

Withheld In Full FOIA Exemption (b)(5)

Draft Document

(2 pages)

2021-1246 (CKK): 00000005867-0000005868

Withheld In Full FOIA Exemption (b)(5)

Draft Document

(3 pages)

2021-1246 (CKK): 00000005869-0000005871

Withheld In Full FOIA Exemption (b)(5)

Draft Document and in Part (b)(6)

(5 pages)

2021-1246 (CKK): 00000005872-0000005876

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Draft Document

(2 pages)

2021-1246 (CKK): 00000005877-0000005878

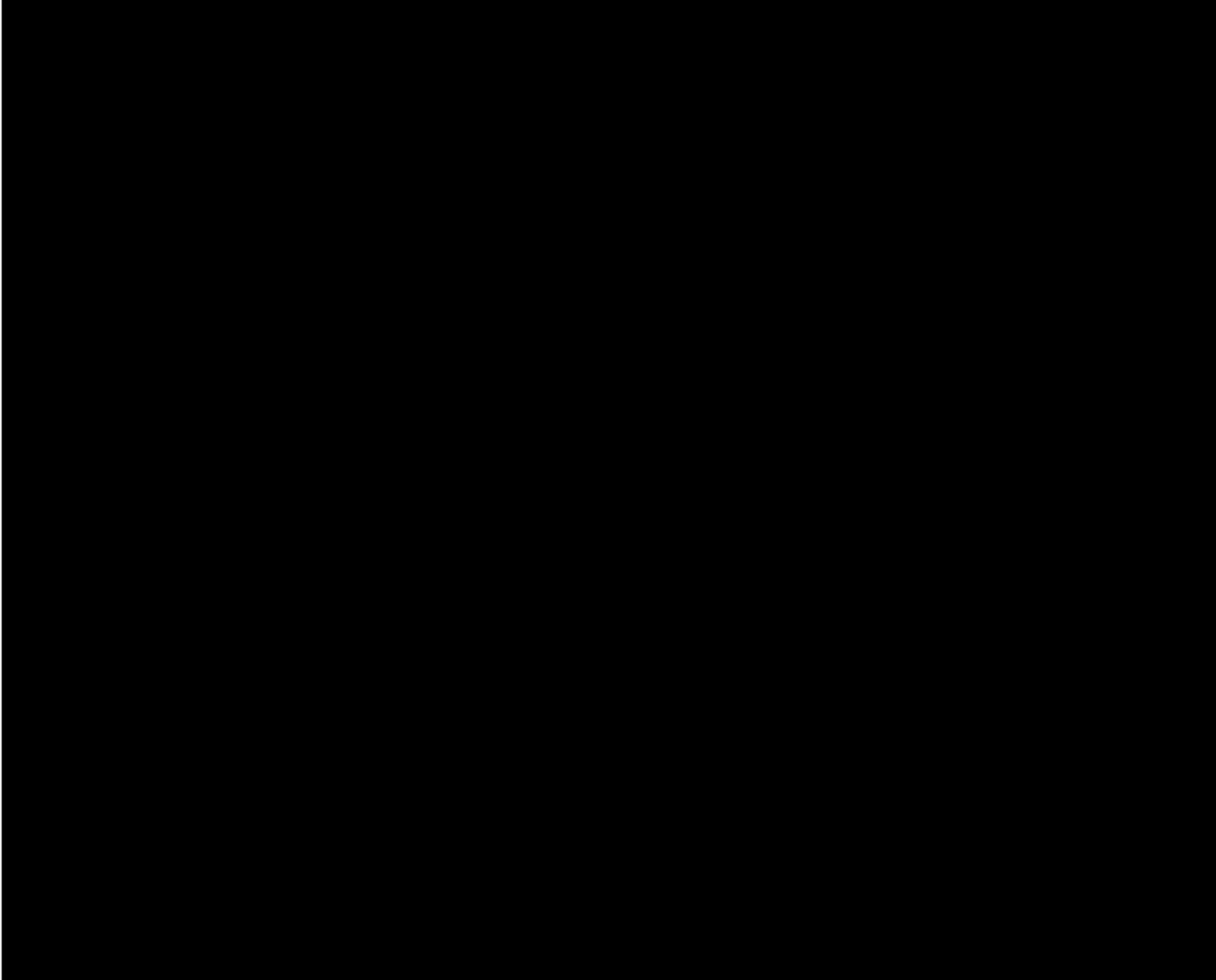
From: [Thannhauser, Sara](#)
To: [Palluconi, Lisa](#); (b)(6); [Moriarty, Kellen](#) (b)(6)
Subject: RE: Urgent Gertler-related one year specific license
Date: Thursday, January 14, 2021 1:53:57 PM

Thanks, Lisa! + (b)(6) attachments sent separately.

From: Palluconi, Lisa (b)(6)
Sent: Thursday, January 14, 2021 1:53 PM
To: (b)(6)
Thannhauser, Sara (b)(6) Moriarty, Kellen
(b)(6)
Subject: FW: Urgent Gertler-related one year specific license

FYSA

Duplicative of Material Located in the 13th Interim: 2021-1246 (CKK): 0000002808-2809



**Duplicative of Material Located in 13th Interim
2021-1246 (CKK): 0000002808-0000002809**

(1 page)

2021-1246 (CKK): 00000005880

Pending Submitter Notice Process

(16 pages)

2021-1246 (CKK): 00000005881-0000005896

Withheld In Full FOIA Exemption (b)(5)

and in Part (b)(6)

(4 pages)

2021-1246 (CKK): 00000005897-0000005900

**Pending Consultation with Other Treasury
Components**

(11 pages)

2021-1246 (CKK): 00000005901-0000005911

**Pending Consultation with Other Treasury
Components**

(6 pages)

2021-1246 (CKK): 00000005912-0000005917

**Pending Consultation with Other Treasury
Components**

(2 pages)

2021-1246 (CKK): 00000005918-0000005919

**Pending Consultation with Other Government
Agency**

(2 pages)

2021-1246 (CKK): 00000005920-0000005921

**Pending Consultation with Other Treasury
Components**

(7 pages)

2021-1246 (CKK): 00000005922-0000005928

**Pending Consultation with Other Treasury
Components**

(5 pages)

2021-1246 (CKK): 00000005929-0000005933

**Pending Consultation with Other Treasury
Components**

(3 pages)

2021-1246 (CKK): 00000005934-0000005936

Pending Submitter Notice Process

(16 pages)

2021-1246 (CKK): 00000005937-0000005952

From: [Thannhauser, Sara](#)
To: (b)(6)
Cc: [Moriarty, Kellen](#)
Subject: FW: Targeted sanctions: impact during COVID-19 crisis, US policy challenge in the DRC
Date: Friday, April 24, 2020 12:20:37 PM

FYSA. (b)(5)

From: (b)(6)
Sent: Friday, April 24, 2020 12:15 PM
To: Gacki, Andrea (b)(6); Thannhauser, Sara
(b)(6); Moriarty, Kellen (b)(6); Palluconi, Lisa
(b)(6); Quinby, Ripley (b)(6); Gatjanis, Gregory
(b)(6)
Cc: Smith, Bradley (b)(6)
Subject: RE: Targeted sanctions: impact during COVID-19 crisis, US policy challenge in the DRC

Thank you Andrea, will do.

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)

From: Gacki, Andrea (b)(6)
Sent: Friday, April 24, 2020 12:09 PM
To: Thannhauser, Sara (b)(6); Moriarty, Kellen
(b)(6); Palluconi, Lisa (b)(6)
(b)(6); Quinby, Ripley (b)(6); Gatjanis, Gregory
(b)(6)
Cc: Smith, Bradley (b)(6)
Subject: Fwd: Targeted sanctions: impact during COVID-19 crisis, US policy challenge in the DRC

Hi all — please distribute more widely:

From: Hilary Mossberg (b)(6)
Date: April 24, 2020 at 12:02:57 PM EDT
To: Gacki, Andrea (b)(6)
Subject: Fwd: Targeted sanctions: impact during COVID-19 crisis, US policy challenge in the DRC

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

Hi Andrea!

I am sure you are on our mailing lists but just wanted to make sure you saw our [sanctions and COVID-19 piece](#). We had noticed so many articles calling for sanctions to be rolled back, and wanted to publish something in support of sanctions. I think OFAC has been doing a great job with public messaging re: the pandemic. I am sure you are incredibly busy!

Our [Gerlter op-ed](#) was also published this week in Haaretz, in case you hadn't seen it.

Anyways, I hope you had a good week and I hope you have a wonderful weekend.

Thanks,
Hilary

----- Forwarded message -----

From: **Brad Brooks-Rubin, The Sentry** <enough@enoughproject.org>

Date: Wed, Apr 22, 2020 at 4:09 PM

Subject: [Core Team] Targeted sanctions: impact during COVID-19 crisis, US policy challenge in the DRC

To: [REDACTED] (b)(6)



Dear Enough Team,

As the coronavirus pandemic continues to threaten and reshape our global economy, there are many uncertainties that lie ahead. One thing we can count on, though, is that corruption will continue to plague some of the world's most vulnerable economies. Keeping a spotlight on corrupt actors and analyzing the impact of financial tools of pressure, specifically targeted network sanctions, remains at the forefront of The Sentry's work. Today, The Sentry examined the use of these sanctions in two different pieces: a policy brief, and an op-ed published in Haaretz.

In the brief "[Targeted Network Sanctions in Africa and the COVID-19 Pandemic](#)," The Sentry's Hilary Mossberg elucidates the differences between targeted network sanctions and broader, comprehensive sanctions programs, and the intentions and ramifications of each. The brief comes in response to recent calls to ease sanctions around the world in the wake of the COVID-19 pandemic, an action that The Sentry argues would be counterproductive in cases of targeted network sanctions. In order to tackle this outbreak, it is more important than ever to ensure that vital resources and assistance are neither diverted nor delayed by corrupt actors—activities that targeted network sanctions help to deter. As a result, removing targeted network sanctions in countries rife with corruption would undermine efforts to tackle the COVID-19 pandemic.

[Read The Sentry's brief on targeted network sanctions and the COVID-19 pandemic.](#)

The Sentry's op-ed in Haaretz, "[Is an Israeli Diamond Tycoon Using Trump-adjacent Lobbyists to Subvert U.S. Foreign Policy?](#)," also analyzes the efficacy of sanctions, specifically those related to Israeli business tycoon Dan Gertler and corruption in the Democratic Republic of Congo. The Sentry's John Prendergast and Sasha Lezhnev warn that Gertler, sanctioned by the US for his involvement in grand corruption, is actively attempting to dodge those sanctions and continue looting the DRC of its natural resources. They caution that, unless the US closes these gaps and doubles down on its sanctions, Gertler and his cronies will seriously undermine US anti-corruption efforts.

[Read The Sentry's op-ed on US sanctions on Dan Gertler.](#)

Sincerely,
Brad Brooks-Rubin
Managing Director

Connect with Us

Enough Project
1420 K Street NW, Suite 200
Washington, D.C. 20005
enough@enoughproject.org

UNSUBSCRIBE

--

The Sentry logo

Hilary Mossberg

The Sentry · Director, Illicit Finance Policy

M. (b)(6)

War crimes shouldn't pay. TheSentry.org

From: (b)(6)
To: (b)(6)
Subject: FW: RELEASE: MEEKS, BASS & HIMES Call for Sanctions Against Dan Gertler
Date: Wednesday, February 3, 2021 1:55:28 PM
Attachments: [image001.jpg](#)
[image021.png](#)
[image007.emz](#)
[image009.wmz](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)

From: Moriarty, Kellen (b)(6)
Sent: Wednesday, February 3, 2021 1:54 PM
To: (b)(6)
Subject: RE: RELEASE: MEEKS, BASS & HIMES Call for Sanctions Against Dan Gertler

No need to hold (b)(5)

(b)(5)

From: (b)(6)
Sent: Wednesday, February 3, 2021 1:52 PM
To: Moriarty, Kellen <(b)(6)>
Subject: RE: RELEASE: MEEKS, BASS & HIMES Call for Sanctions Against Dan Gertler

(b)(5)
(b)(5) so that everything is consolidated –
(b)(6) is taking a final look as we speak and either her or I were planning to revert to (b)(6) shortly,
before the train leave the station!

We can hold if you have final thoughts.

From: Moriarty, Kellen (b)(6)
Sent: Wednesday, February 3, 2021 1:46 PM
To: (b)(6)
Subject: RE: RELEASE: MEEKS, BASS & HIMES Call for Sanctions Against Dan Gertler

Sure thing! (b)(5)

From: (b)(6)
Sent: Wednesday, February 3, 2021 1:39 PM
To: Moriarty, Kellen (b)(6)

Subject: RE: RELEASE: MEEKS, BASS & HIMES Call for Sanctions Against Dan Gertler

No worries, I definitely didn't think that!

Just wanted you to know I wasn't there in case anyone gave us specific instructions of what to do next.
Sounds like all is on track!

(b)(5)

From: Moriarty, Kellen (b)(6)

Sent: Wednesday, February 3, 2021 1:36 PM

To: (b)(6)

Subject: RE: RELEASE: MEEKS, BASS & HIMES Call for Sanctions Against Dan Gertler

Thanks for taking this on (b)(5)

(b)(5)

From: (b)(6)

Sent: Wednesday, February 3, 2021 12:17 PM

To: Moriarty, Kellen (b)(6)

Subject: RE: RELEASE: MEEKS, BASS & HIMES Call for Sanctions Against Dan Gertler

Thank you so much – I didn't get the invitation for the morning call, but will await further word from Nikole and (b)(6), sounds like all is on track!

(And thank you for looping me in!)

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**Duplicative of Material Located in the 19th
Interim: 2021-1246 (CKK): 00000004861-
0000004863**

(3 pages)

2021-1246 (CKK): 00000005958-0000005960

From: (b)(6)
To: [Office of Chief Counsel - OFAC](#); (b)(6)
Cc: (b)(6)
Subject: FW: FYI: DRC Status Update
Date: Friday, June 5, 2020 5:00:46 PM
Attachments: [DRC sanctions status update OFAC \(b\)\(6\).ST.docx](#)

Hi OGT and OCC,

We have been tasked with providing a written update to SFRC staff on the status of the DRC sanctions program. Attached is the latest draft, (b)(5)

(b)(5)

(b)(5)

(b)(5)

If we

could pull something together by sometime on Monday afternoon that would be great.

(b)(6)

(b)(6)

Senior Sanctions Policy Advisor

Office of Foreign Assets Control | Department of the Treasury

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

From: Smith, Bradley (b)(6)

Sent: Friday, June 5, 2020 4:25 PM

To: (b)(6) Palluconi, Lisa (b)(6)

Cc: Thannhauser, Sara (b)(6) Moriarty, Kellen

(b)(6)

(b)(6)

Subject: RE: FYI: DRC Status Update

Thanks (b)(6)

(b)(5)

(b)(5)

From: (b)(6)

Sent: Friday, June 5, 2020 4:06 PM

To: Smith, Bradley (b)(6) Palluconi, Lisa (b)(6)
Cc: Thannhauser, Sara (b)(6) >; Moriarty, Kellen
(b)(6),
(b)(6)
Subject: FYI: DRC Status Update

Brad and Lisa,

This is an FYI that we received a request for a “status update” on sanctions in the DRC from Senate Foreign Relations Committee Republican staff. (b)(5)
(b)(5)

(b)(5)

Please let me know if you have any thoughts or comments.

Thank you,

(b)(6)

(b)(6)

Legislative Affairs Coordinator | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | m: (b)(6)

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(1 page)

2021-1246 (CKK): 00000005963

From: (b)(6)
To: [Moriarty, Kellen](#) (b)(6)
Cc: [Thannhauser, Sara](#); (b)(6)
Subject: For (b)(6) DRC Status Update
Date: Tuesday, June 2, 2020 10:25:06 AM
Attachments: [DRC sanctions status update OFAC.docx](#)

Hi (b)(6)

Attached, please find the final version of the DRC sanctions update as cleared by Sara and Kellen. Please let us know if you have any questions or need anything else.

(b)(6)

(b)(6)
Senior Sanctions Policy Advisor
Office of Foreign Assets Control | Department of the Treasury
Email: (b)(6) | (O) (b)(6) | (M) (b)(6)

From: Moriarty, Kellen (b)(6)
Sent: Tuesday, June 2, 2020 9:42 AM
To: (b)(6)
(b)(6)
(b)(6)
Cc: Thannhauser, Sara (b)(6)
(b)(6)
Subject: RE: For Sara/Kellen: DRC Status Update

Thanks. A few edits attached.

From: (b)(6)
Sent: Tuesday, June 2, 2020 9:19 AM
To: (b)(6)
(b)(6)
Cc: Thannhauser, Sara (b)(6); Moriarty, Kellen
(b)(6),
(b)(6)
Subject: For Sara/Kellen: DRC Status Update

Thanks, (b)(6) Sara/Kellen, please let us know once you've had a chance to review and it is ready for (b)(6) to send back to the Hill.

(b)(6)
Senior Sanctions Policy Advisor
Office of Foreign Assets Control | Department of the Treasury

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

From: (b)(6)

Sent: Monday, June 1, 2020 6:09 PM

To: (b)(6)

(b)(6)

Cc: Thannhauser, Sara (b)(6) Moriarty, Kellen

(b)(6)

(b)(6)

Subject: RE: DRC Status Update

Removing (b)(6) who is now on the Iran team. Moving forward (b)(6) will be the lead on DRC with (b)(6) on backup.

(b)(5)

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)

From: (b)(6)

Sent: Monday, June 1, 2020 4:22 PM

To: (b)(6),

(b)(6)

(b)(6)

Cc: Thannhauser, Sara (b)(6); Moriarty, Kellen

(b)(6)

(b)(6)

Subject: RE: DRC Status Update

All – see attached for a first draft of a DRC sanctions update. I would welcome edits/additions,

(b)(5)

(b)(6)

Senior Sanctions Policy Advisor

Office of Foreign Assets Control | Department of the Treasury

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

From: (b)(6)

Sent: Thursday, May 28, 2020 10:51 AM

To: (b)(6)

(b)(6)

(b)(6)

Cc: Thannhauser, Sara (b)(6) Moriarty, Kellen

(b)(6)

(b)(6)

Subject: RE: DRC Status Update

+ (b)(6) as well for their SA.

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

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)

From: (b)(6)

Sent: Thursday, May 28, 2020 10:48 AM

To: (b)(6),

(b)(6)

Cc: Thannhauser, Sara (b)(6); Moriarty, Kellen

(b)(6)

dna

(b)(6)

Subject: DRC Status Update

Hi all,

We received a Congressional inquiry about our DRC program. (b)(5)

(b)(5)

(b)(5)

(b)(5)

Including (b)(6) and (b)(6) as I know (b)(6) will be transitioning off the program on Friday (good timing (b)(6))

Thank you,

(b)(6)

(b)(6)

Legislative Affairs Coordinator | Office of Foreign Assets Control | U.S. Department of the Treasury

E: (b)(6) | m: (b)(6)

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Document**

(1 page)

2021-1246 (CKK): 00000005968

**Pending Consultation with Other Treasury
Components**

(1 page)

2021-1246 (CKK): 00000005969

Pending Submitter Notice Process

(6 pages)

2021-1246 (CKK): 00000006191-0000006196

**Duplicative of Material Located in the 15th
Interim: 2021-1246: 0000003424-0000003427
And Withheld In Full (b)(3) and 31 U.S.C. § 5319
(75 pages)
2021-1246 (CKK): 00000006197-0000006271**

From: (b) (6)
To: [Smith, Bradley](#)
Cc: [Palluconi, Lisa](#); [Moriarty, Kellen](#); (b) (6); [Thomas, Nikole](#); [Prince, Jason](#); [Gatianis, Gregory](#); [Quinby, Ripley](#); (b) (6); [Jennings, Thomas](#); (b) (6); [Rasmussen, Mary](#); [Christian, Alan](#); (b) (6)
Subject: Review Request by COB 3/23: NGO/DRC Memo for U/S Gacki (TFFC draft with OFAC feedback)
Date: Tuesday, March 23, 2021 2:33:13 PM
Attachments: [20210322 DRC NGO Meeting Memo](#) (b) (6).docx

Duplicative of Material in 2021-1246 (CKK): 0000004854. 19th Interim Release.



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Document**

(6 pages)

2021-1246 (CKK): 00000006273-0000006278

**Pending Consultation with Other Government
Agency**

(4 pages)

2021-1246 (CKK): 00000006279-0000006282

Pending Submitter Notice Process

(23 pages)

2021-1246 (CKK): 00000006283-0000006305

From: [Palluconi, Lisa](#)
To: [Prince, Jason](#); [Quinby, Ripley](#); [Jennings, Thomas](#)
Cc: [Thomas, Nikole](#); [Christian, Alan](#) (b)(6)
Subject: RE: Urgent Gertler-related one year specific license
Date: Friday, January 15, 2021 5:26:39 PM
Attachments: [Gertler Draft cover letter jep Imp.docx](#)

+ Licensing

Jason/OGT – (b)(5)

From: Prince, Jason (b)(6)

Sent: Friday, January 15, 2021 5:20 PM

To: Palluconi, Lisa (b)(6); Quinby, Ripley (b)(6)
Jennings, Thomas (b)(6)

Subject: RE: Urgent Gertler-related one year specific license
PRIVILEGED//PRE-DECISIONAL//DELIBERATIVE
ATTORNEY-CLIENT COMMUNICATION
As discussed, please see attached.

From: Palluconi, Lisa (b)(6)

Sent: Friday, January 15, 2021 3:39 PM

To: Prince, Jason (b)(6)

Subject: FW: Urgent Gertler-related one year specific license
Pre-decisional and Deliberative
FYI

Duplicative of Material Located in the 13th Interim: 2021-1246 (CKK): 0000002808-2809



**Duplicative of Material Located in the 13th
Interim: 2021-1246 (CKK) 0000002808-
0000002809**

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2021-1246 (CKK): 00000006307

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(2 pages)

2021-1246 (CKK): 00000006308-0000006309

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Document**

(2 pages)

2021-1246 (CKK): 00000006310-0000006311

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(2 pages)

2021-1246 (CKK): 00000006312-0000006313

**Pending Consultation with Other Treasury
Components**

(24 pages)

2021-1246 (CKK): 00000006314-0000006337

From: (b)(6)
To: [Palluconi, Lisa](#)
Cc: [Thannhauser, Sara](#); [Moriarty, Kellen](#); (b)(6)
Subject: call with (b)(6) - Illegal Wildlife Trafficking / Environmental Crimes
Date: Tuesday, March 16, 2021 10:20:20 PM

Hi Lisa,

Thank you so much for connecting (b)(6) and I with (b)(6)
(b)(6)

(b)(6) had a wealth of information related to illegal wildlife trafficking and related environmental crimes, along with her colleague (b)(6), who also joined our call.

We wanted to share a few points from our discussion. (b)(5)

(b)(5)

- Our call reaffirmed (b)(5)

(b)(5)

We'll also share the above points with OGT (they were invited to the call, but were not able to join the conversation due to a conflict). (b)(6) and I will continue (b)(5)

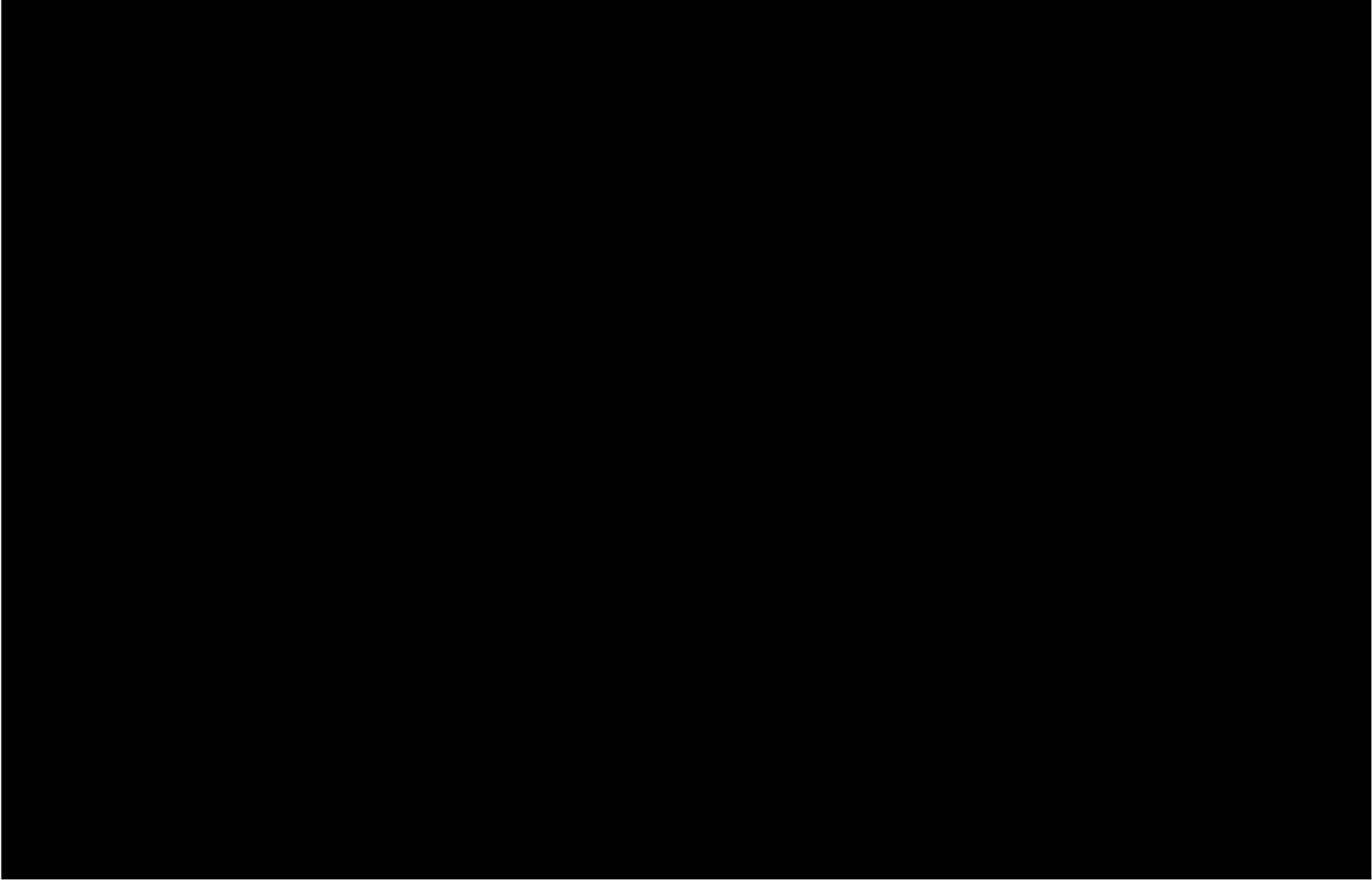
(b)(5)

(b)(5)

Thanks again for connecting us,

(b)(6)

Duplicative of Material in 2021-1246 (CKK): 0000002615. 13th Interim Release.



Palluconi, Lisa 2:50 PM:

thanks! Yeah, I think it is all explainable. Do you have a quick sec?

Thomas, Nikole 2:50 PM:

Yes, want me to call you?

Palluconi, Lisa 2:50 PM:

sure, thanks

From: [Thannhauser, Sara](#)
To: [Thannhauser, Sara](#); [Palluconi, Lisa](#)
Subject: Conversation with Thannhauser, Sara
Date: Tuesday, February 23, 2021 3:41:18 PM

Thannhauser, Sara 1:05 PM:

Hi Lisa! Are you able to join the Russia call?

Palluconi, Lisa 1:05 PM:

Hmm..which one? I don't think I have something on my calendar.

Palluconi, Lisa 1:06 PM:

other than the TFI sync

Thannhauser, Sara 1:06 PM:

funny...I see it on your calendar

Thannhauser, Sara 1:06 PM:

(b) (5)

Thannhauser, Sara 1:06 PM:

(b) (6)

Palluconi, Lisa 1:07 PM:

Oh sorry; I'm looking at my printed calendar!

Thannhauser, Sara 1:07 PM:

Outlook is such a mess

Palluconi, Lisa 1:07 PM:

Been away from my desk.

Palluconi, Lisa 1:07 PM:

Will join

Thannhauser, Sara 1:11 PM:

also you missed this part of the conversation, but it is (b) (6)

Palluconi, Lisa 1:12 PM:

oh, thank you!

Thannhauser, Sara 3:28 PM:

Hi Lisa! (b) (6) just pinged me about a document on TFIN that Andrea wants us to share with (b) (6)

Palluconi, Lisa 3:29 PM:

I can likely do it, unless I have to leave before. This is Gertler. Will let you know.

Thannhauser, Sara 3:29 PM:

Roger that. Just let me know.

From: [Rasmussen, Mary](#)
To: [Rasmussen, Mary](#); [Palluconi, Lisa](#)
Subject: Conversation with Rasmussen, Mary
Date: Monday, August 10, 2020 11:39:19 AM

Rasmussen, Mary 11:16 AM:

Hi Lisa - we've been (b) (5)

(b) (5)

Palluconi, Lisa 11:16 AM:

Sure, if you don't mind. It will give me a bit of context.

Rasmussen, Mary 11:16 AM:

(b) (5)

Palluconi, Lisa 11:16 AM:

Just FYI. I have to run (b) (6) but should be back around 1:30 or before.

Rasmussen, Mary 11:17 AM:

I'll check with (b) (6) and see if they received anything else this morning and we'll try to get it to you in the next few...

By the way - (b)(5)

Palluconi, Lisa 11:18 AM:

Great. Thank you so very much!

Rasmussen, Mary 11:30 AM:

(b) (6) is going to send you the draft Gertler write up now. (b)(5)

(b) (5) She should be sending it within the next 5-10!

Palluconi, Lisa 11:33 AM:

thanks so much, MP!

From: [Quinby, Ripley](#)
To: [Quinby, Ripley](#); [Palluconi, Lisa](#)
Subject: Conversation with Quinby, Ripley
Date: Monday, February 22, 2021 10:19:16 AM

Quinby, Ripley 10:06 AM:

(b) (5)

Palluconi, Lisa 10:07 AM:

really bad joke, Rip!

Quinby, Ripley 10:07 AM:

hahaha

From: [Palluconi, Lisa](#)
To: [Prince, Jason](#); [Palluconi, Lisa](#)
Subject: Conversation with Prince, Jason
Date: Monday, February 22, 2021 5:12:20 PM

Palluconi, Lisa 5:07 PM:

Time for a quick Gertler question?

From: (b) (6)
To: (b) (6) [Palluconi, Lisa](#)
Subject: Conversation with (b) (6)
Date: Friday, January 15, 2021 6:13:55 PM

(b) (6) 5:37 PM:

I have lauren, sara and kellen on the line right now, but I'm not sure if you're available. (b)(5) if

(b)(5)
(u)(c)

Palluconi, Lisa 5:38 PM:

ok, sorry. We are in the middle of Gertler issue (b)(5).

Palluconi, Lisa 5:38 PM:

(b) (5)

Martin, Elyse 5:38 PM:

ah okay. no worries.

Palluconi, Lisa 6:00 PM:

sorry, free now

(b) (6) 6:01 PM:

Sounds good. Let me open the line!

(b) (6) 6:01 PM:

(b)(5)

From: [Palluconi, Lisa](#)
To: (b) (6) [Palluconi, Lisa](#)
Subject: Conversation with (b) (6)
Date: Monday, January 25, 2021 9:27:48 AM

Palluconi, Lisa 9:14 AM:

hi (b) (6)

(b) (6) 9:17 AM:

Good morning Lisa!

Palluconi, Lisa 9:19 AM:

Good morning! Wanted to make sure you were tracking the many quick turn taskings, as these will each come to Brad for review. Happy to chat if helpful.

Palluconi, Lisa 9:19 AM:

I'm tracking 3

(b) (6) 9:20 AM:

Yes, I do believe I'm on the Gertler memo (b)(5)

Palluconi, Lisa 9:21 AM:

That's right. (b) (5)

(b) (5)

(b) (6) 9:22 AM:

Thank you, i'm going to put those on the FO tracker in that order, with Kellen and Nikole and then maybe sara t on the last for now

Palluconi, Lisa 9:22 AM:

Sounds good. Thank you!

**Pending Consultation with Other Treasury
Components**

(11 pages)

2021-1246 (CKK): 00000006347-0000006357

**Pending Consultation with Other Treasury
Components**

(17 pages)

2021-1246 (CKK): 00000006358-0000006374

**Pending Consultation with Other Government
Agency**

(4 pages)

2021-1246 (CKK): 00000006375-0000006378

**Pending Consultation with Other Treasury
Components**

(6 pages)

2021-1246 (CKK): 00000006379-0000006384

**Pending Consultation with Other Government
Agency**

(2 pages)

2021-1246 (CKK): 00000006385-0000006386

**Pending Consultation with Other Treasury
Components**

(5 pages)

2021-1246 (CKK): 00000006387-0000006391

**Pending Consultation with Other Treasury
Components**

(6 pages)

2021-1246 (CKK): 00000006392-0000006397

**Pending Consultation with Other Treasury
Components**

(2 pages)

2021-1246 (CKK): 00000006398-0000006399

**Pending Consultation with Other Treasury
Components**

(1 page)

2021-1246 (CKK): 00000006400

Pending Submitter Notice Process

(6 pages)

2021-1246 (CKK): 00000006401-0000006406

**Pending Consultation with Other Treasury
Components**

(3 pages)

2021-1246 (CKK): 00000006407-0000006409

**Pending Consultation with Other Treasury
Components and Other Government Agencies**

(10 pages)

2021-1246 (CKK): 00000006410-0000006419

**Pending Consultation with Other Treasury
Components**

(2 pages)

2021-1246 (CKK): 00000006420-0000006421

**Pending Consultation with Other Treasury
Components**

(3 pages)

2021-1246 (CKK): 00000006422-0000006424

From: (b)(6)
To: (b)(6)
Subject: Emailing: 20190304 Andrea QA - 3-4 SFRC Glo Mag brief v2 (002)_Imp (002), 20190304 Remarks for SFRC briefing on GloMag and Khashoggi v2_Imp
Date: Thursday, May 14, 2020 4:44:51 PM
Attachments: [20190304 Andrea QA - 3-4 SFRC Glo Mag brief v2 \(002\)_Imp \(002\).docx](#)
[20190304 Remarks for SFRC briefing on GloMag and Khashoggi v2_Imp.docx](#)

This is a bit dated and focused more on Khashoggi issues, but some of the points may be useful.

Your message is ready to be sent with the following file or link attachments:

20190304 Andrea QA - 3-4 SFRC Glo Mag brief v2 (002)_Imp (002)
20190304 Remarks for SFRC briefing on GloMag and Khashoggi v2_Imp

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

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Document**

(19 pages)

2021-1246 (CKK): 00000005971-0000005989

**Pending Consultation with Other Treasury
Components**

(6 pages)

2021-1246 (CKK): 00000005990-0000005995

**Pending Consultation with Other Government
Agency**

(17 pages)

2021-1246 (CKK): 00000005996-0000006012

**Pending Consultation with Other Treasury
Components**

(5 pages)

2021-1246 (CKK): 00000006013-0000006017

**Pending Consultation with Other Treasury
Components**

(3 pages)

2021-1246 (CKK): 00000006018-0000006020

**Pending Consultation with Other Treasury
Components**

(3 pages)

2021-1246 (CKK): 00000006021-0000006023

**Pending Consultation with Other Government
Agencies**

(3 pages)

2021-1246 (CKK): 00000006024-0000006026

**Pending Consultation with Other Treasury
Components**

(3 pages)

2021-1246 (CKK): 00000006027-0000006029

**Pending Consultation with Other Treasury
Components and Other Government Agencies**

(17 pages)

2021-1246 (CKK): 00000006030-0000006046

From: [Thannhauser, Sara](#)
To: (b)(6); [Moriarty, Kellen](#)
Cc: (b)(6)
Subject: RE: For Sara/Kellen: DRC Status Update
Date: Tuesday, June 2, 2020 10:21:23 AM
Attachments: [DRC sanctions status update api kim ST.docx](#)

Thanks, (b)(6) Just a couple minor additional nits from me.

(b)(5)

(b)(5)

From: (b)(6)
Sent: Tuesday, June 2, 2020 10:17 AM
To: Moriarty, Kellen (b)(6)
Cc: Thannhauser, Sara (b)(6)
(b)(6)
Subject: RE: For Sara/Kellen: DRC Status Update

Thanks so much, Kellen. Sara, let me know if you have anything additional. My sense is that once you've reviewed, we can just have (b)(6) send this back to the Hill, but let me know

(b)(5)

(b)(5)

(b)(6)

Senior Sanctions Policy Advisor

Office of Foreign Assets Control | Department of the Treasury

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

From: Moriarty, Kellen (b)(6)
Sent: Tuesday, June 2, 2020 9:42 AM
To: (b)(6)
(b)(6)
(b)(6)
Cc: Thannhauser, Sara (b)(6)
(b)(6)
Subject: RE: For Sara/Kellen: DRC Status Update

Thanks. A few edits attached.

Duplicative of Material Located in 2021-1246 (CKK): 0000005964-5967

Duplicative of Material Located in 2021-1246

(CKK): 0000005964-0000005967

(3 pages)

2021-1246 (CKK): 00000006048-0000006050

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

(1 page)

2021-1246 (CKK): 00000006051

**Pending Consultation with Other Treasury
Components**

(5 pages)

2021-1246 (CKK): 00000006052-0000006056

**Pending Consultation with Other Treasury
Components and Other Government Agencies**

(2 pages)

2021-1246 (CKK): 00000006057-0000006058

**Pending Consultation with Other Treasury
Components**

(7 pages)

2021-1246 (CKK): 00000006059-0000006065

**Pending Consultation with Other Government
Agencies**

(2 pages)

2021-1246 (CKK): 00000006066-0000006067

Pending Submitter Notice Process

(12 pages)

2021-1246 (CKK): 00000006068-0000006079

From: [Prince, Jason](#)
To: (b)(6)
Cc: [Palluconi, Lisa](#); [Thomas, Nikole](#); [Christian, Alan](#)
Subject: RE: RE: Gertler
Date: Friday, January 15, 2021 5:45:28 PM
Attachments: [Gertler Draft cover letter jep Imp jep.docx](#)

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

Hi All,

Please find attached (b)(5)
(b)(5)

Thanks,
Jason

From: (b)(6)
Sent: Friday, January 15, 2021 3:52 PM
To: Prince, Jason
Cc: Palluconi, Lisa ; Thomas, Nikole ; Christian, Alan
Subject: RE: Gertler
Importance: High
Pre-decisional and Deliberative

Hi Jason,

Good afternoon. I've attached copies of the draft cover letter and draft license for Mr. Gertler for you to review. Please let me know if you have any questions.

(b)(6)

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

(2 pages)

2021-1246 (CKK): 00000006081-0000006082

Pending Submitter Notice

(3 pages)

2021-1246 (CKK): 00000006083-0000006085

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Document**

(2 pages)

2021-1246 (CKK): 00000006086-0000006087

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Document**

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2021-1246 (CKK): 00000006088-0000006089

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Document**

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2021-1246 (CKK): 00000006090-0000006092

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Document**

(2 pages)

2021-1246 (CKK): 00000006093-0000006094

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Document**

(2 pages)

2021-1246 (CKK): 00000006095-0000006096

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Document**

(2 pages)

2021-1246 (CKK): 00000006097-0000006098

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Document**

(3 pages)

2021-1246 (CKK): 00000006099-0000006101

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Document**

(3 pages)

2021-1246 (CKK): 00000006102-0000006104

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

(2 pages)

2021-1246 (CKK): 00000006105-0000006106

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

(3 pages)

2021-1246 (CKK): 00000006107-0000006109

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

(3 pages)

2021-1246 (CKK): 00000006110-0000006112

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Document**

(2 pages)

2021-1246 (CKK): 00000006113-0000006114



Sanctions List Search

Specially Designated Nationals and Blocked Persons list ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various other sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

[Download the SDN List](#)
[Sanctions List Search: Rules for use](#)
[Visit The OFAC Website](#)
[Download the Consolidated Non-SDN List](#)
[Program Code Key](#)

Details

Type	Entity	List	SDN
Entity Name	MOKU M NES D'OR SA	Program	GLOMAG
		Remarks	(Linked To: FLEURETTE PROPERTIES LIMITED)

Identifications

Type	ID#	Country	Issue Date	Expire Date
Registration Number	CH27030140272	Switzerland		

Aliases

Type	Category	Name
a.k.a.	strong	MOKU GOLD M NES
a.k.a.	strong	MOKU GOLD
a.k.a.	strong	MOKU GOLDMINES LTD
a.k.a.	strong	MOKU GOLDMINES AG
f.k.a.	strong	FERRO SWISS AG

Addresses

Address	City	State/Province	Postal Code	Country
Renggerstrasse 71	Zurich		8038	Switzerland

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SDN List last updated on: 1/14/2021 11:03:45 AM
Non-SDN List last updated on: 12/14/2020 12:44:01 PM

2021-1246 (CKK): 0000006115



Sanctions List Search

Specially Designated Nationals and Blocked Persons list ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various other sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

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[Download the Consolidated Non-SDN List](#)
[Program Code Key](#)

Details

Type	Entity	List	SDN
Entity Name	GERTLER FAMILY FOUNDATION	Program	GLOMAG
		Remarks	(Linked To: GERTLER, Dan)

Aliases

Type	Category	Name
a.k.a.	strong	LA FONDATION FAMILLE GERTLER

Addresses

Address	City	State/Province	Postal Code	Country
				Congo, Democratic Republic of the

[Back](#)

SDN List last updated on: 1/14/2021 11:03:45 AM
Non-SDN List last updated on: 12/14/2020 12:44:01 PM

2021-1246 (CKK): 0000006116



Sanctions List Search

Specially Designated Nationals and Blocked Persons list ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various other sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

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[Sanctions List Search: Rules for use](#)
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[Download the Consolidated Non-SDN List](#)
[Program Code Key](#)

Details

Type	Entity	List	SDN
Entity Name	FLEURETTE PROPERTIES LIMITED	Program	GLOMAG
		Remarks	(Linked To: GERTLER, Dan)

Identifications

Type	ID#	Country	Issue Date	Expire Date
Public Registration Number	99450	Gibraltar		

Aliases

Type	Category	Name
a.k.a.	strong	FLEURETTE GROUP
a.k.a.	strong	GROUPE FLEURETTE
a.k.a.	strong	FLEURETTE DUTCH GROUP
a.k.a.	strong	VENTORA MINING
a.k.a.	strong	KARIBU AU DEVELOPMENT DURABLE AU CONGO

Addresses

Address	City	State/Province	Postal Code	Country
Strawinskylaan 335 WTC	Amsterdam		1077 XX	Netherlands
B-Tower 3rd floor Gustav Mahlerplein 60 7th Floor ITO Tower	Amsterdam		1082 MA	Netherlands
70 Batetela Avenue Tilapia Building 5th floor 57/63 Line Wall Road	Kinshasa	Gombe		Congo, Democratic Republic of the
	Gibraltar		GX11 1AA	Gibraltar

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SDN List last updated on: 1/14/2021 11:03:45 AM
Non-SDN List last updated on: 12/14/2020 12:44:01 PM

2021-1246 (CKK): 0000006117



Sanctions List Search

Specially Designated Nationals and Blocked Persons list ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various other sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

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[Sanctions List Search: Rules for use](#)
[Visit The OFAC Website](#)
[Download the Consolidated Non-SDN List](#)
[Program Code Key](#)

Details

Type	Individual	List	SDN
Last Name	DEBOUTTE	Program	GLOMAG
First Name	Pieter Albert	Nationality	Belgium
Title		Citizenship	
Date of Birth	15 Jun 1966	Remarks	(Linked To: GERTLER, Dan; Linked To: FLEURETTE PROPERT ES LIMITED; Linked To: GERTLER FAM LY FOUNDATION)
Place of Birth	Roeselare, Flanders, Belgium		

Identifications

Type	ID#	Country	Issue Date	Expire Date
Gender	Male			

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SDN List last updated on: 1/14/2021 11:03:45 AM
Non-SDN List last updated on: 12/14/2020 12:44:01 PM

2021-1246 (CKK): 0000006118



Sanctions List Search

Specially Designated Nationals and Blocked Persons list ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various other sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

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[Sanctions List Search: Rules for use](#)
[Visit The OFAC Website](#)
[Download the Consolidated Non-SDN List](#)
[Program Code Key](#)

Details

Type	Individual	List	SDN
Last Name	GERTLER	Program	GLOMAG
First Name	Dan	Nationality	Israel; Congo, Democratic Republic of the
Title		Citizenship	
Date of Birth	23 Dec 1973	Remarks	
Place of Birth	Tel Aviv, Israel		

Identifications

Type	ID#	Country	Issue Date	Expire Date
Passport	10945182	Israel	28 Jun 2010	27 Jun 2020
Passport	10926248	Israel	25 Feb 2008	27 Feb 2018
Passport	DB0009084	Congo, Democratic Republic of the	28 May 2015	27 May 2020
National ID No.	027100619	Israel		
Gender	Male			

Addresses

Address	City	State/Province	Postal Code	Country
17 Daniel Street	Bnei Brak			Israel
28 Daniel Street	Bnei Brak			Israel
Avenue Tchatchi 29	Gombe	Kinshasa		Congo, Democratic Republic of the

[Back](#)

SDN List last updated on: 1/14/2021 11:03:45 AM
Non-SDN List last updated on: 12/14/2020 12:44:01 PM

2021-1246 (CKK): 0000006119

**Pending Consultation with other Treasury
Components**

(3 pages)

2021-1246 (CKK): 00000006120-0000006122

From: (b)(6)
To: Albowicz, Nikole; (b)(6)
Subject: GloMag Press Pack
Date: Thursday, June 7, 2018 8:07:16 PM
Attachments: [2018-06-11 FACT SHEET - GloMag Human Rights and Corruption Actions v2.docx](#)
[Count of Actions.xlsx](#)

Nikole and (b)(6)

I've finished cleaning up the combined document and wanted to send it to you for review before I send it to the wider audience for release. I've also attached an excel file I used to count the number of individuals and entities in the final section (so we don't have to go through and count them manually). They are also located in this file location: [G:\FAC\Int\Human Rights-GLOMAG\Trip Preparation](#)

I'll be in the office about another 30 minutes if you would like to call and talk this over: (b)(6)

(b)(6)

I will also be in as early as possible tomorrow for additional edits or comments.

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)

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Document**

(4 pages)

2021-1246 (CKK): 00000006124-0000006127

From: (b)(6)
To: Albowicz, Nikole; (b)(6)
Subject: RE: GloMag Press Pack
Date: Thursday, June 7, 2018 8:33:08 PM
Attachments: [2018-06-11 FACT SHEET - GloMag Human Rights and Corruption Actions v2.docx](#)
[Count of Actions.xlsx](#)

Nothing other than edits and comments!

Also, I'm attaching an updated copy because I'm embarrassed to admit I left out a South Sudan action from September 2017, which makes it at least one action involving human rights or corruption every month from January through May 2018.

(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)

From: Albowicz, Nikole

Sent: Thursday, June 07, 2018 8:27 PM

To: (b)(6)

Subject: Re: GloMag Press Pack

Thanks, (b)(6) I'll take a look tonight. Do you need anything other than just edits/comments on this? Please keep track of your hours today. I will ask Todd if we can use comp (and possibly overtime) for this task.

From: (b)(6)

Date: June 7, 2018 at 8:07:15 PM EDT

To: Albowicz, Nikole (b)(6)

(b)(6)

Subject: GloMag Press Pack

Nikole and (b)(6)

I've finished cleaning up the combined document and wanted to send it to you for review before I send it to the wider audience for release. I've also attached an excel file I used to count the number of individuals and entities in the final section (so we don't have to go through and count them manually). They are also located in this file location: [G:\FAC\Int\Human Rights-GLOMAG\Trip Preparation](#)

I'll be in the office about another 30 minutes if you would like to call and talk this over (b)(6)

(b)(6)

I will also be in as early as possible tomorrow for additional edits or comments.

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)

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Document**

(4 pages)

2021-1246 (CKK): 00000006130-0000006133

From: [Thomas, Nikole](#)
To: [Palluconi, Lisa](#); (b)(6); [Christian, Alan](#); [Manfull, Alexandre](#); (b)(6);
(b)(6); [Thannhauser, Sara](#); [Moriarty, Kellen](#); (b)(6);
[Scheinert, Lawrence](#); [Quinby, Ripley](#); [Gatianis, Gregory](#); [Prince, Jason](#)
Cc: [Thomas, Nikole](#)
Subject: Thomas, Nikole has shared "GertlerLicenseSummary_24Jan2021"
Date: Monday, January 25, 2021 9:09:56 AM

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): 00000006135-0000006137

Pending Submitter Notice Process

(2 pages)

2021-1246 (CKK): 00000006138-0000006139

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: RE: Licensing Monthly
Date: Tuesday, February 9, 2021 12:47:21 PM

Okay, that makes sense to me. I'll discuss Gertler (the first request) (b) (5)

(b) (5)

Thanks,

(b) (6)

From: (b) (6)
Sent: Tuesday, February 9, 2021 12:42 PM
To: (b) (6)

Cc: (b) (6)

(b) (6)

Subject: RE: Licensing Monthly

Hi (b) (6)

Yeah, that's just to give folks an idea of the range of what we work on. (b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5) Again, it's just to give folks an idea of what we see, so it's not meant to be exhaustive or exclusive.

(b) (6)

From: (b) (6)
Sent: Tuesday, February 9, 2021 12:22 PM

To: (b) (6)

Cc: (b) (6)

(b) (6)

Subject: RE: Licensing Monthly

Hi (b) (6)

In terms of notable cases, are you just generally summarizing them or is each team member planning to discuss the cases they worked on? I see you already have the Gertler,

(b) (5) requests on the list.

Thanks,

(b) (6)

From: (b) (6)
Sent: Tuesday, February 9, 2021 10:04 AM

To: (b) (6)

Cc: (b) (6)

(b) (6)

Subject: RE: Licensing Monthly

FYI

From: (b) (6)

Sent: Tuesday, February 9, 2021 10:00 AM

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

Subject: RE: Licensing Monthly

Could someone send me the slide deck? I'd prefer the 18th as I'm going to be out for a few days this week.

Thanks,

(b) (6)

From: (b) (6)

Sent: Tuesday, February 9, 2021 9:42 AM

To: (b) (6)

(b) (6)

Cc: (b) (6)

Subject: RE: Licensing Monthly

Either day works for me as well. Thanks.

(b) (6)

From: (b) (6)

Sent: Tuesday, February 9, 2021 9:38 AM

To: (b) (6)

(b) (6)

Cc: (b) (6)

Subject: RE: Licensing Monthly

Hi (b) (6) I will be in (the virtual) office next week, so no issues from me for either Tuesday or Thursday.

From: (b) (6)

Sent: Tuesday, February 9, 2021 9:35 AM

To: (b) (6)

(b) (6)

Cc: (b) (6)

Subject: RE: Licensing Monthly

Hi (b) (6)

Thank you for sending me your slides. Also, Nikole wants the whole team to be present for the presentation, so since a couple of us are going to be out Friday, she wants to know if everyone would be available Tuesday the 16th or Thursday the 18th.

Hi (b) (6)

Nikole would also like you to be part of the team presentation, so can you send me a couple of slides for the deck? It would consist of a couple of cases (b) (5) that you'd like to talk about (b) (5) (b) (5).

If everyone could confirm availability on one or both of the dates above, I'll let Nikole and Alan know.

Thanks,

(b) (6)

From: (b) (6)

Sent: Tuesday, February 9, 2021 8:20 AM

To: (b) (6)

(b) (6)

Subject: RE: Licensing Monthly

I've added my slide to (b) (6) updated version!

Many thanks,

(b) (6)

From: (b) (6)

Sent: Monday, February 8, 2021 5:12 PM

To: (b) (6)

(b) (6)

Subject: RE: Licensing Monthly

Here is a version of the presentation with (b) (5) my slide added!

(b) (6)

From: (b) (6)

Sent: Monday, February 8, 2021 12:46 PM

To: (b) (6)

(b) (6)

Subject: RE: Licensing Monthly

Hi everyone,

I've put together a draft of the slide presentation for this Friday. Let me know what you think in

general, but please take a close look at slide 5 and let me know if you think there's something

missing. I was thinking that in terms of case presentation, (b) (5)

and (b) (6) to discuss as part of their slides (b) (6) I was thinking that you might want to discuss

(b) (5). Also, I have (b) (6) Friday

morning, so I likely won't be back in time (b) (5) do you mind doing the general presentation?

Thanks,

(b) (6)

From: (b) (6)

Sent: Friday, February 5, 2021 2:02 PM

To: (b) (6)

(b) (6)

Subject: RE: Licensing Monthly

Does anyone here have much experience with PP? Could they set something up in sharepoint?

Otherwise, I was going to play around with it this weekend.

From: (b) (6)

Sent: Friday, February 5, 2021 1:47 PM

To: (b) (6)

(b) (6)

Subject: RE: Licensing Monthly

The timing works for me. Is there a way we can all work on the same PowerPoint simultaneously? If

not, I will just send you my slides and then you can transfer everything in them to the master

PowerPoint.

(b) (6)

From: (b) (6)

Sent: Friday, February 5, 2021 1:31 PM

To: (b) (6)

(b) (6)

Subject: RE: Licensing Monthly

Hi everyone,

I told Nikole that we would go next week, since (b) (6) has been out of the office for a little bit. I've attached a copy of the Cuba team's slide deck. Please each put together a couple of slides of bio. How about if we shoot for Tuesday by noon? Does that work? I want to give Nikole and Alan time to review.

Thanks,

(b) (6)

From: Thomas, Nikole (b) (6)

Sent: Thursday, February 4, 2021 10:11 PM

To: _DL_OFAC LIC Managers <DLOFACLICManagers@do.treas.gov>

Subject: Licensing Monthly

Hi All,

The next Licensing Monthly is scheduled for next Friday. Are there any cases to that your teams would like to raise for Brad?

Also, we are down to (b) (6) teams for the showcase feature. (b) (6) any chance your teams would be willing to go next week?

Thanks!

Nikole

From: (b) (6)
To: (b) (6)
Subject: RE: Legal services request (Gertler)
Date: Friday, May 11, 2018 10:38:23 AM

Thanks, will do.

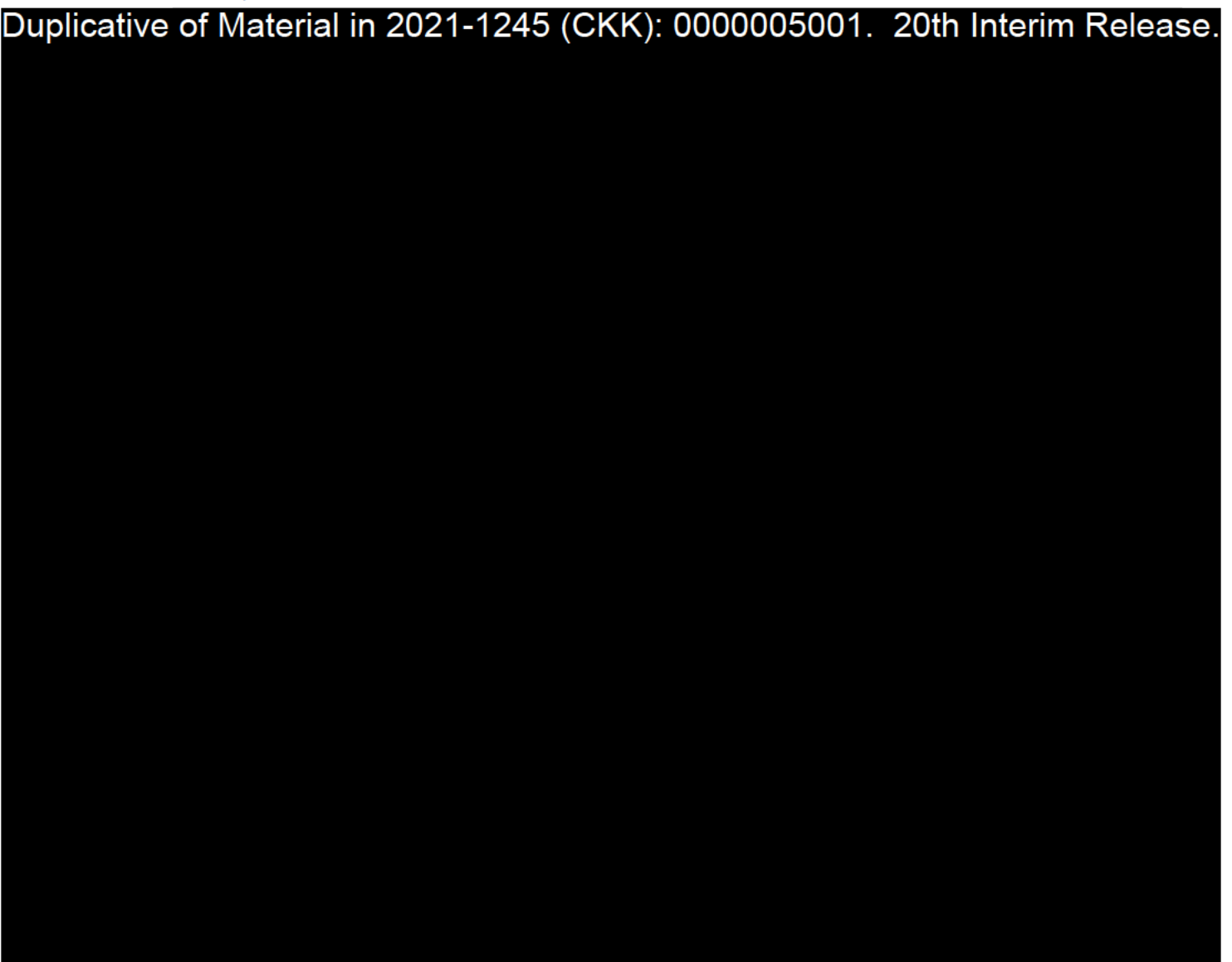
From: (b) (6)
Sent: Friday, May 11, 2018 10:36 AM
To: (b) (6)
Subject: RE: Legal services request (Gertler)

Yes, I'm sure they want to get paid.

Yes, they should be able to send a copy to us.

Thanks,

Duplicative of Material in 2021-1245 (CKK): 0000005001. 20th Interim Release.



**Pending Consultation with Other Treasury
Components**

(5 pages)

2021-1246 (CKK): 00000006145-0000006149

From: (b) (6)
To: (b) (6)
Bcc: (b) (6)
Subject: RE: GLOMAG-2021-373651-1 (Gertler) - Summary
Date: Friday, April 9, 2021 4:01:00 PM
Attachments: [Gertler Gov Relations Request Summary \(003\).docx](#)

PRE-DECISIONAL and DELIBERATIVE

Thank you (b) (6) I think it looks good. (b) (5)
(b) (5). I just had one comment about inserting the link in the text. Otherwise, I think it's ready to go to Nikole and Alan.

Thanks,

(b) (6)

From: (b) (6)

Sent: Friday, April 9, 2021 3:55 PM

To: (b) (6)

Subject: RE: GLOMAG-2021-373651-1 (Gertler) - Summary

PRE-DECISIONAL and DELIBERATIVE

Hi (b) (6)

Thank you for reviewing - (b) (5)

(b) (5)

Many thanks,

(b) (6)

From: (b) (6)

Sent: Friday, April 9, 2021 3:45 PM

To: (b) (6)

Subject: RE: GLOMAG-2021-373651-1 (Gertler) - Summary

PRE-DECISIONAL and DELIBERATIVE

Hi (b) (6)

Thank you for getting this done so quickly. (b) (5)

(b) (5) Also, let me know if you want to discuss (b) (5).

Thanks,

(b) (6)

Duplicative of Material in the 23rd Interim Release

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

(1 page)

2021-1246 (CKK): 00000006151

Pending Submitter Notice Process

(18 pages)

2021-1246 (CKK): 00000006152-0000006169

From: (b) (6)
To: (b) (6)
Subject: RE: GLOMAG Question
Date: Wednesday, February 5, 2020 4:46:38 PM

H (b) (6)

Thank you for talking to me about Dershowitz's license. Please see the news articles about Dershowitz's legal representation of Dan Gertler.

<https://www.cnbc.com/2019/11/05/alan-dershowitz-ex-fbi-director-louis-freeh-lobbying-for-israeli-billionaire-dan-gertler.html>

<https://www.al-monitor.com/pulse/originals/2019/11/alan-dershowitz-lobby-israeli-billionaire-dan-gertler.html>

<https://www.bloomberg.com/news/articles/2019-11-05/dershowitz-freeh-register-to-lobby-for-sanctioned-billionaire>

V/r

(b) (6)

From: (b) (6)

Sent: Wednesday, February 5, 2020 3:52 PM

To: (b) (6)

Subject: GLOMAG Question

Hi (b) (6)

When you get a chance, can you please give me a call? Thank you!

V/r,

(b) (6)

Director

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

(b) (6)

**Pending Consultation with Other Treasury
Components**

(2 pages)

2021-1246 (CKK): 00000006171-0000006172

**Pending Consultation with Other Treasury
Components**

(18 pages)

2021-1246 (CKK): 00000006173-0000006190