto:michael.faucette@mbassociateslaw.com>]  
**Sent:** Friday, November 07, 2014 2:59 PM  
**To:** (b)(6)  
**Cc:** [caroline.watson@mbassociateslaw.com](mailto:caroline.watson@mbassociateslaw.com) Watson  
**Subject:** Kalashnikov / Trademarks Question

Hi (b)(6)

Thanks again for discussing the "Kalashnikov Concern" trademark matter with me last week. As you mentioned over the phone, I have written up a two-part question concerning the use of trademarks and compliance with the Ukraine-related sanctions:

It is clear that trademarks are a kind of property which may be blocked under the Ukraine-related sanctions. 31 C.F.R. § 589.308. However, our question concerns (1) the use of trademarks not legally owned by a sanctioned entity on the SDN List, and (2) the use of trademarks registered to a sanctioned entity but which does not involve any transaction with or benefit to the sanctioned entity.

**1. First**, if a trademark/logo used by the sanctioned entity is not legally registered or owned by the sanctioned entity in the United States or internationally (or even in the Russian Federation), can a U.S. entity independently register and use that trademark/logo on its own products without engaging in a prohibited transaction?

The Executive Orders 13360, 13361, and 13362 provide that "[a]ll property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the following persons are blocked and **may not be transferred, paid, exported, withdrawn, or otherwise dealt in...**" Section 1. (a) (emphasis added). The orders further clarify that "[t]he prohibitions in section 1...include but are not limited to: (a) the **making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked** pursuant to this order." Section 4 (emphasis added).

In this particular situation involving an unregistered trademark, we believe that the U.S. entity would not engage in any prohibited transactions with the sanctioned entity. While the sanctioned entity may use (or have used) the trademark on its products, it never registered or obtained the trademark in the United States or internationally.

Consequently, the sanctioned entity has no recognized legal interest in the property as a trademark in the United States, meaning the trademark is not covered by the Ukraine-related sanctions. While not necessary, the U.S. entity could legally obtain the trademark by registering the previously unregistered trademark in the United States with the USPTO. Furthermore, because it would be the first to register and legally own the trademark in the United States, the U.S. entity's use of the trademark on its own products would not violate the sanctions, as it would hold the sole legal interest in the property. The U.S. entity would not pay or deal with the sanctioned entity to obtain or use the trademark, would not transfer anything to the sanctioned entity, and would not be contributing funds, goods, or services to or for the benefit of the sanctioned entity. Therefore we find that such registration and use of the trademark would not violate any aspect of the Ukraine-related sanctions. Please confirm if you can concur with this analysis.

**2. Secondly**, if the sanctioned entity does own a trademark in the United States, can a U.S. entity still use the trademark on its own products independently without violating the sanctions as long as there is no transaction involving the sanctioned entity?

OFAC gave the following guidance concerning products of a certain sanctioned entity Kalashnikov Concern (in response to the question "If I own a Kalashnikov product, is that product blocked by sanctions? Am I able to resell a Kalashnikov product at a gun show or other secondary market?"): "If a U.S. person is in possession of a Kalashnikov Concern product that was bought and fully paid for prior to the date of designation (i.e., no payment remains due to Kalashnikov Concern), then that product is not blocked and **OFAC sanctions would not prohibit the U.S. person from keeping or selling the product in the secondary market, so long as Kalashnikov Concern has no interest in the transaction. New transactions by U.S. persons with Kalashnikov Concern are prohibited, however, and any property in which Kalashnikov Concern has an interest is blocked pursuant to OFAC's designation of Kalashnikov Concern on July 16, 2014. If a U.S. person has an inventory of Kalashnikov Concern products in which Kalashnikov Concern has an interest (for example, the products are not fully paid for or are being sold on consignment), we advise that U.S. person to contact OFAC for further guidance on handling of the inventory.**" OFAC Frequently Asked Questions

and Answers, Questions Related to Sectoral Sanctions under Executive Order 13662 at 374 (emphasis added).

We believe the independent use of a trademark, registered to a sanctioned entity, by a U.S. entity on independently manufactured products is equivalent to the resale of products obtained from the sanctioned entity prior to the imposition of sanctions, which is allowed by OFAC. Just like the permitted sale of such products on a secondary market by a U.S. entity, the use of the trademark in this situation where a U.S. entity independently marks its own products with a trademark registered to a sanctioned entity and then sells these products without any payment, compensation, or consignment to the sanctioned entity, would not violate the sanctions, because the sanctioned entity has no interest in the U.S. entity's transaction(s). If the sanctioned entity is deemed to have no sanctioned interest in the trademark on its own product sold on the secondary market by a U.S. entity, then it should not have a sanctioned interest in the trademark independently used on a U.S. entity's product and sold by the U.S. entity. Therefore, in our opinion, even if a sanctioned entity owns a trademark in the United States, a U.S. entity may still independently use the trademark on its own products without violating the sanctions as long as there is no transaction involving the sanctioned entity. Please let us know if you agree with this position.

We would greatly appreciate any guidance or thoughts you or your office may have on this issue.

Kind Regards,

Mike Faucette  
Attorney at Law

Mark Barnes & Associates

1350 1<sup>st</sup> 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.





United States Department of State

*Bureau of Political-Military Affairs*

*Washington, D.C. 20520-6817*

**AUG 08 2014**

B. Todd Jones, Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
U.S. Department of Justice  
99 New York Avenue, NE  
Washington, D.C. 20226

Dear Director Jones:

Russia continues to actively destabilize Ukraine by providing material support to Ukrainian separatists and occupying Crimea. Russia has expanded its activity despite statements to the contrary. The President has made clear to Russia that these destabilizing activities would be met with increased costs.

On July 17, 2014 and July 29, 2014, the U.S. Department of the Treasury imposed a set of new prohibitions ("sanctions") on specific entities operating within certain sectors of the Russian economy. Pursuant to Executive Order 13661 (which was issued pursuant to the President's authority under the International Emergency Economic Powers Act), the Secretary of the Treasury designated and blocked the assets of nine Russian defense technology firms operating in the arms or related materiel sector in Russia.

The State Department has broad legal authority to implement these particular sanctions pursuant to the Arms Export Control Act (AECA) and Executive Order 13637. Section 38 of the AECA authorizes the President, in furtherance of world peace and the security and foreign policy of the United States, to control the import of defense articles (which necessarily includes the authority to prohibit such imports) and to provide foreign policy guidance to persons of the United States involved in the import of such articles. Through Executive Order 13637 section 1(n), the President delegated, in part, his AECA responsibilities to the Secretary of State. These delegated responsibilities include implementing foreign policy implicated by the AECA and providing guidance on the statute's implementation; certain of the Executive Order 13661 sanctions announced on July 17, 2014 and July 29, 2014 implicate these responsibilities. Section 1(n) of Executive Order 13637 also delegates the AECA responsibilities for the control of permanent imports of defense articles to the Attorney General (who, in turn, has delegated this

authority to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), pursuant to 28 C.F.R. 0.130(a)), subject to the guidance and views of the Secretary of State on matters affecting the foreign policy of the United States.

The eight (8) entities listed below are subject to arms or related materiel sanctions under Executive Order 13661 as of July 17, 2014:

1. FEDERAL STATE UNITARY ENTERPRISE STATE RESEARCH AND PRODUCTION ENTERPRISE BAZALT (a.k.a. FEDERAL STATE UNITARY ENTERPRISE, STATE RESEARCH AND PRODUCTION ENTERPRISE BAZALT; a.k.a. FSUE SRPE BAZALT; a.k.a. STATE RESEARCH AND PRODUCTION ENTERPRISE BAZALT), 32 Velyaminovskaya, Moscow 105318, Russia; Website [www.bazalt.ru](http://www.bazalt.ru); Email Address [moscow@bazalt.ru](mailto:moscow@bazalt.ru) [UKRAINE2];
2. JOINT STOCK COMPANY CONCERN RADIO-ELECTRONIC TECHNOLOGIES (a.k.a. CONCERN RADIO-ELECTRONIC TECHNOLOGIES; a.k.a. "KRET"), 20/1 Korp. 1 ul. Goncharnaya, Moscow 109240, Russia; Website <http://www.kret.com>; Registration ID 1097746084666 [UKRAINE2];
3. JOINT STOCK COMPANY CONCERN SOZVEZDIE (a.k.a. JSC CONCERN SOZVEZDIE), 14 Plekhanovskaya Street, Voronezh, Russia; 14 ul. Plekhanovskaya, Voronezh, Voronezhskaya obl. 394018, Russia; Registration ID 1053600445337 [UKRAINE2];
4. JOINT STOCK COMPANY MILITARY-INDUSTRIAL CORPORATION NPO MASHINOSTROYENIA (a.k.a. JOINT STOCK COMPANY MILITARY INDUSTRIAL CONSORTIUM NPO MASHINOSTROYENIA; a.k.a. JSC MIC NPO MASHINOSTROYENIA; a.k.a. MIC NPO MASHINOSTROYENIA JSC; a.k.a. MIC NPO MASHINOSTROYENIYA JSC; a.k.a. MILITARY INDUSTRIAL CORPORATION NPO MASHINOSTROENIA OAO; a.k.a. OPEN JOINT STOCK COMPANY MILITARY INDUSTRIAL CORPORATION SCIENTIFIC AND PRODUCTION MACHINE BUILDING ASSOCIATION; a.k.a. VOENNO-PROMYSHLENNAYA KORPORATSIYA NAUCHNO-PROIZVODSTVENNOE OBEDINENIE MASHINOSTROENIYA OAO; a.k.a. VPK NPO MASHINOSTROENIYA), 33, Gagarina St., Reutov-town, Moscow Region 143966, Russia; 33 Gagarin Street, Reutov, Moscow Region 143966,



Russia; 33 Gagarina ul., Reutov, Moskovskaya obl 143966, Russia; Website [www.npomash.ru](http://www.npomash.ru); Email Address [export@npomash.ru](mailto:export@npomash.ru); alt. Email Address [vpk@npomash.ru](mailto:vpk@npomash.ru); Registration ID 1075012001492 (Russia); Tax ID No. 5012039795 (Russia); Government Gazette Number 07501739 (Russia) [UKRAINE2];

5. JOINT-STOCK COMPANY CONCERN ALMAZ-ANTEY (a.k.a. ALMAZ-ANTEY CORP; a.k.a. ALMAZ-ANTEY DEFENSE CORPORATION; a.k.a. ALMAZ-ANTEY JSC; f.k.a. OTKRYTOE AKTSIONERNOE OBSHCHESTVO KONTSEERN PVO ALMAZ ANTEI), 41 ul.Vereiskaya, Moscow 121471, Russia; Website [almaz-antey.ru](http://almaz-antey.ru); Email Address [antey@almaz-antey.ru](mailto:antey@almaz-antey.ru) [UKRAINE2];
6. KALASHNIKOV CONCERN (a.k.a. CONCERN KALASHNIKOV; a.k.a. IZHEVSKIY MASHINOSTROITEL'NYI ZAVOD OAO; f.k.a. IZHMASH R&D CENTER; f.k.a. JSC NPO IZHMASH; f.k.a. NPO IZHMASH OAO; a.k.a. OJSC CONCERN KALASHNIKOV; f.k.a. OJSC IZHMASH; f.k.a. SCIENTIFIC PRODUCTION ASSOCIATION IZHMASH JOINT STOCK COMPANY), 3, Derjabin Pr., Izhevsk, Udmurt Republic 426006, Russia; Registration ID 1111832003018 [UKRAINE2];
7. KONSTRUKTORSKOE BYURO PRIBOROSTROENIYA OTKRYTOE AKTSIONERNOE OBSHCHESTVO (a.k.a. INSTRUMENT DESIGN BUREAU; a.k.a. JSC KBP INSTRUMENT DESIGN BUREAU; a.k.a. KBP INSTRUMENT DESIGN BUREAU; a.k.a. KBP INSTRUMENT DESIGN BUREAU JOINT STOCK COMPANY; a.k.a. "KBP OAO"), 59 Shcheglovskaya Zaseka ul., Tula 300001, Russia; Website [www.kbptula.ru](http://www.kbptula.ru); Email Address [kbkedr@tula.net](mailto:kbkedr@tula.net); Registration ID 1117154036911 (Russia); Government Gazette Number 07515747 (Russia) [UKRAINE2]; and
8. URALVAGONZAVOD (a.k.a. NAUCHNO-PROIZVODSTVENNAYA KORPORATSIYA URALVAGONZAVOD OAO; a.k.a. NPK URALVAGONZAVOD; a.k.a. NPK URALVAGONZAVOD OAO; a.k.a. OJSC RESEARCH AND PRODUCTION CORPORATION URALVAGONZAVOD; a.k.a. RESEARCH AND PRODUCTION CORPORATION URALVAGONZAVOD OAO; a.k.a. URALVAGONZAVOD CORPORATION; a.k.a. "UVZ"), 28, Vostochnoye shosse, Nizhni Tagil, Sverdlovsk region 622007, Russia; 28 Vostochnoe shosse, Nizhni Tagil, Sverdlovskaya oblast 622007, Russia; 40, Bolshaya

Yakimanka Street, Moscow 119049, Russia; Vostochnoye Shosse, 28, Nizhny Tagil 622007, Russia; Website <http://www.uvz.ru/>; alt. Website <http://uralvagonzavod.com/>; Email Address [web@uvz.ru](mailto:web@uvz.ru) [UKRAINE2].

The entity listed below is also subject to arms or related materiel sanctions under Executive Order 13661 as of July 29, 2014:

UNITED SHIPBUILDING CORPORATION (a.k.a. OBEDINENNAYA SUDOSTROITELNAYA KORPORATSIYA OAO; a.k.a. OJSC UNITED SHIPBUILDING CORPORATION; a.k.a. UNITED SHIPBUILDING CORPORATION JOINT STOCK COMPANY; a.k.a. "OSK OAO"), 90, Marata ul., St. Petersburg 191119, Russia; 11, Sadovaya-Kudrinskaya str., Moscow 123242, Russia; Website <http://www.oaoosk.ru/>; Email Address [info@oaoosk.ru](mailto:info@oaoosk.ru) [UKRAINE2].

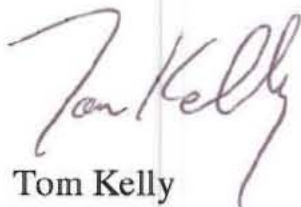
In light of the sanctions for these listed entities, the Secretary of State requests that effective as of the date of this correspondence, ATF suspend all active ATF permits for the permanent importation of defense articles involving the aforementioned entities, until such time as these sanctions are terminated. ATF is also requested to deny any pending and new ATF permit applications effective the date of this correspondence for the permanent importation of defense articles involving these entities, until such time as sanctions are terminated.

We understand that the expiration date of a suspended permit is not and may not be extended as a result of these sanctions. Should a suspended permit expire prior to termination of sanctions, a new permit application for the importation of defense articles from the sanctioned entities should not be approved until sanctions are terminated. Further, defense articles from entities subject to these sanctions that are in a Foreign Trade Zone or a Customs Bonded Warehouse may not be removed until such time as the sanctions are terminated. These actions are necessary to ensure the effectiveness of these particular sanctions, and are consistent with the

declared emergency under IEEPA, and the Secretary of the Treasury's designations.

Please contact us if we can be of further assistance on this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Kelly". The signature is fluid and cursive, with the first name "Tom" and last name "Kelly" clearly distinguishable.

Tom Kelly  
Acting Assistant Secretary



## FW: Kalashnikov / Trademarks Question

---

From: (b)(6)

To: (b)(6)

Date: Wed, 21 Jan 2015 15:13:41 -0500

---

(b)(6) – Here is the email that (b)(6) in Compliance sent me about the Kalashnikov trademark.

(b)(6)

---

From: (b)(6)

Sent: Friday, January 16, 2015 4:55 PM

To: (b)(6)

Subject: FW: Kalashnikov / Trademarks Question

Duplicative of content on Bates No. 2018-08-116: 000641

Bates Nos. 2018-08-116:  
000657-000658

Duplicate Content in  
Bates Nos. 2018-08-116:  
000641-000643

## RE: 1/16/15 - Interagency Sanctions Package - Meeting Summary

**From:** (b)(6)  
**To:** ATF - (b)(6)  
**Cc:** "Smith, Bradley" (b)(6); "Kelleher, Diane (CIV)" DOJ - (b)(6); (b)(6)  
**Date:** Wed, 21 Jan 2015 17:21:54 -0500  
**Attachments:** United Shipbuilding - Press Release.pdf (112.01 kB); EO13661 Designations - Press Release.pdf (124.93 kB); Ownership or control - licensing\_guidance.pdf (117.14 kB)

ATF - (b)(6), and ATF - (b)(6)

(b)(5)

Kind regards,

(b)(6)

(b)(6)  
Attorney-Advisor  
Office of the Chief Counsel (Foreign Assets Control)  
United States Department of the Treasury  
1500 Pennsylvania Avenue, N.W.  
Washington, DC 20220  
Email: (b)(6)  
Office Tel: 202-622-2410

---

**From:** ATF - (b)(6)  
**Sent:** Friday, January 16, 2015 4:25 PM  
**To:** (b)(6)  
**Cc:** ATF - (b)(6)  
**Subject:** RE: 1/16/15 - Interagency Sanctions Package - Meeting Summary

(b)(6)

Thank you so much. Have a great weekend!

ATF - (b)(6)  
Division Chief  
ATF - FEED  
ATF - (b)(6)

---

**From:** (b)(6)  
**Sent:** Friday, January 16, 2015 4:15 PM  
**To:** ATF - (b)(6)  
**Cc:** (b)(6); Kelleher, Diane (CIV); ATF - (b)(6); (b)(6)  
**Subject:** RE: 1/16/15 - Interagency Sanctions Package - Meeting Summary

Hi ATF - (b)(6)

In response to #2 below, (b)(6) from OFAC's compliance division (copied) has graciously agreed to be the OFAC contact for the working group.

We are working on the other issues and will respond to those on a rolling basis.

Many thanks,  
(b)(6)



(b)(6)

Attorney-Advisor  
Office of the Chief Counsel (Foreign Assets Control)  
United States Department of the Treasury  
1500 Pennsylvania Avenue, N.W.  
Washington, DC 20220  
Email: (b)(6)  
Office Tel: 202-622-2410

**From:** ATF - (b)(6)  
**Sent:** Friday, January 16, 2015 2:58 PM  
**To:** State- (b)(6); (b)(6); State- (b)(6); Smith, Bradley; Blackborow, Davin; State- (b)(6)  
**State- (b)(6)**  
**Cc:** DOJ - (b)(6); DOJ - (b)(6); DOJ (b)(6), (b)(7)(C); DOJ - (b)(6)  
**Kiran.Rai@usdoj.gov; Marvin.C.Richardson** ATF - (b)(6); **Curtis.W.Gilbert** ATF - (b)(6)  
**ATF - (b)(6)**  
**ATF - (b)(6)** **Charles.R.Gross** ATF - (b)(6)  
**Subject:** 1/16/15 - Interagency Sanctions Package - Meeting Summary

Hello Colleagues:

You are receiving this message because you participated (or were invited) on today's interagency call on ATF sanctions issues. The following information captures the issues and next steps we discussed during the call. We have also attached some relevant background material as requested:

- (1) August 2014 foreign policy guidance from the State Department (to implement sanctions);
- (2) statistics on sporting shotgun line items implicated by sanctions (suspended permits, denied permit applications);
- (3) RWC correspondence;
- (4) sample ATF Form 6 (import permit) with sporting shotguns;
- (5) ATF sanctions implementation letters (import permit suspensions and permit application denials).

We discussed the following ATF sanctions issues and next steps on our call earlier today:

(1) ATF - (b)(5)  
ATF - (b)(5); (b)(6); ATF - (b)(5) Davin.

(2) ATF - (b)(5), (b)(6)  
ATF - (b)(5), (b)(6) (b)(6)  
ATF - (b)(5)

(3) ATF - (b)(5)

(4) ATF, Treasury - (b)(5)

(5) ATF, State - (b)(5)

(6) ATF - (b)(5)

# ATF - (b)(5)

Please let us know if you require additional information on any of these matters. We look forward to working with you to resolve these and future sanctions issues. Please feel free to forward this message set to any parties we may have missed in the To: or Cc: lines. Thank you for your time earlier today on the call.

**ATF - (b)(6)**

**Division Chief, FESD**

Bureau of ATF, F & E Services Division

Office: **ATF - (b)(6)**

Direct: **ATF - (b)(6)**

Nextel/Cell: **ATF - (b)(6)**

## RE: AK-47s

---

**From:** "Feddo, Thomas" (b)(6)

**To:** (b)(6) "Gacki, Andrea" (b)(6)

**Cc:** (b)(6) "Fisch, Eytan"

**Date:** Thu, 22 Jan 2015 11:30:04 -0500

---

Thanks (b)(6) (b)(5) Appreciate the heads up

---

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

**Sent:** Thursday, January 22, 2015 1

**To:** Gacki, Andrea; Feddo, Thomas; (b)(6)

**Cc:** (b)(6) Fisch, Eytan; (b)(6)

**Subject:** FW: AK-47s

Hi ENF, I know we sent a letter to RWC about the Kalashnikov issue when the sanctions came out.

(b)(5)

(b)(6)

---

**From:** State- (b)(6)

**Sent:** Thursday, January 22, 2015 11:22 AM

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

**Subject:** FW: AK-47s

What do you think about this article? State (b)(5)

State- (b)(6)

---

**From:** State- (b)(6)

**Sent:** Thursday, January 22, 2015 8:51 AM

**To:** State- (b)(6)

**Subject:** AK-47s

State- (b)(6) – this caught my eye. Thought you'd be interested.

[http://www.slate.com/blogs/the\\_slatest/2015/01/21/russian\\_kalashnikov\\_ak\\_47\\_rifles\\_to\\_be\\_made\\_in\\_u\\_s.html](http://www.slate.com/blogs/the_slatest/2015/01/21/russian_kalashnikov_ak_47_rifles_to_be_made_in_u_s.html)

This email is UNCLASSIFIED.

RE: AK-47s

---

From: (b)(6)  
To: "Gacki, Andrea" (b)(6) "Feddo, Thomas" (b)(6)  
(b)(6)  
(b)(6) "Blackborow, Davin"  
Cc: (b)(6) (b)(6) (b)(6)  
Date: Thu, 22 Jan 2015 11:32:18 -0500

Great!

---

**From:** Gacki, Andrea  
**Sent:** Thursday, January 22, 2015 11:30 AM  
**To:** (b)(6) Feddo, Thomas; (b)(6)  
**Cc:** (b)(6) Fisch, Eytan; (b)(6)  
**Subject:** RE: AK-47s

Thanks (b)(6) – (b)(5) Adding some others.

---

**From:** (b)(6)  
**Sent:** Thursday, January 22, 2015 11:24 AM  
**To:** Gacki, Andrea; Feddo, Thomas; (b)(6)  
**Cc:** (b)(6) Fisch, Eytan; (b)(6)  
**Subject:** FW: AK-47s

Duplicative of content in Bates No. 2018-08-116: 000682

Licensing Application involving

(b)(4)

(b)(4)

From:

(b)(6)

To:

(b)(6)

Cc:

(b)(6)

Date:

Thu, 22 Jan 2015 14:19:21 -0500

Attachments:

(b)(4)

Good Afternoon OGT:

Licensing received an Application from the California-based company

(b)(4)

(b)(4) seeking interpretative guidance/advisory opinion on whether it is authorized to engage in business with (b)(4)

According to the Application, (b)(4)

(b)(4)

(b)(4)

Concern was interested in acquiring (b)(4) but that this "action never materialized." claims that SDN Kalashnikov

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

Please find the application attached. Please don't hesitate to contact me if you have any questions or concerns.

Very respectfully,

(b)(6)

(b)(6)

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

Phone:

Email:

(b)(6)





# O F A C

Office of Foreign Assets Control

## License Application

Reference Number:

(b)(4)

Generated on 8/6/2014

### Application Information

**Application Type:** Transactional  
**Application Reason:** New Application  
**Program(s):** UKRAINE-EO13661  
**Description of Subject Matter:**  
Request for advisory opinion on whether (b)(4) is a blocked company.

**Category:** Transactional  
**Subcategory:** Imports  
**Previous Case ID:**

### Contact Information

#### Applicant

**Contact Category:** Institution  
**Organization Name:** (b)(4)  
**Point of Contact Name:** (b)(6)  
**Address:** Line1: (b)(4)  
Line2:  
Line3:  
**City:** (b)(4)  
**State:** California  
**Zip:** (b)(4)  
**Country:** United States  
**Email Address:** (b)(6)  
**Phone:** (b)(6)  
**Principal Place of Business:**  
**Place where Business is Incorporated:**

Office

#### Correspondent

**Contact Category:** Institution  
**Organization Name:** Mark Barnes & Associates  
**Point of Contact Name:** Michael Faucette  
**Address:** Line1: 1350 I Street NW  
Line2: Suite 260  
Line3:  
**City:** Washington  
**State:** DC  
**Zip:** 20005  
**Country:** United States  
**Email Address:** michael.faucette@mbassociateslaw.com  
**Phone:** 202-626-0085  
**Principal Place of Business:**  
**Place where Business is Incorporated:**

Office

### Attachments

Name	Document Type
Advisory Opinion Request	Supplemental Information

### Certification

**Signature:** Michael Faucette  
**Email Address:** michael.faucette@mbassociateslaw.com

**Date:** 8/6/2014



## FW: AK47 to be made in America?

---

From: "Gacki, Andrea" [REDACTED] (b)(6)  
To: "Freddo, Thomas" [REDACTED] (b)(6)  
Date: Thu, 22 Jan 2015 15:49:49 -0500

---

Just fyi:

Duplicative of content in Bates Nos. 2018-08-116: 000095-000096



Bates Nos. 2018-08-116:  
000687-000688

Duplicate Content in  
Bates Nos. 2018-08-116:  
000096-000099

**From:** (b)(6)  
**To:** (b)(6)  
**Subject:** RE: Licensing Application involving (b)(4)  
**Date:** Thursday, January 22, 2015 4:36:52 PM

---

Sorry I can take this one

---

**From:** (b)(6)  
**Sent:** Thursday, January 22, 2015 4:36 PM  
**To:** (b)(6)  
**Subject:** FW: Licensing Application involving (b)(4)  
(b)(4)

Do you want to take this one since you worked this case? If not, let me know and I'll find someone else.

---

**From:** (b)(6)  
**Sent:** Thursday, January 22, 2015 2:19 PM  
**To:** (b)(6)  
(b)(6)  
**Cc:** (b)(6)  
**Subject:** Licensing Application involving (b)(4)  
(b)(4)

Duplicative of content in Bates No. 2018-08-116: 000684



## FW: Russia ECON Daily 01-23-15

From: (b)(6)  
To: "Gacki, Andrea" (b)(6) "Feddo, Thomas" (b)(6)  
Cc: "Fisch, Eytan" (b)(6)  
Date: Fri, 23 Jan 2015 10:23:40 -0500  
Attachments: ECON Daily 01-23-15.docx (304.63 kB)

(b)(5)

From: State- (b)(6)  
Sent: Friday, January 23, 2015 9:30 AM  
To: State- (b)(6)  
Subject: Russia ECON Daily 01-23-15

### Contents

[Rosneft Expands Drive for State Financing in the Face of Sanctions. 1](#)  
[Gazprom Reaffirms Plan to Build Baltic LNG Plant 1](#)  
[U.S. Importer of Kalashnikov Rifles to Launch U.S. Production of AK-47. 2](#)  
[Market Update for January 23. 2](#)

**Rosneft Expands Drive for State Financing in the Face of Sanctions :** Rosneft more than doubled the number of projects it has requested to be financed from the National Wealth Fund (NWF) from 12 to 28, according to [Vedomosti](#). Rosneft said the total financing required to execute all 28 projects exceeds one trillion rubles (\$15 billion). Although not specified, Rosneft is asking for approximately \$6 billion for the 28 projects if Rosneft and the GOR comply with current guidelines – that the GOR would spend no more than 60 percent of the \$78 billion NWF (as of January 1, 2015) for infrastructure projects and would only co-finance up to 40 percent of each project.

*Rosneft originally requested a blanket grant of 1.5 trillion rubles (\$23 billion) from the NWF to be spent on about 100 projects and then increased the request to 2.4 trillion (\$40 billion). However, the Ministry of Economic Development (MED) rejected providing a blanket grant and instead told Rosneft to provide project-specific justifications and amounts in order to determine whether a project was eligible for NWF financing.*

**Gazprom Reaffirms Plan to Build Baltic LNG Plant :** Gazprom reaffirmed its plan to build a new liquefied natural gas (LNG) plant with an annual capacity of up to 15 million tons on the Baltic Sea at the port of Ust-Luga in a [January 22 press release](#). Gazprom Deputy CEO Valery Golubev said its potential markets would be Spain, Portugal, Britain, Latin America, India, and North America.

*Plans for Baltic LNG have been under consideration for a decade, along with other Gazprom LNG projects including Vladivostok LNG and an extension of its existing Sakhalin-2 plant (currently Russia's only operating LNG plant). Gazprom's stated aim is to increase its share of the global LNG market from around 5 percent today to 15 percent, but analysts are skeptical of Russia's ability to expand its LNG export capacity under the financial constraints of Ukraine sanctions. Gazprom's Baltic LNG plant may be designed to compete with Novatek's Yamal LNG, which will become Russia's second LNG plant when it begins operations in 2018 if it can overcome financial difficulties associated with sanctions.*

**U.S. Importer of Kalashnikov Rifles to Launch U.S. Production of AK-47 :** This week, [Russian](#) media reported that American company "Russian Weapon Company" (RWC), the exclusive U.S. importer of Kalashnikov rifles and shotguns, plans to launch production of AK-47 shotguns in the United States in the second quarter of 2015. RWC CEO Thomas McCrossin said that his company had been forced to stop trade with Kalashnikov Concern after the U.S. Government imposed sanctions on the company in July, and that his company plans to satisfy the demand for Kalashnikov shotguns in the U.S. market by launching domestic production.

*Kalashnikov Concern was added to the U.S. Treasury Department's Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) list on July 16, 2014.*

### Market Update for January 23 :

	% change as of 12:00	% change on January 22	% change since 03/03/14	% change since 01/01/14
--	-------------------------	---------------------------	----------------------------	----------------------------

2018-08-116: 000694

MICEX	1.4	3.0	15.4	10.8
RTS	2.5	4.5	-35.5	-43.4
RUB/USD*	-1.0	-1.8	78.8	95.4
	Interventions on 01/21 (Million USD)		Cumulative since 03/03/14 (Billion USD)	Cumulative since 01/01/14 (Billion USD)
Interventions**	0		74.1	89.4

\*Positive number represents ruble weakening against the dollar.

\*\* Positive number represents FX sales, does not include FX purchases by CBR for SWFs.

State- (b)(6)

Economic Section  
U.S. Embassy in Moscow

State- (b)(6)

Switchboard:+7 495 728 -5000

State- (b)(6)

This email is UNCLASSIFIED.





U.S. Embassy Moscow, Russia  
**RUSSIA ECONOMIC DAILY**  
January 23, 2015



## Contents

<a href="#">Rosneft Expands Drive for State Financing in the Face of Sanctions</a> .....	1
<a href="#">Gazprom Reaffirms Plan to Build Baltic LNG Plant</a> .....	1
<a href="#">U.S. Importer of Kalashnikov Rifles to Launch U.S. Production of AK-47</a> .....	2
<a href="#">Market Update for January 23</a> .....	2

**Rosneft Expands Drive for State Financing in the Face of Sanctions:** Rosneft more than doubled the number of projects it has requested to be financed from the National Wealth Fund (NWF) from 12 to 28, according to [Vedomosti](#). Rosneft said the total financing required to execute all 28 projects exceeds one trillion rubles (\$15 billion). Although not specified, Rosneft is asking for approximately \$6 billion for the 28 projects if Rosneft and the GOR comply with current guidelines – that the GOR would spend no more than 60 percent of the \$78 billion NWF (as of January 1, 2015) for infrastructure projects and would only co-finance up to 40 percent of each project.

*Rosneft originally requested a blanket grant of 1.5 trillion rubles (\$23 billion) from the NWF to be spent on about 100 projects and then increased the request to 2.4 trillion (\$40 billion). However, the Ministry of Economic Development (MED) rejected providing a blanket grant and instead told Rosneft to provide project-specific justifications and amounts in order to determine whether a project was eligibility for NWF financing.*

**Gazprom Reaffirms Plan to Build Baltic LNG Plant:** Gazprom reaffirmed its plan to build a new liquefied natural gas (LNG) plant with an annual capacity of up to 15 million tons on the Baltic Sea at the port of Ust-Luga in a [January 22 press release](#). Gazprom Deputy CEO Valery Golubev said its potential markets would be Spain, Portugal, Britain, Latin America, India, and North America.

*Plans for Baltic LNG have been under consideration for a decade, along with other Gazprom LNG projects including Vladivostok LNG and an extension of its existing Sakhalin-2 plant (currently Russia's only operating LNG plant). Gazprom's stated aim is to increase its share of the global LNG market from around 5 percent today to 15 percent, but analysts are skeptical of Russia's ability to expand its LNG export capacity under the financial constraints of Ukraine sanctions. Gazprom's Baltic LNG plant may be designed to compete with Novatek's Yamal LNG, which will become Russia's second LNG plant when it begins operations in 2018 if it can overcome financial difficulties associated with sanctions.*



# Russia Economic Daily

January 23, 2015

**U.S. Importer of Kalashnikov Rifles to Launch U.S. Production of AK-47:** This week, [Russian](#) media reported that American company “Russian Weapon Company” (RWC), the exclusive U.S. importer of Kalashnikov rifles and shotguns, plans to launch production of AK-47 shotguns in the United States in the second quarter of 2015. RWC CEO Thomas McCrossin said that his company had been forced to stop trade with Kalashnikov Concern after the U.S. Government imposed sanctions on the company in July, and that his company plans to satisfy the demand for Kalashnikov shotguns in the U.S. market by launching domestic production.

*Kalashnikov Concern was added to the U.S. Treasury Department’s Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) list on July 16, 2014.*

## Market Update for January 23:

	% change as of 12:00	% change on January 22	% change since 03/03/14	% change since 01/01/14
MICEX	1.4	3.0	15.4	10.8
RTS	2.5	4.5	-35.5	-43.4
RUB/USD*	-1.0	-1.8	78.8	95.4
	Interventions on 01/21 (Million USD)		Cumulative since 03/03/14 (Billion USD)	Cumulative since 01/01/14 (Billion USD)
Interventions**	0		74.1	89.4

\*Positive number represents ruble weakening against the dollar.

\*\* Positive number represents FX sales, does not include FX purchases by CBR for SWFs.

**From:** (b)(6)  
**To:**  
**Subject:** FW: Russia ECON Daily 01-23-15  
**Date:** Friday, January 23, 2015 10:32:37 AM  
**Attachments:** [ECON Daily 01-23-15.docx](#)

---

(b)(6)  
Enforcement Officer  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, N.W.  
Washington, D.C. 20220

(b)(6)

(b)(6)

<http://www.treas.gov/ofac>

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 10:24 AM  
**To:** Gacki, Andrea; Feddo, Thomas; (b)(6)  
**Cc:** Fisch, Eytan; (b)(6)  
**Subject:** FW: Russia ECON Daily 01-23-15

Duplicative of content in Bates No. 2018-08-116: 000694



Bates Nos. 2018-08-116:  
000699-000700

Duplicate Content in  
Bates Nos. 2018-08-116:  
000694-000695

Bates Nos. 2018-08-116:  
000701-000702

Duplicate Document at  
Bates Nos. 2018-08-116:  
000696-000697

**RE: Licensing Application involving** (b)(4)  
(b)(4)

---

**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Fri, 23 Jan 2015 11:11:05 -0500

Ha, sure thing. I'm cranking on some (b)(5) stuff today so I won't be able to do anything with it until late today/early Monday.

Thanks.

(b)(6)

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 11:10 AM  
**To:** (b)(6)  
**Subject:** RE: Licensing Application involving (b)(4)

Morning (b)(6) I will respond to this one. I have to run around all this morning but I promise to respond by 5pm today. Will you bother me later if I don't do it. Thanks!

---

**From:** (b)(6)  
**Sent:** Thursday, January 22, 2015 2:19 PM  
**To:** (b)(6)  
(b)(6)  
**Cc:** (b)(6)  
**Subject:** Licensing Application involving (b)(4)

Duplicative of content in Bates No. 2018-08-116: 000684





RE: RE: RWC

---

From: (b)(6)  
To: (b)(6)  
Date: Fr, 23 Jan 2015 14:25:35 -0500

---

Thanks, everybody, for checking just to make sure.

(b)(6)

---

From: (b)(6)  
Sent: Friday, January 23, 2015 12:35 PM  
To: (b)(6)  
Subject: RE: RE: RWC

(b)(5)

Thanks!

(b)(6)

---

From: (b)(6)  
Sent: Friday, January 23, 2015 12:32 PM  
To: (b)(6)  
Subject: RE: RE: RWC

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

V/r

(b)(6)

---

From: (b)(6)  
Sent: Friday, January 23, 2015 11:28 AM  
To: (b)(6)  
Subject: RE: RE: RWC

That's what I thought, too.

---

From: (b)(6)  
Sent: Friday, January 23, 2015 11:27 AM  
To: (b)(6)  
Subject: RE: RE: RWC

(b)(5)

Thanks

(b)(6)

---

From: (b)(6)  
Sent: Friday, January 23, 2015 11:26 AM  
To: (b)(6)  
Subject: RE: RWC

Hi all:

(b)(5) ?

Thanks,

(b)(6)

**U.S. Importer of Kalashnikov Rifles to Launch U.S. Production of AK-47 :** This week, [Russian](#) media reported that American company "Russian Weapon Company" (RWC), the exclusive U.S. importer of Kalashnikov rifles and shotguns, plans to launch production of AK-47 shotguns in the United States in the second quarter of 2015. RWC CEO Thomas McCrossin said that his company had been forced to stop trade with Kalashnikov Concern after the U.S. Government imposed sanctions on the company in July, and that his company plans to satisfy the demand for Kalashnikov shotguns in the U.S. market by launching domestic production.

*Kalashnikov Concern was added to the U.S. Treasury Department's Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) list on July 16, 2014.*

## Re: Russia ECON Daily 01-23-15

---

**From:** "Blackborow, Davin" (b)(6)  
**To:** (b)(6)  
Gacki, Andrea (b)(6) "Feddo, Thomas"  
**Cc:** "Fisch, Eytan" (b)(6) (b)(6) Smith, Bradley  
**Date:** Fri, 23 Jan 2015 17:55:26 -0500

---

Great - thanks (b)(6)!

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 05:54 PM  
**To:** Blackborow, Davin; (b)(6) Gacki, Andrea; Feddo, Thomas; (b)(6)  
**Cc:** Fisch, Eytan; (b)(6) Smith, Bradley  
**Subject:** RE: Russia ECON Daily 01-23-15

Hi Davin:

(b)(5)

(b)(6)

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 11:18 AM  
**To:** Blackborow, Davin; (b)(6) (b)(6) Gacki, Andrea; Feddo, Thomas; (b)(6)  
**Cc:** Fisch, Eytan; (b)(6) Smith, Bradley  
**Subject:** RE: Russia ECON Daily 01-23-15

Hi Davin:

No, I'm not, but I will check with my team.

(b)(6)

---

**From:** Blackborow, Davin  
**Sent:** Friday, January 23, 2015 10:56 AM  
**To:** (b)(6) Gacki, Andrea; Feddo, Thomas; (b)(6)  
**Cc:** Fisch, Eytan; (b)(6) Smith, Bradley; (b)(6)  
**Subject:** RE: Russia ECON Daily 01-23-15

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

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 10:53 AM  
**To:** (b)(6) Gacki, Andrea; Feddo, Thomas; (b)(6); Blackborow, Davin  
**Cc:** Fisch, Eytan; (b)(6) Smith, Bradley  
**Subject:** RE: Russia ECON Daily 01-23-15

Here's another article about it, for anyone interested in further reading-  
[http://www.upi.com/Business\\_News/2015/01/21/US-company-to-make-AK-47s-after-sanctions-on-Russia/3261421868544/](http://www.upi.com/Business_News/2015/01/21/US-company-to-make-AK-47s-after-sanctions-on-Russia/3261421868544/)

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 10:50 AM  
**To:** (b)(6) Gacki, Andrea; Feddo, Thomas; (b)(6) Blackborow, Davin; (b)(6)  
**Cc:** Fisch, Eytan; (b)(6) Smith, Bradley  
**Subject:** RE: Russia ECON Daily 01-23-15

Also + Brad

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 10:48 AM  
**To:** (b)(6) Gacki, Andrea; Feddo, Thomas; (b)(6) Blackborow, Davin; (b)(6)  
**Cc:** Fisch, Eytan; (b)(6)

**Subject:** RE: Russia ECON Daily 01-23-15

Adding Davin, who I believe has a pending RWC license, and (b)(6) who has corresponded with RWC on prior questions that may be related to this issue.

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 10:34 AM  
**To:** (b)(6); Gacki, Andrea; Feddo, Thomas; (b)(6)  
**Cc:** Fisch, Eytan; (b)(6)  
**Subject:** RE: Russia ECON Daily 01-23-15

Thank you, (b)(6). I am looping (b)(6) who is our Enforcement Officer on this case. I am also looping (b)(6) who is our regular attendee at the Ukr meetings. If (b)(6) has access to the 5<sup>th</sup> floor (something we will check on) then he would be the best suited person to provide any updates.

Also, removing (b)(6) from the chain.

Thank you,

(b)(6)

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 10:2  
**To:** Gacki, Andrea; Feddo, Thomas; (b)(6)  
**Cc:** Fisch, Eytan; (b)(6)  
**Subject:** FW: Russia ECON Daily 01-23-15

Duplicates content in email marked with Bates Nos. 000694-000695

Duplicates content in email marked with Bates Nos. 000694-000695





**From:** (b)(6)  
**To:** (b)(6)  
**Subject:** RE: Licensing Application involving (b)(4)  
**Date:** Monday, January 26, 2015 12:34:00 PM

---

It's fine for this to wait a week until your return.

---

**From:** (b)(6)  
**Sent:** Monday, January 26, 2015 11:54 AM  
**To:** (b)(6)  
**Subject:** Re: Licensing Application involving (b)(4)  
(b)(4)

Hi (b)(6) I'm sorry I never got to this last week w everything going on. Can u assign it to someone so its not a week late? I also never got to tell (b)(6) about the frn. I'm sorry can u do that too.

How is the project for the search for the companies coming along?

---


**From:** (b)(6)  
**Sent:** Thursday, January 22, 2015 04:35 PM Eastern Standard Time  
**To:** (b)(6)  
**Subject:** FW: Licensing Application involving (b)(4)  
(b)(4)

Do you want to take this one since you worked this case? If not, let me know and I'll find someone else.

---

**From:** (b)(6)  
**Sent:** Thursday, January 22, 2015 2:19 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** Licensing Application involving (b)(4)  
(b)(4)

Duplicative of content in Bates No. 2018-08-116: 000684



Duplicative of content in Bates No. 2018-08-116: 000684



**RE: Licensing Application involving** (b)(4)  
(b)(4)

**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Wed, 28 Jan 2015 13:16:55 -0500

Hi (b)(6) – No problem. Next Monday/next week is fine. Just wanted to make sure you hadn't lost track of it.

Thanks,

(b)(6)

**From:** (b)(6)  
**Sent:** Wednesday, January 28, 2015 10:40 AM  
**To:** (b)(6)  
**Subject:** Re: Licensing Application involving (b)(4)

Hi (b)(6) I'm sorry I'm out until next monday. Can I answer you then. If not, let me know and it can be assigned to someone else on my team. Thanks!

(b)(6)

**From :** (b)(6)  
**Sent:** Tuesday, January 27, 2015 06:06 PM Eastern Standard Time  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Licensing Application involving (b)(4)

Hi (b)(6) – Just curious if you have had a chance to look at this entity/my request. This is not an urgent request, but I wanted to make sure it was still on your radar. Let me know if you have any questions or concerns.

V/r

(b)(6)

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 11:10 AM  
**To:** (b)(6)  
**Subject:** RE: Licensing Application involving (b)(4)

Morning (b)(6) I will respond to this one. I have to run around all this morning but I promise to respond by 5pm today. Will you bother me later if I don't do it. Thanks!

**From:** (b)(6)  
**Sent:** Thursday, January 22, 2015 2:19 PM  
**To:** (b)(6)

**Cc:** (b)(6)  
**Subject:** Licensing Application involving (b)(4)

Duplicative of content in Bates No. 2018-08-116: 000684



**From:** (b)(6)  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Russia ECON Daily 01-23-15  
**Date:** Thursday, January 29, 2015 10:53:06 AM

---

Thanks, (b)(6).

---

**From:** (b)(6)  
**Sent:** Thursday, January 29, 2015 10:43 AM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** FW: Russia ECON Daily 01-23-15  
FYSA

---

**From:** (b)(6)  
**Sent:** Thursday, January 29, 2015 10:37 AM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Russia ECON Daily 01-23-15

Thanks (b)(6) I was included in much of this email chain from late last week. I appreciate you touching base with me and clearing this up. (b)(5)

(b)(5)

---

**From:** (b)(6)  
**Sent:** Thursday, January 29, 2015 10:22 AM  
**To:** (b)(6)  
**Subject:** FW: Russia ECON Daily 01-23-15  
Hi (b)(6)

I think (b)(5)

(b)(5)

---

Thanks

(b)(6)

---

**From:** (b)(6)  
**Sent:** Friday, January 23, 2015 5:54 PM  
**To:** Blackborow, Davin; (b)(6) Gacki, Andrea;  
Feddo, Thomas; (b)(6)  
**Cc:** Fisch, Eytan; (b)(6) Smith, Bradley  
**Subject:** RE: Russia ECON Daily 01-23-15

Duplicative of content in Bates No. 2018-08-116: 000706

(b)(5)



Bates Nos. 2018-08-116:  
000834-000836

Duplicate Content in  
Bates Nos. 2018-08-116:  
000706-000708

## FW: UK names

---

**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Fri, 30 Jan 2015 20:06:45 -0500  
**Attachments:** 20150105 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (351.04 kB)

---

fyi

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

**From:** (b)(6)  
**Sent:** Friday, January 30, 2015 1:04 PM  
**To:** Gatjanis, Gregory; Baheri, Leila; (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: UK names

Thanks Greg. FYI. Here's the latest comparison chart, per your request in the mtg earlier.

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

**From:** Gatjanis, Gregory  
**Sent:** Friday, January 30, 2015 12:59 PM  
**To:** Baheri, Leila; (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: UK names

Copying others

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

**From:** Gatjanis, Gregory  
**Sent:** Friday, January 30, 2015 12:55 PM  
**To:** Baheri, Leila; (b)(6)  
**Subject:** FW: UK names

Can we do a scrub of these names and compare them to the ones on our current list?

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

**From:** Mortlock, David [mailto:(b)(6)]  
**Sent:** Friday, January 30, 2015 12:30 PM  
**To:** Gatjanis, Gregory; Baheri, Leila  
**Cc:** 'FriedD'; State (b)(6)  
**Subject:** UK names

Greg,

Hopefully, in time for the targeting meeting. These are names the UK has submitted to the Commission. Would appreciate a scrub on these. I'll let you know if our team has any objections to any of them.

Thanks,  
David

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

**From:** NSS Helpdesk Scanner [mailto:(b)(6)]  
**Sent:** Saturday, January 31, 2015 12:37 AM  
**To:** Mortlock, David  
**Subject:**

## Fw: Ukraine Freedom Support Act

---

**From:** (b)(6)  
**To:**  
**Date:** Tue, 03 Feb 2015 19:32:23 -0500  
**Attachments:** FW\_ Ukraine Freedom Support Act Implementation.msg (80.9 kB); Defense entities.doc (34.3 kB)

---

### Attachments

---

**From:** (b)(6)  
**Sent:** Tuesday, February 03, 2015 06:10 PM  
**To:** Chemali, Hagar; Ballman, Luke; (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Ukraine Freedom Support Act

Hi Hagar,

If this is not too late, the edits to the doc in the attached email are the last I had on the topic.

And here's the list of 14 defense entities.

Copying OFAC for awareness and (b)(6) in case she made any additional changes to the TPs before including in David's testimony materials.

(b)(6)

---

**From:** Chemali, Hagar  
**Sent:** Tuesday, February 03, 2015 10:54 AM  
**To:** Ballman, Luke; (b)(6)  
**Subject:** FW: Ukraine Freedom Support Act

Hey guys! Do we have anything on this we can help the NSC out with?

---

**From:** Stroh, Mark [[mailto:](#) (b)(6)]  
**Sent:** Tuesday, February 03, 2015 10:31 AM  
**To:** Chemali, Hagar  
**Subject:** Ukraine Freedom Support Act

Hey Hagar,

(b)(5)

Also, do you have a list or a press release of the 14 companies we have sanctioned in Russia as a result of the Ukraine stuff? I think those all went down before I got here.

Haven't heard anything from Team India about recommendations for Sec Lew's trip – I'll ping them again today.

Mark

Bates Nos. 2018-08-116:  
000844-000846  
Non-Responsive  
Record