

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

From: (b)(6)
To: (b)(6)
Date: Thu, 23 Apr 2015 19:05:37 -0400

Hi (b)(6) - thanks so much for your help on this one. Much appreciated!

V/r
(b)(6)

From: (b)(6)
Sent: Thursday, April 23, 2015 11:42 AM
To: (b)(6)
Subject: RE: Licensing Application involving (b)(4)

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

Thanks
(b)(6)

From: (b)(6)
Sent: Monday, April 20, 2015 12:20 PM
To: (b)(6)
Subject: RE: Licensing Application involving (b)(4)

Hi (b)(6)

Hope all is well. My apologies, but I keep forgetting to follow up with you regarding this OGT request. Can you let me know if you've had a chance to take a look at this entity? Let me know if you have any questions or concerns.

V/r
(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)

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Bates No. 2018-08-116: 001232
Duplicates Content in
Bates No. 2018-08-116: 000684

FW: Ukraine OGT Requests

From: (b)(6)
To: (b)(6)
Cc: (b)(6)
Date: Wed, 29 Apr 2015 12:29:10 -0400
Attachments: Non-responsive, separate record (b)(3) [Gramm-Leach-Bliley Act, Public Law 106-102], (b)(4), (b)(6); UKRAINE-EO13661-2015-318637-1 application.pdf (11.16 MB)

(b)(6) (b)(6) will get back to you with an answer on this.

From: (b)(6)
Sent: Wednesday, April 29, 2015 12:24 PM
To: (b)(6)
Subject: Ukraine OGT Requests

Hi (b)(6)

I'm hoping you might be able to help me out or point me in the right direction. I know that there have been a number of changes to OGT POC's, so I apologize if you are not the right person to go to.

I have a couple of Ukraine issues I'm hoping someone might be able to help clarify for me:

1. **Non-responsive, separate record**

2. Licensing case (wire transfer): UKRAINE-EO13661-2015-318637-1

- **Summary:** (b)(6) (b)(6) included photo identification and other documents. The (b)(6) in the application (b)(6) payment was blocked (b)(3) [Gramm-Leach-Bliley Act, Public Law 106-102], (b)(4), (b)(6) (b)(3) [Gramm-Leach-Bliley Act, Public Law 106-102], (b)(4), (b)(6) There are extensive notes and emails in the ABARRS report (attached).
- **Assistance:** (b)(5), (b)(6) (b)(5), (b)(6) ?

Any insight you and your team might be able to offer would be greatly appreciated.

Thanks!

(b)(6)
(b)(6)
Sanctions Licensing Officer
Office of Foreign Assets Control (OFAC)
U.S. Department of Treasury
1500 Pennsylvania Ave.
Washington, DC 20220
(b)(6)

Bates Nos. 2018-08-116:

001234-001254

Withheld in Full

Pursuant to (b)(4), With Parts

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

RE: Ukraine OGT Requests

From: (b)(6)
To: (b)(6)
Date: Wed, 29 Apr 2015 12:41:39 -0400

Thanks!

From: (b)(6)
Sent: Wednesday, April 29, 2015 12:40 PM
To: (b)(6)
Subject: RE: Ukraine OGT Requests

(b)(6).

I'm looking into this and will follow up with you shortly.

Regards,

(b)(6)

From: (b)(6)
Sent: Wednesday, April 29, 2015 12:30 PM
To: (b)(6)
Cc: (b)(6)
Subject: RE: Ukraine OGT Requests

Thank you so much!

From: (b)(6)
Sent: Wednesday, April 29, 2015 12:29 PM
To: (b)(6)
Cc: (b)(6)
Subject: FW: Ukraine OGT Requests

Duplicate of content on Bates No. 2018-08-116: 001233



Bates No. 2018-08-116: 001256
Duplicates Content in
Bates No. 2018-08-116: 001233

RE: Ukraine OGT Requests

From: (b)(6)
To: (b)(6)
Cc: (b)(6)
Date: Thu, 30 Apr 2015 18:12:26 -0400
Attachments: (b)(6) application.pdf (11.16 MB)

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

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

Thank you,

(b)(6)

From: (b)(6)
Sent: Thursday, April 30, 2015 12:12 PM
To: (b)(6)
Cc: (b)(6)
Subject: FW: Ukraine OGT Requests

Hi (b)(6)

I received an email from OGT in response to an inquiry I just put in.

UKRAINE-EO13661-2015-318637-1

- **Summary:** (b)(6)
(b)(6) In the application, (b)(6) included photo identification and other documents. The payment was blocked as the (b)(3) [Gramm-Leach-Bliley Act, Public Law 106-102], (b)(4), (b)(6) There are extensive notes and emails in the ABARRS report (attached).
- (b)(5), (b)(6)

Question for you: (b)(5), (b)(6)
(b)(5), (b)(6)

Thanks!
(b)(6)

(b)(5)

(b)(5)

•

From: (b)(6)
Sent: Wednesday, April 29, 2015 2:13 PM
To: (b)(6)
Subject: RE: Ukraine OGT Requests

(b)(6)

On case 1:

Non-responsive, separate record

On case 2:

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

Thank you,

(b)(6)

From: (b)(6)
Sent: Wednesday, April 29, 2015 12:30 PM
To: (b)(6)
Cc: (b)(6)
Subject: RE: Ukraine OGT Requests

Thank you so much!

From: (b)(6)
Sent: Wednesday, April 29, 2015 12:29 PM
To: (b)(6)
Cc: (b)(6)
Subject: FW: Ukraine OGT Requests

Duplicate of content on Bates No. 2018-08-116: 001233

Bates No. 2018-08-116: 001259
Duplicates Content in
Bates No. 2018-08-116: 001233



APPLICATION FOR THE RELEASE OF BLOCKED FUNDS

It is strongly recommended that you use the computer to complete this form

TYPE OF APPLICATION **New Application** Previous Case Number (if applicable):

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

2015 APR -9 PM 1:56

TREASURY DEPARTMENT
FOREIGN ASSETS CONTR...

INTERMEDIARY FINANCIAL INSTITUTION

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



APPLICATION FOR THE RELEASE OF BLOCKED FUNDS (cont'd)

64. **DETAILED** EXPLANATION OF THE TRANSACTION (cont'd)

[Empty box for detailed explanation of the transaction]

65. **APPLICANT CERTIFICATION:** I, THE UNDERSIGNED, HEREBY DECLARE THAT, TO THE BEST OF MY KNOWLEDGE, THE INFORMATION PROVIDED ON THIS APPLICATION AND ANY ACCOMPANYING DOCUMENTATION IS TRUTHFUL AND COMPLETE.

66. SIGNATURE: (b)(6) Signature on printed application 67. DATE: 03 05 2015 (please provide handwritten date)
68. SIGNATORY NAME: (b)(6) 69. SIGNATORY TITLE: _____
70. SIGNATORY E-MAIL: (b)(6)

(b)(6)

Bates Nos. 2018-08-116:

001264-001297

Withheld in Full Pursuant to

(b)(6) With Parts

Pursuant to (b)(4)

Sender: TNT Account : (b)(6)
MBE EURASIA (MAIN OFFICE MBE)
OVCHINNIKOVSKAYA NAB., 22/24
MOSCOW
115035
Russian Federation



* GE259555632WW *

Contact: (b)(6)
Tel: (b)(6)

Sender Ref :

Delivery Address
LICENSING DIVISION OFFICE OF F
U.S. DEPARTMENT OF TREASURY
1500 PENNSYLVANIA AVENUE, N.W.
WASHINGTON
D.C.
20220
United States

Description of Goods Shipping Date: 06 Apr 2015
documents

Contact: NO
Tel: (202) 622-2000

SELF  **BROUGHT** **12:00**  **express**

Special Delivery Instructions		NON DANGEROUS GOODS
Service & Options (12D) 12:00 Express (doc)	No. Of Pieces 1 of 1 Consignment Weight 0.600Kgs	TNT EXPRESS'S LIABILITY FOR LOSS, DAMAGE AND DELAY IS LIMITED BY THE CITE CONVENTION OR THE WARREN CONVENTION WHICHEVER IS APPLICABLE. THE SENDER AGREES THAT THE GENERAL CONDITIONS, ACCESSIBLE VIA THE HELP TEXT ARE ACCEPTABLE AND GOVERN THIS CONTRACT. IF NO SERVICE OR BILLING IS SELECTED THE FASTEST AVAILABLE SERVICE WILL BE CHARGED TO THE SENDER.

RE: Ukraine OGT Requests

From: (b)(6)
To: (b)(6)
Cc: (b)(6)
Date: Fri, 01 May 2015 12:09:09 -0400

Thank you, (b)(6). We appreciate the guidance.

(b)(6)

From: (b)(6)
Sent: Friday, May 01, 2015 12:00 PM
To: (b)(6)
Cc: (b)(6)
Subject: RE: Ukraine OGT Requests

Attorney-Client Privilege

Hi (b)(6),

Here, as you note, (b)(5)

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

(b)(5)

(b)(6)

Thanks

(b)(6)

From: (b)(6)
Sent: Thursday, April 30, 2015 6:12 PM
To: (b)(6)
Cc: (b)(6)
Subject: RE: Ukraine OGT Requests

Duplicative of content on Bates No. 2018-08-116: 001257

Bates Nos. 2018-08-116:

001300-001301

Duplicate Content in

Bates Nos. 2018-08-116:

001257-001259

RE: State Referral for RWC Group Ukraine-EO13661-2015-318183-1 - Livelink 15077 KB

From: (b)(6)
To: non-tsra@state.gov, State (b)(6)
Cc: State (b)(6), (b)(6)
"Blackborow, Davin" (b)(6)
Date: Wed, 06 May 2015 17:45:28 -0400
Attachments: Ukraine-EO13661-2015-318183-1.pdf - 12 MB (0 bytes); RWC Initial Request.pdf - 2 MB (0 bytes); State guidance.pdf - 320 KB (0 bytes)

OFAC has received a request (the "Application") (attached) from Mark Barnes & Associates on behalf of their client, the Russian Weapon Company Group LLC ("RWC Group"), a U.S. company and importer of products from Kalashnikov Concern ("Kalashnikov") and Izhevsky Mekhanichesky Zavod ("Baikal"), seeking reconsideration of a denial they had previously received from OFAC.

In their initial request (attached) in July of 2014, RWC Group sought interpretive guidance as to whether Baikal is majority-owned, 50 percent or more, by Kalashnikov, which was designated on July 16, 2014 under Executive Order 13661 of the Ukraine-Related Sanctions Regulations (the "Regulations"). According to their request, Baikal is a Russian arms manufacturer that deals in sporting shotguns and air rifles. RWC Group imports products from Baikal to sell on the U.S. civilian market. They further stated in their initial request that (b)(4)
(b)(4)

Based on information available to it, OFAC determined that Kalashnikov had a property interest in Baikal's (b)(4) and thus denied RWC Group's request to unblock (b)(4). RWC Group now argues that regardless of Baikal's status, Baikal had either no ownership interest in (b)(4) when sanctions were imposed on Kalashnikov. 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, § 589.304. (b)(4), (b)(5)
(b)(4), (b)(5)

Prior to making a determination with respect to the Application, OFAC seeks State's foreign policy guidance. We note that State initially recommended Treasury (b)(4); State (b)(5)
State (b)(5)
State (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.

Bates No. 2018-08-116: 001318
Non-Responsive Record

RE: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

From: (b)(6)
To: ATF (b)(6)
Cc: (b)(6) ATF (b)(6) benjamin.b.fitzpatrick@usdoj.gov
Date: Thu, 21 May 2015 17:55:27 -0400

ATF (b)(6)

That works - I am currently free on Wednesday afternoon at any time except for 2-3pm.

Thanks.

(b)(6)

From: ATF (b)(6)
Sent: Thursday, May 21, 2015 5:42 PM
To: (b)(6)
Cc: (b)(6) ATF (b)(6) (b)(6)
(b)(6) Benjamin.B.Fitzpatrick@usdoj.gov
Subject: RE: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

(b)(6)

Yes, the date looking best for us here in ATF thus far is Wednesday, May 27, 2015, in the afternoon. Let me know if this works for you. I appreciate you getting back to us.

ATF (b)(6)

Division Chief
ATF - FESD

ATF (b)(6)

From: (b)(6)
Sent: Thursday, May 21, 2015 11:48 AM
To: ATF (b)(6)
Cc: ATF (b)(6) (b)(6)
Subject: RE: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

Hi ATF (b)(6)

Would you or others at ATF be available for a brief call to cover a couple of Baikal-related updates? I could do tomorrow or next week if there is a time that works for you.

Kind regards,

(b)(6)

From: (b)(6)
Sent: Thursday, May 07, 2015 2:26 AM
To: ATF (b)(6)
Cc: ATF (b)(6) (b)(6)
Subject: Re: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

Hi ATF (b)(6)

Thanks for following up. We understand from State EB, who ofac normally works with on sanctions issues, that they were trying to work out policy guidance with atf's usual contact at State but having a hard time getting in touch. Our understanding is that State prefers to take the pen on this issue. If you can ask your state contact to reach out to State (b)(6) at state that will hopefully move this forward.

Separately, ofac is working through the interagency process. We will let you know if there are updates on that end.

I am traveling this week for work so am mostly unavailable, but can talk next week as needed.

Thanks

(b)(6)

From: ATF (b)(6)
Sent: Wednesday, May 06, 2015 05:01 PM
To: (b)(6)
Cc: ATF (b)(6)

ATF (b)(6)

Subject: FW: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

(b)(6)

Hope you are doing well. I just wanted to inquire and follow-up to see if there has been any movement on the Baikal issue and getting ATF and State stakeholders together on the issue. There has been a different attorney assigned at Justice Dep't /ODAG Office to handle the sanctions portfolio so we are bringing him up to speed on all things sanctions. His name is Ben Fitzpatrick and you will see him copied on correspondence moving forward. Let us know if you need anything on our side, we are still standing by as requested. The Baikal pending applications have all exceeded normal ATF processing times at this point so the status inquiries by Importers are picking up.

V/R,

ATF (b)(6)

Division Chief
ATF - FESD

ATF (b)(6)

From: (b)(6)
Sent: Monday, April 20, 2015 10:53 AM
To: ATF (b)(6)
Cc: (b)(6) [Bradley.Smith](#) (b)(6)
Subject: RE: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

Hi ATF (b)(6)

As a brief update, I understand one of the key people who works on this at State has been out on vacation but is back today. We will let you know as we hear anything further.

Kind regards,

(b)(6)

From: (b)(6)
Sent: Tuesday, April 14, 2015 2:27 PM
To: ATF (b)(6)
Cc: (b)(6) Smith, Bradley
Subject: RE: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

Thanks, ATF (b)(6) We will keep you posted.

Kind regards,

(b)(6)

From: ATF (b)(6)
Sent: Tuesday, April 14, 2015 1:40 PM
To: (b)(6) ATF (b)(6)
Cc: (b)(6) Smith, Bradley
Subject: RE: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

(b)(6)

Absolutely, I think this is the needed next step in trying to figure out how this can be effectively executed. Let us know and we will get our team together accordingly. Always, thanks for your help with everything.

V/R,

ATF (b)(6)

Division Chief
ATF - FESD

ATF (b)(6)

From: (b)(6)
Sent: Tuesday, April 14, 2015 1:24 PM
To: ATF (b)(6)
Cc: (b)(6) [Bradley.Smith](#) (b)(6)
Subject: FW: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

ATF (b)(6) and ATF (b)(6)

(b)(5)

2018-08-116: 001325

(b)(5)

Kind regards,

(b)(6)

From: (b)(6)

Sent: Thursday, April 09, 2015 12:24 PM

To: ATF (b)(6)

Cc: ATF (b)(6)

ATF (b)(6) Blackborow, Davin; Smith, Bradley; Baheri, Leila; (b)(6)

Subject: RE: DRAFT: For Your Review: OFAC Baikal Determination (Sanctions)

Duplicative of content in Bates Nos. 2018-08-116: 001200-001201

Bates Nos. 2018-08-116:

001327-001330

Duplicate Content in

Bates Nos. 2018-08-116:

001201-001204

RE: Request for State Contact Information (Sanctions)

From: [REDACTED] (b)(6)
To: ATF (b)(6)
Cc: [REDACTED] ATF (b)(6)
[REDACTED] (b)(6) benjamin.b.fitzpatrick@usdoj.gov
Date: Thu, 28 May 2015 17:00:05 -0400

Hi ATF (b)(6)

State (b)(6) email is State (b)(6). I think her phone number may have changed recently, so I would try reaching her via email.

Kind regards,

(b)(6)

From: ATF (b)(6)
Sent: Thursday, May 28, 2015 3:45 PM
To: (b)(6)
Cc: (b)(6) ATF (b)(6)
[REDACTED] Benjamin.B.Fitzpatrick@usdoj.gov
Subject: Request for State Contact Information (Sanctions)

Hello (b)(6),

Thank you for yesterday's sanctions call. Can you provide us with State (b)(6) contact information so we may establish a communication loop for her Friday update and future dialogue?

Thank you!

ATF (b)(6)

On May 21, 2015, at 11:48 AM, [REDACTED] (b)(6) wrote:

Duplicative of content in Bates Nos. 2018-08-116: 001324-001325



Bates Nos. 2018-08-116:

001338-001343

Duplicate Content in

Bates Nos. 2018-08-116:

001325-001330

RE: Unclass talking points

From: (b)(6)
To: "Ciaramella, Eric" (b)(6) (b)(6) (b)(6)
Cc: "Zentos, Elisabeth" (b)(6) (b)(6)
Date: Thu, 11 Jun 2015 14:49:28 -0400
Attachments: 20150429 Comparison of Country Sanctions_Russia_Ukraine.pdf (366.35 kB)

Thanks Eric. And, as we have all said, it was good to meet you both.

Attached is the chart that we discussed in the meeting that has been a useful reference for keeping up with the various sanctions programs. It is not perfect though, so I always welcome feedback on what we might not have caught. Also, I'd just ask that you not circulate widely as it is a rather informal tool for keeping track.

Thanks

(b)(6)

(b)(6)

Policy Advisor
U.S. Department of the Treasury
Office of Terrorist Financing and Financial Crimes
Office: (b)(6) Blackberry: (b)(6)
(b)(6)

From: Ciaramella, Eric [mailto:(b)(6)]
Sent: Thursday, June 11, 2015 2:44 PM
To: (b)(6)
Cc: Zentos, Elisabeth
Subject: Unclass talking points

Treasury colleagues,

It was very nice to meet you yesterday. As I mentioned in our meeting, I received unclass talking points from (b)(5) last week during our sanctions push ahead of the G-7 Summit. Wanted to send these your way in case they are useful in your interactions with European counterparts. I'll make sure to send future sets of talking points your way as well.

(b)(5) talking points on Russia's actions in and around eastern Ukraine
4 June 2015

Combined Russian-separatist forces continue to violate the terms of the February 12 Minsk Package of Measures.

- The OSCE Special Monitoring Mission reported that the combined Russian-separatist forces concentrated troops and participated in heavy fighting earlier this week around Maryinka, a town near Donetsk.
- Combined Russian-separatist forces shelled the Avdiyivka Coke plant last week, causing this economically vital facility to halt operations for several days.
- Combined Russian-separatist forces maintain heavy artillery pieces and multiple rocket launcher systems within areas prohibited under the Minsk accords.

Russia maintains a force presence in eastern Ukraine and Russian soldiers play an integral role in sustaining and directing the fighting.

- Russian officers serve in leadership roles in the combined Russian-separatist force, organizing the force and planning operations.
- Ukraine's capture of two Russian special operations soldiers in government-controlled territory north of Luhansk illustrates Russia's continued direct involvement in operations on the ground.
- The Russian military still has advanced air defense systems in eastern Ukraine.
- Russian and separatist forces also have a large concentration of command and control equipment in eastern Ukraine.

Combined Russian-separatist forces have conducted extensive training in eastern Ukraine over the last several months. The

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complex nature of this training leaves no doubt that Russian military instructors are involved.

- The training also incorporated Russian UAVs, an unmistakable sign of Russia's presence.
- Ukraine also shot down an advanced UAV in late May that bore distinctly Russian identification and requires an airfield to operate.

Russia continues to maintain forces along its border with Ukraine, as noted by Western journalists.

Since the latest ceasefire took effect on February 15, Russia has shipped additional heavy weapons into eastern Ukraine, adding to the hundreds Russia has already provided.

- Russia has also built up large ammunition stockpiles both on its border with Ukraine and inside eastern Ukraine, further illustrating its direct support to the separatist forces.

From: (b)(6)

Sent: Thursday, June 11, 2015 9:29 AM

To: Ciaramella, Eric

Cc: Zentos, Elisabeth; (b)(6)

(b)(6)

Subject: RE: Thank you

Eric,

It was really great having you over, thanks for taking the time to wander down Pennsylvania. Here's to strategizing :) I am cc'ing everyone you spoke with yesterday: (b)(6), (b)(6) and (b)(6) from OFAC, and (b)(6) and (b)(6) from Terrorist Financing and Financial Crimes (TFFC). Please reach out to us at any time.

(b)(6)

From: Ciaramella, Eric [mailto:(b)(6)]

Sent: Wednesday, June 10, 2015 6:40 PM

To: (b)(6)

Cc: Zentos, Elisabeth

Subject: Thank you

(b)(6),

Thanks again for organizing the meeting today! It was extremely informative, and I'm really glad we all had the chance to sit down and meet one another early in our tenures.

Please circulate my contact info to your colleagues. In case you don't have it handy:

Eric Ciaramella

Director for Ukraine (and probably Baltic States too...)

National Security Council, EEOB 393

Open: (b)(6) | Secure: (b)(6)

Unclass: (b)(6)

SIPRNet: (b)(6)

JWICS: (b)(6)

RE: DRAFT: Updated State Guidance

From: (b)(6)
To: "Fitzpatrick, Benjamin B. (ODAG)" <benjamin.b.fitzpatrick@usdoj.gov>
Cc: "Smith, Bradley" (b)(6)
Date: Thu, 09 Jul 2015 09:58:46 -0400

Sounds good, talk to you then.

From: Fitzpatrick, Benjamin B. (ODAG) [mailto:Benjamin.B.Fitzpatrick@usdoj.gov]
Sent: Thursday, July 09, 2015 9:52 AM
To: (b)(6)
Cc: Smith, Bradley
Subject: RE: DRAFT: Updated State Guidance

Thanks (b)(6). Why don't I give you a call then?

Thanks!
Ben

From: (b)(6)
Sent: Thursday, July 09, 2015 9:46 AM
To: Fitzpatrick, Benjamin B. (ODAG)
Cc: Bradley.Smith (b)(6)
Subject: RE: DRAFT: Updated State Guidance

Ben,

I am available for a call from 2-3 this afternoon. I can call you then, or please feel free to call me – my direct number is (b)(6)

(b)(6)

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: Fitzpatrick, Benjamin B. (ODAG) [mailto:Benjamin.B.Fitzpatrick@usdoj.gov]
Sent: Thursday, July 09, 2015 9:43 AM
To: (b)(6)
Cc: Smith, Bradley
Subject: RE: DRAFT: Updated State Guidance

(b)(6) and Brad,

Good morning. Hope you had a great Fourth. Could we by any chance touch base by phone this afternoon perhaps between 1 and 3 or tomorrow afternoon?

Thanks so much
Ben

From: (b)(6)
Sent: Wednesday, July 01, 2015 9:29 PM
To: Fitzpatrick, Benjamin B. (ODAG)
Cc: Bradley.Smith (b)(6)
Subject: Re: DRAFT: Updated State Guidance

Ben,

I am out of the office tomorrow and driving most of the day. If it is urgent I could do a call late tomorrow afternoon, or I could talk Monday. Let me know what you prefer.

I don't know anything more about timing at this point. Glad to talk about options as well; we have tried and considered a few

avenues to solve this atf issue but can discuss whether there are others.

Thanks,
(b)(6)

From : Fitzpatrick, Benjamin B. (ODAG) [<mailto:Benjamin.B.Fitzpatrick@usdoj.gov>]
Sent: Wednesday, July 01, 2015 06:45 PM
To: (b)(6)
Cc: Smith, Bradley
Subject: RE: DRAFT: Updated State Guidance

(b)(6) and Brad,

Thanks for the update. As you know, this is a pressing issue over here and the expected action should be able to relieve the pressure on ATF. Would it be possible to link up tomorrow to get any more information and figure out if there are options available to us?

Thanks as always for your help on this.

Best,
Ben

From: (b)(6)
Sent: Wednesday, July 01, 2015 6:03 PM
To: Fitzpatrick, Benjamin B. (ODAG)
Cc: Bradley.Smith (b)(6)
Subject: RE: DRAFT: Updated State Guidance

Hi Ben,

It has been delayed a couple of times, and at this point I don't have any insight into when it might proceed. I'm copying Brad in case he might have more information. I'm glad to discuss further as needed.

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: Fitzpatrick, Benjamin B. (ODAG) [<mailto:Benjamin.B.Fitzpatrick@usdoj.gov>]
Sent: Wednesday, July 01, 2015 4:48 PM
To: (b)(6)
Subject: FW: DRAFT: Updated State Guidance

Hey there (b)(6)

I'm just curious if there was any further information on the timing of the issue we discussed last week? Happy to chat on the high side or via secure phone if that's more convenient.

Best,
Ben

Benjamin Fitzpatrick
Senior Counsel to the Deputy Attorney General
Department of Justice
Tel: (202) 305-0273
SCIF: DOJ (b)(6), (b)(7)(E)
Secure: DOJ (b)(6), (b)(7)(E)
U: Benjamin.B.Fitzpatrick@usdoj.gov

DOJ (b)(6), (b)(7)(E)

From: State (b)(6)
Sent: Friday, June 26, 2015 2:04 PM
To: (b)(6); Fitzpatrick, Benjamin B. (ODAG)
Cc: ATF (b)(6); State (b)(6); ATF (b)(6)
Subject: RE: DRAFT: Updated State Guidance

Hi -

I am sorry, I am actually having problems with my own high side. (b)(6) will be able to fill you in. State (b)(5)
State (b)(5) But, there's good news on that front, which (b)(6) will

Best,
State (b)(6)

This email is UNCLASSIFIED.

From: (b)(6)
Sent: Friday, June 26, 2015 1:58 PM
To: Benjamin.B.Fitzpatrick@usdoj.gov; State (b)(6)
Cc: ATF (b)(6); (b)(6); State (b)(6); ATF (b)(6)
Subject: RE: DRAFT: Updated State Guidance

Hi Ben,

Yes, I'll email you shortly on the Secret system.

Thanks,
(b)(6)

From: Fitzpatrick, Benjamin B. (ODAG) [<http://redirect.state.sbu/?url=mailto:Benjamin.B.Fitzpatrick@usdoj.gov>]
Sent: Friday, June 26, 2015 1:56 PM
To: State (b)(6); (b)(6)
Cc: State (b)(6); ATF (b)(6); (b)(6)
Subject: RE: DRAFT: Updated State Guidance

State (b)(6) Just following up on this as I'm reachable at the below high side accounts.

(b)(6) separately, I've seen activity come through the Department recently for review that appears directly relevant to the underlying issue and which would resolve the issue. Might it be possible for us to link up on the high side to discuss this? I'm happy to send a more informative email on the high side if you forward your address.

Thanks
Ben

Ben Fitzpatrick

Senior Counsel to the Deputy Attorney General
Department of Justice
Office: (202) 305-0273
SCIF STE: DOJ (b)(6), (b)(7)(E)
SCIF Secure: DOJ (b)(6), (b)(7)(E)
Unclass: Benjamin.b.fitzpatrick@usdoj.gov

DOJ (b)(6), (b)(7)(E)

From: Fitzpatrick, Benjamin B. (ODAG)
Sent: Wednesday, June 24, 2015 3:40 PM
To: State (b)(6)
Cc: ATF (b)(6); ATF (b)(6); (b)(6)
Subject: RE: DRAFT: Updated State Guidance

State (b)(6)

I have ready access to high side email accounts, as well as access to a secure phone. I'd be happy to discuss this and find a way to get the relevant information back to ATF. My high side accounts are below.

Ben

Ben Fitzpatrick

Senior Counsel to the Deputy Attorney General
Department of Justice
Office: (202) 305-0273
SCIF STE: DOJ (b)(6), (b)(7)(E)
SCIF Secure: DOJ (b)(6), (b)(7)(E)
Unclass: Benjamin.b.fitzpatrick@usdoj.gov

DOJ (b)(6), (b)(7)(E)

From: ATF (b)(6)
Sent: Tuesday, June 23, 2015 2:59 PM
To: State (b)(6)
Cc: ATF (b)(6); Fitzpatrick, Benjamin B. (ODAG); (b)(6)
Subject: RE: DRAFT: Updated State Guidance

State (b)(6) I do not have an account established as of yet but I do have STU/STE line capabilities if we want to conference call on any points?

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

From: State (b)(6) [[http://redirect.state.sbu/?url=mailto: State \(b\)\(6\)](http://redirect.state.sbu/?url=mailto:State (b)(6))]
Sent: Tuesday, June 23, 2015 2:51 PM
To: ATF (b)(6); State (b)(6)
Cc: ATF (b)(6); Fitzpatrick, Benjamin B. (ODAG) (JMD); (b)(6)
Subject: RE: DRAFT: Updated State Guidance

Hey ATF (b)(6)–

Do you have a high-side email where we could correspond?

Best,
State (b)(6)

This email is UNCLASSIFIED.

From: ATF (b)(6)
Sent: Tuesday, June 23, 2015 2:50 PM
To: State (b)(6)
Cc: ATF (b)(6); Benjamin.B.Fitzpatrick@usdoj.gov; (b)(6)
Subject: RE: DRAFT: Updated State Guidance

Good Afternoon State (b)(6)

I hope you are doing well. I wanted to do a quick check in and see if anything has changed in respect to the imminent guidance. Also, in that regard if there is anything you need from the ATF side by way of input or even clarification on any points please feel free to let me know. Thanks as usual.

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: State (b)(6) [[http://redirect.state.sbu/?url=http://redirect.state.sbu/?url=http://redirect.state.sbu/?url=mailto: State \(b\)\(6\)](http://redirect.state.sbu/?url=http://redirect.state.sbu/?url=http://redirect.state.sbu/?url=mailto:State (b)(6))]

Sent: Wednesday, June 10, 2015 1:28 PM

To: ATF (b)(6) State (b)(6)

Cc: ATF (b)(6) Fitzpatrick, Benjamin B. (ODAG) (JMD);
(b)(6)

Subject: RE: DRAFT: Updated State Guidance

Dear ATF (b)(6)-

I've gotten initial guidance from key folks at State and have now sent out the letter for broader clearance. I hope to have something to you by end of the week or early next.

Best,

State (b)(6)

SBU
This email is UNCLASSIFIED.

From: ATF (b)(6)

ATF (b)(6)

Sent: Monday, June 01, 2015 1:33 PM

To: State (b)(6)

Cc: ATF (b)(6)
Benjamin.B.Fitzpatrick@usdoj.gov; (b)(6)

ATF (b)(6)

Subject: DRAFT: Updated State Guidance

Importance: High

State (b)(6)

Thank you for attending the conference call between OFAC, State, and ATF on Tuesday 5/27/2015. In follow-up, please find attached the last version of the **DRAFT** "State Dept Sanctions Guidance" document with comments and/or technical edits bringing it up to date. New edits/comments can be identified as tracked changes essentially identifying the new Acting ATF Director, removing ROSTEC from the SDN listing, ATF (b)(5). Feel free to use this version as your starting point and let me know if you need anything additional etc. Hope to talk soon.

V/R,

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)

On May 21, 2015, at 11:48 AM, (b)(6) wrote:

Duplicative of content in Bates No. 2018-08-116: 001324

2018-08-116: 001401

Bates Nos. 2018-08-116:

001402-001408

Duplicate Content in

Bates Nos. 2018-08-116:

001324-001330

RE: OFAC Question

From: (b)(6), (b)(7)(C)
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Date: Mon, 13 Jul 2015 11:06:48 -0400

Adding (b)(6), (b)(7)(C) this time.

From: (b)(6), (b)(7)(C)
Sent: Thursday, July 09, 2015 7:12 PM
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Subject: Re: OFAC Question

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

From: (b)(6), (b)(7)(C)
Sent: Thursday, July 09, 2015 07:08 PM
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Subject: RE: OFAC Question

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

From: (b)(6), (b)(7)(C)
Sent: Thursday, July 09, 2015 5:10 PM
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Subject: FW: OFAC Question

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

I wasn't sure who worked on the Kalashnikov package on your team, but I was wondering if (b)(5), (b)(7)(E)

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

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

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

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

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

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

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

From: (b)(6), (b)(7)(C)
Sent: Thursday, July 09, 2015 5:04 PM
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Subject: FW: OFAC Question

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

It was nice catching up with you.

ICE (b)(5), (b)(7)(E); Treasury (b)(5)

Thanks,

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

From: ICE (b)(6), (b)(7)(C)
Sent: Wednesday, July 08, 2015 10:45 AM
To: (b)(6), (b)(7)(C)
Cc: ICE (b)(6), (b)(7)(C)

Subject: OFAC Question

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

I hope all is good with you. I have a question regarding the whether a particular entity/address is on the OFAC List. Officer

ICE (b)(7)(E)

ICE (b)(7)(E)

However in addition to that he has noted that the address

ICE (b)(7)(E)

Russia also shows up on the OFAC sanctions list as Kalashnikov and various other names.

ICE (b)(7)(E)

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].

Please let us know what you determine.

Thank you!

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

Special Agent
Homeland Security Investigations
SAC Miami / Counter Proliferations Investigations
11226 N.W. 20th St., Miami, FL 33172
Office: 305-597-
Fax: 305-597-6211
Cell: 305-219-
Email: ICE (b)(6), (b)(7)(C)

Warning: This email and any attachments are ~~UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO)~~. It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this email should be furnished to the media, either in written or verbal form. If you are not an intended recipient or believe you have received this communication in error, please do not print, copy, retransmit, disseminate, or otherwise use this information. Please inform the sender that you received this message in error and delete the message from your system.

2018-08-116: 001448

Bates Nos. 2018-08-116:
001449-001452
Withheld in Full
Pursuant to
(b)(5), (b)(7)(E),
with (b)(6) and (b)(7)(C)
in Part

FW: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661

From: (b)(6)
To: (b)(6) "Baheri, Lella" (b)(6) Blackborow, Davin"
Cc: "Smith, Bradley" (b)(6)
Date: Mon, 03 Aug 2015 11:55:11 -0400
Attachments: ATF Guidance on EO 13661 re sanctions on Russian entities - 8 August 201....pdf (1.5 MB); 07 30 2015 State Dept Sanctions Guidance v 2.docx (22.29 kB)

All,

(b)(5)
(b)(5) but if you have any comments on the document please let me know so I can pass them on to ATF. Getting those by COB today would be ideal so we can put this issue to rest, but if you want to specifically review and need more time please let me know.

Many thanks,

(b)(6)

From: ATF (b)(6)
Sent: Thursday, July 30, 2015 6:25 PM
To: State (b)(6)
Cc: Marvin.G.Richardson ATF (b)(6) Curtis.W.Gilbert ATF (b)(6) Robert.L.Thiemann ATF (b)(6) Benjamin.B.Fitzpatrick@usdoj.gov ATF (b)(6) DOJ (b)(6) (b)(6) (b)(6) Smith, Bradley (b)(6) ATF (b)(6) Charles.R.Gross ATF (b)(6) ATF (b)(6)
Subject: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661
Importance: High

Colleagues:

The attached guidance was drafted and revised using the previous August 8, 2014, Russian Federation sanctions foreign policy guidance from the State Department (also attached), feedback that OFAC previously provided in response to an earlier version of draft revised guidance, and from updates to the OFAC SDN list made late on 7/30/2015 (<https://sdnsearch.ofac.treas.gov/Details.aspx?id=5846>). OFAC previously provided seven additional SDNs to update the original guidance and today Baikal was added to the SDN list. We submit the attached draft guidance to you for Interagency review and State Department final review, approval, and Assistant Secretary signature.

Tom Kelly, Acting Assistant Secretary, Bureau of Political-Military Affairs signed the August 2014 guidance. I have copied all stakeholders so that all have an opportunity for a final look at the draft (to ensure it continues to comport with 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 please provide tracked changes in the document to all on this email for State Department consideration.

This guidance will essentially (b)(5) ATF (b)(5) date guidance is signed by the State Department.

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)

FW: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661

From: (b)(6)
To: (b)(6)
Date: Tue, 04 Aug 2015 10:27:13 -0400
Attachments: ATF Guidance on EO 13661 re sanctions on Russian entities - 8 August 201....pdf (1.5 MB); 07 30 2015 State Dept Sanctions Guidance v 2.docx (22.29 kB)

Hey,

(b)(5)

From: (b)(6)
Sent: Tuesday, August 04, 2015 10:10 AM
To: (b)(6)
Cc: Smith, Bradley
Subject: RE: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661

Sorry about that! Here you go.

From: (b)(6)
Sent: Tuesday, August 04, 2015 9:58 AM
To: (b)(6)
Cc: Smith, Bradley
Subject: RE: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661

Can you guys send me the attachment? Thanks-

From: (b)(6)
Sent: Monday, August 03, 2015 2:05 PM
To: (b)(6)
Cc: Smith, Bradley
Subject: RE: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661

Great, thanks to you both.

From: (b)(6)
Sent: August 03, 2015 2:02 PM
To: (b)(6); (b)(6)
Cc: Smith, Bradley; (b)(6)
Subject: RE: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661

Hello (b)(6)
Not a problem. (b)(6) can look at the updated list. He is out today, but can work on it tomorrow. (b)(6)

From: (b)(6)
Sent: Monday, August 03, 2015 1:55 PM
To: (b)(6)
Cc: Smith, Bradley
Subject: FW: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661
Importance: High

Hi (b)(6),

As an update from my earlier email, we now have the below specific request from ATF to confirm that the list of sanctioned entities in the State letter is current/inclusive. Is this something OGT can check? (b)(6) had reviewed and updated the entities in their letter back in February of this year (email attached).

Thanks very much for your help, and please let me know if you have questions.

(b)(6)

From: ATF (b)(6)
Sent: Monday, August 03, 2015 12:46 PM
To: (b)(6)
Cc: ATF (b)(6)
Subject: FW: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661
Importance: High

(b)(6)

Hope you are well. I was hoping you can help us out in one area if possible with the roll out of the State Department guidance. Can you or maybe even have an OFAC rep just take a look at the 16 designations and ensure there were no changes. We did not amend what OFAC provided previously but I just want to ensure that all ducks are in a row. If OFAC can just give a blanket "concurrence" to the group if there are no changes that would be appreciated.

Thanks or all your help and liaison throughout the past six months with all things "sanctions".

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

From: ATF (b)(6)
Sent: Thursday, July 30, 2015 6:31 PM
To: 'PM_RSAT-TPT@state.gov'
Cc: ATF (b)(6)
Subject: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661
Importance: High

Forwarding to RSAT mailbox due to out of office message set by State (b)(6) FAO.

From: ATF (b)(6)
Sent: Thursday, July 30, 2015 6:25 PM
To: State (b)(6)
Cc: Richardson, Marvin G.; Gilbert, Curtis W.; Thiemann, Robyn L.; ATF (b)(6) Fitzpatrick, Benjamin B. (ODAG); ATF (b)(6) Kelleher, Diane (CIV); Swinton, Nathan M. (CIV); (b)(6) Bradley, Smith (b)(6) (b)(6) ATF (b)(6) Gross, Charles R.; ATF (b)(6)
Subject: DRAFT 7/30/15: For Interagency & State Department Review, Amendment, Approval, Clearance and Signature - Draft Updated Sanctions Foreign Policy Guidance - EO13661
Importance: High

Duplicative of content in Bates No. 2018-08-116: 001472

RE: ATF (b)(4)

From: (b) (6)

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

Cc: ATF (b)(6) State (b)(6) ATF (b)(6)

Date: Mon, 24 Aug 2015 08:32:49 -0400

Hi ATF (b)(6)

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

If you have any questions, feel free to give me a call, I'm in all day today.

best-

(b) (6)

From: ATF (b)(6)

Sent: Friday, August 21, 2015 3:44 PM

To: (b) (6)

Cc: ATF (b)(6) ATF (b)(6) State (b)(6) ATF (b)(6)

Subject: ATF (b)(4)

Hi (b) (6)

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

ATF (b)(6)

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

2018-08-116: 001489

RE: RWC Group Reconsideration Request Ukraine-EO13661-2015-318183-1

From: (b) (6)
To: "Blackborow, Davin" (b) (6)
Date: Tue, 08 Sep 2015 12:05:44 -0400
Attachments: RWC Group Application.pdf (12.68 MB); RWC Group State Memo.pdf (206.04 kB); Ukraine-EO13661-2014-311648-1 Denial.pdf (78.58 kB)

Hi Davin:

Now that Baikal is on the SDN list, (b)(5)
(b)(5)

Thank you,

(b) (6)

From: (b) (6)
Sent: Tuesday, September 08, 2015 10:27 AM
To: (b) (6)
Subject: RWC Group Reconsideration Request Ukraine-EO13661-2015-318183-1

Hi (b) (6)

I wanted to revisit the RWC Group reconsideration request now that we've received State guidance and Izhevsky Mekhanichesky Zavod JSC (Baikal) has been added to the SDN list.

State recommended (b)(5)

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

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

Thanks,

(b) (6)

(b) (6)

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

RE: RWC Group - Draft (b)(5)

From: (b)(6)
To: (b)(6)
Cc: (b)(6)
Date: Tue, 15 Sep 2015 15:40:45 -0400
Attachments: Ukraine-EO13661-2015-318183-1 RWC Group.docx (80.23 kB); RWC Reconsideration request.pdf (12.68 MB); 05062015_State_Referral.pdf (15.21 MB); State Memo 06292015.pdf (206.04 kB)

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

Greetings.

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

(b)(5)?

Thank you,

(b)(6)

Bates No. 2018-08-116: 001515

Duplicates

Bates No. 2018-08-116: 001305



United States Department of State

Washington, D.C. 20520

July 25, 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

The Office of Foreign Assets Control has requested foreign policy guidance on a request from Russian Weapon Company Group (“RWC”) to allow the delivery of goods from a blocked entity, Kalashnikov Concern (“KC”). The goods, (b)(4) were purchased and shipped before KC became a blocked entity; however, (b)(4) have not yet arrived. One payment for the remaining shipments had already been made, but because of the sanctions KC has now written off the balance of payments for RWC, and furthermore has stated in a letter that it has no further claims of ownership of the goods

Recommendation

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

UNCLASSIFIED

2018-08-116: 001549

State (b)(5)



United States Department of State

Washington, D.C. 20520

June 29, 2015

**UNCLASSIFIED
MEMORANDUM**

TO: John Smith
Acting Director
Office of Foreign Assets Control
Department of the Treasury

FROM: State (b)(6) State (b)(6)
Director [REDACTED]
Office of Sanctions Policy and Implementation

SUBJECT: RWC UKRAINE-E013661-2014-311648-1 State (b)(5)

The Russian Weapon Company Group LLC (“RWC Group”), a U.S. company and importer of products from Kalashnikov Concern (“Kalashnikov”) and Izhevsky Mekhanichesky Zavod (“Baikal”), seeking reconsideration of a denial they had previously received from OFAC.

In RWC Group’s initial request in July 2014, they sought to unblock (b)(4) [REDACTED] (b)(4) [REDACTED] (b)(4) [REDACTED] Based on information available to it, OFAC determined that Kalashnikov had a property interest in Baikal’s (b)(4) and thus denied RWC Group’s request to unblock (b)(4) [REDACTED] RWC Group now argues that regardless of Baikal’s status, Baikal had either no ownership interest in (b)(4) [REDACTED] (b)(4) [REDACTED] when sanctions were imposed on Kalashnikov.

Recommendation: State (b)(5)

State (b)(5)

FW: Discuss recent application that lists Baikal firearms

Where: Conference call information attached.
When: Tue Oct 06 09:00:00 2015 (America/New_York)
Until: Tue Oct 06 10:00:00 2015 (America/New_York)
Organiser: ATF (b)(6)
Required Attendees: </o=ustreasury/ou=do/cn=recipients/cn=atf/cn=wi0884">
ATF (b)(6)
(b)(6)
"Manfull, Alexandre" (b)(6)
ATF (b)(6)
(b)(6)
State (b)(6)
ATF (b)(6)

Attachments:
FW_ ATF (b)(4) msg (135.68 kB); NEW AURA CONFERENCE FORM.docx.msg (31.23 kB)

Hello Alex et al-

I got this meeting request from ATF to talk more about Baikal; it has to do with the Kalashnikov-related working group (b)(6) and I were on.

I just wanted to forward this to you guys for situational awareness, and so you can pick someone to reach out to ATF.

Best-

(b)(6)

-----Original Appointment-----
From: ATF (b)(6)
Sent: Tuesday, September 22, 2015 10:53 AM
To: ATF (b)(6) (b)(6) State (b)(6) ; ATF (b)(6)
Subject: Discuss recent application that lists Baikal firearms
When: Tuesday, October 06, 2015 9:00 AM-10:00 AM (UTC-05:00) Eastern Time (US & Canada).
Where: Conference call information attached.

Good morning,

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

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

<<...>> <<...>>

Bates No. 2018-08-116: 001553
Non-Responsive Record

Bates Nos. 2018-08-116:
001554-001556
Non-Responsive Record

Bates No. 2018-08-116: 001557
Non-Responsive Record

RE: ATF Contact

From: (b) (6)
To: (b) (6)
Date: Fri, 02 Oct 2015 16:13:06 -0400

Super, I talked to (b) (6) Thanks very much.

From: (b) (6)
Sent: Friday, October 02, 2015 3:28 PM
To: (b) (6)
Subject: RE: ATF Contact

I think (b) (6) is now going to handle it since he worked on the Kalashnikov thing.

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

(b) (6)

(b) (6) (unclassified)
(b) (6) (SIPR)
(b) (6) (JWICS)

From: (b) (6)
Sent: Friday, October 02, 2015 12:39 PM
To: (b) (6)
Cc: Feddo, Thomas
Subject: FW: ATF Contact

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

Tom asked me to forward you the below email regarding a request from ATF for a primary point of contact at OFAC. I understand that Enforcement will be the POC for this relationship going forward. I'm glad to provide some background on the relationship to the new POC if that would be helpful.

Kind regards,

(b)(6)

From: (b) (6)
Sent: Wednesday, September 30, 2015 9:47 AM
To: Manfull, Alexandre; (b) (6)
Subject: Re: ATF Contact

Hi Alex and (b) (6)

As you may know, (b) (6) had been serving as an OFAC point of contact for ATF prior to his move over to OGT. I was wondering if someone else from Compliance might be able to take over that role? In case it matters, most of ATF's issues thus far have been related to entities designated under the Ukraine/Russia program. We can, of course, help out with legal issues as they arise.

ATF is currently asking OFAC for a call in early October on a firearms import permit application related to Baikal; information on that specific issue is below and attached, and I can forward the invite to whomever might take over, and join the call as needed.

Thanks very much – glad to discuss.

(b) (6)

* * *
FROM ATF:

Good morning, ATF (b)(4), (b)(5)

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

* * *

(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

RE: RWC Group - Draft (b)(5)

From: (b) (6)
To: "Blackborow, Davin" (b) (6)
Cc: (b) (6)
Date: Mon, 05 Oct 2015 10:48:10 -0400
Attachments: RRWC Supplemental Statement.pdf (294.79 kB); RWC Reconsideration Request.pdf (12.68 MB)

Hi Davin,

I wanted to follow up regarding RWC Group's reconsideration request (attached).

I discussed this case briefly with (b) (6) after having reached out (see attached) to Mike Faucette, RWC Group's attorney, to clarify if they would still like to keep their application open given Baikal's designation.

(b)(4)

(b)(5)

Do you think

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

(b)(5)

Thanks,

(b) (6)

From: (b) (6)
Sent: Wednesday, September 16, 2015 4:21 PM
To: (b) (6)
Cc: (b) (6)
Subject: RE: RWC Group - Draft (b)(5)

That's right. Thanks for the reminder, (b) (6) Okay, we'll see what we can do at our end.

(b) (6)

From: (b) (6)
Sent: Wednesday, September 16, 2015 3:01 PM
To: (b) (6)
Cc: (b) (6)
Subject: RE: RWC Group - Draft (b)(5)

Attorney-Client Privilege
Predecisional and Deliberative

Hi (b) (6)

(b)(5)

Thanks,

(b) (6)

From: (b) (6)
Sent: Tuesday, September 15, 2015 3:41 PM
To: (b) (6)
Cc: (b) (6)
Subject: RE: RWC Group - Draft (b)(5)

Duplicative of content in Bates No. 2018-08-116: 001491

Bates No. 2018-08-116: 001561
Duplicates Content in
Bates No. 2018-08-116: 001491

From: [Michael Faucette](#)
To: (b) (6)
Subject: Re: Application with the Office of Foreign Assets Control for RWC Group Ukraine-EO13661-2015-318183-1
Date: Thursday, October 01, 2015 9:55:10 AM
Attachments: [RWC-Baikal \(b\)\(4\) Letter.pdf](#)
[ATT00001.htm](#)

Good morning, (b) (6)

Thank you for your email. We are aware of OFAC's designation of Baikal as an SDN on July 30, 2015. However, our request for reconsideration specifically concerned the status of (b)(4) on July 16, 2014—the date the sanctions against Kalashnikov Concern were imposed.

Our request of April 6, 2015 maintains that even if Baikal was 50% or more owned by Kalashnikov Concern, ownership of the (b)(4) had already transferred from Baikal to RWC *before* the sanctions were imposed on Kalashnikov Concern. (b)(4)

[Redacted]

(b)(4)

I have also reattached our April 6, 2015 letter here for your convenience. 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

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On Sep 29, 2015, at 4:02 PM, (b) (6) wrote:

Dear Mr. Faucette,

This message is in regards to your request of April 6, 2015, submitted on behalf of the RWC Group, with the Office of Foreign Assets Control (OFAC) seeking reconsideration of Case No. Ukraine-E013661-2014-311648-1. You also request the full administrative record used in making the determination that Kalashnikov Concern owns 50% or more of Baikal.

As I'm sure you are aware, Baikal was designated under Executive Order 13661 on July 30, 2015. Given this information, can you please clarify if you wish for RWC Group's application to remain open?

Best Regards,

(b) (6)

(b) (6)

Sanctions Licensing Officer

Licensing Division

Office of Foreign Assets Control

U.S. Department of the Treasury

2018-08-116: 001563

RE: RWC Group - Draft (b)(5)

From: (b) (6)
To: "Blackborow, Davin" (b) (6)
Cc: (b) (6)
Date: Wed, 07 Oct 2015 14:01:52 -0400

Okay, thanks Davin. I'll work on a summary of this case for our next meeting with John and Andrea.

From: Blackborow, Davin
Sent: Tuesday, October 06, 2015 9:57 PM
To: (b)(6)
Cc: (b)(6)
Subject: RE: RWC Group - Draft (b)(5)

Thanks (b)(6) | (b)(5)
(b)(5) (b)(5)
(b)(5) I'm also happy to discuss when you have some time.

Duplicative of content in Bates No. 2018-08-116: 001560



Bates No. 2018-08-116: 001569
Duplicates Content in
Bates Nos. 2018-08-116:
001560-001561