

# **Pending Submitter Notice Process**

**(19 pages)**

**2021-1246 (CKK): 0000002844-0000002862**

**From:** (b)(6)  
**To:** Albowicz, Nikole; (b)(6)  
**Subject:** Fwd: DRAFT: Additional Press Docs for Africa Trip  
**Date:** Friday, June 8, 2018 7:02:40 PM  
**Attachments:** [2018-06-15 Treasury Sanctions Fourteen Entities Affiliated with Dan Gertler SIGAL EDITS.docx](#)  
[2018-06-14 DRC Wheels Up Statement on US Mandelker Visit DRAFT.docx](#)  
[2018-06-12 Treasury Sanctions Sanctions Two Individuals and Five Entities Under Global Magnitsky SIGAL EDITS.docx](#)  
[2018-06-13 Treasury Implements Iran Sanctions Snapback DRAFT.docx](#)

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FYI

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**From:** Unger, Seth (b)(6)  
**Date:** June 8, 2018 at 6:41:55 PM EDT  
**To:** (b)(6)  
(b)(6)  
**Cc:** (b)(6)  
(b)(6)  
(b)(6),  
(b)(6)  
(b)(6)  
**Subject:** DRAFT: Additional Press Docs for Africa Trip

Attached are some of the DRAFT versions of additional documents for the trip:

iloMag 1 ((b)(6)) please send CLEAN version under separate cover (b)(5) are adjudicated);

iloMag 2 ((b)(6)) please send CLEAN version under separate cover (b)(5) are adjudicated);

DRC DRAFT Wheels Up Statement;

Iran Snapback DRAFT Release.

Thanks,

Seth

**SETH UNGER**

Deputy Assistant Secretary *for* Public Affairs

**U.S. Department** *of the* **Treasury**

[Seth.Unger](#) (b)(6)

202-622-9284 work

(b)(6) cell

**Withheld in Full FOIA Exemption (b)(5) –  
Deliberative Process Privilege**

**(10 pages)**

**2021-1246 (CKK): 0000002865-0000002874**

# **Pending Submitter Notice Process**

**(24 pages)**

**2021-1246 (CKK): 0000002875-0000002898**

**From:** (b)(6)  
**To:** [Gacki, Andrea](#); [Smith, Bradley](#)  
**Cc:** (b)(6); [Palluconi, Lisa](#); [Swindells, Felicia](#); [Thannhauser, Sara](#); [Gatjanis, Gregory](#); [Albowicz, Nikole](#) (b)(6)  
**Subject:** FYSA - GloMag docs to TFI FO  
**Date:** Sunday, November 25, 2018 1:11:00 PM  
**Attachments:** [2018 Draft Report to Congress \(Draft Working Level Cleared\) v8.docx](#)  
[20181029 Reponse to H20181001 re GloMag Golge and LES \(Treasury 1\).docx](#)

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Andrea/Brad – For your awareness (no action needed), attached are two State-drafted documents on GloMag for the Hill that I will soon send to TFI FO for Sigal’s approval. One is State’s annual GloMag report to Congress, the bulk of which details OFAC’s GloMag designations and delistings this year. The second is a response to a Hill letter about the designations/delistings of the two Turkish Ministers earlier this year. Neither document involves policy changes.

Note on timing: The annual report is due to the Hill on December 10.

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(b)(6)

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)

**Withheld in Full FOIA Exemption (b)(5) –  
Deliberative Process Privilege**

**(20 pages)**

**2021-1246 (CKK): 0000002900-0000002919**

**From:** (b)(6)  
**To:** Thomas, Nikole (b)(6)  
**Subject:** Gertler Q- Sherman Memo, Menendez QFR  
**Date:** Tuesday, March 9, 2021 9:32:32 AM

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Nikole and (b)(6)

Drawing upon Lisa's language last night, I've cut and pasted the two other Gertler questions out for clearance below. Can you please let me know what you think on the Sherman and Menendez points. I've included Lisa's point for your reference.

For Reference: Hearing Q/A (with Lisa's edits)

(b)(5)

Menendez QFR (PLEASE EDIT)

4. Israeli businessman Dan Gertler was sanctioned by the United States for corrupt mining deals in the Democratic Republic of Congo, from which he made hundreds of millions of dollars. Five days before President Biden's inauguration, the Trump Administration reportedly gave him and his businesses a license that effectively nullified the sanctions -- sanctions that were having a strong positive impact on fighting corruption. Issuing a specific license rather than publicly delisting Gertler or issuing a general license, threatens the integrity of sanctions programs as a whole and sends signals to the world's most corrupt business persons that impunity is the new norm.

- a. Will your team ensure the issuance of this license is investigated?
- b. Will you take measures to notify banks and others that the license is currently under review and carefully vet any possible transactions with Gertler, given there is no indication that the underlying reasons for the original sanctions--corruption and money laundering risks—have been effectively addressed?

**Answer:**

(b)(5)



(b)(5)

(b)(6)

# **Pending Submitter Notice Process**

**(9 pages)**

**2021-1246 (CKK): 0000002922-0000002930**

# **Pending Submitter Notice Process**

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**2021-1246 (CKK): 0000002931-0000002939**

# **Pending Submitter Notice Process**

**(1 page)**

**2021-1246 (CKK): 0000002940**

**From:** [Jennings, Thomas](#)  
**To:** (b)(6); [Moriarty, Kellen](#); (b)(6); [Palluconi, Lisa](#); [Thomas, Nikole](#); [Prince, Jason](#); [Quinby, Ripley](#); [Christian, Alan](#); (b)(6); [Gabanis, Gregory](#); (b)(6); [Jennings, Thomas](#); (b)(6); (b)(6); [Thannhauser, Sara](#); [Manfull, Alexandre](#)  
**Subject:** Glomag License Brainstorm  
**Date:** Monday, January 25, 2021 5:00:06 PM

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Jennings, Thomas 12:31 PM:

chat thread

Jennings, Thomas 12:32 PM:

<https://www.nytimes.com/2021/01/24/us/politics/dan-gertler-sanctions.html>

Thomas, Nikole 12:45 PM:

Jason P: are you on the call?

Thomas, Nikole 12:46 PM:

Sorry, adding Jason in case he was able to join the call.

Jason Prince 12:46 PM:

Happy to join. What are the dial-in instructions?

Thomas, Nikole 12:47 PM:

(b)(5)

Jason Prince 12:47 PM:

Thanks! I've joined.

Thomas, Nikole 12:48 PM:

Thanks, Jason!

(b)(6)

12:51 PM:

We've also heard from the Sentry

(b)(6)

12:52 PM:

Who historically has also made high-er level outreach

Moriarty, Kellen 12:53 PM:

Yeah, sorry I put the Sentry in the paper but said Enough Project on the call -

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since the Sentry is an initiative within/under/alongside the Enough Project.

Thomas, Nikole 12:57 PM:

I'm wondering if we should just say "and prominent NGOs such as the Sentry"

Moriarty, Kellen 12:58 PM:

yeah, I think that works

(b)(6)

12:58 PM:

I like that wording!

**From:** (b)(6)  
**To:** (b)(6); [Thomas, Nikole](#); [Christian, Alan](#)  
**Subject:** GLOMAG-2021-371648-1 FW: Reuters - RPT-Trump administration quietly eased sanctions against Israeli mining magnate Gertler  
**Date:** Tuesday, January 26, 2021 10:46:10 AM

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FYI

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**From:** (b)(6)  
**Sent:** Monday, January 25, 2021 4:05 PM  
**To:** \_DL\_TFI\_Alerts <\_DL\_TFI\_Alerts@do.treas.gov>  
**Subject:** Reuters - RPT-Trump administration quietly eased sanctions against Israeli mining magnate Gertler

**[RPT-Trump administration quietly eased sanctions against Israeli mining magnate Gertler](#)**

By Aaron Ross

DAKAR, Jan 25 (Reuters) - In its final week in office, former U.S. President Donald Trump's administration eased sanctions against Israeli mining magnate Dan Gertler that were imposed for alleged corruption in Congo, according to a license issued by the Treasury Department.

The license, which was not announced publicly, was issued by Treasury's Office of Foreign Assets Control (OFAC), according to a Jan. 15 letter to Gertler's lawyers that was obtained by The Sentry, a Washington D.C.-based anti-corruption group, and seen by Reuters.

It was not clear why the license was issued. Treasury did not immediately respond to emailed requests for comment on Sunday and Monday.

A spokesman for Gertler welcomed the move but anti-graft campaigners urged President Joe Biden's Treasury to revoke the license.

Treasury imposed the sanctions in December 2017 and June 2018, accusing Gertler of using his friendship with Democratic Republic of Congo's former President Joseph Kabila to secure sweetheart mining deals worth more than a billion dollars.

The sanctions prohibited Gertler from doing business with U.S. citizens, companies or banks, effectively barring him from doing transactions in dollars.

Gertler has always denied any wrongdoing and argued that his investments in Congo contributed significantly to the country's development.

While the license does not remove Gertler, an associate and more than 30 of his companies from the sanctions list, it authorises, until Jan. 31, 2022, "all transactions and activities" otherwise prohibited by sanctions against them.

It also requires them to submit detailed reports to OFAC every 90 days about their financial activities.

"Mr. Gertler is grateful to OFAC for issuing a license that will enable him to operate his businesses and philanthropic activities," a spokesman said in a statement.

"He welcomes the reporting requirements and, with the oversight of a distinguished compliance team, looks forward to demonstrating that all of his activities fully comply with the letter and the spirit of the OFAC license and the law."

Brad Brooks-Rubin, The Sentry's managing director and a former Treasury official, said in a statement that the license served "no discernible geostrategic or national security purpose."

"Unlike the pardons and regulatory changes done openly, or any of Treasury's normal methods for undoing sanctions, this was done behind closed doors not only to the public but many professionals

in the government as well,” he said.

The Sentry called on Biden’s Treasury Department to revoke the license.

One of the lawyers who lobbied OFAC on Gertler’s behalf was Alan Dershowitz, who represented Trump in his first impeachment trial before the Senate last year, according to a disclosure form filed with Congress in 2018.

Dershowitz did not immediately respond to an emailed request for comment. (Reporting by Aaron Ross; Editing by Giles Elgood )