

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

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**From:** [REDACTED] (b)(6)  
**To:** "Blackborow, Davin" [REDACTED] (b)(6)  
**Date:** Thu, 05 Feb 2015 11:51:44 -0500  
**Attachments:** For Your Review\_ Amended ATF Draft Response to RWC (Sanctions).msg (2.37 MB)

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Hi Davin,

ATF sent me an email about this one today that I'll forward to you separately. [REDACTED] (b)(5)  
[REDACTED] (b)(5)

Please let me know if you want to discuss.

Many thanks,

[REDACTED] (b)(6)

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**From:** [REDACTED] (b)(6)  
**Sent:** Tuesday, January 27, 2015 2:49 PM  
**To:** Blackborow, Davin  
**Subject:** FW: 1/16/15 - Interagency Sanctions Package - Meeting Summary

Hi Davin,

Just writing to follow-up about the RWC item [REDACTED] (b)(5)  
[REDACTED] (b)(5) Thanks very much for your help, and please let me know if you want to discuss.

Thanks,

[REDACTED] (b)(6)

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**From:** [REDACTED] (b)(6)  
**Sent:** Friday, January 16, 2015 3:15 PM  
**To:** Blackborow, Davin  
**Subject:** FW: 1/16/15 - Interagency Sanctions Package - Meeting Summary

Davin,

Attached in the email here is the ATF response letter to RWC we discussed earlier [REDACTED] (b)(5)  
[REDACTED] (b)(5)

Many thanks,

[REDACTED] (b)(6)

Duplicative content in pages marked Bates Nos. 000668-000669



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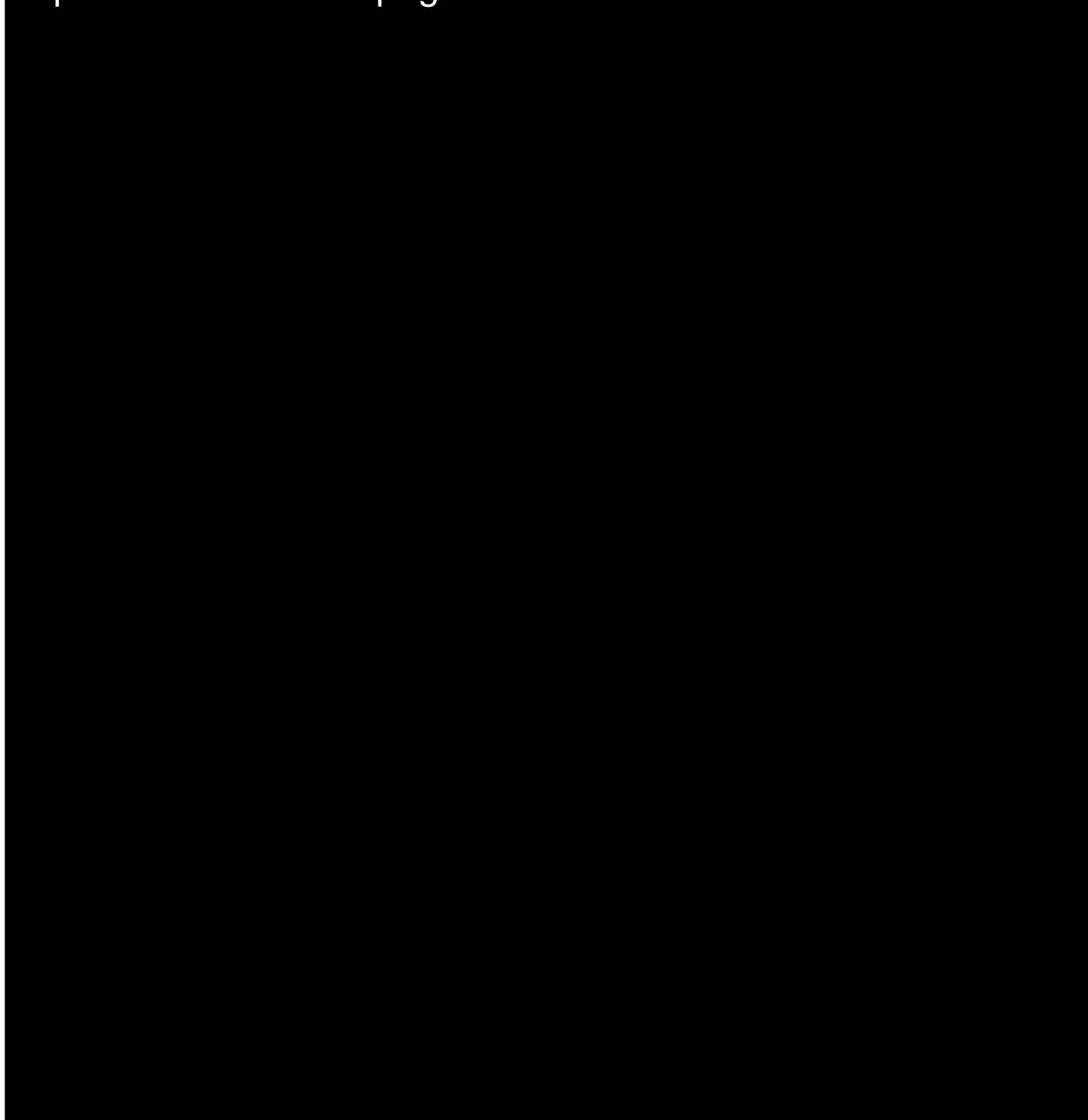
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Duplicative content in pages marked Bates Nos. 000668-000669



## For Your Review: Amended ATF Draft Response to RWC (Sanctions)

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**From:** ATF - (b)(6)  
**To:** "Blackborow, Davin" (b)(6), "Smith, Bradley" (b)(6)  
**Cc:** State (b)(6), kiran.rao@usdoj.gov, DOJ (b)(6), (b)(7)(C), DOJ (b)(6), ATF - (b)(6), "Richardson, Marvin" ATF - (b)(6), ATF - (b)(6), charles.gross ATF - (b)(6)  
**Date:** Wed, 26 Nov 2014 12:33:40 -0500  
**Attachments:** 11 26 14 ATF Draft RWC Response .docx (23.99 kB); ATF Guidance on EO 13661 re sanctions on Russian entities - 8 August 2014.pdf (1.5 MB); RWC Import\_Permit\_Appeal1.pdf (249.84 kB); RWC-Baikal Appeal Update.pdf (498.32 kB)

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Hello,

You have received this email message because you were at some point involved in interagency dialogue regarding Russian Federation sanctions (sanctions). ATF, State - (b)(5)

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

ATF - (b)(5) Accordingly, ATF now requests your agency's review of the revised draft ATF response. We look forward to speaking with you on December 2<sup>nd</sup>. Have a safe and happy Thanksgiving!

Thank you

ATF - (b)(6)

Bates No. 2018-08-116:  
000852-000856  
Withheld in Full  
by ATF Pursuant to  
(b)(4)

# ATTACHMENT A

Bates Nos. 2018-08-116:

000858-000861

Duplicate Content in

Bates Nos. 2018-08-116:

000852-000855

# ATTACHMENT B



Bates Nos. 2018-08-116:

000863-000865

Duplicate Content in

Bates Nos. 2018-08-116:

000595-000597

## FW: Quick Contact Information Confirmation Request (ATF RWC Letter re. Russian Federation Sanctions)

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**From:** [REDACTED] (b)(6)  
**To:** "Blackborow, Davin" [REDACTED] (b)(6)  
**Date:** Thu, 05 Feb 2015 11:52:18 -0500  
**Attachments:** 02.05.15 ATF Draft RWC Response .docx (24.04 kB)

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Per my other email, here is the email from ATF with their draft response to RWC.

Thanks,

(b)(6)

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**From:** ATF - (b)(6)  
**Sent:** Thursday, February 05, 2015 11:27 AM  
**To:** [REDACTED] (b)(6)  
**Subject:** Quick Contact Information Confirmation Request (ATF RWC Letter re. Russian Federation Sanctions)

Hello (b)(6)

As you may recall, RWC submitted an inquiry to ATF that implicated an OFAC response. Last we spoke (on an interagency conference call on [REDACTED] ATF - (b)(5)

ATF - (b)(5)

Thank you so much for all of your help with our implementation questions. We appreciate your timely responses!

ATF - (b)(6)

ATF - (b)(6) | [Attorney](#) | [Law & Policy Division](#) | [Office of Chief Counsel](#) | [Bureau of Alcohol, Tobacco, Firearms & Explosives](#) ATF - (b)(6)  
ATF - (b)(6)

Re: Referral to State Ukraine-EO13661-2014-311648-1 RWC (import Baikal

(b)(4)

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

To: (b)(6)

Date: Fri, 06 Feb 2015 19:34:34 -0500

You're right - (b)(4), (b)(5)

From: (b)(6)

Sent: Friday, February 06, 2015 07:13 PM

To: Blackborow, Davin

Subject: RE: Referral to State Ukraine-EO13661-2014-311648-1 RWC (import Baikal (b)(4))

Hi Davin:

I believe

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

?

From: Blackborow, Davin

Sent: Friday, February 06, 2015 6:58 PM

To: (b)(6)

Subject: Re: Referral to State Ukraine-EO13661-2014-311648-1 RWC (import Baikal (b)(4))

(b)(6),

(b)(5)

Enjoy your weekend!

Davin

From : (b)(6)

Sent: Friday, February 06, 2015 06:18 PM

To: Blackborow, Davin

Cc: (b)(6)

Subject: RE: Referral to State Ukraine-EO13661-2014-311648-1 RWC (import Baikal (b)(4))

Hi Davin:

(b)(6) was out this afternoon, (b)(5), I've prepared a draft referral to State. Does this work for you? If it does, I'll send it over.

Thanks,

(b)(6)

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

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

**From:** (b)(6)  
**To:** non-TSRA@state.gov; State (b)(6)  
State (b)(6) State (b)(6)  
**Cc:** (b)(6) Smith, Bradley; Blackborow, Davin; Feddo, Thomas  
**Subject:** RE: Referral to State Ukraine-EO13661-2014-311648-1 RWC (import Baikal (b)(4))  
**Date:** Friday, February 06, 2015 7:45:43 PM  
**Attachments:** [07292014 application RWC.pdf](#)  
[10102014 supplemental RWC .pdf](#)  
[12122014 Supplemental Letter RWC.pdf](#)  
[Re RWC - Case Number Ukraine-EO13661-2014-311648-1.msg](#)  
[FP Ukraine2 2014 311316-1.pdf](#)

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OFAC has received a revised request from the Russian Weapon Company Group LLC (RWC) (the "Application") (attached) seeking guidance as to whether Izhevsky Mekhanichesky Zavod JSC ("Baikal"), a Russian arms manufacturer that deals in sporting shotguns and air rifles, would be considered a blocked entity pursuant to the Ukraine-Related Sanctions Regulations, 31 C.F.R. Part 589 (the "Regulations"). In addition, RWC is seeking guidance as to whether (b)(4) (b)(4) may be sold by RWC. According to the Application, RWC imports (b)(4) from Baikal to sell in the United States. RWC states that although Baikal is not on OFAC's Specially Designated Nationals and Blocked Persons List (the "SDN List"), it does have a relationship with Kalashnikov Concern (KC), an entity designated under Executive Order 13661 ("E.O. 13661").

According to RWC, Baikal provided RWC with documents demonstrating that Baikal's stock is 100% owned by Rostec, an entity that was added to the Sectoral Sanctions Identifications List on September 12, 2014. RWC characterizes the relationship between Baikal and KC as strictly a marketing one in which KC and Baikal share booths at trade shows and KC assists Baikal with its advertising and other promotional media. (b)(4)

(b)(4)

The Regulations prohibit all transactions prohibited pursuant to Executive Order 13660 of March 6, 2014 (E.O. 13660), Executive Order 13661 of March 16, 2014 (E.O. 13661), and Executive Order 13662 of March 20, 2014 (E.O. 13662). On July 16, 2014, KC was designated pursuant to E.O. 13661; accordingly, all of KC's property and interests in property are blocked. Property blocked pursuant to an Executive order or regulations administered by OFAC is broadly defined to include any property or interest in property, tangible or intangible, including present, future or contingent interests. Regulations, § 589.308. A property interest subject to blocking includes interests of any nature whatsoever, direct or indirect. Regulations, § 589.306.

In addition, persons whose property and interests in property are blocked pursuant to an Executive order or regulations administered by OFAC ("blocked persons") are considered to have an interest in all property and interests in property of an entity in which such blocked persons own, whether individually or in the aggregate, directly or indirectly, a 50 percent or greater interest. Consequently, any entity owned in the aggregate, directly or indirectly, 50 percent or more by one or more blocked persons is itself considered to be a blocked

person. The property and interests in property of such an entity are blocked, regardless of whether the entity itself is listed in the annex to an Executive order or otherwise placed on OFAC's list of Specially Designated Nationals. Please see OFAC's "Revised Guidance on Entities Owned by Persons whose Property and Interests in Property are Blocked" at [http://www.treasury.gov/resource-center/sanctions/Documents/licensing\\_guidance.pdf](http://www.treasury.gov/resource-center/sanctions/Documents/licensing_guidance.pdf).

(b)(5)

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

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

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



Russian Weapon Company Group LLC  
www.rwcgroupplc.com

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

October 10, 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: Case Number UKRAINE-EO13661-2014-311648-1: Additional information for Advisory Opinion Request from RWC Group, LLC on SDN status of “Izhevsky Mekhanichesky Zavod” JSC**

Dear Ms. Gacki:

The purpose of this letter is to provide additional information to RWC Group, LLC’s (“RWC”) July 29, 2014 request to OFAC for an advisory opinion on the debarment status of “Izhevsky Mekhanichesky Zavod” JSC (aka: Izhevsk Mechanical Plant; Baikal) (“Baikal”) under the Specially Designated Nationals List (“SDN”).

As requested by (b)(6) we have attached the contract and invoice between RWC and Baikal for (b)(4) hereinafter, “Contract”), (b)(4)

(b)(4)

2018-08-116: 000881



We think it bears repeating that there existed a marketing relationship between Baikal and KC when the sanctions were imposed and when the attached Contract was executed. This relationship, which has now been terminated, was strictly for managing and marketing purposes such as allowing the two companies to share booths at trade shows and permitting KC to assist Baikal with its advertising and other promotional media. **At no time has KC retained any ownership interest in Baikal.** The Contract is consistent with these facts. On page 1, it mentions the managing/marketing relationship between KC and Baikal. The only other mention of KC in the Contract refers to the (b)(4)

(b)(4) (b)(4) Any future contracts with Baikal will of course omit any references to KC.

Despite the few technical references to KC, we would like to point out that this contract was signed between Baikal and RWC. See Contract p. 9 (showing signatures from both parties with Baikal's and RWC's respective seals). Furthermore, the invoice demonstrates that money was transferred directly from RWC to Baikal. See Contract p. 19. Therefore, this Contract shows that the transaction was solely between RWC and Baikal.

Again, we wish to express our deep gratitude to OFAC Licensing for their open lines of communication and diligent attention that has been shown to this urgent matter. (b)(4)

(b)(4) (b)(4) If you require any further information, please do not hesitate to contact Jay Portz at (215) 949-9944 x106 or jay@rwcgrouppllc.com. Alternatively, you may contact our outside counsel, Michael Faucette of Mark Barnes & Associates at (202) 626-0085 or michael.faucette@mbassociateslaw.com.

Respectfully,  
(b)(6)  
Jay Portz  
Vice President  
RWC Group, LLC



Bates Nos. 2018-08-116:  
000883-000884

Duplicate Content in  
Bates Nos. 2018-08-116:  
000621-000622

**From:** [Michael Faucette](#)  
**To:** (b)(6)  
**Subject:** Re: RWC - Case Number Ukraine-EO13661-2014-311648-1  
**Date:** Wednesday, December 17, 2014 5:18:28 PM  
**Attachments:** (b)(4) - [release from Customs.pdf](#)  
[ATT00001.htm](#)  
[RWC \(b\)\(4\) Information.pdf](#)  
[ATT00002.htm](#)

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Hi (b)(6)

Because RWC was on a continuing payment cycle with Baikal, (b)(4) was paid for in combination with (b)(4). To better explain the payments and delivery information, we have provided details on (b)(4). Attached at the bottom is a chart that lays out information on (b)(4) in a easy to read format.

(b)(4)

- (b)(4) (valued at (b)(4)) arrived in the country well before the sanctions were imposed.
- (b)(4) (valued at (b)(4)) was already in route to the U.S. when the sanctions were announced on July 16, 2014. It was released from Port by U.S. Customs on (b)(4) ahead of schedule and arrived at

- (b)(4) (valued at (b)(4)) was still in Russia at the time the sanctions were announced. (b)(4)  
(b)(4)  
(b)(4) this container has remained in Russia.

The total value for (b)(4)

**PAYMENT INFORMATION:**

RWC has made (b)(4) payments to Baikal totaling (b)(4) on the following dates and for the following items:

- (b)(4) This payment was made towards the amount due on (b)(4)
- (b)(4) This payment was made towards the amount due on (b)(4)

RWC has only received (b)(4) with a combined value of (b)(4). Therefore, RWC has received (b)(4) in goods while paying (b)(4). This overpayment was made prior to the sanctions, with the expectation that (b)(4) would be shipped and that further payments and orders would be made. However, (b)(4) (b)(4) Baikal owed, and continues to owe, (b)(4) to RWC until (b)(4) is received.

To directly answer you question with regard to (b)(4) RWC made payments for this

(b)(4) (b)(4) It was release from U.S. Customs on (b)(4)  
(b)(4) (see attachment) (b)(4)

Please let me know if you require any further information and we would be happy to provide it.

(b)(4) Release from Customs:



**ARRIVAL NOTICE**

B/L No: (b)(4)  
 TPDoc, negotiated, shipped on board

**Notify Party (Complete name and address)**  
 SEASHOTT  
 2609 CABOVER DRIVE, #9  
 HANOVER, MD 21076 / U.S.A.  
 NOTIFY ON ARRIVAL: +1-800-772-4688

<b>Vessel</b> MAERSK OHIO	<b>Voyage No</b> (b)(4)	<b>Print Date</b> (b)(4)
<b>Your ref.</b> (b)(4)		
<b>Place of Receipt</b>	<b>Other Numbering Identification</b> Customs Clearance Loc: (b)(4) Customs Firms Code: (b)(4)	
<b>Port of Loading</b> (b)(4)	<b>Terminal Location:</b> (b)(4)	
<b>Port of Discharge</b> (b)(4)	For IT Date use arrival date below.	
<b>Piece of delivery</b>		

**Consignee (Complete name and address)**  
 RWC GROUP LLC  
 ADDRESS: 911 WILLIAM LEIGH DR. TULLYTOWN, PA 19007  
 USA, TEL.: 215 949 9944, FAX: 215 948 8191

**Shipper/Exporter (Complete name and address)**  
 JOINT-STOCK COMPANY IZHEVSKY MEKHANICHESKY ZAVOD  
 B, PROMYSHLENNAYA STR., IZHEVSK, 426063, RUSSIA

<b>Kind of Packages; Description of goods; Marks and Numbers; Container No./Seal No.</b>	<b>Gross Weight</b>	<b>Measurement</b>
(b)(4)	(b)(4)	

CY/CY

Container No.	Seal No.	Seal Value	Size/Type/Height	Turn Weight	Plas.	Weight	Measurement	Rail Bond /Pick-up No.
(b)(4)								

<b>Freight &amp; Charges</b>	<b>Rate</b>	<b>Curr.</b>	<b>Unit</b>	<b>Prepaid</b>	<b>Collect</b>
Terminal Handling Service- Destination	(b)(4)	USD	(b)(4)		(b)(4)
Total USD		USD			

Agent Name  
 ZAO Maersk

The above mentioned cargo is due to arrive aboard subject vessel On/ or About

Date  
 (b)(4)

We would appreciate if you could contact/provide us at USAImport@maersk.com with your preferred email address. In order for future communications (Arrival notices & Customs Notifications) to be generated correctly which will assist your business and record retention.

If you have any questions please contact Customer Service at 1-800-321-8807. If your container location is LOS ANGELES P400 and you have questions concerning terminal availability of your cargo, please call 1-310-221-4100. For door deliveries please email delivery orders to DeliveryOrder@maersk.com or fax to 888-769-5942.

We must receive delivery order, documents, freight and customs clearance by noon on business day prior to free time expiration in order to prevent demurrage.

For a live up-to-date view of your account with Maersk Line, register at www.maerskline.com to gain access through our online tool - MyFinance. You can view, download and print invoice copies. Save time and costs, with MyFinance.

(b)(4) Information Chart:

(b)(4)		Value	Arrival in U.S.
	(b)(4)		Prior to July, 2014
	(b)(4)		(b)(4)
<b>Total</b>	(b)(4)		

	(b)(4)	Never left Russia
<b>Total for</b>	(b)(4)	

RWC's Payments to Baikal		Payment Towards
	(b)(4)	
	(b)(4)	
<b>Total</b>	(b)(4)	

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

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On Dec 15, 2014, at 3:40 PM, (b)(6) wrote:

Dear Mike,

I wanted to follow up to clarify a few points on Ukraine-EO13661-2014-311648-1. According to the Application, RWC has maintained (b)(4), which you refer to as (b)(4) in your supplemental statement of October 10, 2014.

Can you please clarify (1) when RWC received the shipment that included (b)(4) and (2) when RWC made a payment(s) to Baikal for (b)(4)

Best Regards,

(b)(6)

---

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

**Sent:** Thursday, December 11, 2014 10:54 AM

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

**Subject:** RWC - Case Number Ukraine-EO13661-2014-311648-1

Hi (b)(6),

A week ago you said that our request on Baikal had been completed by you and was being reviewed by other agencies/offices. Since I am unfamiliar with the how the process works, would you be able to tell me which agencies/offices review it before it is approved for release? Thank you!

Kind Regards,

Mike Faucette  
Attorney at Law

Mark Barnes & Associates

2018-08-116: 000890

1350 I St. N.W. , Suite 260  
Washington, D.C. 20005  
Tel. (202) 626-0085  
Fax (202) 626-0088

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On Nov 4, 2014, at 10:07 AM, (b)(6) wrote:

Dear Mike,

Please find OFAC's response attached.

Ukraine-EO13661-2014-311648-1 regarding your request on Baikal is still under review.

Best Regards,

(b)(6)

---

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

**Sent:** Friday, October 31, 2014 2:52 PM

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

**Subject:** Re: RWC - Case Number UKRAINE2-2014-311316-1

Thank you, (b)(6).

Do you know if the State Department had any problems with it? Also, do you have a general idea of how much longer the review process will be? Thank you!

On Oct 31, 2014, at 2:25 PM, (b)(6) wrote:

This case is back with OFAC and is currently under review.

Thanks,

(b)(6)

---

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

**Sent:** Friday, October 31, 2014 2:20 PM

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

**Subject:** Re: RWC - Case Number UKRAINE2-2014-311316-1

Hi (b)(6),

Could you please confirm whether this is still being processed with the State Department? Thank you!

Kind Regards,

Mike Faucette  
Attorney at Law

2018-08-116: 000891



Mark Barnes & Associates

1350 I St. N.W. , Suite 260  
Washington, D.C. 20005  
Tel. (202) 626-0085  
Fax (202) 626-0088

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On Oct 22, 2014, at 5:39 PM, Michael Faucette <[michael.faucette@mbassociateslaw.com](mailto:michael.faucette@mbassociateslaw.com)> wrote:

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) Please do not hesitate to contact me with any further information you require. Thank you again for all the help you have provided!

<RWC - (b)(4)Sale.pdf>  
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

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<Ukraine2-2014-311316-1\_Cover Letter.pdf><Ukraine2-2014-311316-1\_License.pdf>

Bates Nos. 2018-08-116:  
000893-000894

Duplicate Content in  
Bates Nos. 2018-08-116:  
000582-000583

**RE: RWC license**

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**From:** "Smith, John" (b)(6)  
**To:** "Gacki, Andrea" (b)(6) "Blackborow, Davin" (b)(6)  
**Cc:** (b)(6)  
**Date:** Mon, 09 Feb 2015 14:41:12 -0500

(b)(5) Thanks!

---

**From:** Gacki, Andrea  
**Sent:** Monday, February 09, 2015 1:06 PM  
**To:** Blackborow, Davin; Smith, John  
**Cc:** (b)(6)  
**Subject:** RE: RWC license

(b)(5) Thanks!

---

**From:** Blackborow, Davin  
**Sent:** Monday, February 09, 2015 1:00 PM  
**To:** Gacki, Andrea; Smith, John  
**Cc:** (b)(6)  
**Subject:** RE: RWC license

(b)(5)  
(b)(5) I'm also happy to discuss if it would be helpful.

---

**From:** Gacki, Andrea  
**Sent:** Monday, February 09, 2015 12:48 PM  
**To:** Blackborow, Davin; Smith, John  
**Cc:** (b)(6)  
**Subject:** RE: RWC license

PREDECISIONAL AND DELIBERATIVE  
Thanks very much for the write-up!

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

---

**From:** Blackborow, Davin  
**Sent:** Monday, February 09, 2015 12:31 PM  
**To:** Smith, John; Gacki, Andrea  
**Cc:** (b)(6)  
**Subject:** RWC license

John and Andrea,

(b)(4), (b)(5), (b)(6)  
(b)(5) we've asked for a response by Wednesday of this week.

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

Thanks,  
Davin

## RE: RWC license

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**From:** (b)(6)  
**To:** "Blackborow, DavinDisabled" (b)(6)  
**Date:** Tue, 10 Feb 2015 14:05:13 -0500  
**Attachments:** (b)(5).docx (82.06 kB); RWC Draft.docx (85.44 kB)

---

Hi Davin,

The RWC case is still with the State Department, but I wanted to follow up on your comment, DB5, in the attached regarding (b)(5) (b)(5)

I don't believe (b)(5)  
(b)(5) I could (b)(5)

Thanks!

(b)(6)

---

**From:** Blackborow, Davin  
**Sent:** Monday, February 09, 2015 12:50 PM  
**To:** (b)(6)  
**Subject:** RE: RWC license

Great – thanks (b)(6).

---

**From:** (b)(6)  
**Sent:** Monday, February 09, 2015 12:46 PM  
**To:** Blackborow, Davin  
**Subject:** RE: RWC license

Hi Davin,

(b)(6) has sent the State referral. I'll add the articles below to the case file.

Thanks!

(b)(6)

---

**From:** Blackborow, Davin  
**Sent:** Friday, February 06, 2015 1:29 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RWC license

(b)(6),

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

Thanks,  
Davin

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

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

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

**FW: Please Review & Respond by 12 pm February 13th -- Draft Russian Federation Sanctions Foreign Policy Guidance**

**From:** [redacted] (b)(6)  
**To:** [redacted] (b)(6)  
**Date:** Wed, 11 Feb 2015 17:55:22 -0500  
**Attachments:** February 2015 State Dept Sanctions Guidance v.1.docx (24.06 kB)

(b)(6)

With apologies, here is one more open item. I thought [redacted] (b)(5)  
[redacted] (b)(5)

Thanks.  
(b)(6)

**From:** State (b)(6)  
**Sent:** Monday, February 09, 2015 12:17 PM  
**To:** ATF - (b)(6); State (b)(6); (b)(6); State (b)(6)  
**CC:** Blackborow, Davin; Smith, Bradley; State (b)(6); Kiran.Rai@usdoj.gov; DOJ (b)(6)  
DOJ (b)(6); Marvin.G.Richardson; ATF - (b)(6); Curtis.W.Gilbert; ATF - (b)(6)  
ATF - (b)(6); Charles.R.Gross; ATF - (b)(6)

**Subject:** RE: Please Review & Respond by 12 pm February 13th -- Draft Russian Federation Sanctions Foreign Policy Guidance  
+ DTCP and DTCL

SBU  
This email is UNCLASSIFIED.

**From:** ATF - (b)(6)  
**Sent:** Friday, February 06, 2015 11:13  
**To:** State (b)(6); (b)(6)  
**CC:** Davin.Blackborow (b)(6); Bradley.Smith (b)(6); State (b)(6); Kiran.Rai@usdoj.gov;  
DOJ (b)(6); Marvin.G.Richardson; ATF - (b)(6); Curtis.W.Gilbert; ATF - (b)(6)  
Charles.R.Gross; ATF - (b)(6)  
ATF - (b)(6)

**Subject:** Please Review & Respond by 12 pm February 13th -- Draft Russian Federation Sanctions Foreign Policy Guidance

Hello,

**ATF - (b)(5)**

Thank you!  
ATF - (b)(6)

ATF - (b)(6) | Attorney | Law & Policy Division | Office of Chief Counsel | Bureau of Alcohol, Tobacco, Firearms & Explosives | ATF - (b)(6) |  
ATF - (b)(6)

## RE: RWC license

---

**From:** "Blackborow, Davin" (b)(6)  
**To:** (b)(6)  
**Date:** Wed, 11 Feb 2015 22:11:29 -0500

Ok sounds good. I think we could (b)(5)  
(b)(5) (b)(5)

---

**From:** (b)(6)  
**Sent:** Tuesday, February 10, 2015 2:19 PM  
**To:** (b)(6) Blackborow, Davin  
**Subject:** RE: RWC license

Hi all:

(b)(5)

(b)(6)

---

**From:** (b)(6)  
**Sent:** Tuesday, February 10, 2015 2:08 PM  
**To:** Blackborow, Davin  
**Cc:** (b)(6)  
**Subject:** RE: RWC license

I don't think so, but copying (b)(6) here in case I'm missing something.

---

**From:** Blackborow, Davin  
**Sent:** Tuesday, February 10, 2015 2:06 PM  
**To:** (b)(6)  
**Subject:** Re: RWC license

(b)(5) ?

---

**From :** (b)(6)  
**Sent:** Tuesday, February 10, 2015 02:05 PM  
**To:** Blackborow, Davin  
**Subject:** RE: RWC license

Duplicative of content in Bates No. 2018-08-116: 000896

Duplicative of content in Bates No. 2018-08-116: 000896



## FW: Working Group Question - Livelink 2085 KB

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**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Thu, 12 Feb 2015 14:17:25 -0500  
**Attachments:** ATF Guidance on EO 13661 re sanctions on Russian entities - 8 August 2014.pdf - 1 MB (0 bytes); Scanned from a Xerox Multifunction Device - 591 KB (0 bytes)

---

Hi (b)(6)

(b)(5)

Any thoughts?

best-  
(b)(6)

---

**From:** ATF - (b)(6)  
**Sent:** Wednesday, February 11, 2015 3:14 PM  
**To:** (b)(6)  
**Cc:** ATF - (b)(6); (b)(6); ATF - (b)(6)  
**Subject:** Working Group Question

Good afternoon (b)(6)

I have the inaugural question for our working group. We received a permit application in the mail last week from Aquila Arms LLC. The permit lists several Russian manufacturers. One is identified as the following:

OOO Arms  
3/36 Proezd Deryabina  
Izhevsk, 426006, Russia

The address for this company looks very much like the address listed for Kalashnikov Concern (#6 on the attached State letter of guidance to ATF). I would like to verify with you if OOO Arms is or is not a sanctioned company. I don't believe the other manufacturers list are an issue but I have attached the Form 6 attachment in its entirety.

Thank you for taking a look at this permit attachment for me and I look forward to your reply.

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

ATF  
Firearms and Explosives Imports Branch  
244 Needy Road  
Martinsburg, WV 25405  
Office (b)(6)  
Fax (b)(6)  
Cell (b)(6)

---

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

---

**From:** (b)(6)  
**Sent:** Friday, January 16, 2015 4:15 PM  
**To:** ATF - (b)(6)



Bates Nos. 2018-08-116:

000915-000916

Duplicate Content in

Bates Nos. 2018-08-116:

000667-000669

Bates Nos. 2018-08-116:  
000922-000928  
Non-Responsive Record

## RE: Working Group Question

---

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

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

**Date:** Thu, 12 Feb 2015 14:43:01 -0500

---

The investigator that worked this topic is out, but I'll nose around and see what I can find. Right now I'm on deadline on a related matter, but I'll check later this evening.

---

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

**Sent:** February 12, 2015 2:42 PM

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

**Subject:** RE: Working Group Question

sure thing; thanks for taking a look at it.

---

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

**Sent:** Thursday, February 12, 2015 2:41 PM

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

**Subject:** RE: Working Group Question

Hi (b)(6)

(b)(5) Can I get back to you later today on this? Thanks, (b)(6)

Duplicative of content in Bates No. 2018-08-116: 000914

Bates Nos. 2018-08-116:  
000930-000931

Duplicate Content in  
Bates Nos. 2018-08-116:  
000914-000916

**RE: Working Group Question/Baikal**

---

**From:** (b)(6)  
**To:** ATF - (b)(6)  
**Cc:** ATF - (b)(6); (b)(6); ATF - (b)(6)  
**Date:** Thu, 12 Feb 2015 16:51:43 -0500

---

Hello ATF - (b)(6)

(b)(5)

---

**From:** ATF - (b)(6)  
**Sent:** Thursday, February 12, 2015 3:52 PM  
**To:** (b)(6)  
**Cc:** ATF - (b)(6); ATF - (b)(6)  
**Subject:** RE: Working Group Question/Baikal

Thanks (b)(6) for speaking with me earlier today! (b)(5)

(b)(5)

Thank you!

ATF - (b)(6)

ATF  
Firearms and Explosives Imports Branch  
244 Needy Road  
Martinsburg, WV 25405  
Office: ATF - (b)(6)  
Fax: ATF - (b)(6)  
Cell: (b)(6)

---

**From:** ATF - (b)(6)  
**Sent:** Thursday, February 12, 2015 6:33 AM  
**To:** (b)(6)  
**Cc:** ATF - (b)(6); (b)(6); ATF - (b)(6)  
**Subject:** RE: Working Group Question

Good morning (b)(6) when it rains in pours. ATF - (b)(5)

ATF - (b)(5)

ATF - (b)(6)

IOI/Industry Liaison  
ATF  
Firearms and Explosives Imports Branch  
244 Needy Road  
Martinsburg, WV 25405  
Office: ATF - (b)(6)  
Fax: ATF - (b)(6)  
Cell: (b)(6)

---

**From:** ATF - (b)(6)  
**Sent:** Wednesday, February 11, 2015 3:14 PM  
**To:** (b)(6)  
**Cc:** ATF - (b)(6); (b)(6); ATF - (b)(6)  
**Subject:** Working Group Question

Good afternoon (b)(6)

Bates Nos. 2018-08-116:  
000933-000935

Duplicate Content in  
Bates Nos. 2018-08-116:  
000914-000916

## RE: Request for Brief ATF Sanctions Call this Friday @ 2pm

---

**From:** (b)(6)  
**To:** "Blackborow, Davin" (b)(6)  
**Date:** Thu, 19 Feb 2015 09:43:07 -0500

I'll come to your office, Davin, since there is more room. Thanks.

---

**From:** Blackborow, Davin  
**Sent:** Wednesday, February 18, 2015 6:59 PM  
**To:** (b)(6)  
**Subject:** RE: Request for Brief ATF Sanctions Call this Friday @ 2pm

I'm happy either way.

---

**From:** (b)(6)  
**Sent:** Wednesday, February 18, 2015 2:44 PM  
**To:** Blackborow, Davin; (b)(6)  
**Subject:** RE: Request for Brief ATF Sanctions Call this Friday @ 2pm

Great, thanks. You guys are welcome to come to the cozy environs of my office, or I could come to yours, whatever you prefer.

---

**From:** Blackborow, Davin  
**Sent:** Wednesday, February 18, 2015 2:42 PM  
**To:** (b)(6)  
**Subject:** RE: Request for Brief ATF Sanctions Call this Friday @ 2pm

I'm happy to. Also looping in (b)(6).

---

**From:** (b)(6)  
**Sent:** Wednesday, February 18, 2015 2:41 PM  
**To:** Blackborow, Davin  
**Subject:** FW: Request for Brief ATF Sanctions Call this Friday @ 2pm

Hi Davin,

It looks like ATF may be coming back with questions on (b)(5). Do you want to be on the call to discuss those issues this Friday?

Thanks

(b)(6)

---

**From:** ATF - (b)(6)  
**Sent:** Wednesday, February 18, 2015 2:38 PM  
**To:** (b)(6)  
**Subject:** RE: Request for Brief ATF Sanctions Call this Friday @ 2pm

Hello (b)(6)

Thank you! Let's shoot for 2 pm this Friday – we will call you at 622.2410 (please let me know if we should use a different number).

At this point, I know they want to discuss ATF - (b)(5) believe you were waiting to hear something from the State Department; ATF - (b)(5) ATF - (b)(5) and ATF - (b)(5) ATF - (b)(5) I will check with them again to obtain

Thank you!

ATF - (b)(6)

ATF - (b)(6) | Attorney | Law & Policy Division | Office of Chief Counsel | Bureau of Alcohol, Tobacco, Firearms & Explosives | ATF - (b)(6) | ATF - (b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, February 18, 2015 2:29 PM  
**To:** ATF - (b)(6)  
**Subject:** RE: Request for Brief ATF Sanctions Call this Friday

Hi ATF - (b)(6)

Currently, I could be available between 2:00 and 5:00pm on Friday for the call. If you can give me an idea of what issues we might discuss or forward any specific questions that your client have, I might be better able to address them during the call.

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:** Wednesday, February 18, 2015 1:37 PM  
**To:** (b)(6)  
**Subject:** Request for Brief ATF Sanctions Call this Friday

Hello (b)(6),

My client colleagues would like to have a brief call with you to get the latest updates and perhaps ask a few clarification questions. In juggling schedules, it looks like this Friday after 1pm looks best for us. Would you have maybe 20 minutes sometime this Friday afternoon for a brief call?

Thank you!

ATF - (b)(6)

ATF - (b)(6) [Attorney | Law & Policy Division | Office of Chief Counsel | Bureau of Alcohol, Tobacco, Firearms & Explosives](#) | ATF - (b)(6) |  
ATF - (b)(6)



**RE: Referral to State Ukraine-EO13661-2014-311648-1 RWC (import Baikal**

**(b)(4)**

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

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

**Date:** Fri, 20 Feb 2015 15:21:41 -0500

Thanks (b)(6).

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

**Sent:** Friday, February 20, 2015 3:20 PM

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

State (b)(6)

**Cc:** (b)(6) Smith, Bradley; Blackborow, Davin; Feddo, Thomas

**Subject:** RE: Referral to State Ukraine-EO13661-2014-311648-1 RWC (import Baikal (b)(4)

Hi EB:

Good afternoon.

(b)(5)

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

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

Please let me know if you have any questions.

Thank you,

(b)(6)

Duplicative of content in Bates Nos. 2018-08-116: 000869-000870

Duplicates content in Bates No. 2018-08-116: 000870



**FW: HOLD ON STATE DEPT APPROVAL: For State Department Final Review, Approval, and Signature: Draft Updated Sanctions Foreign Policy Guidance**

**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Fri, 20 Feb 2015 17:02:01 -0500  
**Attachments:** 02.13.15 State Dept Sanctions Guidance v.2.docx (22.64 kB)

(b)(6)

The call referenced below was with ATF and OFAC licensing on questions that ATF had related to OFAC licensing issues. I can update you on that call next week whenever is convenient.

Thanks  
(b)(6)

**From:** ATF - (b)(6)  
**Sent:** Friday, February 20, 2015 4:29 PM  
**To:** State (b)(6)  
**Cc:** State (b)(6); (b)(6); Blackborow, Davin (b)(6); Kiran.Raj@usdoj.gov; DOJ (b)(6); DOJ (b)(6); Marvin.G.Richardson ATF - (b)(6); Curtis.W.Gilbert ATF - (b)(6); Charles.R.Gross ATF - (b)(6)

**ATF - (b)(6)**  
**Subject:** HOLD ON STATE DEPT APPROVAL: For State Department Final Review, Approval, and Signature: Draft Updated Sanctions Foreign Policy Guidance  
**Importance:** High

Hello (b)(6)

We had a call this afternoon with OFAC to discuss several Russian Federation sanctions issues impacting current active ATF permits and permit applications. In the course of our discussion with OFAC, we learned that these issues have implications for the draft updated foreign policy guidance we submitted for the State Department's final review, approval, and Assistant Secretary signature.

**ATF - (b)(5)**

ATF would like to have an interagency call with representatives from OFAC, State, and DOJ to expediently discuss and resolve these issues in an effort to finalize the draft updated foreign policy guidance as soon as possible. Until then, we ask the State Department to hold off on finalizing the version of the updated foreign policy guidance that you possess.

Please let us know when State Department representatives who can speak to Russian Federation sanctions issues can assemble for an interagency call next week. Realistically, it may be best to target a specific date and time and work from there. Accordingly, we propose having the interagency call next Tuesday, February 24<sup>th</sup> at 2pm. We ask each agency to confirm the date and time and their availability to participate in this time sensitive matter. All - please feel free to propose a more viable time if required.

Thank you advance,

**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)

**From:** ATF - (b)(6)  
**Sent:** Thursday, February 19, 2015 2:05 PM  
**To:** State (b)(6)  
**Cc:** State (b)(6); (b)(6); Davin Blackborow (b)(6); (b)(6); Raj, Kiran (ODAG) (JMD); Swinton, Nathan M. (CIV); Kelleher, Diane (CIV); Richardson, Marvin G.; Gilbert, Curtis W.; Gross, Charles R.; ATF - (b)(6)

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

**Subject:** For State Department Final Review, Approval, and Signature: Draft Updated Sanctions Foreign Policy Guidance  
**Importance:** High

Good Afternoon <sup>State (b)(6)</sup> et al,

The attached guidance was drafted and revised using the previous August 8, 2014, Russian Federation sanctions foreign policy guidance from the State Department and feedback that OFAC provided in response to the first draft guidance review request. OFAC subsequently provided seven additional SDNs to update the original guidance. We submit the attached draft guidance to you for State Department final review, approval, and Assistant Secretary signature. Acting Assistant Secretary Tom Kelly signed the August 2014 guidance. I have copied OFAC on this message so they have an opportunity for a final look at the draft as well (to ensure it continues to comport with their expectations and requirements). We request expedited State Department review and signature so that ATF may implement sanctions using the complete, updated list provided in the attached draft guidance. If anyone has specific comments on the document for ATF action/concurrence please reply with tracked changes in the document.

Thank so much.

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

**Division Chief, FESD**

Bureau of ATF, F & E Services Division

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

Direct: <sup>ATF - (b)(6)</sup>

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

**RE: HOLD ON STATE DEPT APPROVAL: For State Department Final Review, Approval, and Signature: Draft Updated Sanctions Foreign Policy Guidance**

**From:** "Blackborow, Davin" (b)(6)  
**To:** ATF - (b)(6) | State (b)(6)  
**Cc:** State (b)(6) (b)(6)  
kiran.raj@usdoj.gov DOJ (b)(6)  
marvin.g.richardson ATF - (b)(6) | curtis.w.gilbert ATF - (b)(6) | charles.r.gross ATF - (b)(6)  
DOJ (b)(6)  
ATF - (b)(6) (b)(6) State (b)(6)  
**State (b)(6)**

**Date:** Fri, 20 Feb 2015 17:16:22 -0500

**Attachments:** 02.13.15 State Dept Sanctions Guidance v.2.docx (22.64 kB)

Looping in a few more people.

**From:** ATF - (b)(6)  
**Sent:** State (b)(6)  
**To:** State (b)(6) | (b)(6) Blackborow, Davin; (b)(6) Kiran.Raj@usdoj.gov;  
**Cc:** DOJ (b)(6) | DOJ (b)(6) | Marvin.G.Richardson ATF - (b)(6) | Curtis.W.Gilbert ATF - (b)(6)  
Charles.R.Gross ATF - (b)(6)  
**ATF - (b)(6)**

**Subject:** HOLD ON STATE DEPT APPROVAL: For State Department Final Review, Approval, and Signature: Draft Updated Sanctions Foreign Policy Guidance  
**Importance:** High

**Duplicative of content in Bates No. 2018-08-116: 000946**

Duplicates content in Bates Nos. 2018-08-116: 000946-000947



**FW: HOLD ON STATE DEPT APPROVAL: For State Department Final Review, Approval, and Signature: Draft Updated Sanctions Foreign Policy Guidance**

**From:** [REDACTED] (b)(6)  
**To:** "Blackborow, Davin" [REDACTED] (b)(6)  
**Cc:** [REDACTED] (b)(6) >  
**Date:** Fri, 20 Feb 2015 17:19:13 -0500  
**Attachments:** 02.13.15 State Dept Sanctions Guidance v.2.docx (22.64 kB)

I can do next Tuesday at 2pm if it works for you all.

Thanks.

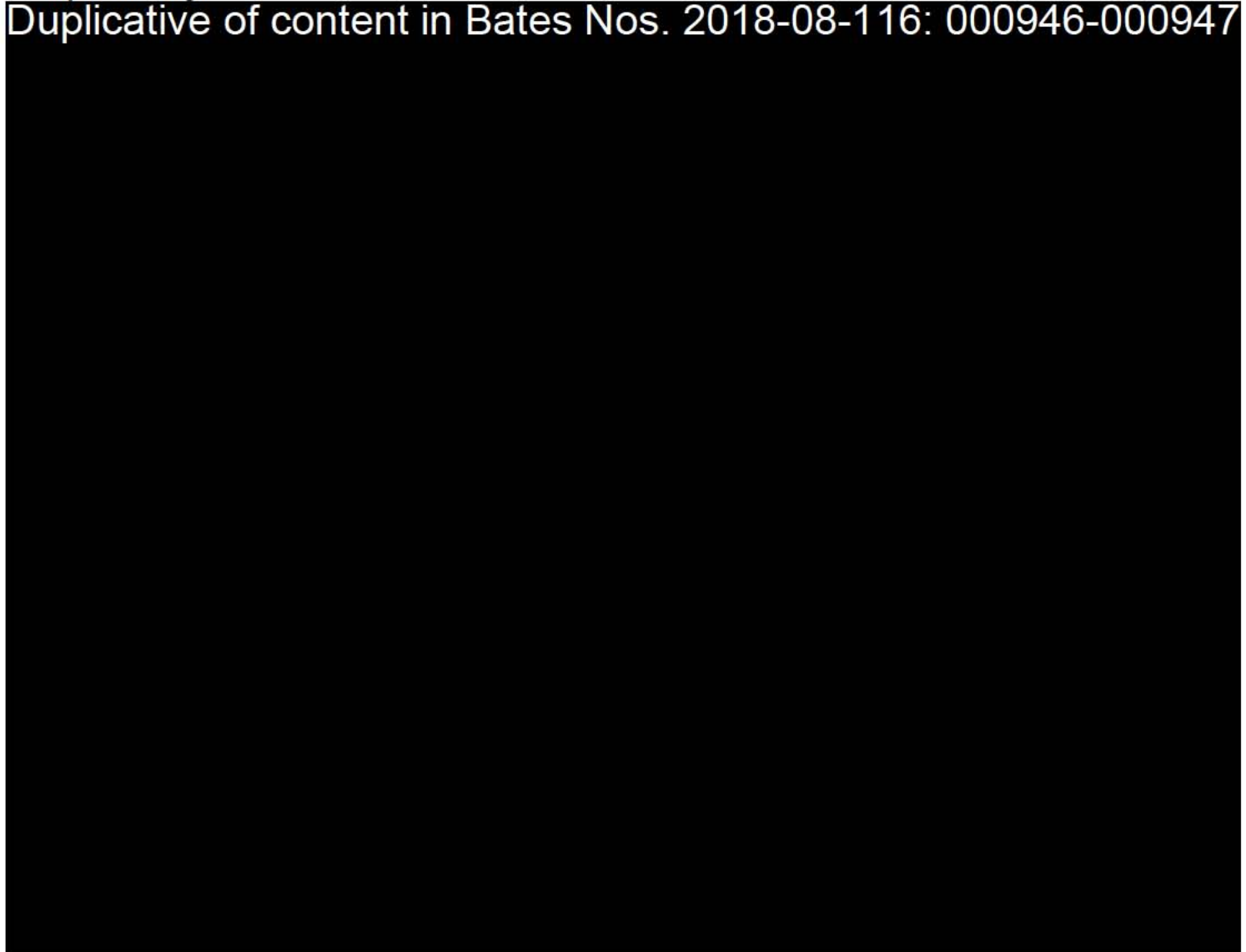
(b)(6)

**From:** ATF - (b)(6)  
**Sent:** Friday, February 20, 2015 4:29 PM  
**To:** [REDACTED] State (b)(6)  
**Cc:** [REDACTED] State (b)(6) | [REDACTED] (b)(6) Blackborow, Davin; [REDACTED] (b)(6) Kiran.Raj@usdoj.gov;  
DOJ (b)(6) [REDACTED] DOJ (b)(6) [REDACTED] Marvin.G.RichardsonATF - (b)(6) [REDACTED] Curtis.W.GilbertATF - (b)(6)  
Charles.R.GrossATF - (b)(6)

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

**Subject:** HOLD ON STATE DEPT APPROVAL: For State Department Final Review, Approval, and Signature: Draft Updated Sanctions Foreign Policy Guidance  
**Importance:** High

Duplicative of content in Bates Nos. 2018-08-116: 000946-000947



Duplicative of content in Bates No. 2018-08-116: 000947





## RE: Baikal Discussion

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**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Date:** Tue, 24 Feb 2015 17:25:56 -0500

I had to change to 4pm since Davin was busy, but it looks like that time works for everyone based on calendars.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 5:19 PM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal Discussion

3pm works for me, and I think Davin is indeed back tomorrow. Thanks again.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 5:14 PM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal Discussion

I can come with an update and I am also free tomorrow afternoon. How about we meet around 3? I do know that Davin was working pretty closely on this case (while in Counsel and now Licensing). But he is back tomorrow I believe.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 5:13 PM  
**To:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal Discussion

Thanks (b)(6), (b)(7)(C) When we do meet, (b)(5) (b)(5) but if we need the time Thursday will work.

If you want to discuss background or anything else feel free to let me know. Thanks very much for your help with this.

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 4:51 PM  
**To:** (b)(6), (b)(7)(C); (b)(6), (b)(7)(C) Blackborow, Davin  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal Discussion

I'm free Thursday and happy to meet at any time.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 4:50 PM  
**To:** (b)(6), (b)(7)(C) Blackborow, Davin; (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal Discussion

(b)(6), (b)(7)(C),  
The case number is 13661-2014-311648-1.

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 4:49 PM  
**To:** (b)(6), (b)(7)(C) Blackborow, Davin; (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal Discussion

+ (b)(6), (b)(7)(C) who will be attending for OGT

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 1:38 PM  
**To:** (b)(6), (b)(7)(C) Blackborow, Davin; (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal Discussion

Thursday afternoon works for me.

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

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 1:37 PM  
**To:** (b)(6), (b)(7)(C) Blackborow, Davin; (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal Discussion

Would sometime on Thursday work?

---

**From:** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 11:17 AM  
**To:** Blackborow, Davin; (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** RE: Baikal Discussion

I'm free this afternoon, but not tomorrow.

---

**From:** Blackborow, Davin  
**Sent:** Tuesday, February 24, 2015 11:16 AM  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** Re: Baikal Discussion

I'm free tomorrow.

---

**From :** (b)(6), (b)(7)(C)  
**Sent:** Tuesday, February 24, 2015 08:02 AM  
**To:** (b)(6), (b)(7)(C) Blackborow, Davin  
**Cc:** (b)(6), (b)(7)(C)  
**Subject:** Baikal Discussion

Predecisional and Deliberative

Hi all,

(b)(5)

Many thanks,

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

(b)(6), (b)(7)(C)  
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), (b)(7)(C)  
Office Tel: (b)(6), (b)(7)(C)

## RE: Working Group Question

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**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Wed, 25 Feb 2015 09:46:59 -0500

---

Yes, whenever is convenient for you is fine with me.

---

**From:** (b)(6)  
**Sent:** Wednesday, February 25, 2015 9:45 AM  
**To:** (b)(6)  
**Subject:** RE: Working Group Question

Okay I'll send a note over. Do you have a few min to discuss before I do?

---

**From:** (b)(6)  
**Sent:** Wednesday, February 25, 2015 9:31 AM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Working Group Question

Also, please feel free to interact with ATF directly. Thanks!

---

**From:** (b)(6)  
**Sent:** Wednesday, February 25, 2015 9:30 AM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Working Group Question

Predecisional and deliberative  
Attorney-Client Privilege

Hi (b)(6)

Thanks for looking at this. I talked with a couple of folks here in OCC about this one. (b)(5)

(b)(5)

I hope that is helpful. Please let me know if you want to discuss.

Thanks

(b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, February 25, 2015 8:27 AM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Working Group Question

Morning (b)(6)

In (b)(6) absence I am happy to assist.

(b)(5)

I'm happy to forward that to the group or to have you edit and forward yourself. Please let me know if we can provide any further assistance.

Aloha,

(b)(6)

---

**From:** ATF - (b)(6)  
**Sent:** Tuesday, February 24, 2015 3:43 PM  
**To:** OFAC Feedback  
**Cc:** ATF - (b)(6)

(b)(6)

**Subject:** FW: Working Group Question

Good afternoon, (b)(6) suggested that while (b)(6) is traveling I should send any queries for the working group to this mailbox. I wanted to check the status of the below request, thank you!

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

IOI/Industry Liaison

ATF

Firearms and Explosives Imports Branch

244 Needy Road

Martinsburg, WV 25405

Office (b)(6)

Fax (b)(6)

Cell (b)(6)

Duplicative of content in Bates Nos. 2018-08-116: 000914-000915

Bates Nos. 2018-08-116:  
000956-000957

Duplicate Content in  
Bates Nos. 2018-08-116:  
000915-000916

## FW: Working Group Question

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**From:** (b)(6), (b)(7)(C)  
**To:** (b)(6), (b)(7)(C)  
**Cc:** (b)(6), (b)(7)(C)  
**Date:** Wed, 25 Feb 2015 10:02:30 -0500  
**Attachments:** ATF Guidance on EO 13661 re sanctions on Russian entities - 8 August 2014.pdf (1.5 MB); Scanned from a Xerox Multifunction Device.msg (636.93 kB)

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

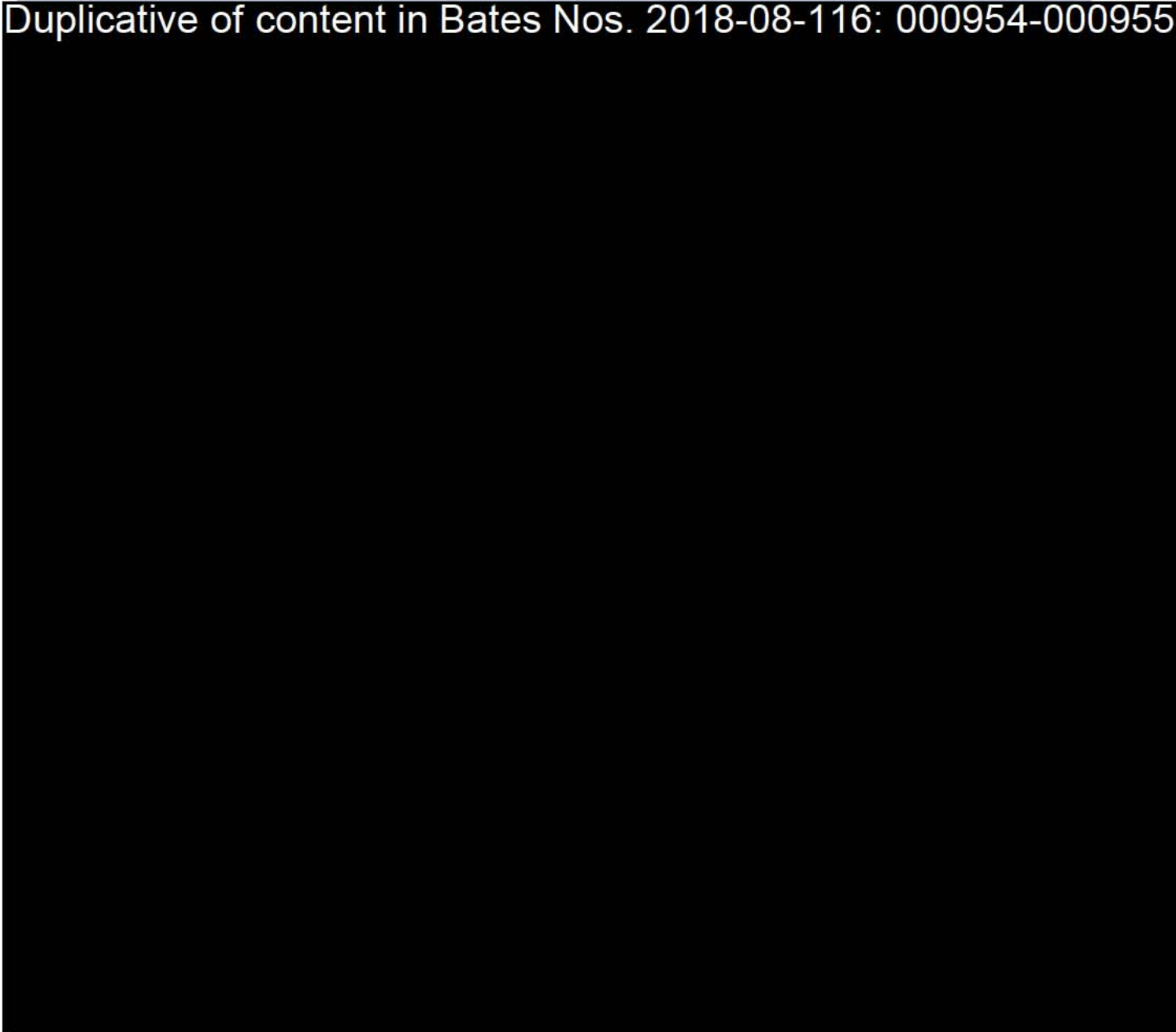
Please find below (and attached) information on the entity OOO Arms which we spoke about earlier.

Please let me know if there is anything more we can ask for from ATF.

Mahalo,

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

Duplicative of content in Bates Nos. 2018-08-116: 000954-000955



Bates Nos. 2018-08-116:  
000959-000960

Duplicate Content in  
Bates Nos. 2018-08-116:  
000955-000957

## RE: Follow-up - Baikal Determination

**From:** (b)(6)  
**To:** ATF - (b)(6)  
**Cc:** ATF - (b)(6)  
State (b)(6) DOJ (b)(6) ATF - (b)(6)  
**Date:** Fri, 27 Feb 2015 17:37:16 -0500

Thanks, ATF - (b)(6) Apologies for the delay on this -- OFAC is working to get you an answer.

Have a good weekend.

(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

**From:** ATF - (b)(6)  
**Sent:** Friday, February 27, 2015 5:35 PM  
**To:** (b)(6)  
**Cc:** ATF - (b)(6)  
State (b)(6) DOJ (b)(6) Curtis.W.Gilbert ATF - (b)(6)  
**Subject:** Follow-up - Baikal Determination

Hello (b)(6)

Thank you for speaking with us this past Tuesday during our sanctions call with State and DOJ, I figured I would just check in weekly (Fridays) to see if there are any updates, etc. Please let us know if there is anything we can provide to help with your internal discussions on finalizing OFAC deliberations on

# Treasury, ATF - (b)(5)

We look forward to working with you and the State Department on updating and finalizing the foreign policy guidance.

I copied the smaller interagency group from the last conference call in case you have any questions for any of us. Have a great weekend.

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)

**From:** (b)(6)  
**Sent:** Monday, February 23, 2015 9:17 AM  
**To:** ATF - (b)(6); State (b)(6)  
**Cc:** State (b)(6) Davin.Blackborow (b)(6) Raj, Kiran (ODAG) (JMD); Swinton, Nathan M. (CIV); Kelleher, Diane (CIV); Richardson, Marvin G.; Gilbert, Curtis W.; Gross, Charles R.; ATF - (b)(6)  
**Subject:** RE: HOLD ON STATE DEPT APPROVAL: For State Department Final Review, Approval, and Signature: Draft Updated Sanctions Foreign Policy Guidance

ATF - (b)(6)

OFAC can be available on Tuesday, February 24 at 2pm for a call.

Thanks,

2018-08-116: 000988



(b)(6)

(b)(6)

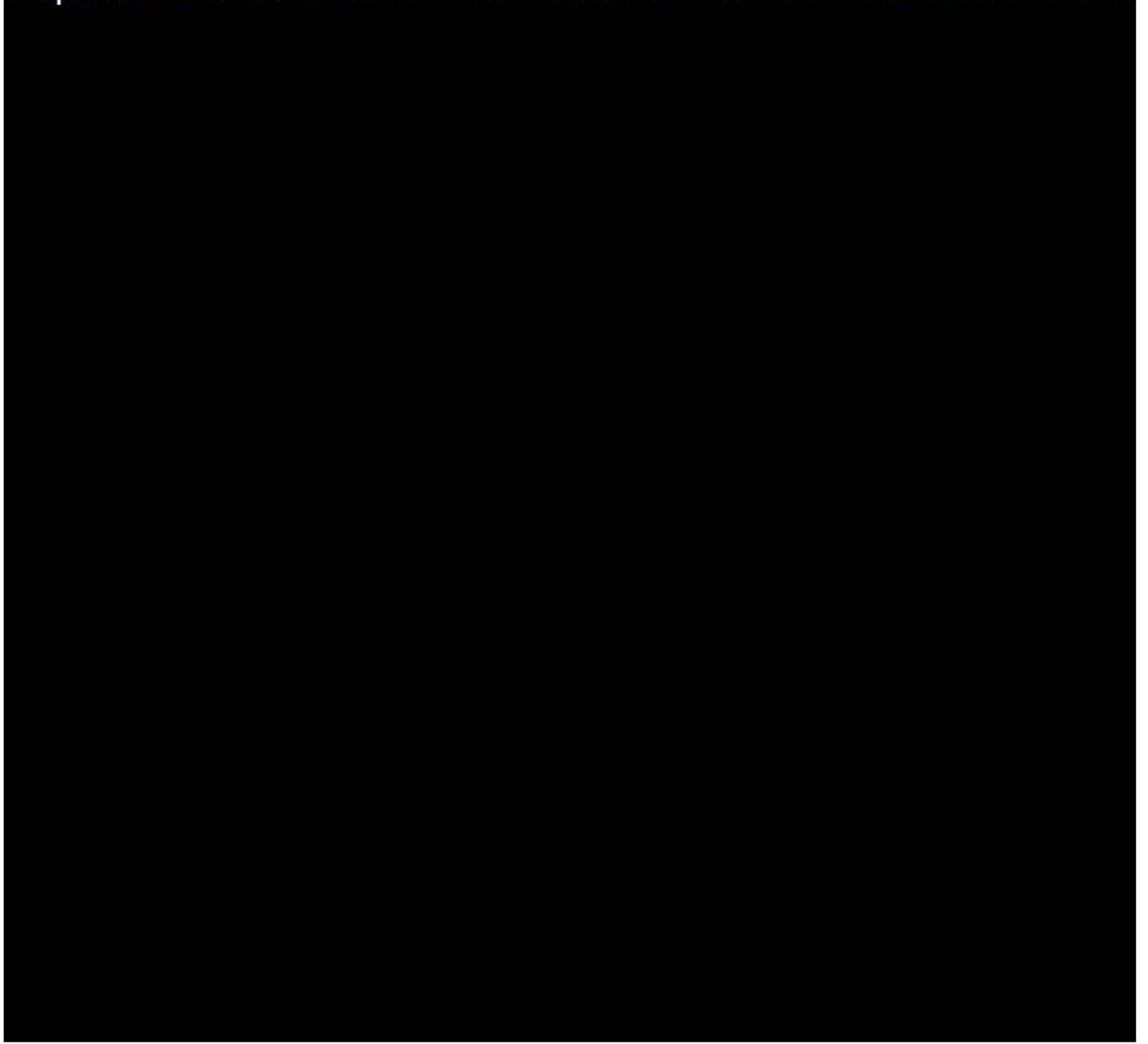
Attorney-Advisor  
Office of the Chief Counsel (Foreign Assets Control)  
United States Department of the Treasury  
1500 Pennsylvania Avenue, N.W.  
Washington, DC 20220  
Email: (b)(6)  
Office Tel: 202-622-2410

**From:** ATF - (b)(6)  
**Sent:** [Redacted]  
**To:** State (b)(6)  
**CC:** State (b)(6); (b)(6); Blackborow, Davin; (b)(6); Kiran.Raj@usdoj.gov; DOJ (b)(6); Marvin.G.Richardson; ATF - (b)(6); Curtis.W.Gilbert; ATF - (b)(6); Charles.R.Gross; ATF - (b)(6)

ATF - (b)(6)

**Subject:** HOLD ON STATE DEPT APPROVAL: For State Department Final Review, Approval, and Signature: Draft Updated Sanctions Foreign Policy Guidance  
**Importance:** High

Duplicative of content in Bates Nos. 2018-08-116: 000946-000947



Duplicative of content in Bates No. 2018-08-116: 000947



## RE: Working Group Question

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**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Wed, 11 Mar 2015 13:56:06 -0400

---

Hi (b)(6)

I just left a voicemail. I was out of the office the past few weeks and apologize for the delayed response. (b)(5)  
(b)(5) (b)(6) (b)(5)

Thank you, (b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, March 11, 2015 1:43 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Working Group Question

Hi (b)(6)-

(b)(5)

best-  
(b)(6)

---

**From:** (b)(6)  
**Sent:** Thursday, February 12, 2015 2:42 PM  
**To:** (b)(6)  
**Subject:** RE: Working Group Question

sure thing; thanks for taking a look at it.

Duplicative of content in Bates No. 2018-08-116: 000929



Bates Nos. 2018-08-116:  
001008-001010

Duplicate Content in  
Bates Nos. 2018-08-116:  
000929-000931

## RE: Working Group Question

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**From:** (b)(6)  
**To:** ATF (b)(6) OFAC\_Feedback <ofac\_feedback@treasury.gov>  
**Cc:** (b)(6), ATF (b)(6)  
**Date:** Wed, 11 Mar 2015 14:06:20 -0400

---

Hi ATF (b)(6) -

I've reached out for an update from our investigator shop; they should get back to me shortly.

best-

(b)(6)

---

**From:** ATF (b)(6)  
**Sent:** Wednesday, March 11, 2015 1:38 PM  
**To:** (b)(6) OFAC\_Feedback  
**Cc:** (b)(6) ATF (b)(6)  
**Subject:** FW: Working Group Question

Good afternoon (b)(6)

ATF (b)(5)

ATF (b)(5)

I look forward to hearing back from you, thanks!

ATF (b)(6)

IOI/Industry Liaison  
ATF  
Firearms and Explosives Imports Branch  
244 Needy Road  
Martinsburg, WV 25405  
Office: ATF (b)(6)  
Fax: ATF (b)(6)  
Cell:

---

**From:** ATF (b)(6)  
**Sent:** Tuesday, February 24, 2015 3:42 PM  
**To:** 'ofac\_feedback@treasury.gov'  
**Cc:** ATF (b)(6), (b)(6)  
**Subject:** FW: Working Group Question

Duplicative of content in Bates No. 2018-08-116: 000955

Bates Nos. 2018-08-116:

001012-001014

Duplicate Content in

Bates Nos. 2018-08-116:

000955-000957

## RE: Working Group Question

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**From:** (b)(6)  
**To:** (b)(6)  
**Date:** Wed, 11 Mar 2015 14:21:31 -0400

---

ok, thanks.

---

**From:** (b)(6)  
**Sent:** Wednesday, March 11, 2015 2:21 PM  
**To:** (b)(6)  
**Subject:** RE: Working Group Question

Give me to COB today on this. ill get back to you guys.

---

**From:** (b)(6)  
**Sent:** Wednesday, March 11, 2015 1:45 PM  
**To:** (b)(6)  
**Subject:** RE: Working Group Question

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

---

**From:** (b)(6)  
**Sent:** Wednesday, March 11, 2015 1:43 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Working Group Question

Duplicative of content in Bates No. 2018-08-116: 001007



Bates Nos. 2018-08-116:  
001016-001018

Duplicate Content in  
Bates Nos. 2018-08-116:  
001007-001010



## RE: Working Group Question

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**From:** [REDACTED] (b)(6)  
**To:** ATF (b)(6)  
**Cc:** [REDACTED] ATF (b)(6) (b)(6)  
(b)(6)  
**Date:** Thu, 12 Mar 2015 15:25:10 -0400

---

Hi ATF (b)(6)

We can be available for a call to provide an update on Baikal whenever is convenient. If possible, it would be great to have your State Department contacts and their counsel available for that call.

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: [REDACTED] (b)(6)  
Office Tel: 202-622-2410

---

**From:** [REDACTED] ATF (b)(6)  
**Sent:** Wednesday, March 11, 2015 1:38 PM  
**To:** [REDACTED] (b)(6) OFAC Feedback  
**Cc:** [REDACTED] (b)(6) ATF (b)(6)  
**Subject:** FW: Working Group Question

Duplicative of content in Bates No. 2018-08-116: 001011



Bates Nos. 2018-08-116:  
001023-001025

Duplicate Content in  
Bates Nos. 2018-08-116:  
001011-001014

## RE: Working Group Question

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

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

**Date:** Thu, 12 Mar 2015 15:45:22 -0400

Apologies (b)(6)

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

(b)(5)

Thanks

(b)(6)

---

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

**Sent:** Thursday, March 12, 2015 1:01 PM

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

**Subject:** RE: Working Group Question

Hi (b)(6)

Were you able to find anything out?

best-

(b)(6)

---

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

**Sent:** Wednesday, March 11, 2015 2:21 PM

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

**Subject:** RE: Working Group Question

Give me to COB today on this. ill get back to you guys.

Duplicative of content in Bates No. 2018-08-116: 001015

Bates Nos. 2018-08-116:  
001027-001029

Duplicate Content in  
Bates Nos. 2018-08-116:  
001015-001018

## FW: Working Group Question

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**From:** [REDACTED] (b)(6)  
**To:** [REDACTED] (b)(6)  
**Date:** Thu, 12 Mar 2015 16:06:57 -0400

---

Fyi.

---

**From:** [REDACTED] ATF (b)(6)  
**Sent:** Thursday, March 12, 2015 4:06 PM  
**To:** [REDACTED] (b)(6) ATF (b)(6)  
**Cc:** [REDACTED] (b)(6) ATF (b)(6)  
**Subject:** RE: Working Group Question

Thank you, (b)(6) Just to be clear, your response [REDACTED] ATF (b)(5)  
[REDACTED] ATF (b)(5)

Thank you!  
ATF (b)(6)

ATF (b)(6) Attorney | Law & Policy Division | Office of Chief Counsel | Bureau of Alcohol, Tobacco, Firearms & Explosives ATF (b)(6) |  
ATF (b)(6)

---

**From:** [REDACTED] (b)(6)  
**Sent:** Thursday, March 12, 2015 3:48 PM  
**To:** [REDACTED] ATF (b)(6)  
**Cc:** [REDACTED] (b)(6) ATF (b)(6)  
**Subject:** RE: Working Group Question

Hi ATF (b)(6) -

Sorry for the delay; I just heard back from our investigative division.  
[REDACTED] (b)(5)

best-  
[REDACTED] (b)(6)

**From:** [REDACTED] ATF (b)(6)  
**Sent:** Wednesday, March 11, 2015 1:38 PM  
**To:** [REDACTED] (b)(6) OEAC Feedback  
**Cc:** [REDACTED] (b)(6) ATF (b)(6)  
**Subject:** FW: Working Group Question

Duplicative of content in Bates No. 2018-08-116: 001011  
[REDACTED]

Bates Nos. 2018-08-116:  
001031-001033

Duplicate Content in  
Bates Nos. 2018-08-116:  
001011-001014

**RE: Working Group Question**

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**From:** (b)(6)  
**To:** ATF (b)(6)  
**Cc:** (b)(6) ATF (b)(6)  
**Date:** Thu, 12 Mar 2015 16:11:11 -0400

Hi ATF (b)(6)

(b)(5)

best-  
(b)(6)

---

**From:** ATF (b)(6)  
**Sent:** Thursday, March 12, 2015 4:06 PM  
**To:** (b)(6) ATF (b)(6)  
**Cc:** (b)(6) ATF (b)(6)  
**Subject:** RE: Working Group Question

Duplicative of content in Bates No. 2018-08-116: 001030

[Redacted content]

Bates Nos. 2018-08-116:  
001035-001037

Duplicate Content in  
Bates Nos. 2018-08-116:  
001030-001033



## FW: Baikal Determination (Sanctions)

---

**From:** (b)(6)  
**To:** (b)(6) "Blackborow, Davin" (b)(6)  
**Cc:** (b)(6)  
**Date:** Fri, 13 Mar 2015 17:51:52 -0400

Just fyi, (b)(5) I will keep you posted as to a possible call.

---

**From:** (b)(6)  
**Sent:** Friday, March 13, 2015 5:46 PM  
**To:** ATF (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Baikal Determination (Sanctions)

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

Thanks for the email. We understand your timing, and for that reason we were hoping to talk with your contacts at State to review possible options to move forward quickly. (b)(5)  
(b)(5)

If State (and DOJ as appropriate) is available for a call, we would prefer to proceed with that option first. If you think that is not possible, let us know and we will try to give you an update on our clients' timing.

Many thanks,

(b)(6)

---

**From:** ATF (b)(6)  
**Sent:** Friday, March 13, 2015 4:27 PM  
**To:** (b)(6)  
**Cc:** ATF (b)(6)  
**Subject:** RE: Baikal Determination (Sanctions)

Hello (b)(6)

Thank you for your patience— ATF (b)(5)

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

Thank you!  
ATF (b)(6)

ATF (b)(6) Attorney | Law & Policy Division | Office of Chief Counsel | Bureau of Alcohol, Tobacco, Firearms & Explosives ATF (b)(6) |  
ATF (b)(6)

---

**From:** (b)(6)  
**Sent:** Thursday, March 12, 2015 3:27 PM  
**To:** ATF (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Baikal Determination (Sanctions)

That sounds good, thank you ATF (b)(6)

---

**From:** ATF (b)(6)  
**Sent:** Thursday, March 12, 2015 3:25 PM  
**To:** (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Baikal Determination (Sanctions)

Hello (b)(6),

Thank you for checking in! I am trying to touch base with all of our relevant stakeholders, and we have had some people out. I should have more information hopefully tomorrow so we can schedule a call and move forward.

Thank you!

ATF (b)(6)

ATF (b)(6) | Attorney | Law & Policy Division | Office of Chief Counsel | Bureau of Alcohol, Tobacco, Firearms & Explosives | ATF (b)(6)

ATF (b)(6)

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**From:** (b)(6)  
**Sent:** Thursday, March 12, 2015 3:22 PM  
**To:** ATF (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Baikal Determination (Sanctions)

ATF (b)(6)

I am writing to check in about a call on Baikal. Please let us know when might be convenient.

Many thanks,

(b)(6)

---

**From:** (b)(6)  
**Sent:** Wednesday, March 04, 2015 4:13 PM  
**To:** ATF (b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Baikal Determination (Sanctions)

Hi ATF (b)(6)

We have had further discussions here and would be ready for a call whenever works on your end. We will provide an update but would also like to discuss the State Department idea in that call, and having counsel from State on the call would be helpful.

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:** Tuesday, March 03, 2015 3:03 PM  
**To:** (b)(6)  
**Subject:** RE: Baikal Determination (Sanctions)

Hello (b)(6)

Thank you for the update! We appreciate your help. I will discuss the State Department idea that you mention here with my client colleagues. We should be able to provide information during our next call from the standpoint of our administrative record for implementing sanctions. The State Department should be able to speak to the parameters of their foreign policy authority. Hopefully State (b)(6) will participate in our next call for this discussion.

Thank you!

ATF (b)(6)

ATF (b)(6) | Attorney | Law & Policy Division | Office of Chief Counsel | Bureau of Alcohol, Tobacco, Firearms & Explosives | ATF (b)(6) |  
ATF (b)(6)

---

**From:** (b)(6)  
**Sent:** Monday, March 02, 2015 4:32 PM  
**To:** ATF (b)(6)  
**Subject:** RE: Baikal Determination (Sanctions)

ATF (b)(6)

Thanks for checking in. At this point, I don't think we will have much of an update. OFAC is currently reviewing some aspects of this matter internally, and I think the result of that review will largely determine our path forward. OFAC is aware of the urgency, and I will let you know as we get more information.

State (b)(5)

2018-08-116: 001042

# State (b)(5)

Thanks.

(b)(6)

---

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

**Sent:** Monday, March 02, 2015 4:09 PM

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

**Subject:** Baikal Determination (Sanctions)

Hello (b)(6)

Thank you for your voicemail message about Baikal. My client colleagues are out of pocket at a conference this week, so I have been attempting to connect with at least one of them so we can discuss Baikal. Please let me know what your schedule looks like tomorrow. If tomorrow does not look good for you, please let me know what would work better.

Thank you so much for your help!

ATF (b)(6)

ATF (b)(6) | [Attorney](#) | [Law & Policy Division](#) | [Office of Chief Counsel](#) | [Bureau of Alcohol, Tobacco, Firearms & Explosives](#) | ATF (b)(6) |

ATF (b)(6)