

**Pending Consultation with Other Government  
Agency**

**(3 pages)**

**2021-1246 (CKK): 0000002598-0000002600**

**From:** (b)(6)  
**To:** [Albowicz, Nikole](#); (b)(6) [Swindells, Felicia](#); [Thannhauser, Sara](#); (b)(6)  
**Subject:** FOR REVIEW BY 2:00 PM TODAY: IP 06 - U.S. and UN sanctions  
**Date:** Monday, July 2, 2018 12:44:19 PM  
**Attachments:** [IP 06 - U.S. and UN sanctions.docx](#)

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All,

Please review attached issue paper on U.S. and UN Sanctions for Ambassador Haley's upcoming trip to the DRC. Clearance requested by 2:00 pm today.

Regards,

(b)(6)

(b)(6)

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

(b)(6)

(b)(6)

**Withheld In Full FOIA Exemption (b)(5)-Draft  
Document and in Part (b)(6)**

**(2 pages)**

**2021-1246 (CKK): 0000002602-0000002603**

**From:** (b)(6)  
**To:** (b)(6)  
(b)(6)  
**Cc:** [Albowicz, Nikole](#); (b)(6) [Conklin, Todd](#); (b)(6)  
(b)(6)  
**Subject:** FLASH Clearance - Designations Where Human Rights or Corruption Are Mentioned  
**Date:** Friday, June 8, 2018 8:41:21 AM  
**Attachments:** [2018-06-11 FACT SHEET - GloMag Human Rights and Corruption Actions v2.docx](#)  
**Importance:** High

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All,

Thank you again for your assistance last night with gathering material for U/S Mandelker's trip to Africa—we've compiled the actions in the attached document.

Could you review for any errors or omissions we may have made when describing or adjusting descriptions of the actions and return to me by **9:45 AM**?

Thank you,

(b)(6)

(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)

**Withheld In Full FOIA Exemption (b)(5) and in  
Part (b)(6)**

**(4 pages)**

**2021-1246 (CKK): 0000002605-0000002608**

**From:** (b)(6)  
**To:** [Unger, Seth](#)  
**Cc:** [Albowicz, Nikole](#); (b)(6); [Conklin, Todd](#); (b)(6)  
**Subject:** Fact Sheet  
**Date:** Friday, June 8, 2018 9:58:40 AM  
**Attachments:** [2018-06-11 FACT SHEET - GloMag Human Rights and Corruption Actions - FINAL.docx](#)

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Seth,

I've attached the final fact sheet. (b)(5)

(b)(5).

Thank you!

(b)(6)

(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)

*FACT SHEET:*

**U.S. Department of the Treasury Actions Related to Human Rights or Corruption  
2017 - 2018**

**Global Magnitsky Program Background**

- In December of 2016, Congress passed the Global Magnitsky Act, providing the President with the authority to impose sanctions on persons engaged in certain human rights violations and corrupt acts globally.
- The law builds upon the spirit of the Sergei Magnitsky Rule of Law Accountability Act, which targets certain human rights abusers in Russia.
- In December of 2017, President Trump signed a new Executive Order that implements the Global Magnitsky Act, authorizing sanctions on persons involved or complicit in serious human rights abuse and corruption across the world.
- In this Executive Order (E.O.), the President declared a national emergency with respect to human rights abuse and corruption globally, and he empowered the Treasury Department to impose financial sanctions and the State Department to issue visa restrictions on those engaged in these malign activities.

**Global Magnitsky – Designations for Human Rights Abuse**

- In the Annex to the E.O., and in a concurrent Treasury action, seven individuals and 12 entities were sanctioned in relation to serious human rights abuse. They were:
  - **Yahya Jammeh**,<sup>1</sup> the former President of The Gambia, who routinely ordered the abuse and murder of those he suspected of undermining his authority, and 12 associated entities;
  - **Maung Maung Soe**, chief of the Burmese Army's Western command, who was in command of Burmese Army and Border Guard Police units alleged to have committed mass killings and arson attacks in northern Rakhine State;
  - **Mukhtar Hamid Shah**, a Pakistani surgeon specializing in kidney transplants, who Pakistani police believe is involved in kidnapping, wrongful confinement, and the removal of and trafficking in human organs;
  - **Gao Yan**, who was the Beijing Public Security Bureau Chaoyang Branch director when human rights activist Cao Shunli who, while detained at Gao's Beijing Public Security Bureau branch, fell into a coma and died from organ failure;
  - **Sergey Kusiuk**, commander of an elite Ukrainian police unit, who was identified as a leader of an attack on peaceful protesters on November 30, 2013;
  - **Julio Antonio Juarez Ramirez**, a Guatemalan Congressman, who was accused of ordering an attack in which two journalists were killed and another injured; and,
  - **Yankuba Badjie**, the former Director General of The Gambia's National Intelligence Agency, who is alleged to have presided over abuses throughout his tenure.

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<sup>1</sup> Yahya Jammeh was designated for both human rights abuse and corruption. He is not listed in the below corruption designations section.

### Global Magnitsky – Designations for Corruption

- In the Annex to the E.O., and in a concurrent Treasury action, seven individuals, one associate, and 25 entities, were sanctioned in relation to corrupt actions. They were:
  - **Angel Rondon Rijo**, a politically connected businessman and lobbyist in the Dominican Republic who funneled money from Odebrecht, a Brazilian construction company, to Dominican officials, who in turn awarded Odebrecht projects to build highways, dams, and another projects;
  - **Artem Chaika**, the son of the Prosecutor General of the Russian Federation, who leveraged his father’s position to award his subordinates unfairly-won state-owned assets and contracts as well as put pressure on business competitors;
  - **Benjamin Bol Mel**, who is the president of a construction company and has used his close ties with South Sudanese President Salva Kiir to win state contracts and receive preferential treatment for his company from high-level officials, as well as two of affiliated entities;
  - **Dan Gertler**, an international businessman and billionaire who has amassed his fortune through hundreds of millions of dollars’ worth of opaque and corrupt mining and oil deals in the Democratic Republic of the Congo (DRC), as well as one of his associates and 19 affiliated entities;
  - **Gulnara Karimova**, daughter of former Uzbekistan leader Islam Karimov, who headed a powerful organized crime syndicate that leveraged state actors to expropriate businesses, monopolize markets, solicit bribes, and administer extortion rackets;
  - **Roberto Rivas Reyes**, President of Nicaragua’s Supreme Electoral Council, who abused his position to amass a sizeable personal wealth and block investigations into his corruption, while perpetrating electoral fraud undermining Nicaragua’s electoral institutions; and,
  - **Slobodan Tesic**, among the biggest dealers of arms and munitions in the Balkans who has used his companies to fund politicians and has used large bribes to secure contracts, as well as four affiliated entities.

### Other Actions Related to Human Rights or Corruption

In addition to actions taken under Global Magnitsky, the Treasury Department has used its full range of authorities to designate individuals and entities who, in addition to the actions for which they were designated, were engaged in human rights abuse, corruption, or related activities, or were associated with individuals or entities engaged in human rights abuse, corruption, or related activities. Although not an exhaustive list, since April of 2017 over 383 individuals and 29 entities have been designated, including but not limited to:

- **May 30, 2018:** Treasury designated Evin Prison, Ansar-e Hizballah and three associated individuals, and Hanista Programming Group, for their role in human rights abuses or in operating technology that could enable human rights abuses, in Iran;
- **May 22, 2018:** Treasury designated five Iranian officials associated with the IRGC-QF and Iran’s ballistic missile programs whose actions disrupted humanitarian aid efforts in Yemen;
- **May 18, 2018:** Treasury designated Diosdado Cabello Rondon (Cabello), who abused his influential government positions in furtherance of his illicit and corrupt activities to control and



**DEPARTMENT OF THE TREASURY**  
**WASHINGTON, D.C.**

direct government agencies and military officials, as well as personally profiting from extortion, money laundering, and embezzlement. Three individuals and three companies who were part of Cabello's corruption network were also designated;

- **May 17, 2018:** Treasury designated Mohammad Ibrahim Bazzi, a close associate of Yahya Jammeh, who, as noted above, routinely ordered the abuse and murder of those he suspected of undermining his authority;
- **May 16, 2018:** Treasury designated Hasan Nasrallah, the Secretary General of Hizballah, who prolonged the human suffering in Syria, fueled the violence in Iraq and Yemen, put the Lebanese state and the Lebanese people at risk, and destabilized the entire region;
- **May 7, 2018:** Treasury designated Pedro Luis Martin Olivares, who exploited his government position and accepted bribes from drug traffickers operating in Venezuela and Colombia;
- **April 18, 2018:** Treasury designated Nasif Barakat and the Barakat Transnational Criminal Organization, a Syria-based transnational human smuggling organization involved in smuggling migrants to the United States;
- **April 6, 2018:** Treasury designated seven Russian oligarchs and 12 companies they own or control, 17 Russian officials, and two Russian entities that have supported the Government of Syria, even after attacks on civilians, such as the repeated chemical weapons attacks;
- **April 6, 2018:** Treasury designated Venezuelan-Italian fashion photographer Miguel Jose Leone Martinez, who helps lead an international prostitution ring associated with the Los Cuinis drug trafficking organization;
- **March 19, 2018:** Treasury designated four current or former Venezuelan officials as part of Treasury's ongoing efforts to highlight the economic mismanagement and endemic corruption that have been the defining features of the Maduro regime;
- **February 5, 2018:** Treasury designated four Democratic Republic of the Congo (DRC) militia and military leaders for activities contributing to widespread poverty, chronic food insecurity, and population displacement in the DRC;
- **January 30, 2018:** Treasury sanctioned the Zhao Wei Transnational Criminal Organization which engaged in human trafficking and child prostitution at its Kings Roman Casino in Laos;
- **January 12, 2018:** Treasury designated Iranian Judiciary head Sadegh Amoli Larijani, Rajae Shahr Prison, and prison director Gholamreza Ziaei for their involvement in serious human rights abuse;
- **January 5, 2018:** Treasury designated four current or former Venezuelan government officials associated with corruption and repression in Venezuela;
- **December 20, 2017:** Treasury designated Chechen leader Ramzan Kadyrov and one other individual for being involved in human rights abuse, including extrajudicial killing and torture;
- **December 13, 2017:** Treasury designated two Lord's Resistance Army facilitators involved in the illicit trade of ivory, weapons, and money in multiple African countries;
- **November 9, 2017:** Treasury designated 10 current or former Venezuelan officials who undermined electoral processes censored the media, and exploited government-administered food programs in Venezuela;
- **October 26, 2017:** Treasury designated seven North Korean individuals and the identified three North Korean entities as Government of North Korea or the Workers' Party of Korea in response to the regime's ongoing and serious human rights abuses; the action was in conjunction with the State Department's "Report on Serious Human Rights Abuses and Censorship in North

**DEPARTMENT OF THE TREASURY**  
**WASHINGTON, D.C.**

Korea,” submitted in accordance with the North Korea Sanctions and Policy Enhancement Act of 2016;

- **September 6, 2017:** Treasury designated three South Sudanese individuals for actions that led to the killing of innocent civilians, and three affiliated entities;
- **August 9, 2017:** Treasury designated eight individuals involved in anti-democratic actions, particularly in organizing or otherwise supporting Venezuela’s Constituent Assembly, which has the power to rewrite the Venezuelan constitution and dissolve Venezuelan state institutions;
- **July 31, 2017:** Treasury designated Venezuelan President Nicolas Maduro, under whom the Venezuelan government has deliberately and repeatedly abused the rights of citizens through the use of violence, repression, and criminalization of demonstrations;
- **July 26, 2017:** Treasury designated 13 current or former officials of the Venezuelan government associated with the undermining of democracy, as well as the Venezuelan government’s rampant violence against opposition protestors and its corruption;
- **June 12, 2017:** Treasury designated ISIS leader, Attallah Salman 'Abd Kafi al-Jaburi, an Iraq-based, ISIS senior leader, who was involved with the development of chemical weapons;
- **May 18, 2017:** Treasury designated eight officials of Venezuela’s Supreme Court of Justice, whose multiple judicial rulings usurped the authority of Venezuela’s democratically-elected legislature and exacerbated the government's mismanagement and corruption;
- **April 24, 2017:** Treasury designated 271 staff members of the Syrian Scientific Studies and Research Center (SSRC) following the April 4, 2017 sarin gas attack by the Assad regime on Syrian civilians; and,
- **April 13, 2017:** Treasury designated the Tehran Prisons Organization and a senior official of Iran’s State Prison Organization for human rights abuses in Iran.

**From:** [Palluconi, Lisa](#)  
**To:** [Palluconi, Lisa](#); [Thomas, Nikole](#)  
**Subject:** Conversation with Palluconi, Lisa  
**Date:** Thursday, February 25, 2021 1:32:31 PM

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Palluconi, Lisa 1:19 PM:

Hi! just seeing the Gertler email. Can you send Jason the letterhead template, which I think would enable Brad to sign it electronically? If I'm understanding the need to put on letterhead.

Thomas, Nikole 1:19 PM:

Hi!

Thomas, Nikole 1:19 PM:

Yes, I just sent a note offering to help to do this for Brad/Jason.

Palluconi, Lisa 1:19 PM:

oh thanks. You are always two steps ahead of me! :)

Thomas, Nikole 1:20 PM:

haha, nah!

Thomas, Nikole 1:20 PM:

I was actually on the phone with (b)(6) and Alan in a separate room so glad you followed up

Thomas, Nikole 1:20 PM:

I could have easily missed it.

**From:** [Thomas, Nikole](#)  
**To:** [Palluconi, Lisa](#); [Thomas, Nikole](#)  
**Subject:** Conversation with Palluconi, Lisa  
**Date:** Friday, January 22, 2021 2:43:20 PM

---

Thomas, Nikole 1:06 PM:

Hi Lisa!

Thomas, Nikole 1:07 PM:

I'm not sure if you will talk to Andrea later today but (b)(5) Paul  
Ahearn (b)(5)

Thomas, Nikole 1:08 PM:

I provided some background but recommended that if Paul (b)(5)  
(b)(5)

Palluconi, Lisa 1:25 PM:

sounds perfect. Thank you

Palluconi, Lisa 1:25 PM:

I did get a call from Scott R last week who asked about it.

Palluconi, Lisa 1:26 PM:

Or maybe on Monday he asked. The days are running together!

Palluconi, Lisa 1:36 PM:

Hi - I want to make sure you saw the email from (b)(6) on the DPRK licensing report.

Thomas, Nikole 2:38 PM:

Sorry! I was on the phone with Alan and others. Yes, I saw (b)(6) email. (b)(5)  
(b)(5)

Thomas, Nikole 2:38 PM:

Mary Pat is out today and believe (b)(6)

Thomas, Nikole 2:39 PM:

(b)(5)

**From:** (b)(6)  
**To:** (b)(6); [Thomas, Nikole](#)  
**Subject:** Conversation with (b)(6)  
**Date:** Tuesday, February 23, 2021 11:50:01 AM

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(b)(6) 11:00 AM:  
good morning Nikole, we've had some fresh inquiries from the NYT piece on gertler

(b)(6) 11:01 AM:  
just wanted to see if you'd heard anything?

(b)(6) 11:03 AM:  
can I call you?

(b)(6) 11:04 AM:  
Sure! I'm at (b)(6)

**From:** [Thomas, Nikole](#)  
**To:** [Roig, Michael](#)  
**Subject:** Accepted: FW: Mr. Dan Gertler - GLOMAG-2020-368297-1

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**Pending Consultation with Other Treasury  
Components**

**(5 pages)**

**2021-1246 (CKK): 0000002618-0000002622**

**Pending Consultation with Other Treasury  
Components**

**(2 pages)**

**2021-1246 (CKK): 0000002623-0000002624**



**Pending Consultation with Other Treasury  
Components**

**(2 pages)**

**2021-1246 (CKK): 0000002625-0000002626**

**Pending Consultation with Other Treasury  
Components**

**(6 pages)**

**2021-1246 (CKK): 0000002627-0000002632**

**From:** [Thomas, Nikole](#)  
**To:** [Christian, Alan](#); (b)(6)  
**Subject:** FW: Draft Gertler materials  
**Date:** Wednesday, February 24, 2021 11:18:00 AM  
**Attachments:** [DRAFT OFAC - Gertler License Revocation Letter 2.23.2021pm nmk.docx](#)  
[DM Gertler JLY 02.24.2021 jep hmt bjs nmk.docx](#)

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FYI

**From:** Smith, Bradley (b)(6)  
**Sent:** Wednesday, February 24, 2021 11:17 AM  
**To:** Palluconi, Lisa (b)(6); Thomas, Nikole (b)(6)  
**Subject:** FW: Draft Gertler materials  
FYI. (b)(5)

---

**From:** Kawerk, Nayla (b)(6)  
**Sent:** Wednesday, February 24, 2021 10:44 AM  
**To:** Trew, Heather (b)(6)  
(b)(6); Gacki, Andrea (b)(6) Rosenberg,  
Elizabeth (b)(6); Ahern, Paul (b)(6); Smith,  
Bradley (b)(6); Sonfield, Brian (b)(6)  
**Cc:** Prince, Jason (b)(6)  
**Subject:** RE: Draft Gertler materials  
A few additional comments/edits from me for consideration. Thanks!

---

**From:** Trew, Heather (b)(6)  
**Sent:** Wednesday, February 24, 2021 10:12 AM  
**To:** (b)(6) Gacki, Andrea (b)(6)  
Rosenberg, Elizabeth (b)(6) Ahern, Paul  
(b)(6) Smith, Bradley (b)(6); Sonfield, Brian  
(b)(6)  
**Cc:** Prince, Jason (b)(6); Kawerk, Nayla (b)(6)  
**Subject:** RE: Draft Gertler materials  
Predecisional/Deliberative/Privileged/Draft  
(b)(5)

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**From:** (b)(6)  
**Date:** February 24, 2021 at 9:14:12 AM EST  
**To:** Trew, Heather (b)(6), Gacki, Andrea (b)(6)  
Rosenberg, Elizabeth (b)(6), Ahern, Paul  
(b)(6), Smith, Bradley (b)(6)  
**Cc:** Prince, Jason (b)(6), Kawerk, Nayla (b)(6)  
**Subject:** RE: Draft Gertler materials  
Thanks Heather and Jason. (b)(5)

---

**From:** Trew, Heather (b)(6)  
**Sent:** Tuesday, February 23, 2021 11:18 PM  
**To:** Gacki, Andrea (b)(6); Rosenberg, Elizabeth  
(b)(6); Ahern, Paul (b)(6); Smith, Bradley

(b)(6)

**Cc:** Prince, Jason (b)(6)

**Subject:** Draft Gertler materials

Predecisional/Deliberative/Privileged/Draft

Everyone - attached, please find a draft decision memo and accompanying draft cover letter to Gertler's counsel for your review and comment.

Please note, (b)(5)

We look forward to your feedback and edits. Thank you!

Thanks,  
Heather

**Withheld In Full FOIA Exemption (b)(5)-Draft  
Document**

**(8 pages)**

**2021-1246 (CKK): 0000002635-0000002642**

**From:** [Smith, Bradley](#)  
**To:** [Palluconi, Lisa](#); [Thomas, Nikole](#)  
**Subject:** FW: Draft Gertler materials  
**Date:** Wednesday, February 24, 2021 11:17:12 AM  
**Attachments:** [DRAFT OFAC - Gertler License Revocation Letter 2.23.2021pm nmk.docx](#)  
[DM\\_Gertler\\_JLY\\_02.24.2021\\_jep\\_hmt\\_bjs\\_nmk.docx](#)

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FYI. [REDACTED] (b)(5).

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**From:** Kawerk, Nayla [REDACTED] (b)(6)  
**Sent:** Wednesday, February 24, 2021 10:44 AM  
**To:** Trew, Heather [REDACTED] (b)(6)  
[REDACTED] (b)(6); Gacki, Andrea [REDACTED] (b)(6); Rosenberg, Elizabeth [REDACTED] (b)(6); Ahern, Paul [REDACTED] (b)(6); Smith, Bradley [REDACTED] (b)(6); Sonfield, Brian [REDACTED] (b)(6)  
**Cc:** Prince, Jason [REDACTED] (b)(6)  
**Subject:** RE: Draft Gertler materials  
A few additional comments/edits from me for consideration. Thanks!

---

**From:** Trew, Heather [REDACTED] (b)(6) >  
**Sent:** Wednesday, February 24, 2021 10:12 AM  
**To:** [REDACTED] (b)(6); Gacki, Andrea [REDACTED] (b)(6); Rosenberg, Elizabeth [REDACTED] (b)(6); Ahern, Paul [REDACTED] (b)(6); Smith, Bradley [REDACTED] (b)(6); Sonfield, Brian [REDACTED] (b)(6)  
**Cc:** Prince, Jason [REDACTED] (b)(6); Kawerk, Nayla [REDACTED] (b)(6)  
**Subject:** RE: Draft Gertler materials  
Predecisional/Deliberative/Privileged/Draft  
[REDACTED] (b)(5)

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**From:** [REDACTED] (b)(6)  
**Date:** February 24, 2021 at 9:14:12 AM EST  
**To:** Trew, Heather [REDACTED] (b)(6), Gacki, Andrea [REDACTED] (b)(6), Rosenberg, Elizabeth [REDACTED] (b)(6), Ahern, Paul [REDACTED] (b)(6), Smith, Bradley [REDACTED] (b)(6)  
**Cc:** Prince, Jason [REDACTED] (b)(6), Kawerk, Nayla [REDACTED] (b)(6)  
**Subject:** RE: Draft Gertler materials  
Thanks Heather and Jason. [REDACTED] (b)(5)

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**From:** Trew, Heather [REDACTED] (b)(6)  
**Sent:** Tuesday, February 23, 2021 11:18 PM  
**To:** Gacki, Andrea [REDACTED] (b)(6); Rosenberg, Elizabeth [REDACTED] (b)(6); Ahern, Paul [REDACTED] (b)(6); Smith, Bradley [REDACTED] (b)(6)  
**Cc:** Prince, Jason [REDACTED] (b)(6)  
**Subject:** Draft Gertler materials  
Predecisional/Deliberative/Privileged/Draft  
Everyone - attached, please find a draft decision memo and accompanying draft cover letter to

Gertler's counsel for your review and comment.

Please note, (b)(6)

We look forward to your feedback and edits. Thank you!

Thanks,

Heather

**Withheld In Full FOIA Exemption (b)(5) – Draft  
Document**

**(7 pages)**

**2021-1246 (CKK): 0000002645-0000002651**



**From:** [Smith, Bradley](#)  
**To:** [Palluconi, Lisa](#); [Thomas, Nikole](#)  
**Subject:** FW: Draft Gertler materials  
**Date:** Tuesday, February 23, 2021 11:24:43 PM  
**Attachments:** [DRAFT OFAC - Gertler License Revocation Letter 2.23.2021pm.docx](#)  
[DM\\_Gertler\\_JLY\\_02.24.2021\\_jep\\_hmt.docx](#)

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FYI. I wasn't sure if you'd received these separately. I hadn't seen much Gertler traffic (if any) since our chat earlier this evening.

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**From:** Trew, Heather (b)(6)  
**Sent:** Tuesday, February 23, 2021 11:18 PM  
**To:** Gacki, Andrea (b)(6); Rosenberg, Elizabeth  
(b)(6); Ahern, Paul (b)(6); Smith, Bradley  
(b)(6)  
**Cc:** Prince, Jason (b)(6)

**Subject:** Draft Gertler materials  
Predecisional/Deliberative/Privileged/Draft  
Everyone - attached, please find a draft decision memo and accompanying draft cover letter to Gertler's counsel for your review and comment.  
Please note, (b)(5)  
We look forward to your feedback and edits. Thank you!  
Thanks,  
Heather

**Withheld In Full FOIA Exemption (b)(5) – Draft  
Document**

**(6 pages)**

**2021-1246 (CKK): 0000002653-0000002658**

# **Pending Submitter Notice Process**

**(19 pages)**

**2021-1246 (CKK): 0000002659-0000002677**

**Pending Consultation with Other Treasury  
Components**

**(37 pages)**

**2021-1246 (CKK): 0000002678-0000002714**

**From:** [Thomas, Nikole](#)  
**To:** (b)(6) [Christian, Alan](#)  
**Subject:** FW: Gertler License - (b)(5)  
**Date:** Thursday, February 4, 2021 3:37:33 PM  
**Attachments:** OFAC (b)(5)  
(b)(5) pdf  
[4\\_5771613563881785837.pdf](#)

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PRIVILEGED//PRE-DECISIONAL//DELIBERATIVE  
ATTORNEY-CLIENT COMMUNICATION

Hi (b)(6) and Alan,

Please see attached draft (b)(5) I only have some minor edits. If you think you may have edits, let's discuss on a conference call.

Thanks!  
Nikole

---

**From:** Prince, Jason (b)(6)  
**Sent:** Thursday, February 4, 2021 3:15 PM  
**To:** Smith, Bradley (b)(6); Palluconi, Lisa (b)(6)  
Thomas, Nikole (b)(6)  
**Subject:** Gertler License - (b)(5)

PRIVILEGED//PRE-DECISIONAL//DELIBERATIVE  
ATTORNEY-CLIENT COMMUNICATION

Hi Brad, Lisa, and Nikole,

Please find attached a draft of (b)(5) For your convenience, I've also included below Nikole's helpful email with OFAC's (b)(5) (b)(5)

Given the nature of this particular (b)(5)

(b)(5)

Thanks,  
Jason

---

**From:** Thomas, Nikole (b)(6)  
**Sent:** Wednesday, February 3, 2021 4:23 PM  
**To:** Prince, Jason (b)(6)

Subject: (b)(5)

Hi Jason,

(b)(5)

Thanks!  
Nikole

(b)(5)

# **Pending Submitter Notice Process**

**(5 pages)**

**2021-1246 (CKK): 0000002717-0000002721**

**Withheld In Full FOIA Exemption (b)(5) – Draft  
Document**

**(1 page)**

**2021-1246 (CKK): 0000002722**



**From:** [Thomas, Nikole](#)  
**To:** [Christian, Alan](#); (b)(6); [Smith, Heather](#)  
**Subject:** FW: Gertler Request  
**Date:** Tuesday, November 3, 2020 11:26:20 AM

---

PRE-DECISIONAL and DELIBERATIVE

Hi All,

I was about to FYI my update to Andrea this morning and then she just passed back the below message.

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

Thanks!

Nikole

---

**From:** Thomas, Nikole

**Sent:** Tuesday, November 3, 2020 11:24 AM

**To:** Gacki, Andrea (b)(6); Smith, Bradley (b)(6)

**Cc:** Palluconi, Lisa (b)(6)

**Subject:** RE: Gertler Request

PRE-DECISIONAL and DELIBERATIVE

Thanks, Andrea! I don't think we need to speak (b)(5)  
(b)(5)

**From:** Gacki, Andrea (b)(6)

**Sent:** Tuesday, November 3, 2020 11:20 AM

**To:** Thomas, Nikole (b)(6); Smith, Bradley (b)(6)

**Cc:** Palluconi, Lisa (b)(6)

**Subject:** RE: Gertler Request

PRE-DECISIONAL AND DELIBERATIVE

Nikole – (b)(5)  
(b)(5)

Don't hesitate to call me at (b)(6) if you'd like to discuss!

Andrea

**Andrea Gacki**

Director | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | O: (b)(6) | M: (b)(6)

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**From:** Thomas, Nikole (b)(6)

**Sent:** Tuesday, November 3, 2020 10:24 AM

**To:** Gacki, Andrea (b)(6); Smith, Bradley (b)(6)

**Cc:** Palluconi, Lisa (b)(6)

**Subject:** RE: Gertler Request

PRE-DECISIONAL and DELIBERATIVE

Hi Andrea and Brad,

We checked in (b)(5)

(b)(5)

Thanks!  
Nikole

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**From:** Gacki, Andrea (b)(6)  
**Sent:** Friday, October 30, 2020 2:46 PM  
**To:** Thomas, Nikole (b)(6); Smith, Bradley  
(b)(6)  
**Cc:** Palluconi, Lisa (b)(6)  
**Subject:** RE: Gertler Request

Perfect – thank you, Nikole!

**Andrea Gacki**

Director | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | T: (b)(6) | M: (b)(6)

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**From:** Thomas, Nikole (b)(6)  
**Sent:** Friday, October 30, 2020 2:46 PM  
**To:** Gacki, Andrea (b)(6); Smith, Bradley  
(b)(6) >  
**Cc:** Palluconi, Lisa (b)(6)  
**Subject:** RE: Gertler Request

PRE-DECISIONAL and DELIBERATIVE

Hi Andrea,  
The latest

(b)(5)

(b)(5)

Thanks!  
Nikole

---

**From:** Gacki, Andrea (b)(6)  
**Sent:** Friday, October 30, 2020 10:51 AM  
**To:** Thomas, Nikole (b)(6); Smith, Bradley  
(b)(6)  
**Cc:** Palluconi, Lisa (b)(6)  
**Subject:** RE: Gertler Request

Hi Nikole – yes, sounds good.

**Andrea Gacki**

Director | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | T: (b)(6) | M: (b)(6)

---

**From:** Thomas, Nikole (b)(6)

**Sent:** Friday, October 30, 2020 10:47 AM

**To:** Gacki, Andrea (b)(6); Smith, Bradley  
(b)(6)

**Cc:** Palluconi, Lisa (b)(6)

**Subject:** Gertler Request

PRE-DECISIONAL and DELIBERATIVE

Hi Andrea and Brad,

As you are aware, we have sent the notification (b)(5)

(b)(5)

so that I can update you? If so, I will send a separate conference line.

Thanks!

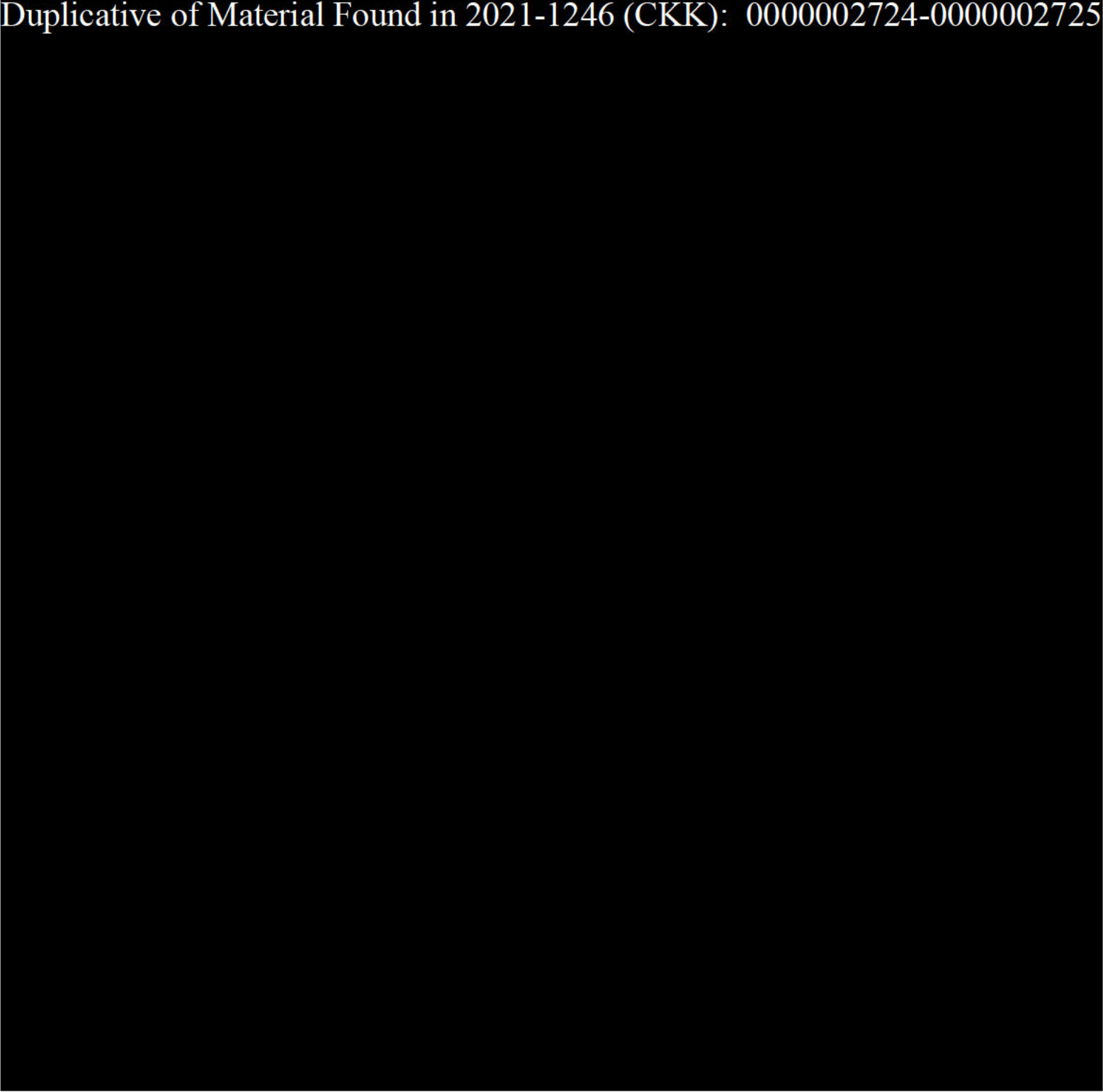
Nikole

**From:** [Thomas, Nikole](#)  
**To:** [REDACTED] (b)(6)  
**Cc:** [Christian, Alan](#)  
**Subject:** FW: Gertler Request  
**Date:** Friday, October 30, 2020 3:14:20 PM

---

FYI

Duplicative of Material Found in 2021-1246 (CKK): 0000002724-0000002725



**From:** [Prince, Jason](#)  
**To:** [Palluconi, Lisa](#); [Thomas, Nikole](#)  
**Subject:** FW: Gertler Specific License Memo for Acting U/S Gacki  
**Date:** Tuesday, February 2, 2021 10:08:53 AM  
**Attachments:** [11.6.2020\\_Gertler\\_License.pdf](#)

---

PRIVILEGED//PRE-DECISIONAL//DELIBERATIVE  
ATTORNEY-CLIENT COMMUNICATION

Good morning, Lisa and Nikole:

(b)(5)

Thanks,  
Jason

---

**From:** Prince, Jason

**Sent:** Thursday, January 28, 2021 7:44 PM

**To:** Palluconi, Lisa (b)(6); Thomas, Nikole (b)(6)

**Subject:** RE: Gertler Specific License Memo for Acting U/S Gacki

PRIVILEGED//PRE-DECISIONAL//DELIBERATIVE  
ATTORNEY-CLIENT COMMUNICATION

Hi Lisa and Nikole,

As part of

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

Thanks,  
Jason

---

**From:** Palluconi, Lisa (b)(6)

**Sent:** Tuesday, January 26, 2021 8:37 AM

**To:** (b)(6) Thomas, Nikole (b)(6);  
(b)(6) Prince, Jason (b)(6)

**Cc:** Smith, Bradley (b)(6)

Christian, Alan (b)(6)

**Subject:** RE: Gertler Specific License Memo for Acting U/S Gacki

+ Jason

Pre-decisional and Deliberative

Hi (b)(6) – Thanks. I’m not opposed, but (b)(5)

(b)(5)

Best,  
Lisa

---

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

**Sent:** Tuesday, January 26, 2021 7:46 AM

**To:** Thomas, Nikole (b)(6)

**Cc:** Smith, Bradley (b)(6)  
Palluconi, Lisa (b)(6); Christian, Alan (b)(6),  
(b)(6)

**Subject:** RE: Gertler Specific License Memo for Acting U/S Gacki

Hi Nikole – For your awareness (b)(5)  
(b)(5)

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

Senior Advisor  
Office of Terrorism and Financial Intelligence  
Department of the Treasury  
(U) (b)(6) | (O) (b)(6) | (M) (b)(6)

---

**From:** Thomas, Nikole (b)(6) >  
**Sent:** Monday, January 25, 2021 4:10 PM  
**To:** (b)(6)  
**Cc:** Smith, Bradley (b)(6)  
Palluconi, Lisa (b)(6); Christian, Alan (b)(6),  
(b)(6)

**Subject:** Gertler Specific License Memo for Acting U/S Gacki  
PRE-DECISIONAL and DELIBERATIVE

Hi (b)(6),  
We have prepared the attached memo for Acting U/S Gacki related to a specific license OFAC recently issued to Israeli billionaire Dan Gertler, who is sanctioned under the Global Magnitsky program, that has become the subject of some recent press articles, as well as inquiries (b)(5)  
(b)(5)  
(b)(5). We are also including a copy of the cover letter and license itself.

Please let us know if we can provide further assistance on this topic.  
Thanks,  
Nikole

**Withheld In Full FOIA Exemption (b)(5)-Draft  
Document**

**(3 pages)**

**2021-1246 (CKK): 0000002729-0000002731**

**From:** (b)(6)  
**To:** (b)(6)  
**Cc:** [Albowicz, Nikole](#); [Swindells, Felicia](#); [Thannhauser, Sara](#)  
**Subject:** FW: FLASH Clearance - Designations Where Human Rights or Corruption Are Mentioned  
**Date:** Friday, June 8, 2018 10:06:32 AM  
**Attachments:** [2018-06-11 FACT SHEET - GloMag Human Rights and Corruption Actions v2.docx](#)  
**Importance:** High

---

Hi (b)(6)

Thanks for circulating the updated FACT SHEET. As discussed, please inform (b)(6) | (b)(5)

(b)(5)

Thanks,

(b)(6)

---

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

**Sent:** Friday, June 08, 2018 8:41 AM

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

(b)(6)

(b)(6)

(b)(6)

(b)(6)

(b)(6)

(b)(6)

(b)(6)

**Cc:** Albowicz, Nikole (b)(6)

(b)(6)

(b)(6)

Conklin, Todd

(b)(6)

(b)(6)

(b)(6)

(b)(6)

**Subject:** FLASH Clearance - Designations Where Human Rights or Corruption Are Mentioned

**Importance:** High

All,

Thank you again for your assistance last night with gathering material for U/S Mandelker's trip to Africa—we've compiled the actions in the attached document.

Could you review for any errors or omissions we may have made when describing or adjusting descriptions of the actions and return to me by **9:45 AM**?

Thank you,

(b)(6)

(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)



**Withheld In Full FOIA Exemption (b)(5)**

**(4 pages)**

**2021-1246 (CKK): 0000002733-0000002736**

**From:** [Gacki, Andrea](#)  
**To:** [Mandelker, Sigal](#)  
**Cc:** [Smith, Bradley](#); [Gatjanis, Gregory](#); [Conklin, Todd](#); [Albowicz, Nikole](#); (b)(6); [Jennings, Thomas](#); [Quinby, Ripley](#); (b)(6); [Baheri, Leila](#); [Palluconi, Lisa](#); [Battle, John](#); [Dondarski, Michael](#); [Manfull, Alexandre](#); (b)(6); [Scheinert, Lawrence](#)  
**Subject:** FW: Notification of Upcoming OFAC Designation Actions  
**Date:** Friday, June 8, 2018 3:52:42 PM

---

Hi Sigal – below is our summary of the designation actions scheduled for next week. Safe travels!

---

**From:** Conklin, Todd  
**Sent:** Friday, June 08, 2018 1:27 PM  
**To:** Gacki, Andrea; Smith, Bradley; (b)(6)  
**Cc:** Gatjanis, Gregory; Albowicz, Nikole; (b)(6); [Palluconi, Lisa](#); [Battle, John](#); [Jennings, Thomas](#); [Quinby, Ripley](#); (b)(6); [Baheri, Leila](#)  
**Subject:** Notification of Upcoming OFAC Actions

(U//LES) **Cyber/Russia/CAATSA Designations:** On **Monday, June 11**, OFAC is preparing to designate five Russian entities and three Russian individuals pursuant to E.O. 13694, as amended, as well as Section 224 of CAATSA. The action will specifically target three enablers of the Russian Federal Security Service (FSB) as well as several entities and individuals that are owned or controlled by or act for or on behalf of the identified enablers. This action is a part of a concerted effort undertaken by the United States to address the Russian Federation’s continued perpetration of destabilizing and destructive activities that directly harm the U.S. and our allies. The designated persons include Digital Security, ERPScan, Embedi, Kvant Scientific Research Institute, Divetechnoservices, and three corporate officials of Divetechnoservices. As part of this action, OFAC will be issuing a third-party blocking notice to Regus PLC since both ERPScan and Embedi utilize virtual office spaces based in California that are owned by Regus. (b)(5)

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

(U//LES) **Libya Designations:** On **Monday, June 11**, following a Dutch-led United Nations (UN) nomination, OFAC is preparing to designate six individuals under Libya E.O. 13726. The Netherlands, Germany, UK, France, and the United States submitted the targets for nomination on May 1, which started a five business day approval period at the UN Security Council. Russia placed a hold on this action for several weeks, but lifted their hold on June 7. Russia’s lifting of the hold immediately resulted in the placement of the six individuals on the UN sanctions list. As a result, the United States is required to domestically implement the designations within two business days of the UN action. The individuals, who are all involved in smuggling migrants from Sub-Saharan Africa through Libya to Europe, will be designated for threatening peace, security, or stability in Libya through the destabilizing effects of migrant smuggling. Their designations will highlight the continued human rights abuses of migrants taking place in Libya at the hands of these smugglers and demonstrate U.S. support to key European partners who are seeking UN action against these individuals. (b)(5)

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

(U//LES) **GLOMAG Designations:** On **Tuesday, June 12 (at 3:00 p.m.)**, OFAC is preparing to designate two individuals and five entities pursuant to Executive Order 13818, “Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption.” **Hing Bun Hieng** will be designated for being the leader of an entity involved in serious rights abuse. Hieng is the commander of the Cambodian armed forces’ Prime Minister Bodyguard Unit (PMBU), which has been accused of being a brutal military unit whose members have beat

members of an opposition political party, beat unarmed protestors, and put in place, and then reported the presence of, improvised explosive devices in order to deter future opposition party protests. **Felix Bautista** will be designated for being a government official engaged in corruption. Bautista is a Senator in the Dominican Republic who has been implicated in corruption scandals both in the Dominican Republic and its neighbor, Haiti. In the Dominican Republic, Bautista has been accused of using his former position as a government employee to engage in corrupt activities, and continued his corrupt activity once he became a Senator. In Haiti, Bautista engaged in corruption by using connections to win public works projects following multiple natural disasters, and, in some cases, never completing projects for which his companies had been paid. [REDACTED] (b)(5)

(b)(5)

(U//LES) **GLOMAG Designations:** On **Friday, June 15**, OFAC is preparing to designate 14 entities pursuant to Executive Order 13818, "Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption." These entities are located in Switzerland, the Netherlands, British Virgin Islands, Zambia, and the DRC. The entities are owned or controlled by, act for or on behalf of, or have provided material support to Dan Gertler, Fleurette Properties Limited, or Africa Horizons Investment Limited, all of which were designated on December 21, 2017. [REDACTED] (b)(5)

(b)(5)

**From:** [Albowicz, Nikole](#)  
**To:** [Albowicz, Nikole](#)  
**Subject:** FW: OFAC licensing matter for next week  
**Date:** Monday, March 11, 2019 5:36:18 PM  
**Attachments:** [weekly.docx](#)  
[March 7 Sigal Weekly Items nat.docx](#)

---

**From:** Palluconi, Lisa  
**Sent:** Friday, March 08, 2019 7:31 PM  
**To:** Gacki, Andrea (b)(6); Smith, Bradley (b)(6)  
**Cc:** Albowicz, Nikole (b)(6)  
(b)(6) Rasmussen, Mary  
(b)(6)  
(b)(6)

**Subject:** OFAC licensing matter for next week  
Andrea/Brad:  
We have one Licensing item to flag for Sigal next week. (b)(5)  
(b)(5)  
(b)(5) Below is a draft note for

Sigal.  
Best,  
Lisa  
\*\*\*\*\*

Hi Sigal,  
We have one licensing item that we are hoping to get your views on early next week. (b)(5)  
(b)(5)  
(b)(5)

Best,  
Andrea  
\*\*\*\*\*

(b)(5)

(b)(5)

**Withheld In Full FOIA Exemption (b)(5)**

**(7 pages)**

**2021-1246 (CKK): 0000002740-0000002746**

**From:** [Albowicz, Nikole](#)  
**To:** [DL OFAC LIC Managers](#)  
**Subject:** FW: OFAC licensing matter for next week  
**Date:** Monday, March 11, 2019 6:04:36 PM  
**Attachments:** [weekly.docx](#)  
[March 7 Sigal Weekly Items nat.docx](#)

---

Hi Team,

In case it's helpful please see the below and attached for the evolution of last week's weekly submission. Below is the final product; the attachments contain edits/comments from me in one and Lisa's edits/comments in the other.

(b)(5)

We will continue to refine this process and I will work on a template to help. Feel free to share with your teams if you think it's useful.

Thanks!  
Nikole

---

**From:** Palluconi, Lisa  
**Sent:** Friday, March 08, 2019 7:31 PM  
**To:** Gacki, Andrea (b)(6) Smith, Bradley (b)(6)  
**Cc:** Albowicz, Nikole (b)(6)  
(b)(6) Rasmussen, Mary  
(b)(6)  
(b)(6)  
**Subject:** OFAC licensing matter for next week

Andrea/Brad:

We have one Licensing item to flag for Sigal next week. (b)(5)  
(b)(5)  
(b)(5) Below is a draft note for  
Sigal.

Best,  
Lisa

\*\*\*\*\*

Hi Sigal,

We have one licensing item that we are hoping to get your views on early next week. (b)(5)  
(b)(5)

Best,

Andrea

\*\*\*\*\*

(b)(5)

(b)(5)

**Withheld In Full FOIA Exemption (b)(5)**

**(6 pages)**

**2021-1246 (CKK): 0000002749-0000002754**



**Pending Consultation with Other Government  
Agency**

**(6 pages)**

**2021-1246 (CKK): 0000002755-0000002760**

# **Pending Submitter Notice Process**

**(8 pages)**

**2021-1246 (CKK): 0000002761-0000002768**

**From:** (b)(6)  
**To:** [Thomas, Nikole](#); [Rasmussen, Mary](#); (b)(6); [Palluconi, Lisa](#); [Thannhauser, Sara](#); [Moriarty, Kellen](#) (b)(6)  
**Cc:** (b)(6); [Coughlin, Zachary](#)  
**Subject:** FW: Summary of facts Global Witness and PPLAAF investigation - Dan Gertler  
**Date:** Tuesday, February 23, 2021 4:54:12 PM

---

FYI-defer to folks on this chain (b)(5)  
(b)(5)

(b)(6)

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

**From:** (b)(6)  
**Sent:** Monday, February 22, 2021 5:05 PM  
**To:** (b)(6)  
(b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Summary of facts Global Witness and PPLAAF investigation - Dan Gertler

Thanks all! (b)(6) and (b)(6) - (b)(5)  
(b)(5)

(b)(6)

(b)(6)  
Senior Advisor  
Office of Terrorism and Financial Intelligence Department of the Treasury  
(U) (b)(6) (O) (b)(6) | (M) (b)(6)

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

**From:** (b)(6)  
**Sent:** Monday, February 22, 2021 2:48 PM  
**To:** (b)(6)  
(b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Summary of facts Global Witness and PPLAAF investigation - Dan Gertler

Hi (b)(6)

I'd also like to join if possible, since I've previously met with GW and PPLAAF on this subject. That said, I defer to OFAC's lead as well.

Best,  
(b)(6)

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

**From:** (b)(6)  
**Sent:** Monday, February 22, 2021 2:40 PM  
**To:** (b)(6)  
(b)(6)  
**Cc:** (b)(6)  
**Subject:** RE: Summary of facts Global Witness and PPLAAF investigation - Dan Gertler

(b)(6) - Thanks for flagging. Happy to join but will follow OFAC's lead on Gertler-related external engagement.

(b)(6)

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

From: (b)(6)

Sent: Monday, February 22, 2021 2:28 PM

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

Cc: (b)(6)

Subject: FW: Summary of facts Global Witness and PPLAAF investigation - Dan Gertler

Hi All - Please see below a request for a call from PPLAAF and Global Witness to discuss information they want to pass along to Treasury related to Gertler. (b)(5)

(b)(5)

Thanks!

(b)(6)

(b)(6)

Senior Advisor

Office of Terrorism and Financial Intelligence Department of the Treasury

(U) (b)(6) | (O) (b)(6) | (M) (b)(6)

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

From: Gacki, Andrea (b)(6) >

Sent: Monday, February 22, 2021 2:06 PM

To: (b)(6)

Subject: FW: Summary of facts Global Witness and PPLAAF investigation - Dan Gertler

(b)(6) and (b)(6) -- I'm sorry for sending you some old emails. I'm trying to clean up my inbox, and I'm realizing that I'm not as good as I used to be at responding to stuff!

Would you be able to reach out and set something up in response to this request? (b)(5)

(b)(5)

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

From: gabriel@pplaaaf.org <gabriel@pplaaaf.org>

Sent: Friday, February 19, 2021 10:30 AM

To: Gacki, Andrea (b)(6)

Cc: henri.thulliez@gmail.com

Subject: Re: Summary of facts Global Witness and PPLAAF investigation - Dan Gertler

\*\* Caution: External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov \*\*

Dear Andrea,

I hope this email finds you well.

Following (b)(6) I would like to update that more revelations will be published shortly regarding Dan Gertler's business dealings.

Could we arrange a call next week so we can update you on the revelations?

Best regards,  
Gabriel

Platform to Protect Whistleblowers in Africa (PPLAAF)

On 2021-02-09 18:47, Andrea Gacki (b)(6) wrote:  
> Thanks very much, (b)(6)  
>  
> Andrea  
>  
> FROM: (b)(6)  
> SENT: Tuesday, February 9, 2021 7:19 AM  
> TO: Gacki, Andrea (b)(6)  
> CC: henri thulliez (henri.thulliez@googlemail.com)  
> <henri.thulliez@googlemail.com>; gabriel@pplaaf.org; Brad Brooks-Rubin  
> (b)(6)  
> SUBJECT: Summary of facts Global Witness and PPLAAF investigation -  
> Dan Gertler  
>  
> \*\* CAUTION: External email. Pay attention to suspicious links and  
> attachments. Send suspicious email to suspect@treasury.gov \*\*  
>  
> Dear Andrea,  
>  
> I hope this email finds you well.  
>  
> I work for Global Witness, an anti-corruption watchdog. I and several  
> of my colleagues working at the Platform to Protect Whistle-blowers  
> (PPLAAF) have met with Treasury and OFAC officials in the past to  
> discuss a publication surrounding Dan Gertler's business dealings and  
> apparent attempt to evade US sanctions.  
>  
> Given the most recent developments, we wanted to make sure that you  
> had at hand the summary of facts we had shared with your colleagues at  
> the time. You can also find the entire investigation here [1], which  
> was published in July 2020.  
>  
> If you have any questions or would like further information, please  
> just let me know.  
>  
> Yours sincerely,  
>  
> (b)(6)  
>  
> (b)(6)  
>  
> DR CONGO CAMPAIGN  
>  
> GLOBAL WITNESS  
>  
> M: (b)(6) | Skype (b)(6) | Twitter:  
> (b)(6)  
> <https://hyperlink.services.treasury.gov/agency.do?origin=www.globalwitness.org>  
> ness.org

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> [1]  
> [https://hyperlink.services.treasury.gov/agency.do?origin=https://www.g](https://hyperlink.services.treasury.gov/agency.do?origin=https://www.globalwitness.org/en/campaigns/corruption-and-money-laundering/undermining-sanctions/)  
> lobalwitness.org/en/campaigns/corruption-and-money-laundering/undermin  
> ing-sanctions/  
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> lobalwitness.org/en/receive-email-updates/  
> [6]  
> [https://hyperlink.services.treasury.gov/agency.do?origin=https://www.g](https://hyperlink.services.treasury.gov/agency.do?origin=https://www.globalwitness.org/en-gb/donate/)  
> lobalwitness.org/en-gb/donate/

**Pending Consultation with Other Government  
Agency**

**(5 pages)**

**2021-1246 (CKK): 0000002773-0000002777**

**From:** [Thomas, Nikole](#)  
**To:** [Prince, Jason](#)  
**Subject:** FW: Thomas, Nikole has shared "GertlerLicenseSummary\_24Jan2021"  
**Date:** Monday, January 25, 2021 1:12:10 PM

---

**From:** Thomas, Nikole (b)(6)  
**Sent:** Monday, January 25, 2021 9:10 AM  
**To:** Palluconi, Lisa (b)(6)  
Christian, Alan (b)(6) Manfull, Alexandre  
(b)(6)  
Jennings, Thomas (b)(6)  
(b)(6); Thannhauser, Sara (b)(6)  
Moriarty, Kellen (b)(6)  
(b)(6)  
Scheinert, Lawrence (b)(6) Quinby, Ripley  
(b)(6); Gatjanis, Gregory (b)(6); Prince, Jason  
(b)(6)  
**Cc:** Thomas, Nikole (b)(6)  
**Subject:** Thomas, Nikole has shared 'GertlerLicenseSummary\_24Jan2021'

Here's the document that Thomas, Nikole shared with you.

Open [GertlerLicenseSummary\\_24Jan2021.docx](#)

[Follow](#) this document to get updates in your newsfeed.



**Withheld In Full FOIA Exemption (b)(5)-Draft  
Document**

**(3 pages)**

**2021-1246 (CKK): 0000002779-0000002781**

**Pending Consultation with Other Treasury  
Components**

**(5 pages)**

**2021-1246 (CKK): 0000002782-0000002786**

**Pending Consultation with Other Government  
Agency**

**(6 pages)**

**2021-1246 (CKK): 0000002787-0000002792**

**Pending Consultation with Other Government  
Agency**

**(4 pages)**

**2021-1246 (CKK): 0000002793-0000002796**

**Pending Consultation with Other Government  
Agency**

**(3 pages)**

**2021-1246 (CKK): 0000002797-0000002799**

**From:** [Christian, Alan](#)  
**To:** [Thomas, Nikole](#)  
**Subject:** FW: Update on Gertler application  
**Date:** Monday, October 26, 2020 5:00:44 PM  
**Attachments:** [Gertler Summary - Updated AWC.docx](#)  
**Importance:** High

---

Hi, Nikole:

(b)(5)

Respectfully,

(b)(6)

(b)(5)

**From:** Gacki, Andrea (b)(6)  
**Sent:** Monday, October 26, 2020 2:04 PM  
**To:** Christian, Alan (b)(6); Thomas, Nikole (b)(6)  
Rasmussen, Mary (b)(6)  
Palluconi, Lisa (b)(6)  
**Cc:** Smith, Bradley (b)(6)  
**Subject:** RE: Update on Gertler application  
Perfect! Thanks so much, Alan. (b)(5)

(b)(5)

Andrea

**Andrea Gacki**

Director | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | O: (b)(6) | M: (b)(6)

---

**From:** Christian, Alan (b)(6)  
**Sent:** Monday, October 26, 2020 1:53 PM  
**To:** Gacki, Andrea (b)(6); Thomas, Nikole (b)(6)  
(b)(6); Rasmussen, Mary (b)(6)  
(b)(6) Palluconi, Lisa (b)(6)

**Cc:** Smith, Bradley (b)(6)  
(b)(6) >

**Subject:** RE: Update on Gertler application

Hi, Andrea:

The sneak preview is attached. We are in the process of preparing the summary for your and Brad's reviews (b)(5)

(b)(5)

Please let us know whether you have any questions.

Respectfully,

Alan

---

**From:** Gacki, Andrea (b)(6)

**Sent:** Monday, October 26, 2020 1:38 PM

**To:** Thomas, Nikole (b)(6) Rasmussen, Mary  
(b)(6); Christian, Alan (b)(6)  
(b)(6) Palluconi, Lisa (b)(6)

**Cc:** Smith, Bradley (b)(6)  
(b)(6)

**Subject:** RE: Update on Gertler application

Hi Nikole – if you could give me a sneak preview, I'd appreciate it, (b)(5)

(b)(5)

(b)(5)

**Andrea Gacki**

Director | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | O: (b)(6) | M: (b)(6)

---

**From:** Thomas, Nikole (b)(6)

**Sent:** Monday, October 26, 2020 1:37 PM

**To:** Gacki, Andrea (b)(6); Rasmussen, Mary  
(b)(6) Christian, Alan (b)(6);  
(b)(6) Palluconi, Lisa  
(b)(6)

**Cc:** Smith, Bradley (b)(6)  
(b)(6)

**Subject:** RE: Update on Gertler application

Hi Andrea,

Your timing is incredible. We are actually editing a summary for you and Brad on this application. Would it be ok to provide to you by COB today or do you need it sooner?

Thanks!

Nikole

---

**From:** Gacki, Andrea (b)(6)

**Sent:** Monday, October 26, 2020 1:11 PM

**To:** Thomas, Nikole (b)(6); Rasmussen, Mary  
(b)(6) Christian, Alan (b)(6)  
(b)(6) Palluconi, Lisa  
(b)(6)

**Cc:** Smith, Bradley (b)(6)

(b)(6)

**Subject:** Update on Gertler application

Nikole and all –

I remember that Gertler’s attorneys submitted a license application some weeks ago. Can you give me an update that I will be able to send to Treasury leadership?

Thanks—

Andrea

**Andrea Gacki**

Director | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | O: (b)(6) | M: (b)(6)



**Withheld In Full FOIA Exemption (b)(5)**

**(2 pages)**

**2021-1246 (CKK): 0000002803-0000002804**

**From:** [Thomas, Nikole](#)  
**To:** (b)(6); [Christian, Alan](#); [Manfull, Alexandre](#); (b)(6); [Jennings, Thomas](#) (b)(6);  
[Thannhauser, Sara](#); [Moriarty, Kellen](#); (b)(6)  
**Cc:** [Palluconi, Lisa](#); [Scheinert, Lawrence](#); [Quinby, Ripley](#); [Gatjanis, Gregory](#)  
**Subject:** FW: Urgent Gertler-related one year specific license  
**Date:** Monday, January 25, 2021 8:13:33 AM  
**Attachments:** [GertlerLicenseSummary\\_24Jan2021.docx](#)

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PRE-DECISIONAL and DELIBERATIVE

Good Morning Everyone,

I took the liberty of starting a rough draft of this memo, which I am attaching here. I'll add it to SP for edits and send a link later this morning. In the meantime, I wanted to send so everyone could take a look (b)(5)

(b)(5)

Thanks!

Nikole

---

**From:** Smith, Bradley (b)(6)  
**Sent:** Sunday, January 24, 2021 9:43 PM  
**To:** (b)(6); [Christian, Alan](#) (b)(6)  
[Thomas, Nikole](#) (b)(6); [Rasmussen, Mary](#)  
(b)(6); [Palluconi, Lisa](#) (b)(6); [Manfull, Alexandre](#)  
(b)(6); [Scheinert, Lawrence](#) (b)(6)  
(b)(6); [Jennings, Thomas](#)  
(b)(6); [Quinby, Ripley](#) (b)(6); [Gatjanis, Gregory](#)  
(b)(6)  
**Cc:** (b)(6)

**Subject:** RE: Urgent Gertler-related one year specific license

Good Evening,

I am sorry for the Sunday evening email, but as I know some of you are tracking, the Gertler license is generating some news this weekend. (b)(5)

(b)(5)

Thank you,  
Brad

---

**From:** (b)(6)  
**Date:** January 15, 2021 at 7:11:24 PM EST  
**To:** Gacki, Andrea (b)(6), [Christian, Alan](#) (b)(6)

Thomas, Nikole (b)(6), Rasmussen, Mary  
(b)(6), Palluconi, Lisa (b)(6), Manfull, Alexandre  
(b)(6), Scheinert, Lawrence (b)(6),  
(b)(6) Jennings, Thomas  
(b)(6), Quinby, Ripley (b)(6), Gatjanis, Gregory  
(b)(6)

**Cc:** Smith, Bradley (b)(6)  
**Subject:** RE: Urgent Gertler-related one year specific license  
PRE-DECISIONAL AND DELIBERATIVE  
Hi Andrea,  
Okay, I've emailed Mr. Weiss and I also copied Mr. Machnes.

(b)(6)

---

**From:** Gacki, Andrea (b)(6)  
**Sent:** Friday, January 15, 2021 6:55 PM  
**To:** (b)(6) Christian, Alan (b)(6)  
Thomas, Nikole (b)(6); Rasmussen, Mary  
(b)(6); Palluconi, Lisa (b)(6); Manfull, Alexandre  
(b)(6); Scheinert, Lawrence (b)(6)  
(b)(6) Jennings, Thomas  
(b)(6); Quinby, Ripley (b)(6); Gatjanis, Gregory  
(b)(6)

**Cc:** Smith, Bradley (b)(6)  
**Subject:** RE: Urgent Gertler-related one year specific license  
PRE-DECISIONAL AND DELIBERATIVE  
Oh, I mean Mr. Weiss, since he is the addressee on our cover letter.

---

**From:** (b)(6)  
**Date:** January 15, 2021 at 6:54:01 PM EST  
**To:** Gacki, Andrea (b)(6) Christian, Alan (b)(6),  
Thomas, Nikole (b)(6) Rasmussen, Mary  
(b)(6), Palluconi, Lisa (b)(6), Manfull, Alexandre  
(b)(6), Scheinert, Lawrence (b)(6),  
(b)(6) Jennings, Thomas  
(b)(6), Quinby, Ripley (b)(6), Gatjanis, Gregory  
(b)(6)

**Cc:** Smith, Bradley (b)(6)  
**Subject:** RE: Urgent Gertler-related one year specific license  
PRE-DECISIONAL AND DELIBERATIVE  
Will do. When you say communicated to Mr. Gertler's attorney, do you mean Mr. Weiss or Mr. Dershowitz?

(b)(6)

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**From:** Gacki, Andrea (b)(6)  
**Sent:** Friday, January 15, 2021 6:50 PM

**To:** (b)(6) Christian, Alan (b)(6)  
Thomas, Nikole (b)(6); Rasmussen, Mary  
(b)(6); Palluconi, Lisa (b)(6); Manfull, Alexandre  
(b)(6); Scheinert, Lawrence (b)(6)  
(b)(6) Jennings, Thomas  
(b)(6) Quinby, Ripley (b)(6) Gatjanis, Gregory  
(b)(6)  
**Cc:** Smith, Bradley (b)(6)

**Subject:** RE: Urgent Gertler-related one year specific license

(b)(6) – thanks to you and everyone for getting this done. I’ve reviewed the file and uploaded signed versions of the cover letter and license. Could I ask you to complete closeout of the case, and also email the cover letter and license to the attorney of record? And could you let me know when it has been communicated to Mr. Gertler’s attorney, (b)(5)

Thank you so much—

Andrea

**Andrea Gacki**

Director | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | T: (b)(6) | M: (b)(6)

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

**Sent:** Friday, January 15, 2021 6:11 PM

**To:** Gacki, Andrea (b)(6); Christian, Alan (b)(6)  
Thomas, Nikole (b)(6) Rasmussen, Mary  
(b)(6); Palluconi, Lisa (b)(6); Manfull, Alexandre  
(b)(6); Scheinert, Lawrence (b)(6)  
(b)(6) Jennings, Thomas  
(b)(6); Quinby, Ripley (b)(6); Gatjanis, Gregory  
(b)(6)

**Cc:** Smith, Bradley (b)(6)

**Subject:** RE: Urgent Gertler-related one year specific license

PRE-DECISIONAL AND DELIBERATIVE

Hi Andrea,

Good evening. The draft cover letter (#06) and draft license (#07) are in your queue in OASIS for final review and signature. Please let me know if you have any questions.

Thank you,

(b)(6)

---

**From:** Gacki, Andrea (b)(6)

**Sent:** Friday, January 15, 2021 5:08 PM

**To:** Christian, Alan (b)(6); Thomas, Nikole (b)(6)  
Rasmussen, Mary (b)(6)  
Palluconi, Lisa (b)(6); Manfull, Alexandre  
(b)(6); Scheinert, Lawrence (b)(6)  
(b)(6) Jennings, Thomas  
(b)(6); Quinby, Ripley (b)(6); Gatjanis, Gregory  
(b)(6); Irwin, Justin (b)(6)  
**Cc:** Smith, Bradley (b)(6)

**Subject:** RE: Urgent Gertler-related one year specific license

Hi all – sorry for the nudge, but I am just checking in on the status of this. (b)(5)

(b)(5)

Andrea

**Andrea Gacki**

Director | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | T: (b)(6) | M: (b)(6)

**From:** Christian, Alan (b)(6)

**Sent:** Thursday, January 14, 2021 1:44 PM

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

Rasmussen, Mary (b)(6)

Palluconi, Lisa (b)(6); Manfull, Alexandre

(b)(6); Scheinert, Lawrence <(b)(6)>;

(b)(6) Jennings, Thomas

(b)(6); Quinby, Ripley (b)(6); Gatjanis, Gregory

(b)(6)

**Cc:** Smith, Bradley (b)(6)

**Subject:** RE: Urgent Gertler-related one year specific license

PRE-DECISIONAL AND DELIBERATIVE

Thank you, Andrea. Licensing will start working on this immediately and will let you know if we have any questions.

Respectfully,

Alan

**From:** Gacki, Andrea (b)(6) >

**Sent:** Thursday, January 14, 2021 1:33 PM

**To:** Thomas, Nikole (b)(6); Rasmussen, Mary

(b)(6); Christian, Alan (b)(6)

(b)(6) Palluconi, Lisa (b)(6) Manfull, Alexandre

(b)(6); Scheinert, Lawrence (b)(6)

(b)(6) Jennings, Thomas

(b)(6); Quinby, Ripley (b)(6) Gatjanis, Gregory

(b)(6)

**Cc:** Smith, Bradley (b)(6)

**Subject:** Urgent Gertler-related one year specific license

PRE-DECISIONAL AND DELIBERATIVE

Hi all –

(b)(5)

OFAC.

- (U//FOUO) The attached draft license is a start, but needs to be modified as described immediately above. **Licensing – can you take the lead in adapting the specific license in close coordination with Compliance,** (b)(5)
- (U//FOUO) Licensing – please also use this email as the foundation for the record. (b)(5)  
(b)(5)  
(b)(5).
- (U//FOUO) Issue a **cover letter** that makes clear that this one-year specific license is in response to Gertler’s delisting request. (b)(5)  
(b)(5)
- (U//FOUO) For OGT: less urgent, but we should take such steps as necessary to suspend or administratively close the pending delisting petition in light of this OFAC action.

(U//FOUO) Thank you, and please let me know if there are any questions.

Andrea

**Andrea Gacki**

Director | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | O: (b)(6) | M: (b)(6)

**Withheld In Full FOIA Exemption (b)(5)-Draft  
Document**

**(2 pages)**

**2021-1246 (CKK): 0000002810-0000002811**

**Pending Consultation with Other Treasury  
Components**

**(2 pages)**

**2021-1246 (CKK): 0000002812-0000002813**



**From:** (b)(6)  
**To:** [Thomas, Nikole](#); [Palluconi, Lisa](#)  
**Cc:** (b)(6)  
**Subject:** Fwd: FYI  
**Date:** Tuesday, March 9, 2021 10:30:12 AM

---

Lisa and Nikole,

Just wanted to flag that following up on last night's action,

(b)(6)

(b)(5)

(b)(5)

(b)(5)

(b)(6)

**From:** [Unger, Seth](#)  
**To:** [REDACTED] (b)(6)  
; [Thannhauser, Sara](#); [Swindels, Felicia](#)  
**Cc:** [REDACTED] (b)(6)  
**Subject:** Fwd: quick question from the NYT  
**Date:** Sunday, December 9, 2018 10:29:02 PM

---

Hey Team,

Please see questions from NYT. I think these [REDACTED] (b)(5)  
[REDACTED] (b)(5) Will you please take a look and let me know though? Hoping to respond tomorrow (Monday) by 11 am.

Thanks!  
Seth

---

**From:** Vogel, Kenneth [REDACTED] (b)(6)  
**Date:** December 9, 2018 at 8:57:54 PM EST  
**To:** Unger, Seth [REDACTED] (b)(6)  
**Cc:** Sayegh, Tony [REDACTED] (b)(6)  
**Subject:** Re: quick question from the NYT

Here's a [6/21/18 notification](#) about the anonymous sanctions levied against the DRC to which I was referring.

Obviously, this is a State Department press release, but I understood that the sanctions themselves were issued by OFAC.

Any clarity on the situation would be much appreciated.

The story was supposed to run in tomorrow's paper, but it looks like they're holding it for at least a day, so if you're able to get back to me sometime tomorrow (Monday 12/10), I would be grateful.

Thanks.  
Ken

On Fri, Dec 7, 2018 at 11:10 PM Kenneth Vogel [REDACTED] (b)(6) wrote:

Ok thx for this.

Let me check to see if I can get any more details on the redacted sanctions tip I got.

On Dec 7, 2018, at 9:55 PM, <[Seth.Unger](#) [REDACTED] (b)(6)>  
wrote:

Hey Ken, Tony passed along your inquiry.

This is the link to the action OFAC took in June related to entities affiliated with Gertler and DRC:

Treasury Sanctions Fourteen Entities Affiliated with Corrupt Businessman Dan Gertler Under Global Magnitsky

<https://home.treasury.gov/news/press-releases/sm0417>

Here was the initial action we took against Gertler last December:

United States Sanctions Human Rights Abusers and Corrupt Actors Across the Globe

<https://home.treasury.gov/news/press-releases/sm0243>

Off record: By definition our sanctions are publicly noticed so that financial institutions and companies can block any accounts in the names of individuals or entities we designate, and/or cease doing business with them. I'm not familiar with instances of sanctioned individuals names being redacted as that seems to contradict our practice of publicly listing them.

If you have additional info I'm happy to engage with some of our experts, but at first glance this doesn't seem accurate. Let me know and happy to help if we can.

Thanks!

Seth

---

**From:** Vogel, Kenneth [REDACTED] (b)(6) >

**Date:** December 7, 2018 at 7:22:59 PM EST

**To:** Sayegh, Tony [REDACTED] (b)(6)

**Subject:** quick question from the NYT

Hey Tony:

Sorry to bother you over the weekend, but I'm writing a story on the Democratic Republic of Congo and sanctions, and I was told that there were

sanctions issued related to the DRC on 6/21/18, but that the names of the sanctioned entities/individuals were redacted.

I can't find anything to that effect on the OFAC website.

Is that accurate and, if so, could you point me to a notice of some kind?

Thanks in advance.

Ken

--

Kenneth P. Vogel

The New York Times

**(b)(6)**

**Pending Consultation with Other Government  
Agency**

**(6 pages)**

**2021-1246 (CKK): 0000002818-0000002823**

**From:** (b)(6)  
**To:** [Unger, Seth](#)  
**Cc:** [Albowicz, Nikole](#); (b)(6)  
**Subject:** Updated Press Releases  
**Date:** Saturday, June 9, 2018 2:54:20 PM  
**Attachments:** [2018-06-15 Treasury Sanctions Fourteen Entities Affiliated with Dan Gertler SIGAL EDITS w. Additional.docx](#)  
[2018-06-12 Treasury Sanctions Sanctions Two Individuals and Five Entities Under Global Magnitsky SIGAL EDITS w. DOS Changes.docx](#)  
**Importance:** High

---

Seth,

I've attached the press releases

(b)(5)

(b)(5)

(b)(5)

If needed I can schedule a call to address it on Monday morning, and adjust as needed.

(b)(6)

**Withheld In Full FOIA Exemption (b)(5)**

**(6 pages)**

**2021-1246 (CKK): 0000002825-0000002830**

**From:** (b)(6)  
**To:** [Thomas, Nikole](#)  
**Subject:** Fwd: Gertler & OFAC  
**Date:** Saturday, January 23, 2021 7:45:56 PM

---

Nikole - FYI, Bloomberg's DRC rep (b)(5) and with whom we've worked with before) reached out to ask about the Gertler license which he somehow has. Email is below and will flag for PA and cc you.

(b)(5)

---

**From:** Michael Kavanagh (b)(6)  
**Date:** January 23, 2021 at 2:07:47 PM EST  
**To:** (b)(6) MICHAEL KAVANAGH, BLOOMBERG/  
NEWSROOM: (b)(6)  
**Subject:** Gertler & OFAC

**\*\* Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Hi (b)(6)

This is Michael Kavanagh from Bloomberg News. We've been in touch about Congo over the past year or so. I tried to reach out to Zach Isakowitz but his email is bouncing back.

I have a copy of a letter from the Department of Treasury from January 15, 2021 signed by the Director of OFAC that gives a license to Dan Gertler and Pieter Deboutte and what looks like all of Gertler's related companies that have been sanctioned to conduct transactions and activities through January 31, 2022.

The license is addressed to Baruch Weiss at Arnold & Porter law firm.

Is this real?

I'm wondering if there's someone at Treasury I could speak to today about this -- I know it must be complicated with the transition, and I'm assuming if Zach's email is bouncing back that he's moved on.

**2021-1246 (CKK): 0000002831**



Please let me know if you need more information and I'm happy to speak by phone if useful.

Many thanks and all best.

Michael

Bloomberg News

(b)(6)

Michael J. Kavanagh

Worldwide (& WhatsApp): (b)(6)

DR Congo: (b)(6)

(b)(6)

(b)(6)

PGP: BFACA49AEDEDAB7A

**From:** (b)(6)  
**To:** [Lemons, Terry L](#)  
**Cc:** [Thomas, Nikole](#); (b)(6); [Christian, Alan](#); [Rasmussen, Mary](#); (b)(6); (b)(6)  
**Subject:** Fwd: Gertler & OFAC  
**Date:** Saturday, January 23, 2021 7:52:21 PM

---

Terry -

Flagging that TFI received a request for comment from a Bloomberg journalist covering the Democratic Republic of Congo regarding a recently issued license for an OFAC-sanctioned individual Dan Gertler (b)(5)

(b)(5)

(b)(5)

Thanks,

(b)(6)

---

**From:** Michael Kavanagh (b)(6)  
**Date:** January 23, 2021 at 2:07:47 PM EST  
**To:** (b)(6) MICHAEL KAVANAGH,  
BLOOMBERG/NEWSROOM: (b)(6)  
**Subject:** Gertler & OFAC

**\*\* Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Hi (b)(6)

This is Michael Kavanagh from Bloomberg News. We've been in touch about Congo over the past year or so. I tried to reach out to Zach Isakowitz but his email is bouncing back.

I have a copy of a letter from the Department of Treasury from January 15, 2021 signed by the Director of OFAC that gives a license to Dan Gertler and Pieter Deboutte and what looks like all of Gertler's related companies that have been sanctioned to conduct transactions and activities through January 31, 2022.

The license is addressed to Baruch Weiss at Arnold & Porter law firm.

Is this real?

I'm wondering if there's someone at Treasury I could speak to today about this -- I know it must be complicated with the transition, and I'm assuming if Zach's email is bouncing back that he's moved on.

2021-1246 (CKK): 0000002833

Please let me know if you need more information and I'm happy to speak by phone if useful.

Many thanks and all best.

Michael

Bloomberg News

(b)(6)

Michael J. Kavanagh

Worldwide (& WhatsApp): (b)(6)

DR Congo: (b)(6)

(b)(6)

(b)(6)

PGP: BFACA49AEDEDAB7A

**From:** (b)(6)  
**To:** [Thomas, Nikole](#)  
**Cc:** (b)(6); [Christian, Alan](#)  
**Subject:** Gertler Amendment (GLOMAG-2020-368297-2)  
**Date:** Thursday, January 7, 2021 8:18:12 AM

---

Hi Nikole,

The Gertler amendment (b)(5) is ready for your review and signature in your OASIS queue. Please let me know if you have any questions or comments/edits!

Many thanks,

(b)(6)

**From:** (b)(6)  
**To:** [Thomas, Nikole](#)  
**Cc:** (b)(6)  
**Subject:** gertler  
**Date:** Friday, March 5, 2021 10:10:06 AM

---

Nikole,

Can you please let us know when/if we're going today?

(b)(6)

# **Pending Submitter Notice Process**

**(7 pages)**

**2021-1246 (CKK): 0000002837-0000002843**