(13 pages)

2021-1246 (CKK): 0000001875-0000001887

(13 pages)

2021-1246 (CKK): 0000001888-0000001900

(13 pages)

2021-1246 (CKK): 0000001901-0000001913

(13 pages)

2021-1246 (CKK): 0000001914-0000001926

(12 pages)

2021-1246 (CKK): 0000001927-0000001938

(14 pages)

2021-1246 (CKK): 0000001939-0000001952

(13 pages)

2021-1246 (CKK): 0000001953-0000001965

(12 pages)

2021-1246 (CKK): 0000001966-0000001977

From: Thomas, Nikole
To: Prince, Jason

Subject: Accepted: (b)(5)

Subject: FW: CLEAR COB: GloMag annual report Date: Tuesday, November 20, 2018 12:02:02 PM Attachments: 2018 Draft Report to Congress (Draft Working Level Cleared) v6.1 (002) rpg.docx Hi Nikole—this is the most recent. Thank you! From: (b)(6)**Sent:** Monday, November 19, 2018 11:12 AM (b)(6); Swindells, Felicia (b)(6)(b)(6)Thannhauser, Sara ; Albowicz, Nikole (b)(6)(b)(6)(b)(6)Cc: (b)(6)(b)(6)(b)(6)(b)(6)(b)(6); Ballman, Luke Subject: RE: CLEAR COB: GloMag annual report Hi(b)(6)(b)(5)-we suggest these small changes on (b)(5)Thanks. (b)(6)From: (b)(6)Sent: Monday, November 19, 2018 9:20 AM To: (b)(6)Swindells, Felicia (b)(6); Thannhauser, Sara (b)(6); Albowicz, (b)(6)Nikole (b)(6)Cc: (b)(6)(b)(6)(b)(6)(b)(6)Ballman, Luke (b)(6)Subject: RE: CLEAR COB: GloMag annual report (b)(5)OGT – If helpful, I have added in (b)(5). Per note below, please clear up the OGT chain as needed and let me know when I should loop in Lisa for Associate Director review. From: (b)(6)**Sent:** Friday, November 16, 2018 11:56 AM Swindells, Felicia To: (b)(6)(b)(6); Thannhauser, Sara (b)(6); Albowicz, (b)(6)Nikole $\overline{(b)(6)}$

From: To:

Cc:		(b)(6)	
		(b)(6)	
		(b)(6)	
		(b)(6)	Ballman, Luke
	(b)(6)		
		GloMag annual report	
OG 1 – 0		please address the items noted bel	ow today for the GloMag report.
From:	(b)(6)		
	hursday, Novembe	er 15, 2018 12:37 PM	
То:	(1) (6)	(b)(6)	Swindells, Felicia
	(b)(6)	; Thannhauser, Sara	(b)(6); Albowicz,
Nikole	(1-)/	(b)(6)	,
Car	(b)(
Cc:		(b)(6)	
		(b)(6)	,
		(b)(6)	>; Ballman, Luke
	(b)(6)	(8)(0)	>, Baillian, Eake
Subject		GloMag annual report	
•		e updates based on those edits.	
		comment/question on	(b)(5)
		(b)(5)	
		(b)(5)	. After that, please clear
up the	OGT chain as need	ed. When sending to Greg/Todd, p	lease let me know, and I can loop in Lisa
for Asso	ociate Director rev	iew.	
From:	(b)(6)		
Sent: ⊤	hursday, Novembe	er 15, 2018 12:08 PM	
To: Swi	indells, Felicia	(b)(6)	
	(b)(6)	; Thannhauser, Sara	(b)(6) Albowicz,
Nikole		(b)(6)	,
	(b)(6)	
Cc:		(b)(6)	
		(b)(6)	
		(b)(6)	
		(b)(6)	Ballman, Luke
	(b)(6)		
•		GloMag annual report	(1) (5)
		that led me to add an additional ed	it $(b)(5)$.
	(b)(6)		
	ey-Advisor	ol (Fausian Assats Contact)	
		el (Foreign Assets Control)	
	States Departmen	corine rreasury	
From: S	Swindells, Felicia		

Sent: Thursday, November 15, 2018 12:03 PM

2021-1246 (CKK): 0000001980

To:	_(b)(6)	Thannhauser, Sara						
Post	(b)(6)	; Albowicz, Nikole	(b)(6)						
9 6 98	300 1990 7000	(b)(6)							
Cc:		(b)(6)							
		(b)(6)							
	(b)(6)								
s	(1)(6)	(b)(6)							
Cubiosti [(b)(6)	Ballman,	Luke (b)(6)						
Hi (b) (6)	Subject: RE: CLEAR COB: GloMag annual report								
I had a nu	imber of comment	s and noted that this needs	to be undated to reflect today's action. Also, I						
am		(b)(to be undated to reflect today's action. Also, I 5)						
		(b)((5)						
Felicia									
From:	(b)(6)								
Sent: We		er 14, 2018 9:46 AM							
To: Swind	lells, Felicia	(b)(6)	Thannhauser, Sara						
		(b)(6)							
		(b)(6)							
Cc:		(b)(6)	_						
		(b)(6) (b)(6)							
a.		(b)(6)							
2	(b)(6)	Ballman,	Luke (b)(6)						
Subject: (CLEAR COB: GloMa		(3)(3)						
	ra and Nikole and	A Committee of the Comm							
Attached	for Assistant Direc	ctor-level and Leg Affairs re	eview is the annual report to Congress on						
GloMag.	This has been ched	cked by me, OGT, and Cour	nsel. TFFC, OIA, and FinCEN (b)(5)						
		(b)(5)						
	(t	0)(5)	. If you are able to provide edits/clearance						
today, tha	at would be appre	ciated. I will then move thi	s to Associate Director review. After that, I plan						
		to TFI FO for Sigal's review	1.						
On timing		s from us last Friday	(b)(5)						
	(b)(5)	36	ey are hoping to receive the our edits ASAP so						
they can move the report up to Pompeo. The ultimate deadline to the Hill is December 10.									
		(b)(5)						

2021-1246 (CKK): 0000001981

(b)(5)Copying (b)(6) and Luke for awareness. (b)(6)Senior Sanctions Policy Advisor | Office of Foreign Assets Control | U.S. Department of the Treasury Telephone: Mobile: (b)(6)(b)(6)(b)(6)(SIPR) (b)(6)(b)(6)(JWICS) (b)(6)From: Sent: Wednesday, November 14, 2018 9:29 AM To: (b)(6)(b)(6)(b)(6)(b)(6)Cc: (b)(6)Subject: RE: CLEAR COB: GloMag annual report Attached with dates included. (b)(6)Office of Global Targeting Office of Foreign Assets Control U.S. Department of the Treasury (b)(6)Office: (b)(6)NSTS: (b)(6) From: (b)(6)Sent: Wednesday, November 14, 2018 9:17 AM (b)(6)(b)(6)(b)(6)Cc: (b)(6)(b)(6)Subject: RE: CLEAR COB: GloMag annual report OGT - quick reminder to please provide dates of designation for the various actions. I can then move this up for clearance so we can get it to Sigal before it goes back over to State. From: (b)(6)Sent: Tuesday, November 13, 2018 2:17 PM (b)(6)To: (b)(6)(b)(6)(b)(6)Cc: (b)(6)Subject: RE: CLEAR COB: GloMag annual report

Thanks, **(b)(6)** The last thing to insert are dates for the various designations. If OGT has those on hand and can insert, that would be appreciated.

In terms of when this will go back, my understanding was that State intended to send this up to Pompeo as soon as they got our input. Given that this will go to the top, we can't send back until we

have sign-off from Sigal. Once the dates are in, I will clear at the Assistant Director level, then the Associate Director level, then I'll see if we can just FYI to OFAC FO and send along toe TFI FO. (b)(5) (b)(5)(b)(5)From: (b)(6)Sent: Tuesday, November 13, 2018 1:21 PM To: (b)(6)(b)(6)(b)(6)(b)(6)Cc: (b)(6)**Subject:** RE: CLEAR COB: GloMag annual report Hi(b)(6) -I have addresses (b)(6) questions and it's now back with you. Do we know when this will go back, seeing as it's just working level input right now? I only ask because (b)(6) asked about it when I spoke to him earlier and I wanted to check in with you. If there are additional questions, someone on the team can help out. I have to leave for the day, but will be back in tomorrow morning. Thanks! V/r, (b)(6)Section Chief, Human Rights and Corruption Office of Foreign Assets Control U.S. Department of the Treasury Work: (b)(6)Work Cell: (b)(6)(b)(6)From: Sent: Thursday, November 8, 2018 3:42 PM (b)(6)To: (b)(6)(b)(6)(b)(6)Albowicz, Nikole Cc: (b)(6)**Subject:** RE: CLEAR COB: GloMag annual report Adding more from OGT who I should have looped in earlier. , I'm just reflagging this as a gentle reminder to address (b)(6) (b)(5)questions/comments when you have a moment (b)(5)(b)(5)(b)(5)From: (b)(6)Sent: Wednesday, November 7, 2018 2:35 PM To: (b)(6)(b)(6)(b)(6)(b)(6)



U.S. Department of the Treasury
Work: (b)(6)
Work Cell (b)(6)
From: (b)(6)
Sent: Wednesday, November 7, 2018 9:28 AM
To: $(b)(6)$
(b)(6)
(b)(6)
Cc: (b)(6)
(b)(6) (b)(6)
Subject: RE: CLEAR COB: GloMag annual report
Hi (b)(6)
Thanks. (b)(6) also mentioned the delisting yesterday evening, and I was just looking at that. I didn't
see info on the delistings in the report, so I've inserted a new subsection about that. (b)(5)
(1, 1/5)
(O)(O)
(b)(5) Also, would OGT be able to put in the dates of the various designations (Sec.
1264(a)(4) requires dates) – maybe just insert as a parenthetical next to each target name (e.g.,
designated on July XX, 2018).
SEC. 1264. REPORTS TO CONGRESS.
(a) IN GENERAL.—The President shall submit to the appropriate congressional committees, in accordance with subsection (b), a report that includes—
(1) a list of each foreign person with respect to which the President imposed sanctions
pursuant to section 1263 during the year preceding the submission of the report;
(2) a description of the type of sanctions imposed with respect to each such person;
(3) the number of foreign persons with respect to which the President—
(A) imposed sanctions under section 1263(a) during that year; and
(B) terminated sanctions under section 1263(g) during that year;
(4) the dates on which such sanctions were imposed or terminated, as the case may be;
(5) the reasons for imposing or terminating such sanctions;
From: $(b)(6)$
Sent: Wednesday, November 7, 2018 9:15 AM
To: $(b)(6)$
(b)(6)
(b)(6)
Cc: (b)(6)
(b)(6)
(b)(6) Subject: RE: CLEAR COB: GloMag annual report
Hey (b)(6)
When we added numbers, (b)(5)
(b)(5)

	(b)(5)
Thanks!	
(b)(6)	
From:	(b)(6)
	2018 at 9:08:44 AM EST
To:	(b)(6)
	(b)(6)
(b)(6)	
Cc:	(b)(6)
	(b)(6)
	(b)(6)
	6)(6)
•	COB: GloMag annual report
Thanks!	
From: (b)(d	
	ember 6, 2018 5:46 PM
То:	(b)(6) (b)(6)
Cc:	(b)(6)
	(b)(6)
	(b)(6)
(b)(6)	
	COB: GloMag annual report
Hi(b)(6)	
Thank you for flaggir	ng this. (b)(5)
(b)(6)	
From: (b)(6)	
	ember 6, 2018 11:56 AM
То:	(b)(6)
	(b)(6)
(b)(6)	(b)(6)
Cc:	(b)(6) (b)(6)
	(b)(6)
Subject: CLEAR COB	: GloMag annual report
TFFC/FinCEN/OIA co	lleagues,
Now that I'm back	(b)(6) , I'm catching up on various items, one of which is clearance
	pal Magnitsky report to Congress that State submits annually on December 10.
·	learance as soon as we can this week, hence the deadline later today. It's a

provide any further TFI component edits today if possible. I will then take it up the chain through Sigal. Thanks!

Senior Sanctions Policy Advisor | Office of Foreign Assets Control | U.S. Department of the Treasury
Telephone: (b)(6) | Mobile: (b)(6)
(U) (b)(6)
(SIPR) (b)(6)
(JWICS) (b)(6)

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(16 pages)

2021-1246 (CKK): 0000001988-0000002003

(4 pages)

2021-1246 (CKK): 0000002004-0000002007

(9 pages)

2021-1246 (CKK): 0000002008-0000002016

(4 pages)

2021-1246 (CKK): 0000002017-0000002020

From: (b)(6)
To:

To: (b)(6) Cc: (b)(6) ; Albowicz, Nikole

Subject: For Review: Press Release for GloMag Action

Date: Wednesday, June 6, 2018 6:03:37 PM

Attachments: Treasury Sanctions Fourteen Entities Under Global Magnitsky.docx

All,

Please review and provide your comments by noon tomorrow on the attached press release. Some items are highlighted pending final numbers or links to other sites. Please add other individuals to this distro as appropriate.

(b)(5)

Thank you,

(b)(6)

Office of Global Targeting Office of Foreign Assets Control U.S. Department of the Treasury

(b)(6)

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(2 pages)

2021-1246 (CKK): 0000002022-0000002023

(5 pages)

2021-1246 (CKK): 0000002024-0000002028

Pending Consultation with Other Government Agency

(6 pages)

2021-1246 (CKK): 0000002029-0000002034

From: (b)(6)To: Jennings, Thomas; Quinby, Ripley; Gatjanis, Gregory; Baheri, Leila; Thomas, Nikole; Palluconi, (b)(6)(b)(6)Cc: (b)(6)Subject: For Associates Review by COB Today - RE: Date: Tuesday, October 27, 2020 2:14:51 PM Attachments: forAssociates.docx al Witness - Undermining Sanctions July 2020.pdf OFAC Associates, (b)(5)Please see the attached Cover Memo of Dan Gertler for your review by COB today, if possible. (b)(5)Thank you all in advance! (b)(6)(b)(6)(b)(6)Work: (b)(6)Cell: (b)(6)Sent: Tuesday, October 27, 2020 12:34 PM To: (b)(6)Jennings, Thomas (b)(6)Cc: (b)(6); Quinby, Ripley ; Gatjanis, Gregory (b)(6); Thomas, Nikole (b)(6); Baheri, Leila (b)(6)Palluconi, Lisa (b)(6)(b)(6)(b)(6)(b)(6)(b)(6)Subject: RE: (b)(5)Hi (b)(6) – Thanks for the update. That sounds like a good run-down to me. We appreciate you all turning this so quickly and will look for it tomorrow by COB. (b)(6)(b)(6)Senior Advisor Office of Terrorism and Financial Intelligence Department of the Treasury (U) (b)(6)(0)(b)(6)From: (b)(6)Sent: Tuesday, October 27, 2020 12:30 PM To: (b)(6)(b)(6)Jennings, Thomas Cc:

(b)(6)	Quinby, Ripley	(b)(6)	Gatjanis, Gregory
(b)(6)	; Baheri, Leila	(b)(6)	Thomas, Nikole
(b)(6)	; Palluconi, Lisa	(b)(6)	<u> </u>
(0)(0)	(b)(6)	(0)(0	
	(b)(6)		
	(b)(6)		
Subject: RE: (b)(5)	(8)(0)		
(b)(6)			
Update on the below, we ha	ve drafted and are current	ly reviewing a cover	note highlighting (b)(5)
opade on the selow, we ha	(1 \ (/ \	
	(b)(á		
	$(U)(\cdot$		
Please let me know if you all	would like to see anything	additional! We're a	aiming to meet the
Wednesday readbook deadl	•	, additional. We let	anning to meet the
Thank you,			
(b)(6)			
(b)(6)			
Work: (b)(6)			
Cell: (b)(6)			
(b)(6)			
	(b)(6)		
From: Quinby, Ripley	(b)(6)		
Sent: Monday, October 26, 2		onia Cragani	
To: Gacki, Andrea		anis, Gregory	Lannings Thomas
(b)(6)	; Baheri, Leila	$\frac{(b)(6)}{(b)(6)}$; Jennings, Thomas
(b)(6)	Thomas, Nikole (b)(6)	(0)(0)	Palluconi, Lisa
(b)(6)	(0)(0)		,
Cc: Smith, Bradley		0)(6)	
cc. Smith, bradiey	(b)(6)))(0)	
(b)(6)	(0)(0)		
Subject: RE: (b)(5)			
	lomag chief and coordinate	or and $(b)(6)$ as ac	ting ASC AD in Tom's
absence)	iornag cinci ana cooramat		ang AJC AD III TOIN 3
Andrea,			
Acknowledged, will do. (b)(6	and team have the nen		
Respectfully,	and team have the pen.		
rip			
	(la)(6)		
From: Gacki, Andrea	(b)(6)		
Sent: Monday, October 26, 2		ianic Gragory	
To: Quinby, Ripley		janis, Gregory	· lonnings Thomas
(b)(6)	; Baheri, Leila	$\frac{(b)(6)}{(b)(6)}$; Jennings, Thomas
(b)(6) (b)(6)	>; Thomas, Nikole	(b)(6)	; Palluconi, Lisa
Cc: Smith, Bradley		n)(6)	
CC. Simili, Drauley	(b)(6)	0)(6)	

Subject: (b)(5) PRE-DECISIONAL AND DELIBERATIVE Hi OGT – I'm not quite sure where exactly to send this, so I'll stick with management. (b)(5)(b)(5)(This is related to a license request filed by his attorneys, and copying Nikole and Lisa who are tracking my separate request.) For OGT: (b)(5)I don't know how much work this will be, but optimally we would get it into the Secretary's readbook on Tuesday or Wednesday of this week. Copying (b)(6) so they are tracking (b)(5) (b)(5)Andrea Andrea Gacki Director | Office of Foreign Assets Control | U.S. Department of the Treasury (b)(6)O: (b)(6) | M: (b)(6)

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(2 pages)

2021-1246 (CKK): 0000002038-0000002039

Duplicative of material located in 2021-1246: 0000000898-0000000936 - 4th Interim

(40 pages)

2021-1246 (CKK): 0000002040-0000002079

(1 page)

2021-1246 (CKK): 0000002080

Pending Submitter Notice Process (6 pages)

2021-1246 (CKK): 0000002081-0000002086

Pending Consultation with Another Government Agency

(4 pages)

2021-1246 (CKK): 0000002087-0000002090

From: (b)(6)

To: Gacki, Andrea; Smith, Bradley

(b)(6); Palluconi, Lisa; Thomas, Nikole; (b)(6); Jennings, Thomas; Gatjanis, Gregory; Baheri, Leila; (b)(6)

(b)(6)

Subject: Cover Memo for OFAC FO Review: DRC/Gertler Date: Tuesday. October 27, 2020 6;42:00 PM
Attachments: (b)(5)

7.2.2020 - Global Witness - Undermining Sanctions July 2020.pdf

Good evening Andrea and Brad,

Attached for your review is the cover memo responding to

(b)(5)



Pending your review, we will seek to get this in the STM readbook for tomorrow morning, but I believe we can get this into STM's readbook by COB tomorrow.

Please let us know if you need anything additional.

Best,

(b)(6)

(b)(6)

Acting Section Chief

Office of Global Targeting

Office of Foreign Assets Control

U.S. Department of the Treasury

Work:

(b)(6)

Cell: (b)(6)

(b)(6)

Duplicative of material located in 2021-1246: 0000000898-0000000936 — 4th Interim

(40 pages)

2021-1246 (CKK): 0000002092-0000002131

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(2 pages)

2021-1246 (CKK): 0000002132-0000002133

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

(b)(6); Gacki, Andrea; Smith, Bradley; Palluconi, Lisa; Thomas, Nikole; (b)(6)
unby, Ripley; Gatjanis, Gregory; Baheri, Leila; (b)(6) Cc:

(b)(6)

Subject: Cover Memo and Attachment for STM Readbook: Dan Gertler + License

Date: Tuesday, October 27, 2020 7:00:09 PM (b)(5) Attachments: forReadbook.docx

al Witness - Undermining Sanctions July 2020.pdf

(b)(6)

Good evening. Attached is the Cover Memo and Attachment 1 for STM's readbook; (b)(5)

(b)(5)

(b)(5)

Please let me know if you need anything additional.

Best,

(b)(6)

(b)(6)

Acting Section Chief

Office of Global Targeting

Office of Foreign Assets Control

U.S. Department of the Treasury

Work:

(b)(6)

(b)(6)Cell:

(b)(6)

Duplicative of material located in 2021-1246: 0000000898-0000000936 — 4th Interim

(40 pages)

2021-1246 (CKK): 0000002135-0000002174

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(2 pages)

2021-1246 (CKK): 0000002175-0000002176

From: luconi, Lisa; Gatjanis, Gregory; Conklin, Todd To: Cc: Swindells, Felicia; Thannhauser, Sara; Albowicz, Nikole (b)(6)Subject: CLEAR COB: GloMag annual report Wednesday, November 21, 2018 6:59:03 AM Date: Attachments: 2018 Draft Report to Congress (Draft Working Level Cleared) v7.docx Lisa and Greg/Todd, If possible, please clear by COB today on the attached annual GloMag report to Congress. This is drafted and submitted by State but includes lots of OFAC content, largely details of designations and delistings this year under the GloMag program. This has gone through Counsel, OGT, Policy, and other TFI components. Once you clear, I will FYI to OFAC FO (cc'ing (b)(6)awareness) and will send to TFI FO for Sigal's signoff. Note on timing: This report is due to Congress December 10. State had asked for our edits by (b)(5)November 9, , so we have been a bit delayed in getting our content updated and checked. Once we send this back, State will take it to Pompeo. (b)(6)Senior Sanctions Policy Advisor | Office of Foreign Assets Control | U.S. Department of the Treasury Mobile: (b)(6)(b)(6)(b)(6)(SIPR) (b)(6)Duplicative of material in 2021-1246 (CKK): 0000001979-0000001987

Duplicative material located in 2021-1246: 0000001979-000001987

(9 pages)

2021-1246 (CKK): 0000002178-0000002186

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(15 pages)

2021-1246 (CKK): 0000002187-0000002201

Pending Consultation with Other Treasury Components

(12 pages)

2021-1246 (CKK): 0000002202-0000002213

Pending Submitter Notice Process (5 pages)

2021-1246 (CKK): 0000002214-0000002218

Pending Consultation with Other Treasury Components

(4 pages)

2021-1246 (CKK): 0000002219-0000002222

Pending Consultation with Other Government Agency

(8 pages)

2021-1246 (CKK): 0000002223-0000002230

Pending Consultation with Other Treasury Components

(5 pages)

2021-1246 (CKK): 0000002231-0000002235

Pending Consultation with Other Government Agency

(53 pages)

2021-1246 (CKK): 0000002236-0000002288