

Responsive Records -25th Interim
2021-1246 (CKK)
Part 1
149 pages

From: (b)(6)
To: Prince, Jason
Cc: Thomas, Nikole; Palluconi, Lisa; Thannhauser, Sara; Moriarty, Kellen; Christian, Alan; (b)(6)(b)(6)
Subject: FW: Review Request: Press materials and "if raised" for DRC-related licensing decision
Date: Friday, March 5, 2021 10:21:47 AM
Attachments: 03032021 - Statement - Gertler Revocation for Associates jep.docx
EB AF PG - Gertler Revocation - XX MAR 2021 for Associates Imp jep.docx
Treasury IfAsked License 25Feb2021 for (OFAC FO).docx

Jason, do you all need anything further from us on this (b)(5)
Just wanted to check in so that nothing gets lost in the shuffle!

From: Smith, Bradley (b)(6)
Sent: Friday, March 5, 2021 9:31 AM
To: (b)(6) <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Palluconi, Lisa <(b)(6)>
Moriarty, Kellen <(b)(6)> Thannhauser, Sara
<(b)(6)> Quinby, Ripley <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas
<(b)(6)> Prince, Jason <(b)(6)>
Subject: RE: Review Request: Press materials and "if raised" for DRC-related licensing decision

PRE-DECISIONAL & DELIBERATIVE—PRIVILEGED & CONFIDENTIAL

Thank you, (b)(6) (b)(5)

(b)(6)

(b)(6)

(b)(6)

(b)(6)

(b)(6)

Thanks again,

Brad

From: (b)(6) <(b)(6)>
Sent: Friday, March 5, 2021 8:18 AM
To: Smith, Bradley (b)(6)
Cc: Thomas, Nikole <(b)(6)> Palluconi, Lisa <(b)(6)>
Moriarty, Kellen <(b)(6)> Thannhauser, Sara
<(b)(6)> Quinby, Ripley <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas
<(b)(6)> Prince, Jason <(b)(6)>
Subject: Review Request: Press materials and "if raised" for DRC-related licensing decision

Good Morning Brad,

(b)(5)

Thanks in advance for your feedback soonest
and let us know if you have further questions!

(b) (6)

(b)(6)

Senior Sanctions Policy Advisor
Office of Foreign Assets Control
Department of the Treasury

Desk: (b)(6)

Mobile: (b)(6)

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos: 006427-006430

From: (b)(6) (b)(6)
To: [Smith, Bradley](#); [Palluconi, Lisa](#)
Cc: [Thannhauser, Sara](#); [Moriarty, Kellen](#); (b)(6) (b)(6) (b)(6)
Subject: FYI: DRC Status Update
Date: Friday, June 5, 2020 4:05:40 PM
Attachments: [DRC sanctions status update OFAC ank aq ST.docx](#)

Brad and Lisa,

(b) (5) [Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]

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

Thank you,

(b)(6)

[Redacted]

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

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

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates No.: 006432

From: [Palluconi, Lisa](#)
To: [Prince, Jason](#)
Subject: FYI - for awareness
Date: Friday, February 5, 2021 2:19:00 PM

Pre-decisional and Deliberative//Attorney-client communication

Hi Jason – I just wanted to share the below, (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

Best,

Lisa

From: (b)(6) (b)(6) (b)(6)
Sent: Thursday, February 4, 2021 1:28 PM
To: (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Cc: (b)(6) (b)(6)
[REDACTED]
Subject: FW: Gertler license NGO letter

(b)(6) –
I'm guessing you have seen this but apologies for the delay if this is the first time it's come across your desk (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Happy to set up a call to discuss but just want to solicit your thoughts (b) (5)

Thanks in advance!

(b)(6)

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

From: Brad Brooks-Rubin <brad@thesentry.org>
Date: Tue, Feb 2, 2021 at 5:29 PM
Subject: Gertler license NGO letter
To: ((b)(6))
[REDACTED], <(b)(6)>
Cc: Rob Berschinski <BerschinskiR@humanrightsfirst.org>, Megha Swamy <mswamy@thesentry.org>

Andrea, Liz, et al,

Please find attached a letter signed by 14 Congolese and 16 international human rights, anti-corruption, and humanitarian NGOs, addressed to Secretaries Blinken and Yellen, urging immediate action to suspend and ultimately reverse the decision to issue to Dan Gertler and associated persons the license GLOMAG-2021-371648-1. I'd ask that you please share this letter with the Secretary and other Treasury counterparts.

As detailed in the letter, the Gertler license:

1. Directly undermines U.S. strategy and policy concerning anti-corruption efforts in the DRC;
2. Sets a dangerous precedent that undercuts the efficacy and legitimacy of the Global Magnitsky sanctions program, as well as sanctions programs more broadly; and
3. Thwarts the critical, challenging, and sometimes dangerous work of Congolese and other civil society organizations and activists.

We have sent the letter and a similar message to colleagues at State and will be sharing this with some members of the press as well.

On a related note, in case it otherwise didn't make its way to you, we also wanted to flag a [letter on the same matter](#) sent to Secretary Yellen yesterday by Senators Booker, Cardin, and Durbin.

Thanks again,

Brad (on behalf of signatories; cc Human Rights First)

Lisa M. Palluconi

Associate Director, Sanctions Policy & Implementation

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

(b)(6) | T (b)(6) M (b)(6)

From: [Rembrandt, Scott](#)
To: [Palluconi, Lisa](#)
Subject: Fwd: NYT article on Gertler
Date: Monday, January 25, 2021 7:59:10 AM

From: (b)(6) <(b)(6)>
Date: January 25, 2021 at 7:55:04 AM EST
To: (b)(6) (b)(6) <(b)(6)> Rembrandt, Scott
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
(b)(6) <(b)(6)>
Subject: NYT article on Gertler

Below link.

<https://www-nytimes-com.cdn.ampproject.org/c/s/www.nytimes.com/2021/01/24/us/politics/dan-gertler-sanctions.amp.html>

Sent from my iPhone

From: [Gacki, Andrea](#)
To: [Palluconi, Lisa](#); [Prince, Jason](#)
Cc: [Smith, Bradley](#)
Subject: Fwd: license confirmation?
Date: Sunday, January 24, 2021 1:02:51 PM
Attachments: [4_5771613563881785837.pdf](#)

FYI. (b)(5)

From: Brad Brooks-Rubin <brad@thesentry.org>
Date: January 24, 2021 at 1:00:40 PM EST
To: Gacki, Andrea <(b)(6)>
(b)(6)
Subject: Fwd: license confirmation?

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

Andrea and Brad -- hope all is as well as can be, esp after this week. Best wishes for 2021.

FYI On the note below. I didn't hear back from Lisa or Jason, which makes sense. So I Imagine this may have reached you already but just FYI that we are going to be doing a fair amount of advocacy around this, both to have it potentially reversed and also with the named banks/institutions (and others) not to unblock since, at least, they were not directed to do so.

Can't imagine the circumstances under which this was issued and have a strong sense about how this came down (literally and figuratively) but obviously don't know more than that it does appear to be valid, that not everyone within the USG who would normally have known about/cleared on such a license did in this case, and that it's a pretty distressing action.

Will very much be focused on actors other than you all in terms of fault/next steps but did want you to be aware that we will be doing a pretty strong press on this one.

Happy to discuss if helpful at any point.

Thanks

Brad

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

From: Brad Brooks-Rubin <brad@thesentry.org>
Date: Sat, Jan 23, 2021 at 12:00 PM
Subject: license confirmation?
To: <(b)(6)>

Hope you both are well. Best wishes for 2021 and hope you managed to survive the tumultuous last few weeks.

I know you may be limited in what can be said about this but the attached license is circulating in DRC circles. It appears legit, and if I read right, undoes the designations of Gertler et al and authorizes the unblocking of their property.

Is it possible for you to confirm this is legitimate? I happen to know the attorney listed and will ask him as well. But before we begin an advocacy campaign around it, wanted to try to verify.

If easier to discuss by phone, I'm at 301-655-4189.

Thanks

Brad

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos: 006438-006440

2021-1246 (CKK): 006441-006444
Duplicate of Bates Stamp 006436-006440 in 25th Interim

From: [Gacki, Andrea](#)
To: [\(b\)\(6\)](#) [\(b\)\(6\)](#) [Jennings, Thomas](#); [Quinby, Ripley](#); [\(b\)\(6\)](#) [\(b\)\(6\)](#) [Moriarty, Kellen](#); [Thannhauser, Sara](#); [Palluconi, Lisa](#)
Cc: [Smith, Bradley](#); [\(b\)\(6\)\(b\)\(6\)](#)
Subject: Fwd: Global Magnitsky Sanctions on Spoilers Urgently Needed
Date: Friday, November 13, 2020 10:42:19 AM

FYI:

From: John Prendergast <jp@thesentry.org>
Date: November 13, 2020 at 10:40:17 AM EST
To: Burwell, Carter [\(b\)\(6\)](#), Gacki, Andrea
<[\(b\)\(6\)](#) [\(b\)\(6\)](#) [\(b\)\(6\)](#) Hilary Mossberg <hmossberg@thesentry.org>, Megha Swamy (Enough) <msswamy@thesentry.org>
Subject: Fwd: Global Magnitsky Sanctions on Spoilers Urgently Needed

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

DATE: November 13, 2020
TO: Carter Burwell, Senior Counselor, U.S. Department of the Treasury
FROM: John Prendergast and the Sentry team
SUBJECT: **Global Magnitsky Sanctions on Spoilers Urgently Needed in CAR, Sudan, South Sudan and DRC**

Hello Carter, Andrea, and Caroline! We are writing to encourage the US government to utilize the Global Magnitsky sanctions authority in the next two months to designate several actors and networks responsible for human rights violations and corruption in Africa, and to promote democracy. The Global Magnitsky sanctions authority has been used successfully in recent years to change behaviors, bring warring parties to negotiating tables, and encourage preservation of human rights. The Sentry believes if the sanctions authority is used in the following situations, the sanctions could be highly effective in combating human rights abuses and bringing corrupt activities to light. These actions are needed urgently to impact the spoilers to peace and democracy in each country: CAR's elections are precarious and the threat of violence runs high; South Sudan's peace implementation is faltering; Sudan's civilian government needs international support and peace spoilers need to be held accountable; and in the DRC, initial governance reforms by President Tshisekedi need to be bolstered by sanctions against high-level corrupt actors who continue to wield significant power, including former President Kabila's network.

Central African Republic:

- **Aziz Nassour**, this Lebanese businessman with alleged links with Hezbollah, al-Qaida and the Wagner Group, because of his role in fueling corruption and election interference, and for his alleged involvement in criminal

activities such as diamond trafficking. This designation would further support other recent sanctions against Yevgeny Prigozhin's network in CAR;

- **Karim Meckassoua**, the former CAR president of the Parliament and former Minister of Foreign Affairs, for sponsoring armed groups to defend personal political interests.

South Sudan: Akol Koor Kuc, the head of the national security service, because of his role in undermining the implementation of the peace agreement, and also because of the organization's role in egregious human rights abuses.

Democratic Republic of Congo:

- **Updated sanctions on Dan Gertler.** Since being sanctioned, Gertler has set up new companies to evade sanctions. An "AKA update" should target these companies.
- **Senior officials involved in corruption.** Sanctioning influential spoilers would have a positive impact on anti-corruption and governance reforms, including Albert Yuma (Gécamines Chairperson), Alexis Thambwe Mwamba (Senate President), and Moïse Ekanga (head of China cooperation).
- **Conflict gold.** Belgian tycoon Alain Goetz and his network of companies involved in the conflict gold trade, which continues to be the biggest funder of armed groups in eastern DRC.

Sudan: Sudan Armed Forces' Matrix of Defense Industries (MDI). The former Finance Minister complained in an interview that Etegahat Group, one of the largest corporations of MDI, keeps the revenues from its exports of livestock and processed meats to Egypt, Saudi Arabia and elsewhere off the books. GIAD, one of MDI's largest holding companies, also keeps the revenues it collects from the sale of its military and civilian products off the books. This level of corruption is emblematic of how Bashir-era business operated, and significantly impacts much needed tax revenue.

The Sentry team will follow up with your staff on dossiers for these entities.

Thank you!!

Pending Consultation With other Treasury Components
2021-1246 (CKK): Bates Nos: 006447 - 06453

From: [Gacki, Andrea](#)
To: [Palluconi, Lisa](#); [Prince, Jason](#)
Cc: [Smith, Bradley](#)
Subject: Fwd: last admin/GloMag sanctions issue Fwd: license confirmation?
Date: Saturday, January 23, 2021 4:18:59 PM

FYI. (b) (5)

From: Rosenberg, Elizabeth <(b)(6)>
Date: January 23, 2021 at 4:10:50 PM EST
To: Gacki, Andrea (b)(6)
Subject: Fwd: last admin/GloMag sanctions issue Fwd: license confirmation?

FYI.

(b) (5)

Liz

From: Brad Brooks-Rubin <brad@thesentry.org>
Date: January 23, 2021 at 3:57:38 PM EST
To: Rosenberg, Elizabeth <(b)(6)>
Subject: Re: last admin/GloMag sanctions issue Fwd: license confirmation?

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

Also a note that we are contacting as many of the institutions named that we can to ask them not to unblock. They are authorized to do so, but not directed to, and the designations remain in place. So am hoping some pressure can help there.

Thanks

Brad

On Sat, Jan 23, 2021 at 3:56 PM Brad Brooks-Rubin <brad@thesentry.org> wrote:

Liz -- hope all is well. Shabbat Shalom -- sorry to write on a Saturday but this one may start to hit the press so wanted to be in touch.

Had planned to write in a week or two re the sanctions review process it sounds like will be underway. Not sure if that will cover GloMag, Africa programs, etc., but if so, just a note that we are of course happy to help however possible. I'm actually looking for a new job

(nothing in hand yet) but the team here will remain strong on these issues.

More urgent issue is the license below. We've now had it confirmed from a few folks (though did not hear back from Lisa or Jason) that it was issued, though it seems to have skirted the interagency and anyone who should have been involved. Given the players who were involved in this, can't imagine it was much of a choice for Andrea. We and likely others will be pushing for action on it ASAP, as it really undermines one of the signature GloMag actions and most important sanctions actions re Africa, maybe ever.

Would be happy to discuss any time, but we certainly hope it can be discussed within the new Administration and, hopefully, reversed. I certainly recognize that there will be a litigation risk attendant to that but hoping that can be weathered.

Let me know if there's anything we can provide or do that would be of help.

Thanks

Brad

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

From: **Brad Brooks-Rubin** <brad@thesentry.org>

Date: Sat, Jan 23, 2021 at 12:00 PM

Subject: license confirmation?

To: <(b)(6)> <(b)(6)>

Hope you both are well. Best wishes for 2021 and hope you managed to survive the tumultuous last few weeks.

I know you may be limited in what can be said about this but the attached license is circulating in DRC circles. It appears legit, and if I read right, undoes the designations of Gertler et al and authorizes the unblocking of their property.

Is it possible for you to confirm this is legitimate? I happen to know the attorney listed and will ask him as well. But before we begin an advocacy campaign around it, wanted to try to verify.

If easier to discuss by phone, I'm at 301-655-4189.

Thanks

Brad

From: (b)(6) (b)(6)
To: [Thomas, Nikole](#); [Palluconi, Lisa](#)
Cc: (b)(6) (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) (5)

[REDACTED]

[REDACTED]

(b)(6)

From: [Jennings, Thomas](#)
To: [Palluconi, Lisa](#); [Prince, Jason](#); [Quinby, Ripley](#)
Subject: Fwd: Case ID: GLOMAG-19833 | Request for Reconsideration on Behalf of Mr. Gertler
Date: Friday, January 15, 2021 5:07:43 PM

From: (b)(6) <(b)(6)>
Date: January 5, 2021 at 9:38:06 AM EST
To: Jennings, Thomas (b)(6) <(b)(6)>, (b)(6) (b)(6)
<(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Subject: RE: Case ID: GLOMAG-19833 | Request for Reconsideration on Behalf of Mr. Gertler

Hi Tom,

(b)(5)

(b)(5)

Best,

(b)(6)

From: Jennings, Thomas (b)(6)
Sent: Tuesday, January 5, 2021 9:28 AM
To: (b)(6) (b)(6) (b)(6)
Cc: (b)(6) <(b)(6)> (b)(6) <(b)(6)>
(b)(6) <(b)(6)>
Subject: RE: Case ID: GLOMAG-19833 | Request for Reconsideration on Behalf of Mr. Gertler

(b)(5)

From: (b)(6) (b)(6) (b)(6)
Sent: Tuesday, January 5, 2021 9:19 AM
To: Jennings, Thomas (b)(6)
Cc: (b)(6) <(b)(6)> (b)(6) <(b)(6)>
(b)(6) <(b)(6)>
Subject: FW: Case ID: GLOMAG-19833 | Request for Reconsideration on Behalf of Mr. Gertler

Tom,

Wanted to flag the attached and below correspondence regarding Gertler's petition. (b)(5)

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos: 006458-006460

Pending Consultation with other Treasury Component
2021-1246 (CKK): Bates Nos.: 006461-006462

From: [Palluconi, Lisa](#)
To: (b)(6) (b)(6) (b)(6) (b)(6)
Subject: Fwd: Gertler & OFAC
Date: Saturday, January 23, 2021 10:29:02 PM

Pre-decisional and Deliberative

(b)(6)(b)(6) - FYI. Happy to discuss on Monday, if helpful. (b) (5)
(b)(6). SENTRY has already reached out to OFAC (they have a copy of the license).

Best,
Lisa

From: Moriarty, Kellen <(b)(6)>
Date: January 23, 2021 at 10:17:44 PM EST
To: (b)(6) (b)(6) <(b)(6)> (b)(6) (b)(6)
(b)(6)
Cc: Thannhauser, Sara (b)(6) >, (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6)
<(b)(6)> (b)(6)
(b)(6) (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)>
Thomas, Nikole (b)(6) Palluconi, Lisa
(b)(6)
Subject: RE: Gertler & OFAC

Adding others in OFAC who are on the original chain along with (b) (6) (b) (5)
(b)(6)

From: (b)(6) (b)(6) <(b)(6)>
Sent: Saturday, January 23, 2021 10:12 PM
To: Moriarty, Kellen <(b)(6)> (b)(6) (b)(6) <(b)(6)>
(b)(6) <(b)(6)>
Cc: Thannhauser, Sara <(b)(6)> >, (b)(6)
<(b)(6)>
Subject: Re: Gertler & OFAC

+ (b)(6) who is handling TFI PA during the transition

Thanks Kellen! could you keep us updated?

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

Mobile: (b)(6)

Email: (b)(6)

From: Moriarty, Kellen <(b)(6)>

Date: January 23, 2021 at 10:04:49 PM EST

To: (b)(6) (b)(6) <(b)(6)> (b)(6) (b)(6) <(b)(6)> (b)(6)
<(b)(6)>

Cc: Thannhauser, Sara (b)(6)

Subject: FW: Gertler & OFAC

FYSA

From: (b)(6) (b)(6) <(b)(6)>

Sent: Saturday, January 23, 2021 9:58 PM

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

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

Cc: (b)(6) (b)(6) Christian, Alan (b)(6) (b)(6)

Rasmussen, Mary <(b)(6)> (b)(6)

<(b)(6)> (b)(6) (b)(6) <(b)(6)> Rembrandt,

Scott <(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> Palluconi,

Lisa (b)(6) Thannhauser, Sara <(b)(6)> Moriarty,

Kellen <(b)(6)> (b)(6) <(b)(6)> (b)(6)

>

Subject: RE: Gertler & OFAC

(b) (5) . Can sort out further if we need
on Monday.

From: (b)(6)

Sent: Saturday, January 23, 2021 9:52 PM

To: (b)(6) (b)(6) (b)(6) <(b)(6)>

Cc: (b)(6) (b) (6) (b)(6)

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

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

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

Subject: RE: Gertler & OFAC

Hi All,

(b) (5)

(b) (5)

Thanks!
Nikole

From: (b)(6) (b)(6) (b)(6)
Sent: Saturday, January 23, 2021 7:52 PM
To: (b)(6) (b)(6) (b)(6)
Cc: Thomas, Nikole <(b) (6)>; (b)(6)(b)(6) <(b)(6)>
Christian, Alan <(b)(6)> Rasmussen, Mary <(b)(6)>
(b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> Rembrandt, Scott <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Subject: Fwd: Gertler & OFAC

(b)(6) -

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)

We haven't responded and will await PA's guidance.

Thanks,
(b)(6)

From: Michael Kavanagh <mjkavanagh@gmail.com>
Date: January 23, 2021 at 2:07:47 PM EST
To: (b)(6) (b)(6) <(b)(6)> MICHAEL KAVANAGH, BLOOMBERG/
NEWSROOM: <mkavanagh9@bloomberg.net>
Subject: Gertler & OFAC

**** Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to 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.

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

+1 917 862 7883

Michael J. Kavanagh

Worldwide (& WhatsApp): +1 917 862 7883

DR Congo: +243 (0)81 715 2746

mjkavanagh@gmail.com

mkavanagh9@bloomberg.net

PGP: BFACA49AEDEDAB7A

2021-1246 (CKK): 006467-006479
Duplicate of Bates Stamp 006463-006466 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos: 006480-006481

2021-1246 (CKK): 006482-006483

Duplicate of Bates Stamp 006478-006479 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos: 006484-006485

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 006486-006497

2021-1246 (CKK): 006498-006499
Duplicate of Bates Stamp 006478-006479 in 25th Interim

2021-1246 (CKK): 006500-006513
Duplicate of Bates Stamp 006484-006497 in 25th Interim

2021-1246 (CKK): 006514-006519
Duplicate of Bates Stamp 006474-006479 in 25th Interim

Pending Consultation with other Treasury Components
2021-1246 (CKK): Bates Nos: 006520-006521

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos: 006522-006523

Pending Consultation with other Treasury Components
2021-1246 (CKK): Bates Nos: 006524-006525

2021-1246 (CKK): 006526-006527
Duplicate of Bates Stamp 006420 - 006421 in 25th Interim

2021-1246 (CKK): 006528-006533

Duplicate of Bates Stamp 006424-006425 in 25th Interim

From: [Scheinert, Lawrence](#)
To: [Palluconi, Lisa](#)
Cc: [Manfull, Alexandre](#)
Subject: FW: Revocation of License Granted for Dan Gertler
Date: Tuesday, March 9, 2021 2:11:03 PM
Attachments: [image010.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)

Hey Lisa – (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Happy to chat too if helpful.

Thanks,
Lawrence

Lawrence Scheinert

Desk: (b)(6)

Mobile: (b)(6)

From: Manfull, Alexandre <(b)(6)>
Sent: Tuesday, March 9, 2021 1:35 PM
To: Scheinert, Lawrence <(b)(6)>
Subject: RE: Revocation of License Granted for Dan Gertler

Hi Lawrence,

(b) (5)

[REDACTED]

Thanks,

Alexandre

From: Manfull, Alexandre <(b)(6)>
Sent: Monday, March 8, 2021 5:37 PM
To: _DL_OFAC OCE-(SCE) Compliance (Govt) <DL_OFACCOM@do.treas.gov>
Subject: FW: Revocation of License Granted for Dan Gertler

Please see below.

From: Scheinert, Lawrence <(b)(6)>
Sent: Monday, March 8, 2021 5:27 PM
To: Manfull, Alexandre <(b)(6)>
Subject: FW: Revocation of License Granted for Dan Gertler

Lawrence Scheinert

Desk: (b)(6)

Mobile: (b)(6)

From: U.S. Department of State <usstatebpa@public.govdelivery.com>

Sent: Monday, March 8, 2021 5:22 PM

To: Scheinert, Lawrence <(b)(6)>

Subject: Revocation of License Granted for Dan Gertler

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[Revocation of License Granted for Dan Gertler](#)

03/08/2021 05:09 PM EST

Ned Price, Department Spokesperson

Today, the Department of the Treasury, in consultation with the Department of State, revoked the license that was issued to Specially Designated National Dan Gertler on January 15, 2021.

The license previously granted to Mr. Gertler is inconsistent with America's strong foreign policy interests in combatting corruption around the world, specifically including U.S. efforts to counter corruption and promote stability in the Democratic Republic of the Congo (DRC). As the original designation of Mr. Gertler under the Global Magnitsky sanctions program in 2017 and subsequent designations in 2018 made clear, Mr. Gertler engaged in extensive public corruption. Under our Privileged Partnership for Peace and Prosperity, the United States stands firmly with our partners in the DRC to counter malign behavior that undermines the country's institutions and economic opportunities.

The United States will continue to promote accountability for corrupt actors with all the tools at our disposal, in order to advance democracy, uphold international norms, and impose tangible costs on those who seek to upend them.

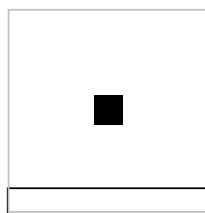
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From: (b)(6) (b)(6)
To: [DL OFAC & Counsel \(Govt\)](#); (b)(6) [Ahern, Paul](#); (b)(6) (b)(6) (b)(6)(b)(6) (b)(6)
(b)(6) (b)(6) (b)(6)(b)(6) [Manor, Tai](#); (b)(6) (b)(6) (b)(6) [Rembrandt, Scott](#); [Rosenberg, Elizabeth](#); [Swindells, Felicia](#); (b)(6) (b)(6)
Subject: Leg Update - Gertler, ISRA/USAID, NS2/HFAC, and Treasury staffing
Date: Tuesday, March 9, 2021 9:41:33 AM
Attachments: [Ev_3YUrWYAUFwL.jpeg](#)

Good morning,

Here is today's Leg update:

- **Gertler:** Senator Cardin tweeted the attached message in support of the Administration's action last night.
- **ISRA:** Senator Grassley sent a letter to USAID nominee, Ambassador Samantha Power, on efforts to remove ISRA from the OFAC SDN List. The letter can be found [here](#).
- **NS2:** HFAC RM McCaul sent a [letter](#) to SecState last night expressing concern over implementation plans for Nord Stream 2 Sanctions.
- **Treasury Staffing:** Business Insider is reporting that Addar Levi, the top lawyer for the Obama Foundation and an attorney from the former president's personal office, is joining the Treasury Department as deputy general counsel in the coming weeks.

Have a great day. Please feel free to reach out with any questions.

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

Cardin Statement on Revocation of Gertler License

WASHINGTON – **U.S. Senator Ben Cardin (D-Md.)**, a senior member of the **Senate Foreign Relations Committee** and lead author of the **Global Magnitsky Human Rights Accountability Act**, issued the following statement after the Department of the Treasury, in consultation with the Department of State, revoked the license that was issued to Specially Designated National Dan Gertler on January 15, 2021.

“Dan Gertler never should have been granted an eleventh-hour permit by the Trump administration to do business with U.S. banks and other companies. As the lead author and ardent defender of the Global Magnitsky Act, I am pleased to see the Biden administration revoke the license granted to the billionaire and his companies. If this egregious permit had been allowed to continue, it would have risked enabling corruption and setting back the integrity and legitimacy of the Global Magnitsky program.

“If well-connected international billionaires like Gertler think there is a chance they can get away with their corrupt actions, then they will not be deterred. The Global Magnitsky Human Rights Accountability Act has become one of the most effective tools available to the U.S. government against foreign officials who have been credibly accused of corrupt practices or human rights abuses. Mr. Gertler’s case reinforces the need for the Global Magnitsky Human Rights Accountability Reauthorization Act (S. 93), which I recently introduced with my Republican colleague Senator Wicker to send a clear signal of our national commitment to defending democratic values and the international rules and standards.”

From: (b)(6)
To: [DL OFAC SPI-\(POL\) Policy \(Govt & Contr\); Palluconi, Lisa](#)
Cc: (b)(6)
Subject: Leg Update - DepSec Confirmation Hearing Highlights
Date: Tuesday, February 23, 2021 5:53:12 PM

Good afternoon Lisa and Policy,

This is an informal summary. (b)(6) and I will transmit a more thorough product later this week.

The Senate Finance Committee held a hearing for our Deputy Secretary-nominee Wally Adeyemo (AOA) this morning. Sanctions and AML had a very large role in today's confirmation hearing. You can watch the full hearing [here](#). (b)(6) and I would like to flag the following highlights from today's Hill hearing:

-China: The first question from Chairman Wyden to AOA was on the use of sanctions authorities to address abuses by top Chinese companies. (This will likely be a QFR.)

-Genocide? Young tried to get AOA to call China's treatment of the Uighers a 'genocide.'

-EO 13959 Codification: Senator Young pressed AOA on whether he would support codification of EO 13959, which AOA declined to do. (This will likely also be a QFR.)

-TFI Staff Shout-out: Ranking Member (and former Banking Chair) Crapo gave a shout-out to TFI staff for their hard work, professionalism, and dedication. AOA seconded his remarks.

-GloMag/Gertler: Senator Cardin asked AOA to commit to look into the Gertler license upon assuming office.

-RuMag: Cardin also noted that it had been almost 18 months since RuMag was last used (incorrectly, the Senator mixed up GloMag and RuMag in his remarks.)

-Cyber sanctions: Senator Cantwell asked AOA to commit to sanctioning cyber adversary states.

-Human Trafficking: Senator Menendez asked AOA to commit to complying with the 2018 TVPA reauthorization and ensuring that international financial institutions have meaningful HT controls in place.

-Use of Sanctions: RM Crapo made very helpful intervention- cautioning his colleagues on the need for Congress to provide flexible sanctions authorities when considering new mandatory measures.

-Sanctions Consultation: Senator Menendez asked AOA to commit to meaningfully consulting congress on sanctions policy, especially with regards to Cuba, Russia, and Iran.

-AMLCFTA/Illicit Cash Act/BSA: There were many questions about the implementation of the newly enacted AML law.

- Senator Warner asked for a commitment to have the AMLCFTA regs out by June.

- Senator Cortez-Masto asked about updates to the cannabis.

- Senator Hassan inquired whether the regulation of antiquities.

Next steps: Senators will have two days to draft and submit written Questions for the Record (QFRs). Leg Affairs is expecting to receive them Thursday night, and a timeline for drafting and clearance of QFR responses will be announced at later time.

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

From: [OFACLegAffairs](#)
To: [DL OFAC & Counsel \(Govt\)](#); (b)(6) [Ahern, Paul](#); (b)(6) (b)(6) (b)(6)(b)(6)(b)(6)
(b)(6)(b)(6)(b)(6)(b)(6) [Manor, Tai](#); (b)(6) (b)(6)(b)(6) [Rembrandt, Scott](#); [Rosenberg, Elizabeth](#); (b)(6) (b)(6) (b)(6)
Subject: Leg Update - Confirmation Hearing Transcript, Leg Dashboard
Date: Friday, February 26, 2021 10:34:03 AM
Attachments: [SFC Adeyemo Confirmation Hearing.pdf](#)
[Legislation Dashboard 0226.pdf](#)

Good morning,

Here is today's Leg Update

- **SFC Confirmation Hearing Transcript** – Attached is the transcript from Deputy Secretary-nominee Wally Adeyemo's confirmation hearing on Tuesday.
- **Leg Dashboard** – Attached is an overview of all the TFI-related legislation that OFAC Leg Affairs is currently tracking.

Happy Friday

Best,
(b)(6) and (b)(6)

Number	Bill Name	Sponsor	Purpose	Comments	Status
Forthcoming	America LEADS Act	Schumer/Menendez	Whole of Government response to China. For OFAC - imposes forced labor and IP theft sanctions	(b) (5)	
H.R. 1231	None	Gonzales	Bill that would prohibit the reentry of the United States into the Joint Comprehensive Plan of Action unless the President makes certain certifications relating to Iran		
H.R. 1036	Bassam Barabandi Rewards for Justice Act	Wilson	This bill's goal is to incentivize informants to come forward with actionable information regarding evasion of U.S. or UN sanctions by expanding the Rewards for Justice program at the State Department		
H.R. 296	Financial Technology Protection Act	Budd	To establish an Independent Financial Technology Task Force to Combat Terrorism and Illicit Financing, to provide rewards for information leading to convictions related to terrorist use of digital currencies, to establish a Fintech Leadership in Innovation and Financial Intelligence Program to encourage the development of tools and programs to combat terrorist and illicit use of digital currencies, and for other purpose		
H.R. 402/S.158	CROOK Act	Keating/Cardin	To promote international efforts in combating corruption, kleptocracy, and illicit finance by foreign officials and other foreign persons, including through a new anti-corruption action fund, and for other purposes.		
H.R. 733	Stop Evasion of Iran Sanctions Act	Steil	Would prevent OFAC licensing Iran-related matters		
H.R. 808	Human Trafficking	Fitzpatrick	Bill would increase the role of the financial industry in human trafficking.		
H.R. 819	the Stop Corrupt Iranian Oligarchs and Entities Act	Kutsoff/Gottheimer	Bill would require a report on oligarchs and parastatal entities of Iran		
H.R. 839/S.226	Jamal Khashoggi Press Freedom	Schiff / Klobuchar	Bill would impose sanctions in response to Khashoggi killing		

H.R. 857	Iranian Arms Transfer Prevention Act of 2021	Bacon	Imposes mandatory sanctions on arms/materiel providers
H.R. 901	No Sanctions Relief for Terrorist Act	Steil	The bill would prohibit the issuance of Iran-related licenses or other waivers
S. 14	Combating Global Corruption Act of 2021	Cardin	The proposed legislation would establish a tiered system of countries with respect to levels of corruption by their governments and required evaluation of foreign persons engaged in grand corruption for designation under the Global Magnitsky Human Rights Accountability Act.
S. 208 / H.R. 1223	Holding Russia Accountable for Malign Activities Act of 2021	Coons	Imposes mandatory sanctions in response to Navalny poisoning.
S. 249	United States-Cuba Trade Act of 2021	Wyden	Repeals Helms-Burton
S. 65	Uyghur Forced Labor Prevention Act	Rubio	Bill would clarify sanctions imposed under the Uyghur Human Rights Policy Act of 2020, as well as ensure that goods produced with Uyghur forced labor do not enter the U.S.
	Support Mexico against Corruption Act	Gallagher	Bill require the imposition of sanctions pursuant to the Global Magnitsky Human Rights Accountability Act to combat corruption and human rights violations perpetrated by officials in the Mexican Government
H.R. 621	Bolivar Act	Waltz	Bill would prohibit contracting with persons that have business operations with the Maduro regime, expanding a previously adopted FY19 NDAA provision.
H.R. 1251	Cyber Diplomacy Act	McCaul	To support United States international cyber diplomacy, and for other purposes.

(b) (5)

S. 379/HR 1228	Libya Stabilization Act	Coons/ Deutsch	To advance a diplomatic solution to the conflict in Libya and support the people of Libya
H.R. 794	National Climate Emergency Act	Blumenauer	To require the President to declare a national climate emergency under the National Emergencies Act
S. 388	Honduras Human Rights and Anti-Corruption Act	Merkeley	Would require designating President of Honduras
H.R. 1214/ S.429	Countering Chinese Propaganda Act	Cotton/Banks	Authorizes sanctions against the CCP's United Front Work Department

(b) (5)

CQ Congressional Transcripts

Feb. 23, 2021

Feb. 23, 2021 Final

Senate Finance Committee Holds Hearing on the Nomination of Adewale Adeyemo to be Deputy Treasury Secretary

LIST OF PANEL MEMBERS AND WITNESSES

WYDEN:

Committee will come to order and I--I want to welcome everyone to nominations week here in the Senate Finance Committee. This is the first of three hearings.

We are very pleased to be able to welcome to the committee Wally Adeyemo who President Biden has nominated to serve as Deputy Treasury Secretary. This is one of the widest-ranging economic jobs in the economic--Executive Branch, so we have got a lot to discuss today. I would also like to welcome our newest members of the Finance Committee, Senator Elizabeth Warren of Massachusetts, and John Barrasso of Wyoming. We are pleased that they are joining the committee, and Senator Warren is not going to waste any time. In a few minutes, she will be introducing Mr. Adeyemo.

So I want to start by talking about the COVID crisis and the COVID jobs crisis. The COVID crisis is unlike any this nation has seen before. It is defined by a sustained level of turmoil for working Americans that no one has seen in generations. While those at the top are doing much better, the COVID economy is essentially split in two. There are long lines at million-dollar open houses, but there are also long lines at America's food banks.

Now with respect to the COVID jobs crisis, you can find some rosy predictions about GDP growth and jobs if you just spend a little time online. Some say that that is a reason to go small with COVID economic relief. In my view, those estimates wildly underestimate the level of economic pain that people in Oregon and across America are feeling a full year into the pandemic. So a few facts as we get started.

The Fed Chair Mr. Powell said recently the January unemployment rate wasn't really 6.3 percent, it was closer to 10 percent for this country, and for working Americans, particularly those at modestly paid positions, it was 17 percent. 5 million workers have dropped out of the workforce since the pandemic hit; most of them were women who have had to sacrifice jobs to provide their own childcare.

In terms of women's participation in the labor force, the pandemic wiped out all of the gains going back 35 years. New data showed last week that job claims, jobless claims jumped unexpectedly yet again. Before the pandemic, the highest number of new unemployment claims ever filed in a week came in October 1982. It was 695,000. The number of new jobless claims has now been higher than the pre-pandemic previous peak every single week for 48 weeks in a row. And obviously, the pandemic has taken a terrible human toll, half 1 million lives lost. It has infected and shredded the economic fabric of our country at its most vulnerable points.

There is an epidemic of child hunger. Families who were struggling to pay for housing before the pandemic are now months behind on rent or mortgages; millions and millions of mothers are facing the prospect of an irreversible setback to their incomes, their savings, and their careers. Our goal for the months and years ahead cannot be to simply return to the economy of January 2020.

For too many people, the cost of living a dignified life in America was unaffordable even before the pandemic, so the Congress and the Biden administration need to go big with a focus on fresh policies that are going to get more families off this country's economic tight rope and get them off for good.

Now the Treasury Department is going to be right at the center of that effort, and my view is Wally Adeyemo is an ideal choice to serve as deputy secretary. You can look high and low colleagues for somebody who might not--who might have something that's not positive to say about Adeyemo, but you can't find him or her because he has such a strong track record of working with people in a positive way; he knows the Treasury inside and out. He brings an extensive economic policy background, including on key international issues that will help us recover here at home and rebuild our alliances abroad.

He knows from first-hand experience, having been in the Biden administration, that going small is a big risk. Perhaps most importantly, he has worked closely with members of this committee and staff on a range of issues, and as I say, he has always left, always left the impression that he's knowledgeable and dedicated, and effective. I very much enjoyed my meeting with Mr. Adeyemo.

In December, we talked about the COVID recovery, Treasury's central role in fighting climate change, and taking new approaches to address racial disparities baked into our economic policies; as colleagues know, that is going to be a special priority in the Senate Finance Committee in this session.

So I am looking forward to working with Mr. **Adeyemo** and the Treasury Department on a host of issues, including shell companies, something that didn't get a whole lot of front-page headlines but last year the Congress passed landmark legislation to end the use of anonymous shell companies in the United States.

It took a lot of hard work. Senator Whitehouse was very involved. Senator Crapo was very involved. Senator Grassley was very involved. Senator Rubio and I were heavily involved. So there was a lot of bipartisan effort. Now that the legislation is law, it's up to the Treasury Department to write strong rules and implement it. We are going to want to talk about those challenges this morning.

I will close with just one last point. When Mr. **Adeyemo** was confirmed, he will be making history as part of a history-making duo, the first African American Deputy Treasury Secretary will be serving under the first woman Treasury secretary, and I am glad that the Senate Finance Committee has been part of helping to boost that long, long, long overdue progress.

Mr. **Adeyemo**, thank you for your willingness to return to public service, and I think now we will recognize Ranking Member Crapo, and the Pacific Northwest is pleased that Oregon and Idaho are going to have a real role in this committee. Senator Crapo?

CRAPO:

Thank you, Senator Wyden, and I really appreciate the opportunity to be in this position to work with you on this committee. I appreciate our friendship and our collaboration, and our successful efforts in the past to build bipartisan solutions. And welcome Mr. **Adeyemo**. I appreciate you being

here as well. Before I go on, I want to also welcome our two new members Senator Warren and Senator, are also. This is the best committee in the Senate, in my opinion. Now my friends--

WYDEN:

Very--very objectively.

CRAPO:

Well, some of my friends on the banking committee that I was just the chair of the last Congress might say that I am being untrue to them, but maybe I will say those two committees are tied to be the two best committees in the United States Senate.

The Treasury Department leads and oversees a vast array of issues of importance to the Americans and to the United States economy, including economic policies such as tax policy and economic stability, managing the U.S. government's finances and debt, financial markets and institutions, illicit finance, and financial sanctions, trade and global organizations like the G7, the G20 and the IMF and the Social Security and Medicare trust funds to name just some of its Horton jurisdictional influence.

The deputy secretary of the Treasury stands at the forefront of many of these issues, advising the Treasury secretary on the activities and policies of the Treasury Department and programs and even sometimes serving as a liaison between the Secretary and Congress.

In the last administration, I worked very closely with former Deputy Secretary Justin Muzinich on a number of matters, including the economic support for individuals, businesses, and financial markets impacted by the

COVID-19 crisis in the CARES Act and combating money laundering and illicit finance as a part of the beneficial ownership in BSA/AML reform and many more.

If confirmed as deputy secretary of the Treasury, Mr. Adeyemo would be no exception in actively engaging in many initiatives with Congress. Mr.

Adeyemo has served throughout his career in a number of different roles in the government related to economic and financial issues, such as the Treasury Department, the National Economic Council of the White House, and the Consumer Financial Protection Bureau.

During his time at the Treasury and the NEC under the Obama administration, he was involved in international policy, engaging with foreign officials, and advocating for U.S. interests abroad, including as the president's representative to the G7 and G20 as well as the chief negotiator for the macroeconomic aspects of the Trans-Pacific Partnership.

He has also held positions at a private--at private and non-private organizations, including as a senior advisor at BlackRock between 2017 and 2019 and as the editor of the Hamilton Project at the Brookings Institution. In addition to accumulating diverse, relevant experiences, it is important to understand the framework through which nominees think about and formulate policy.

During this hearing, I look forward to understanding more about Mr. Adeyemo's thoughts on his priorities at Treasury, how the U.S. can stay competitive globally through tax policy; additional COVID-19 funding, and its potential impacts on the U.S. economy and fiscal sustainability going forward; protecting national and financial security and curbing illicit activities and promoting U.S. interest abroad and curbing bad actors.

Even since his time in the Obama administration, there has been an (INAUDIBLE) in the challenges facing the nation's economy in the national and financial security. For example, the U.S. has grappled with the COVID-19 pandemic, which Chairman Wyden discussed, and the economic consequences of government-mandated shutdowns since the beginning of last year, which have since eased.

Congress worked across the aisle multiple times in 2020 to provide unprecedented economic support to individuals, families, and businesses most affected by COVID-19, including the CARES Act in March, additional PPP funding in the summer, and the most recent COVID-19 relief package in December.

Senator Wyden indicated this crisis has exacted a terrible toll on America, and he is right. I agree with that and agree that another COVID package is appropriate. There are some disagreements on the scope and content of that package, though.

Unfortunately, Democrat leadership have apparently charted a path toward a massive untargeted \$1.9 trillion package that may even bypass this committee, and there remain many questions about it, not necessarily about the need for a package but for the potential impact and the many--the impact of the many non-COVID party--partisan policies that are included in the package.

COVID relief is just one example of an area where the deputy secretary has played an active role in the past toward bipartisan solutions, and I look forward to working with you, Mr. Adeyemo, to achieve that same result this time as we move forward.

Mr. Adeyemo also--Adeyemo also comes with private sector experience that could raise questions--excuse me, the private sector experience that can help him in dealing with these issues and providing the kind of advice and support that we need on these critical issues.

Finally, in your past government roles, you played a role in the international and national security space working on various international economic issues, including trade and investment policy agendas, CFIUS, and engagement with multilateral development banks. It has also been noted that you were the chief negotiator in the Trans-Pacific Partnership; noting these issues, I am interested to hear your views on the work we did last Congress on beneficial ownership and anti-money laundering, your views on sanctions, and how you will include views of Congress from both sides of the aisle in deliberations at international forums.

Again Mr. Adeyemo, thank you for being willing to serve and thank you for joining the committee today. I look forward to your testimony.

WYDEN:

Thank you, Senator Crapo. Senator Warren?

WARREN:

Thank you, Mr. Chairman, and thank you, Ranking Member Crapo. I appreciate your warm welcome. I am happy to be joining a committee that has such principled leadership, so thank you very much.

I have the privilege of introducing Wally Adeyemo, who has been nominated to be our next deputy secretary of the Treasury. I have known Wally for more than a decade. We worked closely together when we were

standing up the Consumer Financial Protection Bureau, and I have trusted his counsel ever since.

Wally understands the American dream up close and personal. He and his family immigrated from--to the U.S. from Nigeria, laying down roots in California's Inland Empire. He grew up in a working-class neighborhood where he learned about hard work and righteous values from his mother, who is a nurse, and his father, who is an elementary school principal.

Now perhaps one of the most important things to know about Wally is that he was learned named most likely to succeed by his classmates at Eisenhower High School in Rialto, California. This was a very perceptive group of high school kids.

He then headed off to UC Berkeley and then to Yale Law School. He was working at the Treasury Department when President Obama asked me to set up the newly passed Consumer Financial Protection Bureau. Wally became the CFPB's first chief of staff, where he worked miracle after miracle. During his years in the Obama administration, he lent his talents to just about every critical economic policymaking position.

He has a wealth of experience for this job. Wally's smarts, his talent for making things happen, and his skill as a natural diplomat prepare him well for this role. He has a firm command of the array of domestic and international policies under the Treasury's purview, and I believe that he can be trusted to effectively advance our economic and national security interests abroad.

But the thing about Wally, what makes him so remarkable is that he knows deep in his bones that America's interests lie in our shared prosperity. If confirmed, he will fight to ensure that every family has a fair shot at getting

ahead and that every kid has access to the opportunities that he enjoyed. Wally always remembers where he came from, and for that reason, I know he will always stand up for hard-working people who are trying to build a future.

Wally cares deeply about our country, he truly believes in the good that America can do around the world, and he will fight day and night to ensure that this is a better country for America's workers and families, so welcome Wally. Congratulations on your nomination, and we look forward to today's discussion.

WYDEN:

Thank you, Senator Warren, for the strong launch of the nomination's consideration.

We have got a little bit more to do. The Assistant Senate Majority Leader, Senator Durbin, would like to make a statement. We are going to put that into the record without objection, and that then brings us, Mr. Adeyemo, to your opening statement. Please go ahead.

ADEYEMO:

Chairman Wyden, Ranking Member Crapo, and members of this committee, it is a privilege to come before you today as President Biden's nominee to be deputy secretary of the Treasury. I want to thank Senator Warren for the generous introduction, and I want to thank the members of this committee for considering my nomination. I also want to express my gratitude to the president, vice president, and Secretary Yellen for putting their confidence in me.

I spent the majority of my working life in public service inspired by my parents, who came to this country to provide their children with an opportunity. My parents emphasized the need to give back to a country that has given us so much, demonstrating the value of service every day as an educator and a nurse helping to provide opportunity and care to members of our community. If confirmed as deputy secretary of the Treasury, my focus will be advancing policies that provide everyone access to the same economic opportunities I have enjoyed.

Taking these steps to ensure that all Americans share in our prosperity is not only a moral imperative; it's essential to our long-term economic growth. Today the most immediate threat to our shared prosperity is COVID-19. Until we contain the pandemic economic policy must remain focused on providing relief to those harmed by the public health crisis, especially those disproportionately impacted low-income Americans and communities of color.

The pandemic has exacerbated inequality, strained families, and expose disparities and opportunities throughout our country that existed long before COVID-19. Without additional relief, this hardship will become even more acute and will inflict long-lasting pain on countless Americans. Containing the pandemic is not only critical to our economic prosperity, it is also critical to advancing our national security.

I have spent a great deal of time working at the intersection of economic policy and national security, including my time as deputy national security advisor for International Economics. If confirmed, I've been asked by Secretary Yellen to work on a number of Treasury's national security priorities. This will involve a focus on three critical areas.

First, we need to invest in America's competitiveness; to ensure the future is made in America we must fuel innovation, make smart, targeted investments in critical industries and technologies, and pursue policies that protect American workers and industries from anti-competitive trade practices. Taking steps to invest at home will put our firms and workers in the best position to compete globally.

Second, we must reclaim America's credibility as a global leader advocating for economic fairness and democratic values. As the President has said, America's alliances are our greatest asset. We must work hand-in-hand with our allies to confront those that threaten our economic and national security. This is the only way to build a global economy where the rules of the road reward hard work and innovation, not unfair practices and abuse.

Finally, we need to work with Congress and strategically use the Treasury Department's tools to protect our citizens from threats foreign and domestic. Treasury's tools must play a role in responding to authoritarian governments that seek to subvert our democratic institutions, combating unfair economic practices in China and elsewhere, and detecting and eliminating terrorist organizations that seek to do us harm.

These are not Democratic or Republican challenges, they are American challenges, and I know the ways that we address these challenges have real-life consequences. I have seen this first-hand coming from a working-class part of California called the Inland Empire that was devastated by the great recession.

Many of those same neighbors and friends are struggling today to survive the public health and economic crisis created by COVID-19. Addressing the challenges faced by people in the Inland Empire and communities like it all

over the country is in our economic and national security interest. And the actions we take today must not only protect Americans from COVID-19 but should also lay the groundwork for years of economic prosperity and opportunity.

At this critical time for our country, I hope to join you in fighting to give others the same opportunity my family had. Today just as when I joined the Treasury in 2009, I feel called to serve my country and will be honored to do so as deputy secretary of the Treasury. I look forward to collaborating with the members of this committee and Congress to rebuild the American economy from this historic crisis. Mr. Chairman, Ranking Member Crapo, members of the committee, thank you so much for considering my nomination, and I'm happy to take your questions.

WYDEN:

Very good, Mr. Adeyemo. We have got some obligatory matters we have to deal with. We are going to ask you four questions. Let me first ask, is there anything that you are aware of in your background that might present a conflict of interest for the duties of the office to which you have been nominated?

ADEYEMO:

No, senator.

WYDEN:

Do you know of any reason, personal or otherwise, that would in any way prevent you from fully and honorably discharging the responsibilities of the office to which you have been nominated?

ADEYEMO:

No, senator.

WYDEN:

Do you agree without reservation to respond to any reasonable summons to appear and testify before any duly constituted committee of the Congress if you are confirmed?

ADEYEMO:

Yes, I do.

WYDEN:

Finally, do you commit to provide a prompt response in writing to any questions addressed to you by any senator of this committee?

ADEYEMO:

Yes, I do.

WYDEN:

Very good. Let me turn to my questions now, and then we will go to Senator Crapo.

What is very striking about this committee, Mr. Adeyemo, is that we have got a number of members who serve on Finance and Intelligence and your background has a very impressive intersection between those two areas, economics and intelligence, and in our meeting, we discussed your national security experience and how Treasury's purview through the financial

crimes enforcement network, committee on foreign investment in the United States, sanctions policy would be an important part of your duties and also to make sure that any money laundering efforts were ones that we examined very carefully because we only want transactions that were held to high standards.

I have a couple of items I want to touch on, but in the context of how you plan to address this part of Treasury's portfolio and on day one I am struck by this matter of widespread interest on sanctions stemming from the executive order on China in November and it obviously had national security implications and I would be interested as part of your answer with respect to this part of your portfolio is what kind of approaches would you recommend to go after the top Chinese firms in this area and what kinds of targets would be appropriate so give us your general views and then specifically that--that question because a lot of members are getting asked about it.

ADEYEMO:

Well, senator, let me start by thanking the members of this committee and Congress for the work that was done in the NDAA to advance legislation that would give us additional authorities. When I served in the Obama administration on a regular basis when I would visit with international counterparts, they would ask why the United States didn't have legislation that could look at beneficial ownership, and I couldn't give them a good answer, now I can, and I am appreciative to the members that have worked on that.

If confirmed as deputy secretary of the Treasury, one of my primary goals will be implemented at legislation in order to put us in a position in which we can protect the country. Stepping back and addressing the committee's

interests in China as the president has made clear China is our top strategic competitor.

Where China is willing to compete on a level playing field, I believe the American people, our companies, and our firms will be more innovative and have the ability to be successful. Where China is not willing to play on a level playing field, it is important that we hold them accountable to the rules that they have agreed to in the international system.

I believe this needs to be done in some cases unilaterally, but always best to do multilaterally working with other countries, especially our allies, to demonstrate to the Chinese that they are isolated when they violate the rules of the road. That's going to be my approach to dealing with the issues that relate to China.

With regard to the executive order that you mentioned, I look forward to sitting down with my colleagues at the Treasury Department, the government to understand implementation and how it's being implemented in working with you and members of the committee to look at how we can use the tools that exist today to hold China accountable.

WYDEN:

Good. And I understand you want to talk to your colleagues about that. We would be interested if you want to add anything else for the record about what kinds of approaches you might recommend with respect to going after those top Chinese firms. That is particularly my concern.

Let me ask you about this issue of racial disparities. We are going to put a special focus during this session of Congress here in the Finance Committee on long-standing economic failures and inequities in our country, and people

of color were already disproportionately burdened by wage gaps before the pandemic, the communities of color have been disproportionately affected both in terms of illness, death and financial devastation by the pandemic and women are almost twice as likely as men to have lost a job and this has been a priority for me in terms of getting economic equity for people of color and women for a long time.

Now my question is if we are really going to correct those historical disparities, it's important for policymakers to understand where tax benefits really tax expenditures are going. Unfortunately, Treasury's Office of Tax Analysis has consistently emitted analysis of tax expenditures by race and gender, so my question Mr. **Adeyemo** and I think we have talked with you about this would you support including this important tax analysis by race and gender in Treasury publications and commit to working with all of us Senator Crapo, I, and others to obtain this important transparency into our tax system?

ADEYEMO:

Senator, I am committed to working with you on this issue. I agree with you that it is critical that we understand how the policies that we are implementing have an impact on the American people, especially those most harmed in marginalized communities.

I think it's critical both morally for us to address this issue, but it is also a critical economic issue that we unlock the unrealized potential of marginalized people in this country in order to grow our economy and make sure that we are competitive going forward.

WYDEN:

Okay. Senator Crapo?

CRAPO:

Thank you, Senator Wyden, and Mr. Adeyemo. I'm going to try to go through three or four questions and skip around on topics, so bear with me here.

First, a number of countries have imposed or plan to impose discriminatory Digital Services Taxes or DSTs that unfairly target U.S. companies. The Finance Committee has expressed bipartisan opposition to unilateral measures like DSTs and advocated for countries to reach a multilateral agreement at the Organization for Economic Cooperation and Development or the OECD. Will you continue to negotiate toward a multilateral agreement at the OECD that does not unfairly target U.S. companies and compromise the U.S. tax base?

ADEYEMO:

Senator, I am committed to working with senator--with Secretary Yellen if confirmed to engage in a multilateral negotiations that does not unfairly burden U.S. companies but rather creates a level playing field for competition.

CRAPO:

Thank you. And then switching to the AML/BSA legislation that you just referenced, I appreciate your reference to it. It took us a while to get that through the Banking Committee. Senator Whitehouse and Senator Warner, a number of others on this committee were very interested in trying to make sure that got through, and I think it is very important, particularly the new

beneficial ownership information relating to establishing a government database of such disclosures for the use of federal authorities.

As you--as you and I have discussed privately, there is some significant concern, particularly from the small business community, about that regulatory burden that might grow out of that data management which I would like to see minimized to the maximum extent possible. If confirmed will you work with Congress to streamline that reporting process and to limit the burdens on industry while we still make sure that we achieve the objectives of this legislation?

ADEYEMO:

Senator, I am committed to making sure that we limit the burden on industry. I know that small businesses in America want to make sure that they help us protect this country, and I believe we can do that in a way that doesn't overly burden them as we move forward. I look forward to working with you and the members of the committee to making sure that we do that.

CRAPO:

All right. Thank you. I appreciate that. I had a question on sanctions that was almost identical to the one that Senator Wyden already asked you, so I'm just going to follow up on his sanctions question with a little bit of a different twist.

In the last two Congresses or so, a dynamic has developed that I think is relatively new in sanctions policy, and that is Congress has begun going down the road of adopting mandatory sanctions with high degrees of specificity relating to certain countries or certain individuals or entities even.

Without giving imposition of those sanctions the flexibility that we have had in previous sanctions regimes that we had established in other words, not letting Treasury, and by the way, I think that the treasury team that deals with sanctions is outstanding, and I have great confidence in them, but I have been concerned about the lack of flexibility in those kinds of congressional approaches that we have seen developing in the last few years that take the entire decision-making process and the fine-tuning and management of those sanctions away from the Department of Treasury and essentially create a rigid system.

Do you agree that the best approach is to have more flexibility so that the sanctions can be applied with much greater specificity, and could you comment if you do agree with that that the impact that lacking that has on our allies and our friends around the world who are not made a part of the sanctions decisions?

ADEYEMO:

Senator, I appreciate the question, and I want to join you in commending the career people who work at Treasury on the sanctions policy on a regular basis. In my time at the Obama administration, I had a chance to work with a number of them. They are dedicated Americans looking to protect our national security.

With regard to sanctions policy at large, Secretary Yellen has asked me if confirmed to conduct a top to bottom review of sanctions that are currently in place to look at how they are used, how we can make them more effective, how we can move forward.

I am looking forward to doing that work and then spending time with you and members of Congress to talk about what we can do to make sure that we improve the efficacy of the sanctions that we have and the policies that we use. My view is that we are always best placed when we take these actions on a bipartisan basis and looking forward to talking to you about what we can do to advance our foreign policy interests.

You are right that from my standpoint that our sanctions regimes are always best when we are able to do them multilaterally, not only for the economic impact but also the political impact. That will require us to think through how we use these tools flexibly, and I'm looking forward to working with you and other members of Congress to address these issues.

CRAPO:

Thank you. My time has expired, but also one further or maybe a couple of other further ones but one question I didn't get to was with regard to the new CDFI MDI Fund that was created by the last COVID bill.

I am very interested in that; Senator Warner and a number of the others on this committee are very interested in making sure that that new program is rolled out quickly and effectively to help our minority institution--financial institutions in this country be able to provide greater services so I will just note that to you and I will ask for your commentary on that in your response after the hearing. Thank you.

ADEYEMO:

Thank you, senator.

CARDIN:

I understand next we have Senator Stabenow by WebEx.

STABENOW:

Well, thank you very much, Mr. Chairman, Senator Cardin, and welcome to our wonderful, distinguished nominee, Mr. Adeyemo. It was wonderful to talk with you and to have a chance to go through a whole number of issues when we had an opportunity to first speak.

There are so many different issues related to Treasury all very, very important that you and the secretary, of course, are going to be responsible for and I want to speak to one that I spoke with you about as well which relates to part of, and a very important part of the American Rescue Plan that we are now working on and that relates to pensions.

You know, we--there's so many different ways in which Treasury impacts people's lives, business lives, our international status, and so on, and we also, you will be overseeing some very important personal issues that relate to people's ability to have a good life and put money aside, and, you know, people who have followed the rules all of their lives and done all of the right things and are now finding themselves after they thought they had a pension that they had been saving for now in a situation where that is in jeopardy and really their--their quality of life in jeopardy.

We have in the rescue plan the Butch Lewis Emergency Pension Plan Relief Act, which would, as you know, stabilize the multi-employer pension plans for more than a million people in their families, and in fact, in Michigan, we have over 440,000 people that are in multi-employer pension plans and tens of thousands are in danger right now of losing their plans, and many have already seen over half of their pension eliminated very, very challenging and

tragic situation. So many of the workers that are covered are in industries on the front lines.

As you know, the pandemic our truckers and delivery people, grocery store, food preparation workers, construction workers, I mean all of the folks again working hard every day playing by the rules and now are in a situation where their futures and their retirement is in jeopardy.

So the time really is now to act and I would like you to speak to the importance of this issue and the importance of putting in place this part of the Rescue Plan.

ADEYEMO:

Well, senator, thank you so much for the time that we spent together talking about the issues that your constituents face. I think this is a critical issue addressing the--these pension issues are critical.

As you know well, President Biden during the campaign supported similar legislation. I look forward to working with you to address the needs of this group of people who many of whom are on the front lines. Addressing this challenge sooner rather than later is both important from the standpoint of meeting the needs of these people as they retire but it also makes economic sense.

STABENOW:

Absolutely. Along this line are folks working hard every day and looking at the future jobs of our country. I want to speak about manufacturing for a moment. As we are moving forward this certainly has a global competitiveness issue for us, it is an issue of jobs, good-paying jobs in

America, and our committee, of course, is going to be continuing to be very involved in issues around clean energy tax incentives, how we are encouraging more job creation in the United States.

Senator Manchin and I are working on a reconstituted 48C of the tax code, which is an Advanced Energy Manufacturing Tax Credit to help our companies create new jobs in clean energy manufacturing, retooling our plants, and so on. We originally did that back in 2009.

It was, at the time, very successful. It was something that really helped turn Michigan around, in terms of clean energy manufacturing, but we are now really wanting to focus as well in other parts of the country that have lost jobs related to coal and mining and other kinds of manufacturing jobs.

So when we look at this, and you talk about China as a competitor with us, we know that on top of every other issue, we are also looking at China holding almost three-fourths of the world's manufacturing capacity for lithium-ion battery cells, for instance, which is a vital component for us as we move forward on electric vehicles and we need to be making those here in America.

So could you speak about the tax code, the clean energy manufacturing kinds of issues in terms of the importance of moving forward and leading the globe and not ceding to China and other places in terms of the jobs in these important sectors?

ADEYEMO:

Senator, I agree with you that making sure that the tax code is set up in a way where it invests in innovation and encourages companies in America to do that makes a great deal of sense, especially when it comes to clean energy.

This is a place where we want to make sure that the future is made here in America and not made somewhere else in the world; critically important to making sure that we get these incentives right in order to ensure that our companies are in a position to compete not just in America but also abroad in selling American goods and services.

I look forward to working with you and members of this committee to make sure that we are setting incentives in the right way, using the tax code but also using other policy levers as well.

STABENOW:

Thank you very much. I know my time is up, Mr. Chairman, but I look forward to working with you. This is such an important area for us to move forward in terms of good-paying jobs and our place in the global economy as well. Thank you.

CARDIN:

Thank you, Senator Stabenow. Senator Cantwell?

CANTWELL:

Thank you, Mr. Chairman and Mr. Adeyemo congratulations on your nomination. I know that people have asked you about sanction issues, so I think I will just continue on that front.

Cybersecurity is one of the most important things I believe that we need to be working on from an infrastructure perspective, and I know that you will be leading a review of U.S. sanctions. Should we be looking and working on an international basis to basically get U.S. allies to work together on sanctioning countries who initiate cyber-attacks?

ADEYEMO:

Senator, my view is that it is critical that we work closely with our allies to hold those accountable that sponsor cyber-attacks that look to destroy or disrupt services in the United States, around the world.

CANTWELL:

Thank you. We look forward to working with you on that.

Also, in President Biden's agenda is a further investment in the affordable housing tax credit; this is something that Chairman Wyden and I have worked on to further investments in affordable housing. My colleague Senator Young who is on this committee, and I have introduced legislation to increase by 50 percent the amount of money going into affordable housing because the tax credit creates jobs, and it also helps provide important unit availability.

People think, well, if you don't build the housing like the cost, you don't have the cost well, we do have the cost, we have the cost of housing in dealing with population in different settings which is really actually ends up being more costly. So what will you do to help carry out President Biden's agenda on the Affordable Housing Tax Credit agenda?

ADEYEMO:

Senator, I look forward to working with my colleagues in the administration on affordable housing issues but also with you and Senator Young on your proposal. I agree with you that this is a critical issue for us in terms of ensuring that we meet the affordable housing needs in this country. That tax credit has been successful. We should look at ways to make sure that we are

using it in a way that is effective going forward. I look forward to working with you and Senator Young on that.

CANTWELL:

And lastly, I know my colleague Senator Crapo the ranking member, will remember this, but we spent many hours last March in a room talking about how to better protect the economy during the COVID crisis, and part of it was an investment in aerospace manufacturing particularly the supply chain. As it turned out, those resources didn't get adequately used to protect the supply chain.

Our colleagues, Senator Moran and others, have been working, and the Commerce Committee overall has been working to try to get Treasury to focus on using the resource that it was given to help on supply chain support. We have lost something like over 100,000 jobs in aerospace already, and we could lose more, so will Treasury work with the Congress to make sure that this important sector of the U.S. economy is helped during the COVID pandemic and that we are doing all we can to preserve those jobs so that we are competitive after the crisis in one of the biggest export sectors to our economy?

ADEYEMO:

Senator, if confirmed, I look forward to working with my colleagues at Treasury to address these issues. I agree with you that one of the things we need to pay a great deal of attention to is the supply chain--chain. I think the supply chain and lots of industries, including aerospace, are going to change as a result of the pandemic, and the key for us is making sure that we make investments now that make sure that America is in a position to win the

future when it comes to supply chain, so I look forward to working with you if confirmed and my colleagues at Treasury to address this important issue.

CANTWELL:

And then I guess I would say the one last point on that as it relates to the administration's infrastructure investment, I see there is a great opportunity to work collaboratively both on the infrastructure dollars and on the job training and skilling of a workforce to be able to take advantage of those infrastructure jobs and infrastructure investment, and that is something Treasury Secretary Yellen mentioned at her confirmation hearing that these kind of workforce training issues were something that Treasury was going to pay particular attention to.

I hope that in the next COVID package, we can marry this up so that we are again both making the investment in very needed infrastructure but also skilling a workforce that can take advantage of those high-wage jobs.

ADEYEMO:

I completely agree, senator. I think the things you mentioned are all critical to American competitiveness and we meet need to make sure that our economy is competitive as we come out of COVID-19 in order to make sure that our workers and our firms have opportunity to sell American goods here at home and also abroad.

CANTWELL:

Thank you. Thank you, Mr. Chairman.

WYDEN:

Thank you, Senator Cantwell. Senator Grassley?

GRASSLEY:

Thank you, Senator Chairman or Mr. Chairman, and welcome.

Congratulations on your appointment, and this gives us a chance to discuss some policy not necessarily whether you should have the job because I believe that you will probably be confirmed. So just because we disagree on policy might not have anything to do with whether or not we think you ought to be in that job.

President Biden has proposed increasing the corporate rate from 21 to 28. If enacted, our country would once again have one of the highest corporate tax rates among developed countries.

In your view, how will raising the corporate tax rate above that of most developed countries affect the global competitiveness of the United States? And I ask that question because I thought at 35, it was just outlandish that we would expect their corporations and jobs in America to compete with overseas, so we got it down to where now we are very competitive.

ADEYEMO:

Senator, thank you for the question. I think I agree with you that one of the things we need to focus on is making sure that our companies in America remain competitive globally. I think that taxation has a lot to do with that, but also investment has a great deal to do with that.

The president, as you mentioned, has proposed during the campaign raising the corporate rate to 28 percent. The president has also proposed making a number of important strategic investments in the United States that

corporations have been calling for--for a long time. My goal if confirmed is to make sure that we work internationally through the OECD and the G20 tax process to make sure that we create a more level playing field for American companies, especially when it comes to taxation.

We need to end what seems like a race to the bottom in terms of international taxation where companies are competing against each other and create one in which we are working together to make sure that we are maintaining our tax base. I look forward to working with you and members of this committee on those issues going forward.

GRASSLEY:

Thank you. There's an economic consensus that significant corporate portion of the corporate income tax rate falls on workers in the form of reduced wages and benefits, so we even have what I consider a liberal tax policy center assumes that 20 percent of the corporate tax falls on workers. Similarly, the joint committee on taxation and even our CBO have both concluded that 25 percent of the corporate tax rate is borne by workers, so if you raise the corporate tax rate, you are going to affect the jobs by that corporation.

Do you agree that if the corporate tax rate is increased to 28 percent, as proposed, American workers will feel at least a part of the burden through fewer jobs, reduced wages, and less benefits?

ADEYEMO:

Senator, I look forward to if confirmed looking at the data that we have collected from the last few years of corporate taxation in order to look at what the impact has been in terms of wages for employees and corporations

and the impact that it has had and then looking at the data and looking at the research I look forward to working with the president to advance a proposal that will advance the benefits for American workers.

Part of this is ensuring that we not only think about the tax rate, but other proposals that we have that will hopefully strengthen the ability of corporations to continue to hire Americans and keep corporations here in the United States of America. I think the holistic policy proposals that the president has proposed would create jobs in this country, and I look forward to working with you and members of this committee to make sure that as we refine the president's tax proposals, we do it in a way that is centered on making sure that America remains competitive.

GRASSLEY:

My--this will probably have to be my last question. Prior to the Trump administration, Chinese state-owned enterprises were buying American companies at a record clip to acquire technology and intellectual property. This included a number of Chinese state-owned enterprises purchasing U.S. agricultural operations. How do you view the rise of the state-owned enterprises in the global economy over the last decade, and do you think special investment rules are necessary for such firms?

ADEYEMO:

Senator, I think it is an important question, something that we need to look at very closely. I think that since I have left government, Congress has enhanced the CFIUS process, which I think has been a useful tool to making sure that we are able to protect U.S. companies and U.S. interests.

I think it's going to be critical that as we do a holistic look at our policies within the U.S. government, we look at what we can do to make sure that we protect American technology and ensure that things made in America are made are protected as well. I don't have a view on that particular issue, but I look forward to working with my colleagues in government if confirmed to look at that issue and look forward to working with you as well on it.

GRASSLEY:

Thank you. Thank you, Mr. Chairman.

WYDEN:

Thank you, Senator Grassley. Our next two are Senator Thune and then Senator Menendez.

THUNE:

Thank you, Mr. Chairman. Mr. Adeyemo, welcome and congratulations on your nomination. We will look forward to working with you.

I want to get to a couple of questions here quickly, starting with the fact that last year as you all know, Congress allocated almost \$4 trillion on a bipartisan basis to help our nation get through this public health and economic crisis. The legislation amounted to the largest federal response to any crisis since the second world war, and while the administration talks about the need to go big on its \$1.9 trillion proposals to come on top of the bipartisan \$900 billion relief bill that was signed into law less than two months ago.

There is early inflation warning sign, and I think that is last week's report of a 1.3 percent January increase in producer prices which is a post-2009 high.

There's reporting that, you know, the increase in the quantity of money in the economy measured by M2 last year year-over-year was up \$4 trillion or 26 percent, and the projection it's going to be up another 12 percent this year which is twice what has been the average from 2000, 2019.

When you get that kind of quantity of money out there chasing goods, typically what happens is you get inflation. And when you get inflation, you start seeing an uptick in interest rates. So I would just as the question, given the massive and I would say massive by historic standards government spending paired with historically ultra-low interest rates, what types of risk do you expect from inflation in wages, assets, commodity prices, and how would price inflation impact wages and employment?

ADEYEMO:

Senator, thank you for the question, and as we think through economic policy, it is important that we be mindful of all of the risks. My view is the greatest risk we find--we face right now is the downside risk of not doing enough to address the pandemic that we face.

Ten million Americans today are without jobs, 4 million more have decided to drop out of the labor force for reasons like you able to have childcare, 2 million have seen their wages decreased. Thirteen million Americans today are unable to make rental payments, and 83 million report that they are finding it difficult making necessary expenses.

The goal must be until we have the pandemic controlled that we will continue to provide relief to small businesses and American workers to ensure that we can get the vaccine in people's arms, and I think the greatest

risk that we face is not doing enough to ensure that there isn't scarring in the economy on the other side of the pandemic.

THUNE:

Well, if I might, it just seems to me that, you know, and I don't disagree that there are people out there who are hurting, and, you know, clearly, the unemployment rate is some higher in some areas of the country than it is in others. My State of South Dakota it is 3 percent; I think a lot of that probably has to do with our economy having state open but it doesn't strike me that you help people who are trying to come up the economic ladder who are dependent today upon government if you start getting inflation taking off and runaway inflation drives up the cost of everything they have to buy.

Higher interest rates affect mortgage cost, car payments all of the sorts of things that people in this country are going to be making and I don't know how you avoid that when you are shoving as much money out into the economy as we already have and is what is being talked about here.

And so I would just, you know, I guess pose a question is that there's an awful lot of economic thought out there that suggest that another \$2 trillion particularly when it's poorly targeted and I argue that in many respects this is going to do more harm than good and I would ask the question too when you talk about targeting the assistance \$350 billion for the states which on average last year this is across the country all 50 states 1.6 percent decline in revenue; a lot of states had significant increases in revenue.

Is that a wise use of dollars when we are running \$25 trillion to \$30 trillion in debt, and worried about inflation and an increase in interest rates which could have a very harmful impact on the very people you're trying to help?

ADEYEMO:

Senator, the challenges that we face due to COVID-19 pandemic are wide and varied, and we are fortunate that states have not been more affected in terms of their revenues, but a number of states throughout the country have had additional expenses be it dealing with the healthcare crisis that they are facing today and having to rethink the way that they do government services. Many policy estimates are that over the next two years they will be over \$300 billion in additional expenses and revenue decreases for state governments.

Addressing that is critical to do because more than 18 million Americans work for these state governments. These state governments provide additional essential services that allow our children to go to school, that allow people to collect unemployment.

So I do look forward to working with you and with other members to make sure that we are able to provide relief that is targeted to the American people to ensure that we can get to the other side of the pandemic and making critical investments in the American economy to keep it competitive.

THUNE:

I would, Mr. Chairman, just in closing, argue that the reason our kids aren't in school it's not in most cases its decisions made by in many cases school boards, governments there's a lot of money out there already in schools, there's more coming, and I just think it's time to reevaluate how we do this.

I think \$1.9 trillion on top of the almost \$5 trillion that we have already done is--has the potential to create lots of disruptions in an economy that we are

trying to get back on its feet and perhaps could do more harm than good.

Thank you, Mr. Chairman.

WYDEN:

Thank you. Senator Menendez?

MENENDEZ:

Thank you, Mr. Chairman. Mr. Adeyemo, congratulations, look forward to your stewardship there at Treasury along with Secretary Yellen. And just a comment on my distinguished colleagues' point about state we often forget state, local and county governments.

The numbers that we have seen from states don't include the fourth quarter of last year or anything in this year, so there is a continuing challenge I can tell you that from New Jersey perspective that had one of the highest rates of infections and deaths in the nation as a result of COVID. But counties and municipalities, which are also part of the equation of the administration's plan they have received very little and have great challenges as a result of COVID, so I commend that to people's attention.

We had a good conversation yesterday. I just want to go through some of the highlights. In my role as the chairman of the Senate Foreign Relations Committee, we have a handful of peaceful diplomacy tools, the use of our international opinion that we can generate, the use of our aid and trade to induce people and nations to act in a certain way and the denial of aid and trade and access to our financial institutions as sanctions. So if confirmed, would you commit to using sanctions as a--I'm sorry, I can't hear myself.

WYDEN:

Colleagues, guys, guys--Senator Menendez is having problems hearing himself.

MENENDEZ:

Would you commit to using sanctions as a foreign policy tool?

ADEYEMO:

Senator, I completely agree with you that sanctions are a tool, and they need to be in the foreign policy strategy, and I look forward to doing that and to working with you and the committee to enhance those tools.

MENENDEZ:

Thank you. And if confirmed, would you commit that you and your staff will meaningfully consult with and provide advance notice to Congress on any significant changes to sanctions programs administered by Treasury, including, for example, Iran, Russia, Cuba, just to mention some?

ADEYEMO:

Senator, I look forward to consulting with you and members of the committee and Congress on any changes that we make.

MENENDEZ:

Thank you. Now, as you know, the 2017 Trump tax bill gutted the state and local tax deduction, and Republicans used the money from this tax increase on middle-class families in many states New Jersey, New York, California, and others to give even bigger tax breaks to corporate America and the very wealthy.

Repealing this partisan attack on what I call blue-chip states like New Jersey that spur innovation, that drive the nation's economy, that subsidize most of other states, we would be very happy to get every dollar we pay to the federal government back and ask for no more but we have many of our colleagues who get billions of dollars to their states more than they pay the federal government.

So this is one of my top priorities this year, accord to the U. S. News and World Report, New Jersey has the second-best public-school system in the country and the highest per capita income in the country, in other words we do a great job of educating our children and giving them the ability to reach their potential. And it's not just because New Jersians are smarter than their fellow Americans, it's because we invest--

UNKNOWN:
(INAUDIBLE)

MENENDEZ:
--well I would say they are, but I--I would reserve that (INAUDIBLE) my colleague from Indiana's chuckling but it's because we invest in our people and because we invest in our schools and roads and bridges and other critical infrastructure, we're one of the hardest hit states by the SALT cap.

So while I support a full repeal of the sal cap I do appreciate the Biden administration's plan which would significantly restore the deduction, it would be a big improvement over the status quo. So just a couple of quick questions, do you--do you think it's just a coincidence that states hardest hit by the cap like New Jersey are also the same states that have some of the

public education systems, highest per capita incomes and also contribute most to the federal government?

ADEYEMO:

Well senator, I know that those things are true because states like New Jersey have made investments in those things that have been needed, and well founded and look forward to working with you on this important issue.

MENENDEZ:

Does it make sense to punish taxpayers and states like New Jersey that choose to make investments in their people and as a result pay more to the federal government than they take out?

ADEYEMO:

Senator, again, I think it's critical to work with you on this issue, and I'm looking forward to doing it.

MENENDEZ:

Oh, we look forward to working with you to fulfill the administration's plan. Finally, in 2018, I led the effort to pass the Trafficking Victims Protection Reauthorization Act, which passed Congress unanimous--unanimously, one section of that bill requires the Treasury secretary promote anti-trafficking policies at international financial institutions, such as integrating anti-trafficking interventions into projects who are requiring government action against trafficking, as a condition of making loans would you commit to advance anti-trafficking efforts at the international financial institutions and regularly brief my staff on the work that's being done?

ADEYEMO:

Senator, I'm committed to continuing this important work and to regularly briefing your staff.

MENENDEZ:

Thank you, thank you Mr. Chairman.

WYDEN:

Thank you, Senator Menendez. Senator Young.

YOUNG:

Thank you, Chairman. This morning, I sent a letter to Secretary Yellen concerning the need to combat Chinese Communist Party and its affiliated enterprises from being able to access capital and profit from American retail investors. Mr. Chairman, I'd like to request that my letter be included in the hearing record.

WYDEN:

Without objection.

YOUNG:

Mr. **Adeyemo**, as the chairman mentioned earlier, in the hearing last November, President Trump signed Executive Order 13959, which builds upon a long-standing requirement established in Section 1237 of the National Defense Authorization Act of 1999. And involves the Treasury's Department Office of Foreign Asset Control List.

This EO will help to protect us investors from unintentionally providing capital that ultimately goes towards enhancing the capabilities of the Chinese Communist Party and its armed forces and intelligence services, both of which routinely target American citizens and businesses through cyber operations, and directly threaten the critical infrastructure, economy and military of the United States and its allies and partners around the world.

Mr. Adeyemo, what is the current status of Executive Order 13959? And do you believe it's an important step in protecting Americans from investing in Chinese companies that are involved in these kinds of activities?

ADEYEMO:

Senator, thank you for the important question, if confirmed to be deputy secretary of Treasury, I look forward to looking into the current status of that EO and its implementation.

But stepping back and talking about the importance of this issue, I want to make clear to you that I think that it is critical that we use the tools, the Treasury's tools and our tools to hold China accountable for actions that they take, that are not consistent with international law, and that put our national security at risk. I think that part of this for us is going to be making sure that we take a critical look at how Chinese firms may be using our financial system to do just that. And I look forward to doing that, if confirmed.

YOUNG:

Well, thank you for that. They are utilizing our financial system. It's--we have the broadest and deepest capital markets in the world and--and

frankly, they're dependent on our financial system to--to help fund their slaveholder state. If confirmed, would you work with me to see this executive order's codified in the law, including in any improvements that the administration working with me would--would like to make in order to further strengthen its effect?

ADEYEMO:

Senator, I agree with you that our capital markets are our strength. It's one that we need to make sure that we use to advance the interests of the American people. I look forward to working with you on this issue and to looking at what legislation may make sense in terms of ensuring that we protect the American economy from those that seek to harm us.

YOUNG:

I hoped we could work together on codifying that executive order. In addition to the Communist Chinese military companies, another major concern is U. S. investment and Chinese companies that are linked to or affiliated with egregious human rights abuses, including the aiding and abetting of genocide against the Uighur population in Shenzhen. Do you support Secretary Yellen and Secretary Blinken's description of the Uyghurs treatment in Shenzhen is genocide? Yes or No, please.

ADEYEMO:

Senator the--I agree with Secretary Yellen the human rights abuse is conducted by the Chinese Communist Party.

YOUNG:

She used the term genocide.

ADEYEMO:

I agree with Secretary Yellen's statement when it came to her reference to the Uyghurs.

YOUNG:

Okay, thank you. If confirmed, what other steps will you take to ensure U. S. investors aren't unwittingly funding these companies responsible for things such as forced abortions, forced labor, concentration camps and other horrific human rights abuses?

ADEYEMO:

Senator, I think that it's critical that we step back, and we think about what we can do as a country, to hold those accountable who vi--violate international law, but that we don't do it alone. And I think President Biden has made this clear that it is important that we need a--that we lead an alliance of countries that share our values, to hold those people accountable. And I look forward to if confirmed, in this rule to working on those sets of issues and doing that with you and members of this committee and also members of Congress.

YOUNG:

I'll look forward to that as well. I--I'd close by nothing that U. S investment in Chinese companies as well as Chinese investment in the United States, including in dollar denominated bonds is a web that's growing more tangled by the day.

One of China's most glaring weaknesses is access to the kind of large-scale financing that only U. S. capital markets can adequately provide. As this is one of our country's greatest strengths, we must make sure that we take every measure necessary to protect it. I look forward to working with you sir. And we'll have some additional questions on--on the topic for record--for the record.

ADEYEMO:

Thank you.

WYDEN:

Thank you, Senator Young. Now next you Order is Senator Carper. Is he on the web?

UNKNOWN:

(OFF-MIC) He--it does like he--it does look like he's logged in but I don't-I don't see him yet.

WYDEN:

Okay, next would-be Senator Cardin.

UNKNOWN:

I think it's your--your turn.

UNKNOWN:

For what?

WYDEN:

Is--is Senator Cardin out there in cyberspace? Alright, next would-be Senator Brown on the web. Next would-be Senator Casey, on the web. Next would-be Senator Warner on the web, and then the very patient Sheldon Whitehouse.

WHITEHOUSE:

In the room.

WYDEN:

In the room.

WHITEHOUSE:

In the room. Welcome Mr. Adeyemo, congratulations on this appointment. I have a little present for you that I've mentioned, I'm going to give you because--you know, we are, at this point engaged in a planetary experiment to create physical, biological and chemical changes in the way Earth operates that are unprecedented in human history, the problem of climate change from carbon emissions.

And that is not only going to happen in the physical, chemical and biological world, that is also going to happen in the economic world. And what this is, is a list of--a summation, if you will, of many of the warnings that have come out from a great many different sources about the economic crash prospects associated with uncontrolled climate change. And because it's a big--I've given it to every single one of my colleagues, by the way.

And because it's a big book, let me just run you through the highlights reel as you know, Dr. Carney of the Bank of England was one of the earliest warners. He warned that climate change will threaten financial resilience and longer-term prosperity.

The 34 central banks and the network for the financial sector estimate losses of up to \$20 trillion virus in the broad economy. The bank of banks, the Bank of International Settlements has said that "Exceeding climate tipping points could lead to catastrophic and irreversible impacts that would make qualifying for financial data damages impossible." Let that phrase sink in just a moment "Catastrophic and irreversible. impacts that would make quantifying financial damages impossible.

Now the recent CFTC report brought out under the Trump administration warned that climate change poses a major risk to the stability of the U.S. financial system. The consulting firm McKinsey has warned that climate change could make long duration borrowing unavailable. Standard and Poor's Global has warned "The higher the temperature, the more damaging climate change will be and in a nonlinear way" and Freddie Mac, important to my coastal State of Rhode Island has warned that rising sea levels and spreading floodplains appear likely to destroy billions of dollars in property and to displace millions of people.

The economic losses and social disruption are likely to be greater in total, than those expenses your interest in the housing crisis and Great Recession. We have been well and truly warned Mr. Adeyemo and it's on this administration to heed those warnings and take action. Is it your view that continuing as the IMF has calculated to subsidize the fossil fuel industry to the tune of \$600 billion dollar dollars a year in the United States alone is consistent with heading off the crashes that are so warned of?

ADEYEMO:

Senator, thank you so much for providing the information. I look forward on you--with you on this important issue. I agree with President Biden that this is a critical crisis that we need to address as a country, and it is an economic crisis as well. One in which we need to bring to bear our full array of tools to ensure that not only are we dealing with the risk but also making sure that we're investing in innovation in order to ensure that American companies or firm--firms are on the leading edges of helping us solve this challenge.

WHITEHOUSE:

Do you doubt Mr. Adeyemo that IMF calculation that our carbon problem stands on a \$600 billion dollar subsidy to fossil fuels in the U. S. alone?

ADEYEMO:

Senator I'm not familiar with the IMF number but I am familiar with the fact that there are subsidies that are provided to those firms by the United States government and President Biden's made very clear his position on those subsidies going forward.

WHITEHOUSE:

Last point. We've talked about the beneficial ownership that many of us in this committee worked on making happen. I just want to flag for you I think this is important not just because of the beneficial ownership reform that we but because there is larger in my view, clash of civilizations happening in the world and that clash of civilizations is between rule-of-law countries and kleptocracies and countries run by criminals and countries run by cruel, tyrannical autocrats.

And in between those two spaces is an enormous dark economy that allows the bad guys from the bad world to hide their stolen assets behind rule-of-law protections that we give them. And I think it's a critical national security priority for us to do everything we can to degrade that dark economy, so that the kleptocrats and the criminals and the autocrats do not find shelter in our rule-of-law sanctuaries.

ADEYEMO:

Senator, I completely agree with you the transparency is critical to both democracy but also to expose those who seek to abuse people and abuse the privileges the democracies provide. So I look forward to working with you and members of this committee on those critical issues.

WHITEHOUSE:

Thank you. You'll find I think bipartisan interest in that.

WYDEN:

You--you will indeed, and I thank my colleague. Next in line is Senator Carper. Senator Carper is on the web.

CARPER:

Mr. Chairman

WYDEN:

There you are.

CARPER:

Good morning everyone.

WYDEN:

Good morning.

CARPER:

Thanks--thanks so much. Mr. **Adeyemo**, has anyone ever mispronounced your name?

ADEYEMO:

Just a few people, senator.

CARPER:

Do we get--do we get extra credit if we pronounce it correctly? But I greatly enjoyed visiting with you a couple of weeks ago. We're delighted that you are willing to serve (INAUDIBLE) success in getting confirmed before--before long.

Like a number of my colleagues, that throughout our time in--in the public service we have sought to live our lives in the spirit of Matthew 25 which calls on us (INAUDIBLE) among us.

Now, as we respond to the dual public health and economic crisis that--that we face, I believe, and I think most of us--maybe all of us agree we have a--an obligation to make sure that limited resources are--get--get to those that are most--most in need.

I know that you and I share a commitment to ensuring that in the economic relief it is equitable especially as this pandemic has revealed racial inequalities in way too many of systems and--and communities.

When debating what policies will best spur economic recovery, I believe in the three T's reminded of this by--by Leon Panetta, just the other day, "Timely targeted and temporary." In other words, we need to deliver resources to those in need--most in need as quickly as we can. In addition while the worst of the pandemic will hopefully be over this summer and from a number of our economists, we're getting to encourage, encouraging words of--of late as the--we step up the vaccination process, but encouraging words that the pem--pandemic could actually--the worst of it at least could be over sometimes this--this summer.

We all have--also have to keep in mind the potential long-term effects of a pandemic and in order to prevent lasting damage to our economy and to the American people. So let me just ask you a couple of questions if I--I could, Mr. Adeyemo. Can--can you share with us some of your thoughts on how best to address the unique effects of this pandemic on vulnerable communities as we consider future relief proposals, please.

ADEYEMO:

Senator, thank you for the question. My view is that one of the most important things we can do is make sure that we provide relief to those most impacted by the pandemic and that is largely low-income Americans and communities of colors and other marginalized communities.

The critical piece of this for us is ensuring that we provide--that we provide relief to the individuals so that includes unemployment relief and also

providing them with resources to meet some of their basic needs, but also to the small businesses and companies if they work--that they work for.

I think what Congress has done with regard to PPP has been helpful to small businesses in providing them with ability to make it through the pandemic to the other side, and the key is--and a critical piece here is that we continue to provide relief until we're on the other side of the pandemic in order to ensure that there is not scarring in the economy and that we're able to ensure that the economy is in a position to grow, not only over the next year but over the next several years and that we're able to make critical investments that keep America's economy competitive going forward.

CARPER:

Alright, Mr. Chairman, how much time do I still have left please?

WYDEN:

One minute and 30 seconds.

CARPER:

Real quick if I could Mr. Adeyemo, with respect to OECD digital tax negotiations, what approach do you plan to take to the OECD digital tax negotiations for example in your view (INAUDIBLE)

ADEYEMO:

Senator I appreciate the question as Secretary Yellen made clear we look forward in engaging in these multilateral discussions to reach a conclusion that will hopefully level the playing field. And our goal will be to ensure that

we protect America's tax revenues and make sure that American companies can compete on a level playing field.

CARPER:

That was perfect, at least in terms of the timing. Thank you, senator. Mr. Chairman back to you.

WYDEN:

Thank you, Senator Cardin, we've got some votes coming up. We're gonna have to be juggling and Senator Cardin?

CARDIN:

Well, thank you, Mr. Chairman, and let me--let me thank you for your willingness to serve our nation. It's interesting that several of our colleagues have talked about sanctions and I'm going to talk a little bit more about sanctions.

It's important that we do work with our allies as you point out on sanction regime, I strongly support that. But U. S. leadership is vitally important as we've seen, with the enactment of the Global Magnitsky statue, I was proud to work with Senator McCain to get that enacted.

And under the Trump administration, it's been a year and a half, since there's been any use of the Global Magnitsky, and I understand you're doing a review, and that's certainly something that needs to be done.

But I would urge you to try to work as quickly as possible. Yesterday, the European Union announced sanctions against Russian oligarchs in regards to the arrest of Mr. Navalny. It's interesting that before imposing those

sanctions, there was a conversation including Secretary Blinken, so the--there is the coordination with the Global Magnitsky and I understand you're doing a review, and that's certainly something that needs to be done. But I would urge you to try work as quickly as possible.

Yesterday, the European Union announced sanctions against Russia oligarchs in regards to the arrest of Mr. Navalny. It's interesting that before imposing those sanctions, there was a conversation including Secretary Blinken, so the--there is the coordination with the United States, we very much appreciate that but we--we need to move forward.

I wanna mention one specific case in which the Trump administration in its last days gave relief to Dan Gertler, who had been sanctioned by the United States for his activities in DRC. We have written you a letter urging you to take a look at that immediately.

This is an injustice that was done during the last days of the Trump administration. And your review, timely review of this is critical because if the sanction relief is given, a lot of the purpose for which that sanction was imposed will be irreversibly unable to deal with that.

So I would ask your commitment that you would immediately take a look at this issue. There's bipartisan efforts to make sure that our sanctions are imposed properly, and that the relief given to Mr. Gertler appears not to have been warranted. So can we get your commitment that you will make a timely review of that particular case?

ADEYEMO:

Senator, if confirmed by the Senate, I'm committed to looking at that case in particular, but stepping back to talk about the fact that I'm also committed to

doing the top to bottom review of our sanctions policy in general in order to make sure that we're effectively using the tools that are provided by Congress, to advance Our national security interests.

After that review I look forward to working with you to make that we're in a position into advance America's goal. You are right that oftentimes America needs to lead and we are off--we are best when we lead accompanied by our allies.

I think the case that you cited in terms of the actions that Europe has taken is a great example of where we can coordinate better to demonstrate to the world that we stand together, in holding those who seek to aboy--to abuse the international system accountable for that.

CARDIN:

And--and again, I don't--don't disagree with top to bottom review, I think that makes sense, recognize that these sanction regimes have been imposed, not only bipartisan, near unanimous support in the Congress of the United States, and that we--we need to step forward as quickly as possible.

And I was glad to see yesterday that we did some of that. You've also talked about dealing with marginalized communities, which, again, I support I have--I'm the chair of the Small Business and Entrepreneurship Committee, I can tell you, as Chairman Wyden said in regards to this committee's focus on the underserved community, our Small Business Committee is going to focus on how the small business tools can be better focused on the underserved communities.

We also on this committee, have jurisdiction over the tax code. And we can do a better job in targeting the tools that are available in regards to the

underserved communities. So can you just tell me your game plan on how you plan to implement the Biden's commitment to help those communities that have been left behind?

ADEYEMO:

Senator, thank you for the question, and I look forward to working with you and the Small Business Committee on these issues. I think that a big piece of this is ensuring that we get credit into these communities in order to make sure that we're creating jobs for small businesses--through small businesses in these communities.

I think what Congress did in terms of providing additional resources for CDFIs will be helpful, frankly, in terms of making sure that credit gets into these community--communities. Part--the Small Business Credit Initiative that is currently a piece--part of the relief efforts that Congress is currently debating will also be helpful, but--but part of this will be us stepping back and making sure that we're using all the tools of the Treasury Department and across the government, per the president's instruction to advance these issues.

My view is that this is not only something that is morally important, but it's critical to our economic future. Unlocking the unrealized potential of marginalized communities is critical to growing the economy and making sure that we're in position where we can compete globally.

CARDIN:

I would just point out you can do a lot by executive order, and we we're pleased to see yesterday's announcement in regards to small businesses a 14-day window for the smaller of the small businesses, removing the

prohibitions on the returning citizens dealing with the self-employed, a more generous definition of the aids.

They're the type of things that you can do. And I was pleased you worked with us on those executive orders and I would just encourage you to same as you do your view as to how we can better target help to the traditionally underserved communities.

WYDEN:

I--I very much agree with Senator Cardin and we've got to move on, Senator Brown on the web.

BROWN:

Thank--thank you Mr. Chair and I respect that you're trying to move quickly to get people to vote. And I will have--I really only have one question, Mr. Adeyemo, you and I and Secretary Yellen discussed the enactment in early January over President Trump's veto of landmark bipartisan legislation to upgrade U. S. anti-monitoring--money laundering laws and to finally end abuses by anonymous shell corporations by requiring firms to register their beneficial ownership information with FinCEN.

Sec--secretaries--I'm sorry, Senators Warren, and Warren--Warner and Crapo were prominent players in that both of them sit on the Banking and Housing Committee and on this committee. They were integral to this last passage.

As you know, the bill establishes tight timelines for new rules that must be written for establishing a new beneficial ownership database alongside the

SAR database at FinCEN and to otherwise implement the many requirements of the new law.

So my question is, will you commit to continuing to work with us to mend\-- implement this new law promptly, effectively, completely to ensure adequate funding to implement the new AML law?

ADEYEMO:

Senator, thank you for your work on this important issue. And I can commit to you that if I'm confirmed by the Senate, this will be one of my top priorities. And I look forward to working with you and members of this committee and of the Banking Committee to make sure that we implement that law in keeping with congressional intent, and that we use those authorities to protect the national security the United States of America.

BROWN:

Thank you, Mr. **Adeyemo**. My--my only slight correction is we now--as I'm chairman of this committee, we now call it the Banking and Housing Committee, not just the Banking Committee, it's too long been known as just the Banking Committee on Capitol Hill. So, a slight correction in your comments, but I look very much forward to working with you on this issue. And Senator Warner and Senator Crapo. And I yield back my time, Mr. Chairman. Thank you.

WYDEN:

Thank--thank you, Senator Brown. We've got a number of very patient members, Senator Casey's next.

CASEY:

Mr. Chairman, thanks very much. And I want to commend Mr. Adeyemo for his willingness to serve again, and we're grateful for this opportunity to ask a couple of questions. I'll--I'll try to get to two if I can.

As you know, in our earlier discussion, we discussed the need to work with our allies to address the challenges posed by China. That's the focus of my question. We--we must engage I believe, and I think there's bipartisan support for this coordinated effort to address market distortions, subsidies anti-competitive behavior from China.

Through the Finance Committee, Trade--Trade Subcommittee, Senator Cornyn and I worked on a multifaceted approach to--to focusing on China. We--we included in our hearings a focus on the Belt and Road Initiative, extra-territorial censorship, as well as market access challenge.

We worked in a bipartisan way on policies to address some of these practices. There are of course, cross-cutting issues which will require both the coordination and communication as well as cooperation.

Can you discuss how your--your professional experience will inform your work with respect to China and how you'll engage with the inter-agency through multilateral cooperation to address the challenges posed by China, especially threats to the core principles of our economic system?

ADEYEMO:

Senator, thank you for the question. In the Obama Administration I had the opportunity to serve as the deputy national security advisor for International

Economics in that role, I was the president's representative of the G7 And the G20.

But in addition to doing that, I was also the person who coordinated international economic policy within the White House. That role gave me perspective that it's going to be critical for us as an administration to make sure that we look at the--our competition with China holistically. We can't separate the economic from the pure security.

We have to look at it all because that's the way the Chinese look at these issues, and I look forward to working with my colleagues throughout the U. S. government to address these important issues, but also to ensuring that as we think about how we address them at home, we're also mindful about bringing our allies along with us.

Fundamentally, what we need to do is demonstrate to those advantage of the international trade system that those countries that worked with them to create the system will hold them accountable for following the rules of the road and making sure that we compete on a level playing field.

CASEY:

Thanks very much. And my last question is about a proposal, I have to have a--in place a reverse CFIUS, a legislator proposal to establish an outbound investment stream for critical national capabilities. This would--this would enhance our visibility and supply chain vulnerabilities.

We're obviously too reliant right now on China for critical supplies, whether it's medical equipment or PPE. We have to make sure we're doing everything possible to have more vi--visibility on these vulnerabilities with respect to production dependencies in--in other critical sectors whether it's

core industrial manufacturing or infrastructure semiconductors, medical supplies or others.

So my legislation would establish a process to conduct ongoing reviews of supply chains and domestic production and manufacturing capacities. Can you discuss your views of this proposal?

ADEYEMO:

Senator, I think it's critically important that we understand our supply chain and what vulnerabilities exist in that supply chain in order to protect America's national security interest, defined broadly when you look at the pandemic, no one would have imagined that we would have been so dependent on another country to protect the United States of America.

It's critical that as we think about a review of our supply chains, we think about the threats that we face today, but also imagine to--to imagine how those threats can morph going into the future. So I look forward to working with you on this important issue and to doing it from a whole of government perspective, to ensure that we're meeting our national security interests.

CASEY:

Thanks very much, thank you Mr. Chairman.

WYDEN:

Thank you Senator Casey. We are gonna try to finish before we go and vote and at this point, we have Senator Warner on the web, and we have Senator Warren here and we have put out an all points alert if there are any other senators. So Senator Warner next and then Senator Warren.

WARNER:

Well thank you Mr. Chairman and Mr. Adeyemo. It's great to see you again I'm--you seem to have been very calm through this whole hearing and I--I know you've been thanking us for all of our questions, so I'll try to get my couple in very quickly. I recognize you're time constrained.

One of the things we've talked about in the past is something that Senator Crapo and I and the chairman and others worked on, to get support in for CDFIs and MDIs, minority (INAUDIBLE) institutions and community loan and financial institutions in the last COVID-related bill.

We've seen disproportionate harm to black and brown businesses coming out of COVID. This program which will put \$9 billion dollars of tier 1 capital into these institutions could be leveraged up to \$90 billion dollars of additional lending as well as the grant program put forward. Can you speak to that a bit and how you'll make this a priority that it gets implemented appropriately?

ADEYEMO:

Senator, this is a critically important issue to I know members of this committee, but also to President Biden and to the Biden administration. And if confirmed, it'll be one of my top priorities to ensure that we implement this effectively and in a way that is additive to the number of things that Congress has already done, including PPP to get money into the hands of people in these communities.

Fundamentally this is about getting credit to low income and minority communities in order to make sure that they can--we can grow those economies. Doing this well and effectively will require us to partner with

CDFIs and minority owned depositor institutions which I'm committed to doing and to working with you and the committee on.

WARNER:

Well I--I will say that I appreciate the answer, but you didn't thank me for my question, so I was a little concerned on that. Let me move to the--my other question. A number of members had asked about the Illicit Cash Act, the--the beneficial ownership issues and appreciate the broad bipartisan work that--that went on, on that legislation. I've got two questions, on--you know trying to get the rules in place before June before the next meeting of the UN General Assembly, can we get that done?

And then another part in--in the Illicit Cash Act was a--created a new financial crime sec--FinTech Crimes Symposium. I think this is very important and we worked to make this FinTech Symposium a success and make sure that we're continuing to work on these AML activities.

ADEYEMO:

Well senator, thank you for your question. I think the--my view senator, is that if confirmed, I look forward to working hard to try and get those rules in place as soon as possible. I'm not aware of--

WARNER:

--Before June? Before June?

ADEYEMO:

--Senator, if I'm confirmed I look forward to try and get them done as soon as possible and hopefully before June. I look forward to spending time with

my colleagues at Treasury who are already working on these issues and understanding where they stand and we'll come back and brief you on those, as soon as I'm confirmed.

With regard to the second piece of your question yes, I completely agree that it's an important piece of legislation that I look forward to working on.

WARNER:

Thank you. Look forward to supporting you. Thank you, Mr. Chairman.

WYDEN:

Thank you, Senator Warner. Senator Warren?

WARREN:

Thank you, Mr. Chairman. So the Trump administration didn't even pretend to have a strategy for containing the coronavirus and rebuilding our economy and that's why we've surpassed half a million deaths and unemployment is currently around 10 percent.

So I'm glad to see action, decisive action from President Biden on both fronts. He's demonstrating a leadership that we've been waiting for and Treasury has a really important role to play here including engaging with our allies.

The International Monetary Fund issues special drawing rights, kind of currency that members like the U. S. can use to provide resources to countries that need help. Now it's no surprise that the Trump administration blocked efforts to issue new SDRs withholding a critical tool that helps support a global pandemic response. Mr. Adeyemo can you help explain

why that providing low-income countries with resources they to fight this pandemic and its economic fallout is so important to our own safety and economic recovery.

ADEYEMO:

Senator thank you for the question. My view is and the view that is shared by I know members of this committee is that in order to address this pandemic and contain the pandemic we need to contain it globally.

Fundamentally the pandemic doesn't respect borders, it doesn't respect counties or cities or states, it is global in nature and we need to ensure that countries around the world are put in a position to deal with a pandemic and its results.

Part of this is going to require money, as we've discovered in our own country and providing financial resources to some of the most poorest countries in the world is going to be critical to our national security, if we seek to make sure that COVID-19 isn't something that continues to affect us.

WARREN:

Yeah, good. Thank you. I appreciate that answer and I hope Treasury will commit to delivering this crucial support. This pandemic won't be over for us until it's over for everyone and our economy won't fully recover until other countries' economies are back on their feet as well.

Right now, the pandemic and economic recovery need to be your top priorities I understand that. But I also wanna ask about how to ensure financial systems serves the needs of families going forward.

Our financial system has been rigged for a long time to help the wealthy and the well connected. Private equity firms get rich off stripping assets from companies, loading them up with a bunch of debt and then leaving workers behind, leaving consumers behind, leaving whole communities in the dust. This business model is based on creating even more massive inequality in our economy.

Treasury has the tools to address this head-on including through the Financial Stability Oversight Council. So, Mr. Adeyemo, one of FSOC's responsibilities is addressing the risks financial activities impose on low-income and underdeveloped communities. Will you commit to using FSOC authorities to address economic inequality including by recommending more regulatory scrutiny of private equity funds?

ADEYEMO:

Senator, I'm committing to working with Secretary Yellen to address issue that face minority communities and minorities in this country, using all of the tools of the Treasury Department. Some of these are regulatory, but I think we have a number of other tools that we can use also to address these challenges. They're issues that I care about personally and I--and I look forward to working with the secretary on those issues and also working with you to address them going forward.

WARREN:

Well, and I appreciate that, but I really do wanna bear down on this one. You have an FSOC tool here that's powerfully important--all it takes is the courage to step up and use that tool. So I appreciate that there are other tools

as well, and I wanna see you use them all. But will you commit to the--using this tool?

ADEYEMO:

I'm committed, Senator to talking to Secretary Yellen about this tool and making sure that on top of our agendas thinking about how the financial system can best serve all Americans including marginalized communities. In terms of how the FSOC does that, I'm looking forward to talking directly to her about that and making sure that we come back to you.

WARREN:

Mr. **Adeyemo**, I just wanna say on this one, I don't think you should waiver about this. If you and the administration are committed to taking a whole of government approach to advancing economic and racial equality, then Treasury can't be a bystander in this. Treasury has a lot of tools especially FSOC and I urge you to use them.

ADEYEMO:

Thank you senator and I look forward to using all of our tools to address this very important issues.

WARREN:

I like hearing you'll use all your tools. Thank you. Thank you, Mr. Chairman.

WYDEN:

Thank--thank you Senator Warren. I believe now we have Senator Cortez Masto on the web. So we might make--make this in the votes. Senator?

CORTEZ MASTO:

Thank you, thank you Ranking Member, Mr. **Adeyemo** thank you so much for your willingness to serve and taking the time to speak with me. Let--let me just start up very quickly cause I know everybody wants to--we've got a vote going on as well.

But three years ago, Congress reformed CFIUS process which has helped address the impact of Chinese investment in critical sectors. While some countries had started developing similar processes, many strategic partners are only beginning to review Chinese investments in critical sectors. How could we help those allies emulate a CFIUS like process?

ADEYEMO:

Senator, it's good to see you, thank you for the question. My view is that we have--we have tools in the United States that have put us in a position to protect our national security and it's critical that we work with our allies to develop those tools as well.

A number of our allies have taken steps to make sure that they protect their investments, but what we know is that those who seek to take advantage of our national security if they're unable to gain access to the U.S. economy and to critical technologies here, they will look to other countries.

So a big piece of running the CFIUS process through the Treasury Department is from my perspective is making sure that we work with our allies to ensure that they have the same type of authorities in their countries, to address these critical issues going forward. It's gonna be something that I will be focused on if confirmed, and I look forward to working with you to address these important issues.

CORTEZ MASTO:

I do as well, and I also hope that you would also consider leading a comprehensive inter-agency campaign as well around these issues. Let me move on to our--an issue that's important for my state: hospitality, gaming and the service industry.

In--in Nevada, resort operators support a whole community, the economic impacts of this pandemic have been a direct to its employees, the small businesses that depend on our resorts and the revenue generated for the state.

These are ripple effects that we have seen and felt throughout our entire economy in my state as well as in the country. You know, I brought this conversation up and this concern of mine with Secretary Yellen in her confirmation hearing. But can you give me your thoughts on the importance of robust and safe tourism, to the general economy and states and local economies that rely on local revenues?

ADEYEMO:

Senator, the tourism industry like a number of industries in the United States have been dramatically impacted by the coronavirus. These industries are critical to our long-term economic growth and critical to American workers.

It's cri--we need to make sure that we provide resources to help the small businesses and workers who are struggling because of the coronavirus with the ability to get through to the other side and that we continue to invest in some of the things that make America great which include the industry that you spoke about. I look forward to working with you on these issues going forward.

CORTEZ MASTO:

Thank you and then one final question do you believe Treasury should seek to update FinCEN's 2014 guidance on the bank secrecy ex--expectations for financial institution that provide services to cannabis related industries? And if so, what changes do you recommend?

ADEYEMO:

Senator, I look forward if confirmed to talking to my colleagues at Treasury about this important issue and thinking through what changes may be needed and doing this in a way that's consistent with the inter-agency and with the president's guidance. In doing that I look forward to consulting with you and members of this committee on our path forward.

CORTEZ MASTO:

Thank you. Thank you again for your willingness to serve and congratulations.

ADEYEMO:

Thank you.

WYDEN:

Thank you, Senator Cortez Masto, Senator Bennet.

BENNET:

Thank you Mr. Chairman, I think you're running the most expeditious hearing in the history of the United States Senate. So I'm grateful that--for

that. Mr. Adeyemo, it's been wonderful to see you again and I--I'm very grateful on your willingness to serve.

We have missed you and are glad you're back. As you know, incredibly, the United States has one of the highest child poverty rates in--among our industrialized coun--industrial countries in the world. I think a recent report showed us at 28 out of 32, an OECD Report.

And I was thrilled that the Biden administration included in its COVID--its next COVID package an expansion of the Child Tax Credit along the lines of the bill that Senator Brown and I have been working on for so long it seems.

And the results of that Mr. Chairman is that we would cut childhood poverty in this country by almost 50 percent. I noticed that the House version of the bill has--contained a provision that we had to--to instruct the IRS to make this a monthly payment.

And I just wondered if Congress ends up putting that on your doorstep whether you will be able to champion that in the agency to make sure that we are able to do it on a monthly basis, and maybe you could talk a little bit about the importance of families receiving that tax credit on a monthly basis as opposed to the annual basis they receive it today.

ADEYEMO:

Senator, the evidence of what it would do for income smoothing (PH) by--by receiving these payments on a monthly basis are convincing.

If confirmed, I would look to work with the IRS to figure out how we could make this happen because the reality is that one of the things, we need to do is to address poverty in this country especially among children.

It's not only an investment in the children today, but it's an investment in America's future and making sure that we're building the most competitive Amer--competitive America possible. So I look forward to working with you on this issue and to, if confirmed, working with my colleagues at the IRS to try and figure out a way to make sure we can get these payments to Americans on a more regular basis.

BENNET:

I--I agree with everything that you just said, and I'll add that Columb--an institute at Columbia University just put out a study last week about the proposal that the Biden Administration has made.

And it says that it would pay back eight times on an annual basis if we did this. So it's not lonely about the future it's about the present as well. I wonder if you could say a few words about affordable housing?

Our housing in Colorado and across the country has become incredibly expensive, in many mountain towns there's really very little workforce housing at--at this point and in many rural areas in this state there's very little workforce housing. (INAUDIBLE) I just wondered if you could say a few words about that?

ADEYEMO:

Senator, affordable housing is often the gateway to opportunity. Having an affordable housing be in the city center or near jobs and near good education for children is critical to ensuring that people have the ability to in many ways, access the American dream and social mobility.

There are a number of tools that the Treasury Department and the Executive Branch has to address this challenge. I think it's critical that we do it in a way that is strategic and comprehensive. I look forward to if confirmed, working on this set of issues with my colleagues at Treasury, with my colleagues at HUD, but also with my colleagues at CFPB and across the government.

Because I think that one of the things that we've discovered long before this crisis is that we don't have enough affordable housing in America, and we need to make sure that we find ways to expand it.

BENNET:

We've had such a challenge with our mobility rates for so long and that's showing up in people's inability to afford housing, healthcare, higher ed, early childhood ed, and I think it's another reason why I think that child tax credit is so important.

I am gonna reserve the last-minute Mr. Chairman, in the interest of you--the schedule and my colleague from New Hampshire but let me just say how much I look forward to working with you on automatic stabilizers, something that the chairman and I have been working on as we--as we try to get out of the politics and into a place where we're actually helping working families. So thank you Mr. Chairman, and thank you Mr. Adeyemo.

WYDEN:

True on all counts. Senator Hassan?

HASSAN:

Well thank you Mr. Chair, I'm gonna see if I can get close enough to the mic, there we go. And thank you to Mr. Adeyemo for joining us and for your

willingness to serve. It's a difficult time in our country, so we're really grateful for your interest and willingness to--to serve and we thank your family for the joint commitment that that reflects.

Mr. **Adeyemo**, the year-end COVID relief package contained a bipartisan bill that I introduced with Senator Byrd that made--that made small businesses eligible for both Paycheck Protection Program and the Employee Retention Tax--Retention Tax Credit with guardrails to prevent for double dipping.

Recently I joined Senator Burr to urge the Treasury to ensure that PPP participants have full access to the Employee Retention Credit by issuing much needed guidance. Treasury can also facilitate small business assistance by increasing educational outreach around the Employee Retention Credit. Mr. **Adeyemo**, if confirmed, will you work to ensure that small businesses promptly receive the guidance that they need to take full advantage of the Employee Retention Tax Credit and will you work to increase the educational outreach around the credit?

ADEYEMO:

Senator, I'm committed to doing those things. As you know, 98 percent of small businesses in America employ less than 20 people. These small businesses need to be informed about the benefits they have that'll help them get through to the other side of the pandemic and I look forward to doing this with my colleagues at Treasury if confirmed, and to working with you on this issue.

HASSAN:

Thank you very much. Let's move to a different issue that is of great concern to my constituents. Earlier this month I called on Senate leadership to protect granted staters from out of state income taxes in the next legislative package.

Currently, other states are trying to impose income taxes on New Hampshire residents who normally commute to those states, but they're working from home during the pandemic.

I strongly oppose these unconstitutional out of state taxes, and I'll continue working with the committee and my colleagues to build on a bipartisan proposal to provide strict limits on states' authority to tax workers outside their borders.

Mr. Adeyemo, as this committee considers proposals to limit out of state taxes, will you work with Treasury staff to provide technical feedback on any legislation?

ADEYEMO:

Senator, if confirmed, I look forward to providing technical assistance.

HASSAN:

Thank you so much. I look forward to working with you and with the committee to protect my constituents who are working remotely from what are really overreaching efforts by other states.

I wanted to turn to another subject, in previous finance hearings, I've stressed the importance of Treasury programs that combat the financing of terrorist and criminal organizations. In the previous few years, there have

been highly concerning reports that the Islamic State sold looted antiquities to help fund their campaign of terror.

To address this, last year's bipartisan National Defense Authorization Act extended anti-terrorism finance requirements of the trade of antiquities and artifacts. The NDAA also required a study of money laundering in the art market by the Financial Crimes Enforcement Network. Can you speak to how the updated requirements for antiquity dealers will help combat terrorists and criminal financing and will you keep the committee apprised of the findings from the FinCEN study on money laundering in the art market?

ADEYEMO:

Senator, I'm committed to keeping the committee abreast of the work that the--my colleagues in FinCEN do if I'm confirmed to the position of deputy secretary of the Treasury. I agree that this is an important issue, and one that requires our attention in order to make sure that those that seek to take advantage or--of our financial system are unable to.

HASSAN:

Great, thank you. Last question. Start-ups and new businesses will play a central role in job creation and economic growth during the recovery from COVID-19. Unfortunately, many new businesses have limited access to current small business assistance programs including the Paycheck Protection and the Employee Retention Tax Credit.

And it was nice to hear you speak about the importance of small businesses in--in answer to my first question. I strongly support addressing this in

upcoming relief legislation provide--by providing assistance to the tax code that is tailored to start-up businesses.

Mr. **Adeyemo**, if confirmed will you work with me and this committee to evaluate ways to direct assistance to new businesses and support new business job creation during the recovery from COVID-19?

ADEYEMO:

Senator, I'm committed to working with you and member of this committee to think about how we build innovative small businesses in America. They're the key to our long-term success, and we need to invest in that sooner rather than later.

HASSAN:

Well thank you very much Mr. **Adeyemo**, I appreciate it very much.

WYDEN:

I--I thank my colleague. Mr. **Adeyemo**, they're holding the vote for Senator Hassan and I. So two quick points, one it is easy to see why you have so many fans, and I look forward to doing everything I can to move this nomination as quickly as possible and colleagues, we're gonna have a really hectic week.

With respect to the questions for the record, on this nominee Mr. **Adeyemo**, the deadline for members to submit will be Thursday February 25th at 5 p.m. That deadline is firm. And with that the Finance Committee is adjourned.

List of Panel Members and Witnesses

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SEN. DEBBIE STABENOW (D-MICH.)

SEN. MARIA CANTWELL (D-WASH.)

SEN. BOB MENENDEZ (D-N.J.)

SEN. THOMAS R. CARPER (D-DEL.)

SEN. BENJAMIN L. CARDIN (D-MD.)

SEN. SHERROD BROWN (D-OHIO)

SEN. MICHAEL BENNET (D-COLO.)

SEN. BOB CASEY (D-PA.)

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DEPUTY TREASURY SECRETARY NOMINEE ADEWALE ADEYEMO

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(b)(6)

From: Smith, Bradley <(b)(6)>

Date: January 25, 2021 at 7:54:27 AM EST

To: Palluconi, Lisa <(b)(6)> Thannhauser, Sara

<(b)(6)> Moriarty, Kellen <(b)(6)> Thomas,

Nikole <(b)(6)> Rasmussen, Mary <(b)(6)>

Christian, Alan <(b)(6)> <(b)(6)> Sun,

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

Manfull, Alexandre <(b)(6)> Lieberman, Michael

<(b)(6)> Gatjanis, Gregory <(b)(6)> Quinby,

Ripley <(b)(6)> Prince, Jason <(b)(6)> <(b)(6)>

<(b)(6)>

Cc: <(b)(6)> <(b)(6)> <(b)(6)> <(b)(6)> <(b)(6)>

<(b)(6)>

Subject: FW: Regulatory review

Good Morning,

I apologize for the early morning email, (b) (5)

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Again, I am sorry for the fire-drill nature of the request, but I appreciate your help with it.

Thanks,

Brad

From: Gacki, Andrea

Sent: Monday, January 25, 2021 7:07 AM

To: (b)(6) >; Smith, Bradley

(b)(6) Ahern, Paul <(b)(6)> Neufeld, Michael

(b)(6) Farley, John M <(b)(6)> Trew, Heather

(b)(6)

Cc: (b)(6)(b)(6) <(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)

(b)(6) <(b)(6)> (b)(6) (b)(6) <(b)(6)> (b)(6) (b)(6)

(b)(6) (b)(6) (b)(6) <(b)(6)>

Subject: Fwd: Regulatory review

Good morning —

Please see the request below from Andy Baukol (b)(5)

(b)(5)

Thank you in advance, and please let me know if you'd like to discuss.

Andrea

From: Baukol, Andrew <(b)(6)>

Date: January 25, 2021 at 6:56:20 AM EST

To: Gacki, Andrea <(b)(6)> (b)(6)

(b)(6) Ahern, Paul <(b)(6)>

Nisanci, Didem <(b)(6)>

Sonfield, Brian

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

Subject: Regulatory review

Colleagues,

(b)(5)

(b)(5)

Thanks.

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 006627-006629

From: [Jennings, Thomas](#)
To: [\(b\)\(6\)](#); [Moriarty, Kellen](#); [\(b\)\(6\)](#); [Prince, Jason](#); [Palluconi, Lisa](#); [Quinby, Ripley](#); [Rozenberg, Norman](#); [Christian, Alan](#); [Scheinert, Lawrence](#); [Gatianis, Gregory](#); [\(b\)\(6\)\(b\)\(6\)](#); [Jennings, Thomas](#); [Thannhauser, Sara](#); [\(b\)\(6\)](#); [\(b\)\(6\)](#); [Thomas, Nikole](#); [Manfull, Alexandre](#)
Subject: Glomag License Brainstorm
Date: Monday, January 25, 2021 12:57:58 PM

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.

Prince, Jason 12:46 PM:

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

Thomas, Nikole 12:47 PM:

(b)(5)

Prince, Jason 12:47 PM:

Thanks! I've joined.

Thomas, Nikole 12:48 PM:

Thanks, Jason!

(b)(6) (b)(6) 12:51 PM:

We've also heard from the Sentry

(b)(6) (b)(6) 12:52 PM:

(b)(5)

Moriarty, Kellen 12:53 PM:

(b)(5)

Thomas, Nikole 12:57 PM:

(b)(5)

Pending Consultation with other Treasury Components
2021-1246 (CKK): Bates No.: 006631

From: [Palluconi, Lisa](#)
To: (b)(6) [Palluconi, Lisa](#)
Subject: Gertler Treasury (if asked) and State (Press statement and if asked) materials
Date: Monday, March 8, 2021 12:00:42 PM

Palluconi, Lisa 10:20 AM:

Hi (b)(6)

(b)(5)

(b)(6)

10:24 AM:

(b)(6)

(b)(5)

(b)(5)

(b)(5)

(b)(6)

10:25 AM:

(b)(5)

Palluconi, Lisa 10:27 AM:

Thanks.

(b)(5)

Palluconi, Lisa 10:27 AM:

(b)(5)

(b)(6)

10:29 AM:

Ok, that's helpful. I couldn't tell from Andrea's timeline.

(b)(5)

Palluconi, Lisa 10:29 AM:

(b)(5)

Palluconi, Lisa 10:30 AM:

(b)(5)

(b)(6)

10:31 AM:

(b)(5)

Thank you!

Palluconi, Lisa 10:36 AM:

thanks!

Palluconi, Lisa 10:50 AM:

Hi! I think we are good. Just copied you on the note to (b)(6) senior advisor and to Mike N's team.

(b)(6)

10:51 AM:

Great, thank you!

(b)(5)

Palluconi, Lisa 11:46 AM:

Thanks again for all your help, (b)(6) Sorry that this was a bit chaotic/disorganized this morning, but looks like it is all sorted out (fingers crossed!).

(b)(6)

11:48 AM:

Of course! Happy to help. Fingers crossed indeed.

From: [Palluconi, Lisa](#)
To: [Prince, Jason](#); [Palluconi, Lisa](#)
Subject: Gertler Treasury (if asked) and State (Press statement and if asked) materials
Date: Monday, March 8, 2021 10:07:17 AM

Palluconi, Lisa 9:53 AM:

Hi

Prince, Jason 9:55 AM:

Hi there - (b) (5) I'm not fully in the loop on coordinating
the (b) (5) It may be best for us to reach out to (b) (5), (b) (5)

Palluconi, Lisa 9:55 AM:

thanks

2021-1246 (CKK): 006634-006635

Duplicate of Bates Stamp 006632-006633 in 25th Interim

From: [Thomas, Nikole](#)
To: (b)(6)(b)(6) (b)(6)(b)(6)
Cc: [Smith, Bradley](#); (b)(6) (b)(6) [Palluconi, Lisa](#); [Christian, Alan](#); (b)(6)(b)(6)
Subject: Gertler Specific License Memo for Acting U/S Gacki
Date: Monday, January 25, 2021 4:10:01 PM
Attachments: [GertlerLicenseSummary_forTFIFO.docx](#)
[CoverLetter_GLOMAG2021_371648_1.pdf](#)
[License_GLOMAG2021_371648_1.pdf](#)

PRE-DECISIONAL and DELIBERATIVE

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

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

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

Thanks,
Nikole

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 006637-006641

Withheld in Full FOIA Exemption (b)(5) 2021-1246
(CKK): Bates Nos.: 006642-006644

From: [Thomas, Nikole](#)
To: [Smith, Bradley](#)
Cc: [Palluconi, Lisa](#); [Scheinert, Lawrence](#); [Gatjanis, Gregory](#); [Quinby, Ripley](#); [Prince, Jason](#); [Christian, Alan](#); (b)(6)
(b)(6) [Manfull, Alexandre](#); [Jennings, Thomas](#); (b)(6) (b)(6) [Thannhauser, Sara](#); [Moriarty, Kellen](#);
(b)(6) (b)(6) (b)(6)
Subject: Gertler SL Memo for TFI FO
Date: Monday, January 25, 2021 3:16:17 PM
Attachments: [GertlerLicenseSummary_forOFACFO.docx](#)
[CoverLetter_GLOMAG2021_371648_1.pdf](#)
[License_GLOMAG2021_371648_1.pdf](#)

Hi Brad,

(b)(5)

Please let us know if you have any edits or comments.

Thanks!
Nikole

2021-1246 (CKK): 006646-006653
Duplicate of Bates Stamp 006437-006444 in 25th Interim

From: [Thomas, Nikole](#)
To: [Gacki, Andrea](#); [Smith, Bradley](#)
Cc: [Palluconi, Lisa](#)
Subject: Gertler Request
Date: Friday, October 30, 2020 10:47:25 AM

PRE-DECISIONAL and DELIBERATIVE

Hi Andrea and Brad,

(b) (5) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Thanks!
Nikole

From: [Gacki, Andrea](#)
To: [Quinby, Ripley](#); [Gatianis, Gregory](#); [Baheri, Leila](#); [Jennings, Thomas](#); [Thomas, Nikole](#); [Palluconi, Lisa](#)
Cc: [Smith, Bradley](#); (b)(6)(b)(6)(b)(6)(b)(6)(b)(6)
Subject: Gertler package/intel
Date: Monday, October 26, 2020 1:33:24 PM

PRE-DECISIONAL AND DELIBERATIVE

Hi OGT – (b) (5)

(b) (5)

For OGT: (b) (5)

(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: (b)(6)(b)(6)
To: Gacki, Andrea
Cc: (b)(6)(b)(6) Smith, Bradley; Palluconi, Lisa; Jennings, Thomas; (b)(6)(b)(6) Christian, Alan; (b)(6)(b)(6) (b)(6) Ahern, Paul; Prince, Jason; Trew, Heather; (b)(6)(b)(6) (b)(6)(b)(6) Rembrandt, Scott
Subject: Gertler Memo
Date: Tuesday, January 26, 2021 9:53:17 AM
Attachments: [GertlerLicenseSummary_forTFIFO_clean.docx](#)

Hi Andrea – (b) (5) . Let us know how you would like us to move forward when you have a moment.

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)

Withheld in Full FOIA Exemption (b)(5) 2021-1246
(CKK): Bates Nos.: 006657-006659

From: [Thomas, Nikole](#)
To: [Palluconi, Lisa](#); [Scheinert, Lawrence](#); [Gatjanis, Gregory](#); [Quinby, Ripley](#)
Subject: Gertler Memo for Associate Director Review
Date: Monday, January 25, 2021 1:39:41 PM

Hi Lisa, Lawrence, Greg, and Rip,

The Gertler SL options memo is now ready for your review in SP: (b) (5)

so appreciate if you could send edits/clearance as soon as possible since you are probably juggling multiple deadlines right now.

Thanks!
Nikole

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
2021-1246 (CKK): Bates Nos.: 006661-006663


Responsive Records
2021-1246 (CKK) 25th Interim Part 2
121 pages

From: [Prince, Jason](#)
To: [Palluconi, Lisa](#); [Thomas, Nikole](#)
Cc: [Smith, Bradley](#)
Subject: Gertler Materials
Date: Wednesday, February 24, 2021 2:11:51 PM
Attachments: [DM_Gertler_JLY_02.25.2021_for_Fed_Pro.docx](#)
[DRAFT OFAC - Gertler License Revocation Letter_2.24.2021.docx](#)

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

Hi Lisa and Nikole,

Please find attached the current drafts of the JLY Decision Memo and the License Revocation Letter. (b) (5)



Please shout if you
have any questions, concerns, edits, etc.

Thanks,
Jason

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 006665-006671

From: [Gacki, Andrea](#)
To: [\(b\)\(6\)\(b\)\(6\)](#); [Rasmussen, Mary](#); [Christian, Alan](#); [Thomas, Nikole](#); [Palluconi, Lisa](#)
Cc: [Smith, Bradley](#); [\(b\)\(6\)\(b\)\(6\)](#)
Subject: Gertler license-related request
Date: Friday, January 8, 2021 12:21:42 PM

Hi everyone! Could you send me, in a Word document format, the Gertler license (b) (5)

[REDACTED]

(b) (5)

[REDACTED]

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: [Prince, Jason](#)
To: [Smith, Bradley](#); [Palluconi, Lisa](#); [Thomas, Nikole](#)
Subject: Gertler License Update
Date: Tuesday, February 23, 2021 4:35:47 PM

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

Any chance you have a few minutes for an update on the Gertler license matter? (b) (5)

(b) (5) (b) (5) (b) (5)
(b) (5) #). Thanks.

From: [Ruggles, Taylor V](#)
To: [Thomas, Nikole](#)
Cc: [Palluconi, Lisa](#)
Subject: Gertler License Request
Date: Friday, October 30, 2020 9:34:30 AM

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

Nikole - (b) (5) [REDACTED] On what number can I reach you? I am
(b)(6) [REDACTED]

Thanks,
Taylor

From: [Brad Brooks-Rubin](#)
To: [Rosenberg, Elizabeth](#); [Gacki, Andrea](#); (b)(6) [Palluconi, Lisa](#); [Prince, Jason](#)
Cc: (b) (6)
Subject: Gertler license NGO letter
Date: Tuesday, February 2, 2021 5:31:18 PM
Attachments: [21.02.02 Yellen-Blinken Ltr re Gertler License.pdf](#)

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

Andrea, Liz, et al,

Please find attached a letter signed by 14 Congolese and 16 international human rights, anti-corruption, and humanitarian NGOs, addressed to Secretaries Blinken and Yellen, urging immediate action to suspend and ultimately reverse the decision to issue to Dan Gertler and associated persons the license GLOMAG-2021-371648-1. I'd ask that you please share this letter with the Secretary and other Treasury counterparts.

As detailed in the letter, the Gertler license:

1. Directly undermines U.S. strategy and policy concerning anti-corruption efforts in the DRC;
2. Sets a dangerous precedent that undercuts the efficacy and legitimacy of the Global Magnitsky sanctions program, as well as sanctions programs more broadly; and
3. Thwarts the critical, challenging, and sometimes dangerous work of Congolese and other civil society organizations and activists.

We have sent the letter and a similar message to colleagues at State and will be sharing this with some members of the press as well.

On a related note, in case it otherwise didn't make its way to you, we also wanted to flag a [letter on the same matter](#) sent to Secretary Yellen yesterday by Senators Booker, Cardin, and Durbin.

Thanks again,

Brad (on behalf of signatories; cc Human Rights First)

Brad Brooks-Rubin

Managing Director

The Sentry

The Honorable
Antony Blinken
Secretary of State
Washington, D.C. 20520

The Honorable
Janet Yellen
Secretary of the Treasury
Washington, D.C. 20220

February 2, 2021

Re: Mr. Dan Gertler's license (No. GLOMAG-2021-371648-1)

Dear Mr. Secretary,
Dear Madam Secretary,

We write to you as members of Congolese and international civil society organizations.

We would like to share with you our deepest concerns with regards to [the decision of the Office of Foreign Assets Control \(OFAC\)](#), dated January 15, 2021 and made public on January 24, 2021, granting a license to businessman Dan Gertler, who was sanctioned for corruption in the Democratic Republic of Congo (DRC) under the Global Magnitsky Human Rights Accountability Act in December 2017. The license allows him to resume transactions with American entities for a year and unblock his frozen property.

We wish to respectfully request immediate action to reconsider, suspend and reverse this decision. We believe this decision severely undermines US global anti-corruption policies and its foreign policy strategy in the DRC, which notably supports current President Felix Tshisekedi's anti-corruption policy. Over the past years, the US Embassy in Kinshasa has been instrumental in putting the fight against corruption front and center on the political agenda in the DRC.

The sanctions against Mr. Gertler and his entities are the embodiment of that policy: they attest to the fact that the US is ready to take concrete and effective action against those who deprive the Congolese people of the means to rebuild the country. This has provided a crucial stepping stone to Congolese civil society groups determined to bolster the fight against corruption.

It has come to our attention that this extraordinary license was issued opaquely and in haste during former President Donald Trump's last days in office. It appears that standard consultations both within the Treasury Department and the State Department had not taken place prior to the issuance of the license, completely catching off guard a wide range of US officials who had worked hard to enact, uphold, and publicly defend the sanctions. This decision came after months of extensive [lobbying](#) on Mr. Gertler's behalf, including by well-known lawyers close to then-President Trump.

The Dan Gertler case had illustrated how impactful the Magnitsky sanctions can be. A longtime friend of DRC's former President Joseph Kabila, he was added to the very first [Global Magnitsky sanctions list](#) in December 2017 for "opaque and corrupt mining deals in DRC." This long-awaited sanction came following years of public reporting, both from international media and non-governmental organizations, who sought to expose how DRC's public mining revenues had been diverted.

The scale and nature of the corruption Gertler facilitated had a significant impact on the human rights of many Congolese. One of the bases for the sanctions, according to the press release announcing them, was Gertler acting as a middleman for deals between Kabila and oil companies that reportedly resulted, between 2010 and 2012 alone, in a loss of US\$1.36 billion to the state. This amounts to nearly half of the country's health budget over those three years, which falls far below both the regional average and the per capita spending a World Health Organization-supported study identified as the minimum to provide adequate health care in DRC.

OFAC's move to sanction Mr. Gertler was the first instance in which the tireless efforts of Congolese and international organizations were recognized. They took a major toll on the Israeli billionaire's financial dealings that according to OFAC itself had enabled and facilitated significant corrupt activities during the administration of former DRC president Joseph Kabila.

Evidence published in July 2020 by [PPLAAF](#) and [Global Witness](#), who are signatories to this letter, suggests that Gertler and his associates set up a highly complex system of proxies, shell companies, and an international money laundering network to evade US sanctions, as a means to allow him to continue to operate in the DRC and funnel millions of dollars abroad. The ingenuity and complexity of this apparent network indicates that his access to financial networks had been essential to his previous operations. Mr. Gertler has denied any knowledge of or connection with this network as well as rejecting all allegations of wrongdoing and corruption.

In November 2020, a US judge [sentenced](#) a subsidiary of New York hedge fund Och-Ziff for corruption in DRC. Although Mr. Gertler was not charged in this case, the court documents include information about the alleged role played by Gertler in the corruption, including the arrangement of bribes to DRC officials and judges, which further strengthens the need to keep sanctions in place.

While one could have expected an expansion of US sanctions following these revelations last year, the January 15 license sends a worrying signal to those who are looking to undermine the US sanctions regime. It sets a dangerous precedent and largely undercuts efforts to fight overseas corruption as part of the Global Magnitsky program, which has been an example for much other legislation around the world as an effective way to put pressure on those responsible for corruption and human rights abuses.

Last but not least, this license thwarts the critical and challenging work of civil society organizations and activists in DRC and beyond to bring accountability to those who had plundered their country's resources and risks creating additional victims of corruption. According to a [report](#) by civil society organizations Raid and Afreewatch, which are signatories to this letter, in just one mining deal involving Mr. Gertler, an estimated 32,000 local residents were deprived of clean drinking water, plagued with ongoing air and water pollution, sickness and lack of educational opportunities due to corruption. Mr. Gertler denies any corruption in this instance.

The Congolese civil society organizations signing this letter take tremendous risks to fight corruption in DRC and have greatly appreciated support for their efforts from international actors, including the US government. In his most recent video following President Biden's inauguration, US Ambassador to the DRC, Michael Hammer, said, "*It is in the interest of the American and the Congolese people to reinforce democracy, to fight corruption and to put an end to impunity.*" We take Ambassador Hammer at his word: we remain ready and willing to work with the US government to reinforce democracy, fight corruption and put an end to impunity. We hope you will stand with us.

We urge the Biden administration to immediately investigate this last-minute license, and, subject to relevant information, reverse its decision. The US needs to ensure that the proceeds of alleged corruption are not being accessed and unblocked during the transition, or for political motives.

We therefore respectfully request that the Treasury Department inform banks and financial institutions that the license is under review and that they should not unblock or allow further activities pursuant to the license until the new administration has had a chance to review both the reason for granting the license and its due process.

Thank you in advance for your attention.

We remain at your disposal if you have any questions or require any further information.

Sincerely yours,

Congolese Organizations

Afrewatch

Agir pour des élections transparentes et apaisées

Cadre de concentration sur les ressources naturelles de l'Ituri (CDC/RN)

Coalition pour la gouvernance des entreprises publiques du secteur extractif (COGEP)

Congo n'est pas à Vendre (« Congo is not for sale »)

Congo Nouveau

Filimbi

Initiative bonne gouvernance et droits de l'Homme (IBGDH)

Justice pour tous

Lucha

Observatoire citoyen des droits et de lutte contre la corruption en RDC (OCIDC)

Observatoire de la dépense publique (ODEP)

Observatoire d'études et d'appui à la responsabilité sociale et environnementale (OEARSE)

UNIS – Plateforme panafricaine de lutte contre la corruption

International Organizations

EG Justice

FACT Coalition

Freedom House

Global Witness

Human Rights First

Human Rights Watch

Never Again Coalition

The ONE Campaign

Open Society Foundations

Oxfam America

Platform to Protect Whistleblowers in Africa (PPLAAF)

Publish What You Pay – U.S.

Resource Matters

Rights and accountability in development (RAID)

The Sentry

Transparency International

From: [Gacki, Andrea](#)
To: [Palluconi, Lisa](#); [Thomas, Nikole](#); [Rasmussen, Mary](#)
Cc: [Smith, Bradley](#)
Subject: Gertler license application
Date: Sunday, August , 2020 2:2 :53 PM

Hi and apologies for the Sunday interruption! (b) (5)

we can discuss for 5 min on Monday,
at your convenience.

Andrea

From: [Prince, Jason](#)
To: [Smith, Bradley](#); [Palluconi, Lisa](#); [Thomas, Nikole](#)
Subject: Gertler License - Draft FPG Request to State
Date: Thursday, February 4, 2021 3:14:48 PM
Attachments: [OFAC FPG Request to State - Gertler License.docx](#)
[cover letter.pdf](#)
[4_5771613563881785837.pdf](#)

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

Hi Brad, Lisa, and Nikole,

Please find attached a draft of the FPG request to State in relation to the Gertler license. (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

If it might be helpful to hop on the phone to discuss anything, please let me know.

Thanks,
Jason

From: Thomas, Nikole <(b)(6)>
Sent: Wednesday, February 3, 2021 4:23 PM
To: Prince, Jason <(b)(6)>
Subject: Referral Template

Hi Jason,

(b) (5)
[REDACTED] Let
me know if you have any questions.

Thanks!

Nikole

(b) (5)

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates No. 006884

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 006685-006689

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): 006690

2021-1246 (CKK): 006692
Duplicate of Bates Stamp 006691 in 25th
Interim

2021-1246 (CKK): Bates Nos.: 006693-006728
Duplicate of Bates Nos.: 005584-005619 in 23rd
Interim

From: (b)(6) (b)(6)
To: (b)(6) (b)(6); (b)(6) (b)(6) (b)(6) (b)(6); [Smith, Bradley](#); [Rosenberg, Elizabeth](#); (b)(6) (b)(6) (b)(6) (b)(6)
Cc: [DL OFAC SPI-\(POL\) Policy \(Govt & Contr\)](#); [Palluconi, Lisa](#)
Subject: NSC Leg Sync 3/9/21
Date: Tuesday, March 9, 2021 10:55:52 AM

Good morning,

This morning, NSC #LEG hosted its Tuesday Leg sync.

- Gertler: (b) (5) (b) (5)
- NS2: Sen. Cruz is holding the nomination of Bill Burns to be CIA Director over concerns on the implementation of NS2 sanctions.
- DOD's Colin Kahl will have his Committee vote today. Given the likelihood that his nomination may result in a tie, a discharge petition may be required to facilitate a floor vote. (Although the nomination will likely be held.)
- Syria/ME – NSC continues member-level engagement on last month's strike.
- Interagency Election Security actions are rolling out beginning on March 15.
- Anne Neubarger (DNSA-Cyber) is beginning a series of SSCI-member meetings this week on Cyber, specifically on the Microsoft vulnerability.
- Today, WH Press will announce Biden's Quad meeting.
- SFRC/China mark-up is set for late March, however the Committee has not agreed upon a set of bills for mark up.

(b) (5)

From: (b)(6)(b)(6)
To: [DL OFAC Global Magnitsky](#)
Cc: [Thomas, Nikole](#); [Rasmussen, Mary](#)
Subject: Licensing Request for Dan Gertler - GLOMAG-2020-368297-1
Date: Friday, August 7, 2020 9:44:51 AM
Attachments: [Gertler Application.pdf](#)
[Vekselberg Summary.pdf](#)

Hi all –

Please see the below summary of a recent request submitted on behalf of Dan Gertler under the GLOMAG program. (b) (5)

[REDACTED]

Thanks,

(b)(6)

Dan Gertler: GLOMAG-2020-368297-1

**Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 006730-006731**

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 006732-006771

From: (b)(6)(b)(6)
To: [DL OFAC Russia](#)
Cc: (b)(6)(b)(6)(b)(6)(b)(6) [Thomas, Nikole; Rasmussen, Mary](#)
Subject: (b) (5)
Date: Wednesday, May 27, 2020 12:44:47 PM
Attachments: (b) (5)
[Vekselberg Application.pdf](#)

Hi all –

Please see the updated summary of (b) (6)

(b) (5)

Thanks,

(b)(6)

(b) (5)

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 006772-006774

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 006775-06788

2021-1246 (CKK): 006789
Duplicate of Bates Stamp 006436 in 25th
Interim

2021-1246 (CKK): 006790-006792
Duplicate of Bates Stamp 006438-006440 in 25th
Interim

Pending Consultation with other Treasury Components
2021-1246 (CKK): Bates Nos.: 006793-006797

2021-1246 (CKK): 006798-006800
Duplicate of Bates Stamp 006794-006797 in 25th
Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 006801-006810

2021-1246 (CKK): 006811-006813
Duplicate of Bates Stamp 006794-006797 in 25th
Interim

2021-1246 (CKK): 006814-006823
Duplicate of Bates Stamp 006801-006810 in 25th
Interim

2021-1246 (CKK): 006824-006826
Duplicate of Bates Stamp 006793-006797 in 25th
Interim

2021-1246 (CKK): 006827-006836
Duplicate of Bates Stamp 006814-006823 in 25th
Interim

2021-1246 (CKK): 0064837-006840
Duplicate of Bates Stamp 006793-006797 in 25th
Interim

2021-1246 (CKK): 006841-006850
Duplicate of Bates Stamp 006814-006823 in 25th
Interim

2021-1246 (CKK): 006851-006857
Duplicate of Bates Stamp 006793-006797 in 25th
Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 006858-006861

From: [Moriarty, Kellen](#)
To: (b)(6)(b)(6)
Cc: [Palluconi, Lisa](#); [Thannhauser, Sara](#)
Subject: RE: Carter Burwell intro brief due-outs
Date: Monday, June 22, 2020 5:16:37 PM
Attachments: [QAAR - Global Magnitsky Sanctions v5.docx](#)

(b)(6) – (b) (5)

[Redacted]

[Redacted]

– Kellen

From: Quinby, Ripley <(b)(6)>
Sent: Monday, June 22, 2020 9:55 AM
To: (b)(6)(b)(6) <(b)(6)>
Cc: Gatjanis, Gregory <(b)(6)> [Palluconi, Lisa](#)
<(b)(6)> [Thannhauser, Sara](#) <(b)(6)> [Scheinert, Lawrence](#) <(b)(6)> [Manfull, Alexandre](#)
<(b)(6)> <(b)(6)>
Subject: RE: Carter Burwell intro brief due-outs

(b)(6)

Please find OGT's due-out(s) attached. (b) (5)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

OGT is happy to follow up with any other materials, or discussions, that may be useful.

–rip

From: (b)(6)(b)(6) <(b)(6)>
Sent: Friday, June 19, 2020 2:47 PM
To: Gatjanis, Gregory <(b)(6)> [Quinby, Ripley](#)
<(b)(6)> [Palluconi, Lisa](#) <(b)(6)> [Thannhauser, Sara](#)
<(b)(6)> [Scheinert, Lawrence](#) <(b)(6)>
[Manfull, Alexandre](#) <(b)(6)>
Subject: Carter Burwell intro brief due-outs

All -

Thank you for briefing Carter this afternoon, he very much appreciated the opportunity to speak with you and learn about OFAC. Below is a consolidated list of due outs from today's briefing. Once I receive these, I will send them to (b)(6) and (b)(6).

(b) (5)

Regards,

(b)(6)

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

(b)(6)

| T: (b)(6)

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 006864-006869

From: [Palluconi, Lisa](#)
To: (b)(6)
Cc: [Thannhauser, Sara](#); [Moriarty, Kellen](#); (b)(6)
Subject: RE: call with (b) (6) - Illegal Wildlife Trafficking / Environmental Crimes
Date: Wednesday, March 17, 2021 10:12:00 PM

(b)(6) – belated thanks for this very interesting and helpful readout! Thank you and (b)(6) for following up on these issues and exploring possibilities. And, so glad you were able to meet (b) (6) virtually!

Best,

Lisa

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

Hi Lisa,

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

Laura had a wealth of information related to illegal wildlife trafficking and related environmental crimes, along with her colleague Nicholas Weber, who also joined our call.

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

(b) (5)

(b) (5)

Thanks again for connecting us,

(b)(6)

Pending Consultation with other Treasury Components
2021-1246 (CKK): Bates Nos.: 006872-006873

2021-1246 (CKK): 006874-006877
Duplicate of Bates Stamp 006871-006873 in 25th
Interim

Pending Consultation with Other Treasury Components
2021-1246 (CKK): Bates No.: 006878-006883

From: [Smith, Bradley](#)
To: [Thomas, Nikole](#); [Prince, Jason](#); [Palluconi, Lisa](#)
Subject: RE:
Date: Thursday, February 25, 2021 1:30:08 PM

Thank you, Nikole!

From: Thomas, Nikole <(b)(6)>
Sent: Thursday, February 25, 2021 1:26 PM
To: Smith, Bradley <(b)(6)> Prince, Jason <(b)(6)>
Palluconi, Lisa <(b)(6)>
Subject: RE:

PRE-DECISIONAL and DELIBERATIVE

No problem. Please see attached. Note that it still has the pre-decisional/deliberative/etc. marking highlighted in yellow at the top.

From: Smith, Bradley <(b)(6)>
Sent: Thursday, February 25, 2021 1:25 PM
To: Thomas, Nikole <(b)(6)> Prince, Jason <(b)(6)>
Palluconi, Lisa <(b)(6)>
Subject: RE:

Oh, I am on a call right now and then have a quick OGT call. If it's easy for you do it, that would be great. I am happy to scan it, though if that's best.

From: Thomas, Nikole <(b)(6)>
Sent: Thursday, February 25, 2021 1:19 PM
To: Prince, Jason <(b)(6)> Smith, Bradley <(b)(6)>
Palluconi, Lisa <(b)(6)>
Subject: RE:

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

Hi Brad,

(b) (5) (b) (5). Just let me know.

Thanks!
Nikole

From: Prince, Jason <(b)(6)>

Sent: Thursday, February 25, 2021 1:15 PM

To: Smith, Bradley <(b)(6)> Palluconi, Lisa <(b)(6)>

Thomas, Nikole <(b)(6)>

Subject: RE:

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

Thanks, Brad. (b) (5)

(b) (5)

Can I help to facilitate anything that would be less of a hassle for you?

From: Smith, Bradley <(b)(6)>

Sent: Thursday, February 25, 2021 1:09 PM

To: Prince, Jason <(b)(6)> Palluconi, Lisa <(b)(6)>

Thomas, Nikole <(b)(6)>

Subject: RE:

(b) (5)

From: Prince, Jason <(b)(6)>

Sent: Thursday, February 25, 2021 1:02 PM

To: Smith, Bradley <(b)(6)> Palluconi, Lisa <(b)(6)>

Thomas, Nikole <(b)(6)>

Subject: FW:

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

(b) (5)

Thanks!

From: Trew, Heather <(b)(6)>

Sent: Thursday, February 25, 2021 12:36 PM

To: Gacki, Andrea <(b)(6)> Schaffer, Laurie <(b)(6)>

Rosenberg, Elizabeth <(b)(6)> Ahern, Paul

<(b)(6)> Smith, Bradley <(b)(6)> <(b)(6)>

<(b)(6)> Sonfield, Brian <(b)(6)>

Cc: Prince, Jason <(b)(6)>

Subject: RE:

Privileged/Deliberative/Predecisional/Draft

Hello everyone – thank you for all your support during this process. (b) (5)

(b) (5)
[Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Thanks,
Heather

From: Trew, Heather
Sent: Wednesday, February 24, 2021 7:46 PM
To: Gacki, Andrea <(b)(6)> Schaffer, Laurie <(b)(6)>
Rosenberg, Elizabeth <(b)(6)> Ahern, Paul
<(b)(6)> Smith, Bradley <(b)(6)> <(b)(6)>
<(b)(6)> Sonfield, Brian <(b)(6)>
Cc: Prince, Jason <(b)(6)>
Subject: RE:

Privileged/Deliberative/Predecisional/Draft

Hello everyone – (b) (5)
[Redacted]
[Redacted]

[Redacted]

Thank you everyone, for your patience and assistance!

Thanks,
Heather

From: Trew, Heather
Sent: Wednesday, February 24, 2021 1:47 PM
To: 'Gacki, Andrea' <(b)(6)> Schaffer, Laurie
<(b)(6)> Rosenberg, Elizabeth <(b)(6)>
Ahern, Paul <(b)(6)> Smith, Bradley <(b)(6)> <(b)(6)> ,

(b) (6) <(b)(6)> Sonfield, Brian <(b)(6)>

Cc: Prince, Jason <(b)(6)>

Subject: RE:

Privileged/Deliberative/Predecisional/Draft

Thanks so much, everyone. (b) (5)

Please let us know if you would like to discuss.

Thanks,
Heather

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

Sent: Wednesday, February 24, 2021 12:46 PM

To: Schaffer, Laurie <(b)(6)> Trew, Heather

<(b)(6)> Rosenberg, Elizabeth <(b)(6)> Ahern,

Paul <(b)(6)> Smith, Bradley <(b)(6)> (b)(6)

<(b)(6)>

Cc: Prince, Jason <(b)(6)>

Subject: RE:

Hi all – thanks for the work on this memo. (b) (5)

From: Schaffer, Laurie <(b)(6)>

Sent: Wednesday, February 24, 2021 11:08 AM

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)>

Subject:

Hi everyone. Heather and Jason, very nice work on the memo. (b) (5)

(b) (5)

(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)> Schaffer, Laurie <(b)(6)>
Cc: Prince, Jason <(b)(6)>
Subject: Draft Gertler materials

Predecisional/Deliberative/Privileged/Draft

(b) (5)

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

Thanks,
Heather

2021-1246 (CKK): 006889-006892
Duplicate of Bates Stamp 006824-006826 in 25th
Interim

2021-1246 (CKK): 006896-006898
Duplicate of Bates Stamp 006824-006826 in 25th
Interim

2021-1246 (CKK): 006899-006901
Duplicate of Bates Stamp 006824-006826 in 25th
Interim

2021-1246 (CKK): 006902-006906
Duplicate of Bates Stamp 006827-006829 in 25th
Interim

Pending Consultation with other Treasury Component
2021-1426 (CKK): Bates Nos.: 006907-006915

From: [Thomas, Nikole](#)
To: [Prince, Jason](#); [Palluconi, Lisa](#)
Subject: RE: Gertler Specific License Memo for Acting S Gacki
Date: Tuesday, February 2, 2021 :05:35 PM

Hi Jason,

I'm so sorry for the late reply! Somehow I missed your earlier email from this afternoon. Would noon tomorrow work?

Thanks!
Nikole

From: Prince, Jason <(b)(6)>
Sent: Tuesday, February 2, 2021 6:20 PM
To: Thomas, Nikole <(b)(6)> Palluconi, Lisa <(b)(6)>
Subject: RE: Gertler Specific License Memo for Acting U/S Gacki

PRIVILEGED

Hi Nikole,

I'm circling back on this. When would be a convenient time to discuss? In the meantime, I hope you enjoy a relaxing evening.

Thanks,
Jason

From: Prince, Jason
Sent: Tuesday, February 2, 2021 12:35 PM
To: Thomas, Nikole <(b)(6)> Palluconi, Lisa <(b)(6)>
Subject: RE: Gertler Specific License Memo for Acting U/S Gacki

Hi Nikole – Would now work? If so, please call (b)(6). I'm free until 1:00. Thanks.

From: Thomas, Nikole <(b)(6)>
Sent: Tuesday, February 2, 2021 10:12 AM
To: Prince, Jason <(b)(6)> Palluconi, Lisa <(b)(6)>
Subject: Re: Gertler Specific License Memo for Acting U/S Gacki

Hi Jason,

Do you have a minute to discuss?

Thanks!
Nikole

From: Prince, Jason <(b)(6)>
Date: February 2, 2021 at 10:08:52 AM EST
To: Palluconi, Lisa <(b)(6)> Thomas, Nikole <(b)(6)>
Subject: FW: Gertler Specific License Memo for Acting U/S Gacki

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,

(b) (5)

Thanks,
Jason

From: Palluconi, Lisa <(b)(6)>
Sent: Tuesday, January 26, 2021 8:37 AM
To: (b)(6)(b)(6) <(b)(6)> Thomas, Nikole <(b)(6)>
(b)(6)(b)(6) <(b)(6)> Prince, Jason <(b)(6)>
Cc: Smith, Bradley <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Christian, Alan <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Subject: RE: Gertler Specific License Memo for Acting U/S Gacki

+ Jason

Pre-decisional and Deliberative

Hi (b)(6) – Thanks. (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

Best,
Lisa

From: (b)(6)(b)(6) <(b)(6)>
Sent: Tuesday, January 26, 2021 7:46 AM
To: Thomas, Nikole <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Cc: Smith, Bradley <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Palluconi, Lisa <(b)(6)> Christian, Alan <(b)((b)(6)> (b)(6)
(b)(6) <(b)(6)>
Subject: RE: Gertler Specific License Memo for Acting U/S Gacki

Hi Nikole – (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(b)(6)

[REDACTED]
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)(b)(6) <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Cc: Smith, Bradley <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Palluconi, Lisa <(b)(6)> Christian, Alan <(b)((b)(6)> (b)(6)
(b)(6) <(b)(6)>
Subject: Gertler Specific License Memo for Acting U/S Gacki

PRE-DECISIONAL and DELIBERATIVE

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

(b) (5)

[Redacted]

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

Thanks,
Nikole

2021-1246 (CKK): 006920-006928
Duplicate of Bates Stamp 006916-006919 in 25th
Interim

2021-1246 (CKK): 006929-006946
Duplicate of Bates Stamp 005929-005933 in 24th
Interim

From: (b)(6) (b)(6)
To: [Palluconi, Lisa](#); [Thomas, Nikole](#)
Cc: (b)(6) (b)(6)
Subject: RE: FYI
Date: Tuesday, March 9, 2021 10:37:26 AM

Got it. (b) (5)

From: Palluconi, Lisa <(b)(6)>
Sent: Tuesday, March 9, 2021 10:36 AM
To: (b)(6) (b)(6) <(b)(6)> Thomas, Nikole
<(b)(6)>
Cc: (b)(6) (b)(6) <(b)(6)>
Subject: RE: FYI

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

From: (b)(6) (b)(6) <(b)(6)>
Sent: Tuesday, March 9, 2021 10:30 AM
To: Thomas, Nikole <(b)(6)> Palluconi, Lisa <(b)(6)>
Cc: (b)(6) (b)(6) <(b)(6)>
Subject: Fwd: FYI

Lisa and Nikole,

(b) (5)

[Redacted]

(b)(6)

2021-1246 (CKK): Bates No. 6948
Duplicate of Bates No. 6949 in 25th
Interim

From: [Palluconi, Lisa](#)
To: [Prince, Jason](#)
Subject: Re: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo
Date: Tuesday, March 23, 2021 4:47:30 PM

No worries! (b)(6) mentioned that the clearance process for this one was a bit off all around.

From: Prince, Jason <(b)(6)>
Date: March 23, 2021 at 2:01:52 PM EDT
To: Palluconi, Lisa <(b)(6)>
Subject: FW: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Ugh – My apologies if I monkeyed up the clearance process on this one. (b) (5)

(b)(6)
In any event, I didn't mean to jump the queue!

From: Palluconi, Lisa <(b)(6)>
Sent: Tuesday, March 23, 2021 11:31 AM
To: Prince, Jason <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Rasmussen, Mary <(b)(6)> (b)(6)
<(b)(6)> (b)(6) (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Jennings,
Thomas <(b)(6)> Thomas, Nikole <(b)(6)>
Christian, Alan <(b)(6)> Moriarty, Kellen <(b)(6)>
(b)(6) <(b)(6)> (b)(6) <(b)(6)>
(b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Folks – (b) (5) Just trying balance competing demands.

Thanks,
Lisa

From: Prince, Jason <(b)(6)>
Sent: Tuesday, March 23, 2021 11:28 AM
To: (b)(6)(b)(6) <(b)(6)> Rasmussen, Mary
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
(b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)

(b)(6) (b)(6) (b)(6)
(b)(6) (b)(6) (b)(6) Jennings,
Thomas (b)(6) Thomas, Nikole (b)(6)
Palluconi, Lisa (b)(6) Christian, Alan (b)(6)
Moriarty, Kellen (b)(6) (b)(6) (b)(6)
(b)(6) (b)(6) (b)(6)
(b)(6) (b)(6) (b)(6)

Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

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

Good morning, All:

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

Thanks,
Jason

From: (b)(6)(b)(6) (b)(6)
Sent: Tuesday, March 23, 2021 9:37 AM
To: Rasmussen, Mary (b)(6) (b)(6)
(b)(6) (b)(6) (b)(6) (b)(6) (b)(6)
(b)(6) Prince, Jason (b)(6) (b)(6)
(b)(6) (b)(6) (b)(6)
Cc: (b)(6) (b)(6) (b)(6)
(b)(6) (b)(6) (b)(6)
(b)(6) (b)(6) (b)(6) Jennings,
Thomas (b)(6) Thomas, Nikole (b)(6)
Palluconi, Lisa (b)(6) Christian, Alan (b)(6)
Moriarty, Kellen (b)(6) (b)(6) (b)(6)
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Hi Ari,

Good morning. (b)(5)

Thank you,

(b)(6)

From: Rasmussen, Mary <(b)(6)>
Sent: Monday, March 22, 2021 10:50 PM
To: (b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Prince,
Jason <(b)(6)> (b)(6) <(b)(6)>
(b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6); (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Jennings,
Thomas <(b)(6)> Thomas, Nikole <(b)(6)>
Palluconi, Lisa <(b)(6)> Christian, Alan <(b)(6)>
Moriarty, Kellen <(b)(6)> (b)(6) <(b)(6)> (b)(6)
(b)(6) <(b)(6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

+ (b)(6)

From: (b)(6) <(b)(6)>
Date: March 22, 2021 at 10:47:55 PM EDT
To: (b)(6) (b)(6) <(b)(6)> (b)(6)
<(b)(6)> Prince, Jason <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Jennings,
Thomas <(b)(6)> Thomas, Nikole <(b)(6)>
Palluconi, Lisa <(b)(6)> Christian, Alan <(b)(6)>
Rasmussen, Mary <(b)(6)> Moriarty, Kellen
<(b)(6)> (b)(6) <(b)(6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Good Evening,

(b) (5)

+ a few more from POL as well as Licensing

(b)(6)

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

From: (b)(6) (b)(6) <(b)(6)>
Sent: Monday, March 22, 2021 7:46 PM
To: (b)(6) <(b)(6)> Prince, Jason <(b)(6)>
(b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
>; (b)(6) <(b)(6)> (b)(6)
<(b)(6)> Jennings, Thomas <(b)(6)>
Subject: FW: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

OCC—

Flagging the attached, and happy to loop you in as requested (b) (5)

Happy to loop you in as requested.

Best,

(b)(6)

(b)(6)

Work: (b)(6)

Cell: (b)(6)

(b)(6)

From: (b)(6) (b)(6)
Sent: Monday, March 22, 2021 7:43 PM
To: (b)(6) >; (b)(6) (b)(6)
<(b)(6)> _DL_TFI_Africa <DL_TFI_Africa@treasury.gov>; (b)(6)
>; (b)(6) >; (b)(6)

<(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)>

Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Initial edits in the attached.

(b)(6)

Work: (b)(6)

Cell: (b)(6)

(b)(6)

From: (b)(6) (b)(6) <(b)(6)>

Sent: Monday, March 22, 2021 5:54 PM

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

<(b)(6)> _DL_TFI_Africa <_DL_TFI_Africa@treasury.gov>; (b)(6)

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)>

Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

++ more POL, as I'm not sure who is on the TFI Africa distro. Thanks!

(b)(6)

Work: (b)(6)

Cell: (b)(6)

(b)(6)

From: (b)(6)

Sent: Monday, March 22, 2021 5:37 PM

To: (b)(6) (b)(6) <(b)(6)> _DL_TFI_Africa

<_DL_TFI_Africa@treasury.gov>; (b)(6) (b)(6)

Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

+(b)(6) (b)(5)

From: (b)(6) (b)(6) <(b)(6)>

Sent: Monday, March 22, 2021 5:20 PM

To: _DL_TFI_Africa <DL_TFI_Africa@treasury.gov>; (b)(6)

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

Subject: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Good afternoon (b) (5)

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

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

Best,

(b)(6)

(b)(6)

Office of Terrorist Financing & Financial Crimes
U.S. Department of the Treasury

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

From: (b)(6)
To: [Palluconi, Lisa](#)
Subject: (b) (5)
Date: Thursday, February 4, 2021 2:27:30 PM

Great.

(b) (5) (b) (5) and
sending to you now!

From: Palluconi, Lisa <(b)(6)>
Sent: Thursday, February 4, 2021 2:26 PM
To: (b)(6) <(b)(6)>
Subject: (b) (5)

Sounds good! Separately, (b) (5)

From: (b)(6) <(b)(6)>
Sent: Thursday, February 4, 2021 2:24 PM
To: Palluconi, Lisa <(b)(6)> Thannhauser, Sara
<(b)(6)> Moriarty, Kellen <(b)(6)>
Cc: (b)(6) <(b)(6)>
Subject: (b) (5)

Sounds great, Lisa. Perhaps tomorrow if you're amenable with everything else going on today?

From: Palluconi, Lisa <(b)(6)>
Sent: Thursday, February 4, 2021 2:22 PM
To: (b)(6) <(b)(6)> Thannhauser, Sara
<(b)(6)> Moriarty, Kellen <(b)(6)>
Cc: (b)(6) <(b)(6)>
Subject: (b)(5)

(b) (5)

From: (b)(6) <(b)(6)>
Sent: Thursday, February 4, 2021 1:24 PM
To: Thannhauser, Sara <(b)(6)> Moriarty, Kellen
<(b)(6)>
Cc: Palluconi, Lisa <(b)(6)> (b)(6) <(b)(6)>
Subject: (b)(5)

I have some initial thoughts on this that would be happy to chat in person on. (b) (5)

From: (b)(6)(b)(6) <(b)(6)>
Sent: Thursday, February 4, 2021 11:30 AM
To: (b)(6) (b)(6) <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Cc: (b)(6) (b)(6) <(b)(6)> (b)(6) <(b)(6)>
(b)(6) <(b)(6)>
Subject: (b)(5)

Good morning Andy,

(b) (5) . Thanks for handling the comms on this.

(b)(6)
Senior Advisor to the Acting Under Secretary | Office of Terrorism and Financial Intelligence |
U.S. Department of the Treasury
(b)(6) | O: (b)(6) | M: (b)(6)

From: (b)(6) (b)(6) <(b)(6)>
Date: February 4, 2021 at 11:11:37 AM EST
To: (b)(6)(b)(6) <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Cc: (b)(6) (b)(6) <(b)(6)> (b)(6) <(b)(6)>
<(b)(6)> (b)(6) <(b)(6)>
Subject: (b)(5)

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

Let me know if you have any questions.

Thanks,

(b)(6)

From: (b)(6) >
Sent: Thursday, February 4, 2021 3:05 AM
To: (b)(6) (b)(6) <(b)(6)> (b)(6)
Subject: (b)(5)

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

(b)(6) and (b)(6)1,

(b) (5) [REDACTED]

[REDACTED]

Thanks.

(b)(6)

2021-1246 (CKK): 006958-006964
Duplicate of Bates Stamp 006955-006957 in 25th
Interim

2021-1246 (CKK): 006965-006986
Duplicate of Bates Stamp 006985-006988 in 25th
Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 006987-006988

From: [Gacki, Andrea](#)
To: [Thomas, Nikole](#); [Palluconi, Lisa](#); (b)(6)(b)(6) (b)(6)(b)(6)
Cc: [Smith, Bradley](#); [Christian, Alan](#)
Subject: RE: State Notice: Dan Gertler - GLOMAG-2020-368297-1
Date: Wednesday, November 4, 2020 1:23:49 PM

Thanks, Nikole!

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: Wednesday, November 4, 2020 1:21 PM
To: Gacki, Andrea <(b)(6)> Palluconi, Lisa <(b)(6)>
(b)(6)(b)(6) <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Cc: Smith, Bradley <(b)(6)> Christian, Alan <(b)(6)>
Subject: RE: State Notice: Dan Gertler - GLOMAG-2020-368297-1

Hi All - (b) (5)

Thanks!

Nikole

From: Gacki, Andrea <(b)(6)>
Sent: Wednesday, November 4, 2020 10:19 AM
To: Palluconi, Lisa <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Thomas, Nikole <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Cc: Smith, Bradley <(b)(6)> Christian, Alan <(b)(6)>
Subject: RE: State Notice: Dan Gertler - GLOMAG-2020-368297-1

Hi all - (b) (5)

From: Palluconi, Lisa <(b)(6)>
Sent: Wednesday, November 4, 2020 8:39 AM
To: Gacki, Andrea <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Thomas, Nikole <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Cc: Smith, Bradley <(b)(6)> Christian, Alan <(b)(6)>
Subject: RE: State Notice: Dan Gertler - GLOMAG-2020-368297-1

(b) (5)

From: Gacki, Andrea <(b)(6)>
Date: November 4, 2020 at 8:16:37 AM EST

To: (b)(6)(b)(6) <(b)(6)> Palluconi, Lisa <(b)(6)>
Thomas, Nikole <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Cc: Smith, Bradley <(b)(6)> Christian, Alan <(b)(6)>
Subject: RE: State Notice: Dan Gertler - GLOMAG-2020-368297-1

Thank you all — (b) (5)

From: (b)(6)(b)(6) <(b)(6)>
Date: November 4, 2020 at 7:40:51 AM EST
To: Palluconi, Lisa <(b)(6)> Thomas, Nikole <(b)(6)>
(b)(6) (b)(6) <(b)(6)>
Cc: Gacki, Andrea <(b)(6)> Smith, Bradley <(b)(6)>
Christian, Alan <(b)(6)>
Subject: RE: State Notice: Dan Gertler - GLOMAG-2020-368297-1

Thanks Lisa!

(b)(6)
Mobile: (b)(6)

Email: (b)(6)

From: Palluconi, Lisa <(b)(6)>
Date: November 4, 2020 at 7:40:18 AM EST
To: (b)(6)(b)(6) <(b)(6)> Thomas, Nikole <(b)(6)>
(b)(6) (b)(6) <(b)(6)>
Cc: Gacki, Andrea <(b)(6)> Smith, Bradley <(b)(6)>
Christian, Alan <(b)(6)>
Subject: RE: State Notice: Dan Gertler - GLOMAG-2020-368297-1

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

Best,
Lisa

From: (b)(6)(b)(6) <(b)(6)>
Sent: Wednesday, November 4, 2020 7:32 AM
To: Thomas, Nikole <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Cc: Gacki, Andrea <(b)(6)> Smith, Bradley <(b)(6)>
Palluconi, Lisa <(b)(6)> Christian, Alan <(b)(6)>
Subject: Re: State Notice: Dan Gertler - GLOMAG-2020-368297-1

2021-1246 (CKK): 006991-007053
Duplicate of Bates Stamp 006447-006453 in 25th
Interim

Pending Consultation with Treasury Components
2021-1246 (CKK): Bates Nos.: 007054-007057

2021-1246 (CKK): 007058-007066
Duplicate of Bates Stamp 006447-006453 in 25th
Interim

2021-1246 (CKK): 007067-007069
Duplicate of Bates Stamp 006454-006455 in 25th
Interim

2021-1246 (CKK): 007070-007084
Duplicate of Bates Stamp 007067-007069 in 25th
Interim

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 007085-007086

Pending Consultation with other Treasury Components
2021-1246 (CKK): Bates Nos.: 007087-007091

2021-1246 (CKK): 007092-007101
Duplicate of Bates Stamp 007088-007091 in 25th
Interim

2021-1246 (CKK): 007102-007134
Duplicate of Bates Stamp 005929-005933 in 25th
Interim

From: (b)(6)
To: Thannhauser, Sara; Moriarty, Kellen; (b)(6) Alan; (b)(6)(b)(6) Thomas, Nikole; (b)(6)
Cc: (b)(6) (b)(6)
Subject: Quick Turn Review by 3:45 pm today: DRC-related public messaging
Date: Thursday, March 4, 2021 3:19:05 PM
Attachments: 03032021 - Statement - Gertler Revocation .docx
EB AF PG - Gertler Revocation - XX MAR 2021.docx

Good Afternoon,

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted]

Thanks in advance and please reach out if you have questions! (and forward to anyone I missed!!

(b)(6)

[Redacted]
Senior Sanctions Policy Advisor
Office of Foreign Assets Control
Department of the Treasury
Desk: (b)(6)
Mobile: (b)(6)

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007136-007138

From: [Moriarty, Kellen](#)
To: (b)(6)(b)(6) (b)(6)(b)(6)
Cc: [Palluconi, Lisa](#); [Thannhauser, Sara](#); (b)(6) (b)(6)
Subject: OFAC regulatory review / controversial actions list
Date: Tuesday, January 26, 2021 12:07:11 AM
Attachments: [2021-01-25 OFAC Controversial Actions \(for TFI FO\).docx](#)

(b)(6) (b)(6) – (b) (5)

. Thanks and please reach out with any questions.

– Kellen

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007140-007141

Withheld in Full FOIA Exemption (b)(5), (b)(6)
2021-1246 (CKK): Bates Nos.: 007142-007145

2021-1246 (CKK): 007146-007148
Duplicate of Bates Stamp 007144-007145 in 25th Interim

2021-1246 (CKK): 007149-007151
Duplicate of Bates Stamp 007145-007147 in 25th
Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007152-007154

2021-1246 (CKK): 007155-007159
Duplicate of Bates Stamp 007145-007147 in 25th
Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007160-007161

2021-1246 (CKK): 007162-007198
Duplicate of Bates Stamp 007145-007147 in 25th
Interim

Withheld in Full FOIA Exemption (b)(5) 2021-1246 (CKK):
Bates Nos.: 007199-007201

2021-1246 (CKK): 007202-007214
Duplicate of Bates Stamp 007194-007201 in 25th
Interim

Pending Consultation with other Treasury Component
2021-1246 (CKK): Bates Nos.: 007215-007217

2021-1246 (CKK): 007218-007230
Duplicate of Bates Stamp 007216-007217 in 25th
Interim

From: [Smith, Bradley](#)
To: [\(b\)\(6\)\(b\)\(6\)](#) [\(b\)\(6\)](#) [Palluconi, Lisa](#); [Prince, Jason](#)
Cc: [Thomas, Nikole](#); [Christian, Alan](#)
Subject: RE: Dan Gertler License Request: GLOMAG-2021-373651-1
Date: Friday, April 9, 2021 8:04:29 PM

PRE-DECISIONAL & DELIBERATIVE—PRE-DECISIONAL & DELIBERATIVE

Thank you, [\(b\)\(6\)](#) for pulling these documents. Your recall is incredible, and I am always so grateful for your thoroughness, thoughtfulness, and diligence.

[\(b\)\(5\)](#)



In any event, I offer that as food for thought. Thank you, again. I hope you have a great weekend.

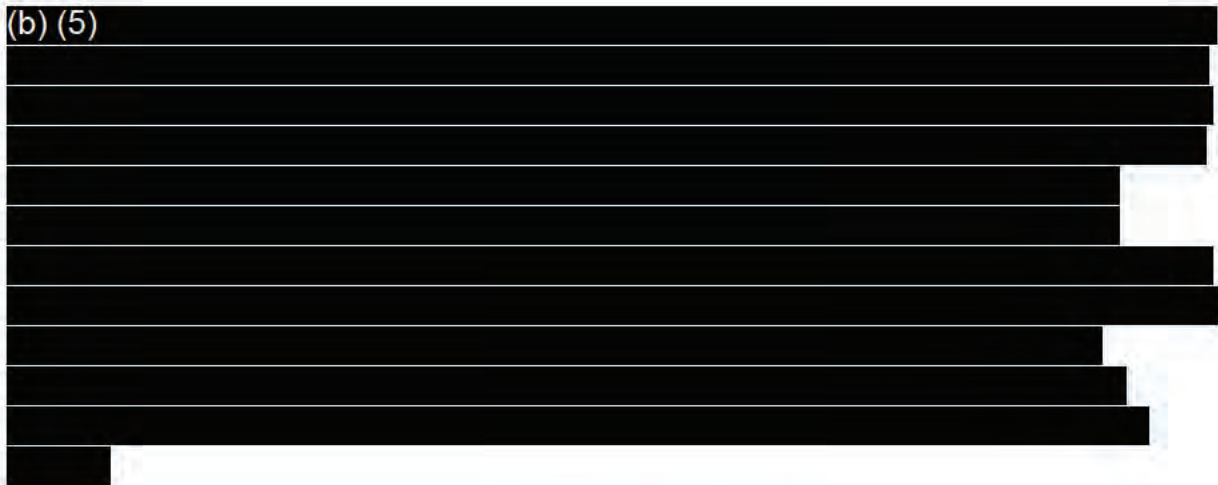
Brad

From: [\(b\)\(6\)\(b\)\(6\)](#) [\(b\)\(6\)](#)
Sent: Friday, April 9, 2021 6:33 PM
To: Smith, Bradley [\(b\)\(6\)](#) [\(b\)\(6\)](#)
[\(b\)\(6\)](#) Palluconi, Lisa [\(b\)\(6\)](#) Prince, Jason
[\(b\)\(6\)](#)
Cc: Thomas, Nikole [\(b\)\(6\)](#) Christian, Alan [\(b\)\(6\)\(b\)\(6\)](#)
Subject: RE: Dan Gertler License Request: GLOMAG-2021-373651-1

PRE-DECISIONAL & DELIBERATIVE—PRIVILEGED & CONFIDENTIAL

Hi Brad,

[\(b\)\(5\)](#)



(b)(6)

From: Smith, Bradley <(b)(6)>
Sent: Friday, April 9, 2021 5:49 PM
To: (b) (6) <(b)(6)> Palluconi, Lisa
<(b)(6)> Prince, Jason <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Christian, Alan <(b)((b)(6)>
(b)(6(b)(6) <(b)(6)>
Subject: RE: Dan Gertler License Request: GLOMAG-2021-373651-1

PRE-DECISIONAL & DELIBERATIVE—PRIVILEGED & CONFIDENTIAL

Thank you, (b) (6), for the flag. (b) (5)



Thanks again,


Brad

From: (b) (6) <(b)(6)>
Sent: Friday, April 9, 2021 4:56 PM
To: Smith, Bradley <(b)(6)> Palluconi, Lisa <(b)(6)>
Prince, Jason <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Christian, Alan <(b)((b)(6)>
(b)(6(b)(6) <(b)(6)>
Subject: Dan Gertler License Request: GLOMAG-2021-373651-1

PRE-DECISIONAL and DELIBERATIVE

Hi Brad, Lisa, and Jason,

(b) (5)



Pending Submitter Notice Process

2021-1246 (CKK): Bates Nos.: 007233

Please let us know of any questions and guidance on next steps.

Many thanks,

(b) (6)

2021-1246 (CKK): 007234-007238
Duplicate of Bates Stamp 007231-007233 in 25th
Interim

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 007239-007242

From: [Prince, Jason](#)
To: [Jennings, Thomas](#); [OFAC.Reconsideration](#)
Cc: [Gatjanis, Gregory](#); [Palluconi, Lisa](#); (b)(6)(b)(6) (b)(6) (b)(6) (b)(6) [Quinby, Ripley](#); (b)(6)
(b)(6) [Thomas, Nikole](#); (b)(6)
Subject: RE: Dan Gertler et al - Compliance
Date: Thursday, April 1, 2021 9:06:01 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

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

Another update: (b) (5)

Any questions, concerns, or additional edits?

From: Prince, Jason
Sent: Thursday, March 25, 2021 5:11 PM
To: Jennings, Thomas <(b)(6)> Smith, Bradley
<(b)(6)> [OFAC.Reconsideration](#) <OFAC.Reconsideration@treasury.gov>;
(b)(6) <(b)(6)>
Cc: Gatjanis, Gregory <(b)(6)> Palluconi, Lisa
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Quinby,
Ripley <(b)(6)> (b)(6) (b)(6) <(b)(6)> Thomas, Nikole
<(b)(6)>
Subject: RE: Dan Gertler et al - Compliance

PRIVILEGED

Quick update: (b) (5)

Thanks for your patience.

From: Jennings, Thomas <(b)(6)>
Date: March 23, 2021 at 12:49:35 PM EDT
To: Smith, Bradley <(b)(6)> [OFAC.Reconsideration](#)
<OFAC.Reconsideration@treasury.gov>, Prince, Jason <(b)(6)> (b)(6)
<(b)(6)>
Cc: Gatjanis, Gregory <(b)(6)> Palluconi, Lisa
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Quinby,
Ripley <(b)(6)> Gatjanis, Gregory <(b)(6)> (b)(6)
(b)(6) <(b)(6)> Thomas, Nikole <(b)(6)>
Subject: RE: Dan Gertler et al - Compliance

Thanks, Brad (moving you to bcc as we figure this out).

(b) (5)

Thank you.

Sincerely,

OFAC Reconsideration

From: Smith, Bradley <(b)(6)>

Sent: Tuesday, March 23, 2021 12:19 PM

To: OFAC.Reconsideration <OFAC.Reconsideration@treasury.gov>; Jennings, Thomas

<(b)(6)>

Cc: Gatjanis, Gregory <(b)(6)> Palluconi, Lisa

<(b)(6)> <(b)(6)> <(b)(6)> Prince, Jason

<(b)(6)> <(b)(6)> <(b)(6)> <(b)(6)>

<(b)(6)> <(b)(6)> <(b)(6)> <(b)(6)>

Quinby, Ripley <(b)(6)> Gatjanis, Gregory <(b)(6)>

<(b)(6)> <(b)(6)> <(b)(6)> Thomas, Nikole <(b)(6)>

Subject: RE: Dan Gertler et al - Compliance

PRE-DECISIONAL & DELIBERATIVE—PRE-DECISIONAL & DELIBERATIVE

Thanks, (b) (5)

Thanks,

Brad

Pending Submitter Notice Process

021-1246 (CKK): Bates Nos.: 007245-007247

2021-1246 (CKK): 007248-007273
Duplicate of Bates Stamp 007243-007247 in 25th Interim

Øending Consultation with other Treasury Components
2021-1246 (CKK): Bates Nos.: 007274-007284

From: (b)(6) (b)(6)
To: Gacki, Andrea; Smith, Bradley
Cc: (b)(6)(b)(6) Palluconi, Lisa; Thomas, Nikole; (b)(6) Jennings, Thomas; Gatjanis, Gregory; Baheri, Leila; (b)(6) (b)(6) (b)(6) (b)(6) (b)(6) Christian, Alan; (b)(6)(b)(6) (b)(6)(b)(6)
Subject: RE: Cover Memo for OFAC FO Review: DRC/Gertler
Date: Tuesday, October 27, 2020 6:51:08 PM

Thanks for your review! (b) (5)

Thanks,

(b)(6)

(b)(6)

Work: (b)(6)

Cell: (b)(6)

(b)(6)

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

Sent: Tuesday, October 27, 2020 6:50 PM

To: (b)(6) (b)(6) <(b)(6)> Smith, Bradley

<(b)(6)>

Cc: (b)(6)(b)(6) <(b)(6)> Palluconi, Lisa <(b)(6)> Thomas,

Nikole <(b)(6)> (b)(6) <(b)(6)> Jennings,

Thomas <(b)(6)> Gatjanis, Gregory <(b)(6)>

Baheri, Leila <(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)> Christian, Alan <(b)(6)> (b)(6)(b)(6)

<(b)(6)> (b)(6)(b)(6) <(b)(6)>

Subject: RE: Cover Memo for OFAC FO Review: DRC/Gertler

Thanks very much, (b)(6) Nicely done; (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: (b)(6) (b)(6) <(b)(6)>

Sent: Tuesday, October 27, 2020 6:42 PM

To: Gacki, Andrea <(b)(6)> Smith, Bradley <(b)(6)>

Cc: (b)(6)(b)(6) <(b)(6)> Palluconi, Lisa <(b)(6)> Thomas,

Nikole <(b)(6)> (b)(6) <(b)(6)> Jennings,

Thomas <(b)(6)> Gatjanis, Gregory <(b)(6)>

Baheri, Leila <(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> Christian, Alan <(b)(6)> (b)(6)(b)(6)
<(b)(6)> (b)(6)(b)(6) <(b)(6)>

Subject: Cover Memo for OFAC FO Review: DRC/Gertler

Good evening Andrea and Brad,

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]

Please let us know if you need anything additional.

Best,

(b)(6)

(b)(6)

Acting Section Chief

Office of Global Targeting

Office of Foreign Assets Control

U.S. Department of the Treasury

Work: (b)(6)

Cell: (b)(6)

(b)(6)

From: [Gacki, Andrea](#)
To: (b)(6) (b)(6) [Smith, Bradley](#)
Cc: (b)(6)(b)(6) [Palluconi, Lisa](#); [Thomas, Nikole](#); (b)(6) [Jennings, Thomas](#); [Gatjanis, Gregory](#); [Baheri, Leila](#); (b)(6) (b)(6) (b)(6) (b)(6) (b)(6) [Christian, Alan](#); (b)(6)(b)(6) (b)(6)(b)(6)
Subject: RE: Cover Memo for OFAC FO Review: DRC/Gertler
Date: Tuesday, October 27, 2020 6:49:35 PM
Attachments: [STM Gertler Request for OFACFO - amq edits.docx](#)

Thanks very much, (b)(6) Nicely done; attaching very minor edits here. If possible, it would be optimal to get this into STM's/JGM's readbooks for tomorrow morning.

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: (b)(6) (b)(6) <(b)(6)>
Sent: Tuesday, October 27, 2020 6:42 PM
To: Gacki, Andrea <(b)(6)> Smith, Bradley <(b)(6)>
Cc: (b)(6)(b)(6) <(b)(6)> Palluconi, Lisa <(b)(6)> Thomas, Nikole <(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas <(b)(6)> Gatjanis, Gregory <(b)(6)> Baheri, Leila <(b)(6)> (b)(6) <(b)(6)> (b)(6) <(b)(6)> (b)(6) <(b)(6)> (b)(6) <(b)(6)> (b)(6) <(b)(6)> (b)(6) <(b)(6)> Christian, Alan <(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Subject: Cover Memo for OFAC FO Review: DRC/Gertler

Good evening Andrea and Brad,

Attached for your review is (b)(5)
(b)(5)
(b)(5)
(b)(5)

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

Please let us know if you need anything additional.

Best,

(b)(6)

(b)(6)

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

Work: (b)(6)

Cell: (b)(6)

(b)(6)

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007289-007290

From: Gacki, Andrea
To: (b)(6) (b)(6) (b)(6)(b)(6) (b)(6)(b)(6)
Cc: (b)(6)(b)(6) Smith, Bradley; Palluconi, Lisa; Thomas, Nikole; (b)(6) Jennings, Thomas; Quinby, Ripley; Gatjanis, Gregory; Baheri, Leila; (b)(6) (b)(6) (b)(6) (b)(6) (b)(6) (b)(6)
Subject: RE: Cover Memo and Attachment for STM Readbook: Dan Gertler + License
Date: Wednesday, October 28, 2020 4:21:08 PM

All – (b) (5)

[Redacted]

[Redacted]

[Redacted]

Thank you so much for all the work in pulling this together!

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: (b)(6) (b)(6) (b)(6)
Sent: Tuesday, October 27, 2020 7:00 PM
To: (b)(6)(b)(6) (b)(6) (b)(6) (b)(6) (b)(6)
Cc: (b)(6)(b)(6) (b)(6) Gacki, Andrea (b)(6)
Smith, Bradley (b)(6) Palluconi, Lisa
(b)(6) Thomas, Nikole (b)(6) (b)(6)
(b)(6) Jennings, Thomas (b)(6)
Quinby, Ripley (b)(6) Gatjanis, Gregory
(b)(6) Baheri, Leila (b)(6) (b)(6)
(b)(6) (b)(6) (b)(6) (b)(6)
(b)(6) (b)(6)
(b)(6) (b)(6) (b)(6) (b)(6)
(b)(6) Christian, Alan (b)(6)(b)(6) (b)(6)
(b)(6) (b)(6) (b)(6)(b)(6) (b)(6)
Subject: Cover Memo and Attachment for STM Readbook: Dan Gertler + License

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

Good evening. (b) (5)

[Redacted]

[Redacted]

Please let me know if you need anything additional.

Best,

(b)(6)

(b)(6)

Acting Section Chief

Office of Global Targeting

Office of Foreign Assets Control

U.S. Department of the Treasury

Work: (b)(6)

Cell: (b)(6)

(b)(6)

From: (b)(6)
To: [Smith, Bradley](#)
Cc: (b)(6) (b)(6) [Palluconi, Lisa](#); [Quinby, Ripley](#); [Gatjanis, Gregory](#); [Scheinert, Lawrence](#); [Thannhauser, Sara](#); [Moriarty, Kellen](#); (b)(6) [Prince, Jason](#); (b)(6) [Thomas, Nikole](#); (b)(6) (b)(6) (b)(6)
Subject: RE: For Brad's review: DRC-related congressional letters
Date: Tuesday, March 16, 2021 1:41:31 PM

Thank you, Brad, we appreciate your assistance with this!

Best regards,

(b)(6)

From: Smith, Bradley <(b)(6)>
Sent: Tuesday, March 16, 2021 1:40 PM
To: (b)(6) <(b)(6)>
Cc: (b)(6) (b)(6) <(b)(6)> [Palluconi, Lisa](#) <(b)(6)>
[Quinby, Ripley](#) <(b)(6)> [Gatjanis, Gregory](#) <(b)(6)>
[Scheinert, Lawrence](#) <(b)(6)> [Thannhauser, Sara](#) <(b)(6)>
[Moriarty, Kellen](#) <(b)(6)> (b)(6)
(b)(6) <(b)(6)> [Prince, Jason](#) <(b)(6)> (b)(6)
(b)(6) <(b)(6)> [Thomas, Nikole](#) <(b)(6)> (b)(6)
(b)(6) <(b)(6)> (b)(6) <(b)(6)>
Subject: RE: For Brad's review: DRC-related congressional letters

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

Thanks again,

Brad

From: (b)(6) <(b)(6)>
Sent: Tuesday, March 16, 2021 11:26 AM
To: Smith, Bradley <(b)(6)>
Cc: (b)(6) (b)(6) <(b)(6)> [Palluconi, Lisa](#) <(b)(6)>
[Quinby, Ripley](#) <(b)(6)> [Gatjanis, Gregory](#) <(b)(6)>
[Scheinert, Lawrence](#) <(b)(6)> [Thannhauser, Sara](#) <(b)(6)>
[Moriarty, Kellen](#) <(b)(6)> (b)(6)
(b)(6) <(b)(6)> [Prince, Jason](#) <(b)(6)> (b)(6)
(b)(6) <(b)(6)> [Thomas, Nikole](#) <(b)(6)> (b)(6)
(b)(6) <(b)(6)> (b)(6) <(b)(6)>
Subject: For Brad's review: DRC-related congressional letters

Hi Brad,

We would like to request your review of two Dan Gertler-related congressional letters – these are available on OneCT.

Responsive Records
2021-1246 (CKK) 25th Interim
Part 3
145 pages

(b) (5)

Response to Senators Booker, Cardin, and Durbin

[Clearance Tracker - Clearance Page \(treasuryecm.gov\)](#)

Response to Reps Meeks, Bass, and Himes

<https://onect.treasuryecm.gov/layouts/15/UniversalCT/pages/ctHome.aspx?Id=20212-SE-871>

The incoming letters are also included on OneCT as "Supporting Documents," for your reference.

Please let us know if you have any questions.

Best regards,

(b)(6)

From: Prince, Jason <(b)(6)>

Sent: Tuesday, March 16, 2021 10:27 AM

To: (b)(6) <(b)(6)>

Cc: Palluconi, Lisa <(b)(6)> Thannhauser, Sara

<(b)(6)> Moriarty, Kellen <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)>

(b)(6) <(b)(6)> (b)(6) (b)(6)

<(b)(6)> (b)(6) <(b)(6)>

Subject: RE: Congressional Letters for Counsel review by Tuesday 10am - Dan Gertler

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

Good morning, (b)(6) :

(b) (5)

Thanks,
Jason

From: (b)(6) <(b)(6)>

Sent: Monday, March 15, 2021 3:26 PM

To: Prince, Jason <(b)(6)> (b)(6) <(b)(6)>

Cc: Palluconi, Lisa <(b)(6)> Thannhauser, Sara

<(b)(6)> Moriarty, Kellen <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)>

(b)(6) <(b)(6)> (b)(6) (b)(6)

<(b)(6)>

Subject: Congressional Letters for Counsel review by Tuesday 10am - Dan Gertler

Hi Jason and Sarah,

(b) (5)

- **Response to Senators Booker, Cardin, and Durbin**— Draft response is attached, and the incoming letter is attached to this message for reference.
The letter to Sen Booker et al. has also been reviewed by State/EB, as the incoming letter was cc'd to Secretary Blinken.
- **Response to Reps Meeks, Bass, and Himes** - Draft response is attached, and incoming letter is attached to this message for reference.

Thank you for your review.

Best regards,

(b)(6)

2021-1246 (CKK): 007296-007298
Duplicate of Bates Stamp 007293-007295 in 25th Interim



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

March 22, 2021

The Honorable Gregory W. Meeks
Chairman
Committee on Foreign Affairs
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Meeks:

Thank you for your February 3, 2021 letter regarding the issuance of a specific license for Dan Gertler. We share your concern regarding the grave conditions in the Democratic Republic of the Congo (DRC), including widespread poverty and instability, and the importance of robust U.S. leadership in addressing human rights and corruption.

On March 8, 2021, after having determined that the license issued to Mr. Gertler on January 15, 2021 is inconsistent with the Administration's foreign policy objectives, the Department of the Treasury, in consultation with the Department of State, revoked it. Specifically, the January 2021 license granted to Mr. Gertler is inconsistent with America's strong foreign policy interests in combatting corruption around the world, specifically including U.S. efforts to counter corruption and promote stability in the DRC. As the original imposition of sanctions on Mr. Gertler and certain Gertler-affiliated persons under the Global Magnitsky sanctions program in 2017 and subsequent designations of additional Gertler-affiliated entities in 2018 made clear, Mr. Gertler engaged in extensive public corruption.

The Department of the Treasury takes seriously the ongoing effort to hold accountable those involved in serious human rights abuse and corruption, including those in the DRC. We are encouraged to know that the Global Magnitsky Act has not only received strong bipartisan support in Congress, but also support from likeminded allies and multilateral partners across the globe. Treasury is committed to fulfilling its obligations pursuant to the Global Magnitsky Act and will leverage all the tools at its disposal to do so.

We look forward to continuing to work closely with our partners in Congress to support human rights in the DRC and around the world. If you have further question, please direct your staff to contact the Office of Legislative Affairs.

Sincerely,

Angel L. Nigaglioni
Deputy Assistant Secretary for Appropriations
Office of Legislative Affairs

Identical letter sent to:
The Honorable Karen Bass
The Honorable Jim Himes



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

The Honorable Karen Bass
U.S. House of Representatives
Washington, DC 20515

Dear Representative Bass:

Thank you for your February 3, 2021 letter regarding the issuance of a specific license for Dan Gertler. We share your concern regarding the grave conditions in the Democratic Republic of the Congo (DRC), including widespread poverty and instability, and the importance of robust U.S. leadership in addressing human rights and corruption.

On March 8, 2021, after having determined that the license issued to Mr. Gertler on January 15, 2021 is inconsistent with the Administration's foreign policy objectives, the Department of the Treasury, in consultation with the Department of State, revoked it. Specifically, the January 2021 license granted to Mr. Gertler is inconsistent with America's strong foreign policy interests in combatting corruption around the world, specifically including U.S. efforts to counter corruption and promote stability in the DRC. As the original imposition of sanctions on Mr. Gertler and certain Gertler-affiliated persons under the Global Magnitsky sanctions program in 2017 and subsequent designations of additional Gertler-affiliated entities in 2018 made clear, Mr. Gertler engaged in extensive public corruption.

The Department of the Treasury takes seriously the ongoing effort to hold accountable those involved in serious human rights abuse and corruption, including those in the DRC. We are encouraged to know that the Global Magnitsky Act has not only received strong bipartisan support in Congress, but also support from likeminded allies and multilateral partners across the globe. Treasury is committed to fulfilling its obligations pursuant to the Global Magnitsky Act and will leverage all the tools at its disposal to do so.

We look forward to continuing to work closely with our partners in Congress to support human rights in the DRC and around the world. If you have further question, please direct your staff to contact the Office of Legislative Affairs.

Sincerely,

Angel L. Nigaglioni
Deputy Assistant Secretary for Appropriations
Office of Legislative Affairs

Identical letter sent to:

The Honorable Gregory W. Meeks

The Honorable Jim Himes



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

The Honorable Jim Himes
U.S. House of Representatives
Washington, DC 20515

Dear Representative Himes:

Thank you for your February 3, 2021 letter regarding the issuance of a specific license for Dan Gertler. We share your concern regarding the grave conditions in the Democratic Republic of the Congo (DRC), including widespread poverty and instability, and the importance of robust U.S. leadership in addressing human rights and corruption.

On March 8, 2021, after having determined that the license issued to Mr. Gertler on January 15, 2021 is inconsistent with the Administration's foreign policy objectives, the Department of the Treasury, in consultation with the Department of State, revoked it. Specifically, the January 2021 license granted to Mr. Gertler is inconsistent with America's strong foreign policy interests in combatting corruption around the world, specifically including U.S. efforts to counter corruption and promote stability in the DRC. As the original imposition of sanctions on Mr. Gertler and certain Gertler-affiliated persons under the Global Magnitsky sanctions program in 2017 and subsequent designations of additional Gertler-affiliated entities in 2018 made clear, Mr. Gertler engaged in extensive public corruption.

The Department of the Treasury takes seriously the ongoing effort to hold accountable those involved in serious human rights abuse and corruption, including those in the DRC. We are encouraged to know that the Global Magnitsky Act has not only received strong bipartisan support in Congress, but also support from likeminded allies and multilateral partners across the globe. Treasury is committed to fulfilling its obligations pursuant to the Global Magnitsky Act and will leverage all the tools at its disposal to do so.

We look forward to continuing to work closely with our partners in Congress to support human rights in the DRC and around the world. If you have further question, please direct your staff to contact the Office of Legislative Affairs.

Sincerely,

Angel L. Nigaglioni
Deputy Assistant Secretary for Appropriations
Office of Legislative Affairs

Identical letter sent to:

The Honorable Gregory W. Meeks

The Honorable Karen Bass

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

The Honorable Cory A. Booker
United States Senate
Washington, DC 20510

Dear Senator Booker:

Thank you for your February 1, 2021 letter regarding the issuance of a specific license for Dan Gertler. We share your concern regarding the grave conditions in the Democratic Republic of the Congo (DRC), including widespread poverty and instability, and the importance of robust U.S. leadership in addressing human rights and corruption.

On March 8, 2021, after having determined that the license issued to Mr. Gertler on January 15, 2021 is inconsistent with the Administration's foreign policy objectives, the Department of the Treasury, in consultation with the Department of State, revoked it. Specifically, the January 2021 license granted to Mr. Gertler is inconsistent with America's strong foreign policy interests in combatting corruption around the world, including U.S. efforts to counter corruption and promote stability in the DRC. As made clear by the original imposition of sanctions on Mr. Gertler and certain Gertler-affiliated persons under the Global Magnitsky sanctions program in 2017 and subsequent designations of additional Gertler-affiliated entities in 2018, Mr. Gertler engaged in extensive public corruption.

The Department of the Treasury takes seriously the ongoing effort to hold accountable those involved in serious human rights abuse and corruption, including those in the DRC. We are encouraged to know that the Global Magnitsky Act has not only received strong bipartisan support in Congress, but also support from likeminded allies and multilateral partners across the globe. Treasury is committed to fulfilling its obligations pursuant to the Global Magnitsky Act and will leverage all the tools at its disposal to do so.

We look forward to continuing to work closely with our partners in Congress to support human rights in the DRC and around the world. Please contact our Office of Legislative Affairs if we can be of further assistance.

Sincerely,



Angel Nigaglioni
Deputy Assistant Secretary for Appropriations
Office of Legislative Affairs

Identical letter sent to:

The Honorable Benjamin L. Cardin

The Honorable Richard Durbin

cc: The Honorable Antony J. Blinken

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

The Honorable Benjamin L. Cardin
United States Senate
Washington, DC 20510

Dear Senator Cardin:

Thank you for your February 1, 2021 letter regarding the issuance of a specific license for Dan Gertler. We share your concern regarding the grave conditions in the Democratic Republic of the Congo (DRC), including widespread poverty and instability, and the importance of robust U.S. leadership in addressing human rights and corruption.

On March 8, 2021, after having determined that the license issued to Mr. Gertler on January 15, 2021 is inconsistent with the Administration's foreign policy objectives, the Department of the Treasury, in consultation with the Department of State, revoked it. Specifically, the January 2021 license granted to Mr. Gertler is inconsistent with America's strong foreign policy interests in combatting corruption around the world, including U.S. efforts to counter corruption and promote stability in the DRC. As made clear by the original imposition of sanctions on Mr. Gertler and certain Gertler-affiliated persons under the Global Magnitsky sanctions program in 2017 and subsequent designations of additional Gertler-affiliated entities in 2018, Mr. Gertler engaged in extensive public corruption.

The Department of the Treasury takes seriously the ongoing effort to hold accountable those involved in serious human rights abuse and corruption, including those in the DRC. We are encouraged to know that the Global Magnitsky Act has not only received strong bipartisan support in Congress, but also support from likeminded allies and multilateral partners across the globe. Treasury is committed to fulfilling its obligations pursuant to the Global Magnitsky Act and will leverage all the tools at its disposal to do so.

We look forward to continuing to work closely with our partners in Congress to support human rights in the DRC and around the world. Please contact our Office of Legislative Affairs if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Angel Nigaglioni", with a long horizontal flourish extending to the right.

Angel Nigaglioni
Deputy Assistant Secretary for Appropriations
Office of Legislative Affairs

Identical letter sent to:

The Honorable Cory A. Booker

The Honorable Richard Durbin

cc: The Honorable Antony J. Blinken

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

The Honorable Richard Durbin
United States Senate
Washington, DC 20510

Dear Senator Durbin:

Thank you for your February 1, 2021 letter regarding the issuance of a specific license for Dan Gertler. We share your concern regarding the grave conditions in the Democratic Republic of the Congo (DRC), including widespread poverty and instability, and the importance of robust U.S. leadership in addressing human rights and corruption.

On March 8, 2021, after having determined that the license issued to Mr. Gertler on January 15, 2021 is inconsistent with the Administration's foreign policy objectives, the Department of the Treasury, in consultation with the Department of State, revoked it. Specifically, the January 2021 license granted to Mr. Gertler is inconsistent with America's strong foreign policy interests in combatting corruption around the world, including U.S. efforts to counter corruption and promote stability in the DRC. As made clear by the original imposition of sanctions on Mr. Gertler and certain Gertler-affiliated persons under the Global Magnitsky sanctions program in 2017 and subsequent designations of additional Gertler-affiliated entities in 2018, Mr. Gertler engaged in extensive public corruption.

The Department of the Treasury takes seriously the ongoing effort to hold accountable those involved in serious human rights abuse and corruption, including those in the DRC. We are encouraged to know that the Global Magnitsky Act has not only received strong bipartisan support in Congress, but also support from likeminded allies and multilateral partners across the globe. Treasury is committed to fulfilling its obligations pursuant to the Global Magnitsky Act and will leverage all the tools at its disposal to do so.

We look forward to continuing to work closely with our partners in Congress to support human rights in the DRC and around the world. Please contact our Office of Legislative Affairs if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Angel Nigaglioni", with a long horizontal flourish extending to the right.

Angel Nigaglioni
Deputy Assistant Secretary for Appropriations
Office of Legislative Affairs

Identical letter sent to:

The Honorable Cory A. Booker

The Honorable Benjamin L. Cardin

cc: The Honorable Antony J. Blinken

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007313-007314

From: [Quinby, Ripley](#)
To: [Palluconi, Lisa](#); (b)(6) (b)(6) [Thomas, Nikole](#); (b)(6) [Jennings, Thomas](#); [Gatjanis, Gregory](#); [Baheri, Leila](#); (b)(6) (b)(6) (b)(6)
Cc: (b)(6) (b)(6) (b)(6) [Christian, Alan](#); (b)(6)(b)(6) (b)(6)(b)(6)
Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel
Date: Tuesday, October 27, 2020 6:19:39 PM

Hey all, I spoke to Lisa (b) (5)

(b)(6) more guidance to follow verbally.

From: Palluconi, Lisa <(b)(6)>
Sent: Tuesday, October 27, 2020 6:07 PM
To: Quinby, Ripley <(b)(6)> (b)(6) (b)(6)
<(b)(6)> Thomas, Nikole <(b)(6)> (b)(6)
<(b)(6)> Jennings, Thomas <(b)(6)> Gatjanis, Gregory <(b)(6)> Baheri, Leila <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)(b)(6)
<(b)(6)>
Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

Hi-(b) (5)
(b)(6) Defer to you all on who has the info and pen on that.

From: Quinby, Ripley <(b)(6)>
Date: October 27, 2020 at 5:34:22 PM EDT
To: Palluconi, Lisa <(b)(6)> (b)(6) (b)(6)
<(b)(6)> Thomas, Nikole <(b)(6)> (b)(6)
<(b)(6)> Jennings, Thomas <(b)(6)> Gatjanis, Gregory <(b)(6)> Baheri, Leila <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)(b)(6)
<(b)(6)>
Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

Hey Lisa,

(b) (5)

Otherwise, (b)(6) (b) (5) Sound good to you?

-rip

From: Palluconi, Lisa <(b)(6)>

Sent: Tuesday, October 27, 2020 5:26 PM

To: Quinby, Ripley <(b)(6)> (b)(6) (b)(6)

<(b)(6)> Thomas, Nikole <(b)(6)> (b)(6)

<(b)(6)> Jennings, Thomas <(b)(6)> Gatjanis,

Gregory <(b)(6)> Baheri, Leila <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> Christian, Alan

<(b)(6)> (b)(6) <(b)(6)> (b)(6)(b)(6)

<(b)(6)>

Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

All – Thanks for the work on this. (b) (5)

(b)(6)

Best,

Lisa

From: Quinby, Ripley <(b)(6)>

Sent: Tuesday, October 27, 2020 4:22 PM

To: (b)(6) (b)(6) <(b)(6)> Thomas, Nikole

<(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas

<(b)(6)> Gatjanis, Gregory <(b)(6)> Baheri, Leila

<(b)(6)> Palluconi, Lisa <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6) Alan

<(b)(6)> (b)(6) <(b)(6)> (b)(6)(b)(6)

<(b)(6)>

Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

(b) (5)

From: (b)(6) (b)(6) <(b)(6)>

Sent: Tuesday, October 27, 2020 4:02 PM

To: Thomas, Nikole <(b)(6)> Quinby, Ripley <(b)(6)>
(b)(6) <(b)(6)> Jennings, Thomas <(b)(6)>
Gatjanis, Gregory <(b)(6)> Baheri, Leila <(b)(6)>
Palluconi, Lisa <(b)(6)> (b)(6) <(b)(6)>
(b)(6) <(b)(6)> (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)(b)(6)
<(b)(6)>
Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

Rip and Lisa,

Please see the attached Cover Memo for your review (b) (5)

Please let us know if you need anything additional!

Best,

(b)(6)

(b)(6)

Work: (b)(6)

Cell: (b)(6)

(b)(6)

From: Thomas, Nikole <(b)(6)>

Sent: Tuesday, October 27, 2020 3:49 PM

To: Quinby, Ripley <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas
<(b)(6)> Gatjanis, Gregory <(b)(6)> Baheri, Leila
<(b)(6)> Palluconi, Lisa <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)(b)(6)
<(b)(6)>
Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

PRE-DECISIONAL and DELIBERATIVE

Hi (b)(6)

Thanks for your patience and help! (b) (5)

Thanks again!

Nikole

From: Quinby, Ripley <(b)(6)>

Sent: Tuesday, October 27, 2020 3:34 PM

To: (b)(6) (b)(6) <(b)(6)> Thomas, Nikole

<(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas

<(b)(6)> Gatjanis, Gregory <(b)(6)> Baheri, Leila

<(b)(6)> Palluconi, Lisa <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)>

Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

Cool. (b) (5)

From: (b)(6) (b)(6) <(b)(6)>

Sent: Tuesday, October 27, 2020 3:33 PM

To: Quinby, Ripley <(b)(6)> Thomas, Nikole <(b)(6)>

(b)(6) <(b)(6)> Jennings, Thomas <(b)(6)>

Gatjanis, Gregory <(b)(6)> Baheri, Leila <(b)(6)>

Palluconi, Lisa <(b)(6)> (b)(6) <(b)(6)>

(b)(6) <(b)(6)> (b)(6) <(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)>

Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

Rip and Nikole,

Thanks for the convos! (b) (5)

Happy to keep aggregating edits as helpful!

Best,

(b)(6)

(b)(6)

Work: (b)(6)

Cell: (b)(6)

(b)(6)

From: Quinby, Ripley <(b)(6)>

Sent: Tuesday, October 27, 2020 3:11 PM

To: Thomas, Nikole <(b)(6)> (b)(6) (b)(6)

<(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas

<(b)(6)> Gatjanis, Gregory <(b)(6)> Baheri, Leila

<(b)(6)> Palluconi, Lisa <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)>

Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

high five

From: Thomas, Nikole <(b)(6)>

Sent: Tuesday, October 27, 2020 3:11 PM

To: Quinby, Ripley <(b)(6)> (b)(6) (b)(6)

<(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas

<(b)(6)> Gatjanis, Gregory <(b)(6)> Baheri, Leila

<(b)(6)> Palluconi, Lisa <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)>

Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

Hi Rip,

(b) (5)

Thanks for coordinating!

Nikole

From: Quinby, Ripley <(b)(6)>

Sent: Tuesday, October 27, 2020 2:42 PM

To: (b)(6) (b)(6) <(b)(6)> (b)(6)

<(b)(6)> Jennings, Thomas <(b)(6)> Gatjanis,

Gregory <(b)(6)> Baheri, Leila <(b)(6)> Thomas,

Nikole <(b)(6)> Palluconi, Lisa <(b)(6)> Skopowski,

Jack <(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)>
Subject: RE: For Associates Review by COB Today - RE: Gertler package/intel

Returned with edits: (b) (5)
[Redacted]
[Redacted]
[Redacted]

From: (b)(6) (b)(6) <(b)(6)>
Sent: Tuesday, October 27, 2020 2:15 PM
To: (b)(6) <(b)(6)> Jennings, Thomas
<(b)(6)> Quinby, Ripley <(b)(6)> Gatjanis, Gregory
<(b)(6)> Baheri, Leila <(b)(6)> Thomas, Nikole
<(b)(6)> Palluconi, Lisa <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)>
Subject: For Associates Review by COB Today - RE: Gertler package/intel

OFAC Associates,

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted] Happy to change if you have a particular preference.

Thank you all in advance!
(b)(6)

(b)(6)
Work: (b)(6)
Cell: (b)(6)
(b)(6)

From: (b)(6) (b)(6) <(b)(6)>

Sent: Tuesday, October 27, 2020 12:34 PM

To: (b)(6) (b)(6) <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> Jennings, Thomas
<(b)(6)> Quinby, Ripley <(b)(6)> Gatjanis, Gregory
<(b)(6)> Baheri, Leila <(b)(6)> Thomas, Nikole
<(b)(6)> Palluconi, Lisa <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)>

Subject: RE: Gertler package/intel

Hi (b)(6) – Thanks for the update. (b) (5) . We appreciate you all turning this so quickly and will look for it tomorrow by COB.

(b)(6)

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

From: (b)(6) (b)(6) <(b)(6)>
Sent: Tuesday, October 27, 2020 12:30 PM
To: (b)(6) (b)(6) <(b)(6)> (b)(6) (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> Jennings, Thomas
<(b)(6)> Quinby, Ripley <(b)(6)> Gatjanis, Gregory
<(b)(6)> Baheri, Leila <(b)(6)> Thomas, Nikole
<(b)(6)> Palluconi, Lisa <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)>

Subject: RE: Gertler package/intel

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

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

Please let me know if you all would like to see anything additional! (b) (5)

Thank you,

(b)(6)

(b)(6)

Work: (b)(6)

Cell: (b)(6)

(b)(6)

From: Quinby, Ripley <(b)(6)>

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

To: Gacki, Andrea <(b)(6)> Gatjanis, Gregory

<(b)(6)> Baheri, Leila <(b)(6)> Jennings, Thomas

<(b)(6)> Thomas, Nikole <(b)(6)> Palluconi, Lisa

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

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

(b)(6) (b)(6) <(b)(6)> (b)(6) (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Subject: RE: Gertler package/intel

(+ (b)(6) and (b)(6) as acting glomag chief and coordinator, and (b)(6) as acting ASC AD in Tom's absence)

Andrea,

Acknowledged, will do. (b)(6) and team have the pen.

Respectfully,

rip

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

Sent: Monday, October 26, 2020 1:33 PM

To: Quinby, Ripley <(b)(6)> Gatjanis, Gregory

<(b)(6)> Baheri, Leila <(b)(6)> Jennings, Thomas

<(b)(6)> Thomas, Nikole <(b)(6)> Palluconi, Lisa

<(b)(6)>

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

(b)(6) (b)(6) <(b)(6)> (b)(6) (b)(6) <(b)(6)>

Subject: Gertler package/intel

PRE-DECISIONAL AND DELIBERATIVE

Hi OGT – (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)

2021-1246 (CKK): 007324-007327

Duplicate of Bates Stamp 007315-007323 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007328-007329

2021-1246 (CKK): 007330-007343

Duplicate of Bates Stamp 007315-007323 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007344-007345

2021-1246 (CKK): 007346-007357
Duplicate of Bates Stamp 007315-007323 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007358-007360

2021-1246 (CKK): 007361-007367
Duplicate of Bates Stamp 007315-007323 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007368-007370

2021-1246 (CKK): 007371-007377

Duplicate of Bates Stamp 007315-007323 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007378-007380

2021-1246 (CKK): 007381-007388

Duplicate of Bates Stamp 007315-007323 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007389-007391

2021-1246 (CKK): 007392-007407

Duplicate of Bates Stamp 007315-007323 in 25th Interim

From: [Palluconi, Lisa](#)
To: (b)(6)
Subject: RE: For Associate Dir review by 1:30pm: Memo JLY call with Secretary Blinken
Date: Friday, February 19, 2021 1:35:00 PM

Thanks much! (b) (5)

(b)(6)

(b)(6)

From: (b)(6) <(b)(6)>
Sent: Friday, February 19, 2021 1:33 PM
To: Palluconi, Lisa <(b)(6)>
Subject: RE: For Associate Dir review by 1:30pm: Memo JLY call with Secretary Blinken

Sounds good – (b) (5)

(b)(6)

From: Palluconi, Lisa <(b)(6)>
Sent: Friday, February 19, 2021 1:32 PM
To: (b)(6) <(b)(6)>
Subject: RE: For Associate Dir review by 1:30pm: Memo JLY call with Secretary Blinken

Thanks! (b) (5)

(b)(6)

Thanks again!

From: (b)(6) <(b)(6)>
Sent: Friday, February 19, 2021 1:31 PM
To: Palluconi, Lisa <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)> Moriarty,
Kellen <(b)(6)> Thomas, Nikole <(b)(6)> (b)(6)
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)
<(b)(6)> Thannhauser, Sara <(b)(6)>
Gatjanis, Gregory <(b)(6)> Quinby, Ripley <(b)(6)>
(b)(6) <(b)(6)>
Subject: RE: For Associate Dir review by 1:30pm: Memo JLY call with Secretary Blinken

Thanks so much, Lisa. (b) (5)

(b)(6)

From: Palluconi, Lisa <(b)(6)>
Sent: Friday, February 19, 2021 12:56 PM

To: (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)> Moriarty,
Kellen <(b)(6)> Thomas, Nikole <(b)(6)> (b)(6)
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)
<(b)(6)> Thannhauser, Sara <(b)(6)>
Gatjanis, Gregory <(b)(6)> Quinby, Ripley <(b)(6)>
Subject: RE: For Associate Dir review by 1:30pm: Memo JLY call with Secretary Blinken

Thanks much, (b)(6) and all. (b)(5)

Best,
Lisa

From: (b)(6) <(b)(6)>
Sent: Friday, February 19, 2021 10:41 AM
To: Palluconi, Lisa <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)> Moriarty,
Kellen <(b)(6)> Thomas, Nikole <(b)(6)> (b)(6)
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)
<(b)(6)> Thannhauser, Sara <(b)(6)>
Gatjanis, Gregory <(b)(6)> Quinby, Ripley <(b)(6)>
Subject: For Associate Dir review by 1:30pm: Memo JLY call with Secretary Blinken

(b)(5)

Best,
(b)(6)

From: (b)(6)
Sent: Friday, February 19, 2021 10:37 AM
To: Moriarty, Kellen <(b)(6)> Thomas, Nikole
<(b)(6)> (b)(6) <(b)(6)> (b)(6)(b)(6)
<(b)(6)> (b)(6) <(b)(6)> Thannhauser,

Sara <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Thanks! (b) (5)

From: Moriarty, Kellen <(b)(6)>
Sent: Friday, February 19, 2021 10:17 AM
To: Thomas, Nikole <(b)(6)> (b)(6)
<(b)(6)> (b)(6)(b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Thannhauser,
Sara <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Thanks, Nikole. (b) (5)

From: Thomas, Nikole <(b)(6)>
Sent: Friday, February 19, 2021 10:15 AM
To: (b)(6) <(b)(6)> (b)(6)(b)(6) <(b)(6)>
(b)(6) <(b)(6)> (b)(6) <(b)(6)>
Moriarty, Kellen <(b)(6)> Thannhauser, Sara
<(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Hi All,

(b) (5)

Thanks!
Nikole

From: (b)(6) <(b)(6)>

Sent: Friday, February 19, 2021 10:08 AM

To: (b)(6)(b)(6) <(b)(6)> (b)(6) <(b)(6)>
(b)(6) <(b)(6)> Moriarty, Kellen
<(b)(6)> Thannhauser, Sara <(b)(6)> Thomas,
Nikole <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Thanks, (b)(6) Happy to chat off line if easier. Will start a separate thread now.

From: (b)(6)(b)(6) <(b)(6)>
Sent: Friday, February 19, 2021 10:07 AM
To: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> Moriarty, Kellen <(b)(6)> Thannhauser,
Sara <(b)(6)> Thomas, Nikole <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) (b)(6) <(b)(6)> (b)(6)
<(b)(6)> Christian, Alan <(b)(6)> Rasmussen, Mary
<(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Hi (b)(6),

I had a question (b)(5)

Thanks,

(b)(6)

From: (b)(6) <(b)(6)>
Sent: Friday, February 19, 2021 9:44 AM
To: (b)(6) <(b)(6)> Moriarty, Kellen
<(b)(6)> Thannhauser, Sara <(b)(6)> Thomas,
Nikole <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6)(b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Hi all – (b)(5)

(b) (5)

As you update, please adjudicate/remove comments as appropriate. Let me know if you have any questions.

(b) (6)

From: (b)(6) <(b)(6)>
Sent: Friday, February 19, 2021 9:37 AM
To: Moriarty, Kellen <(b)(6)> Thannhauser, Sara <(b)(6)>
<(b)(6)> <(b)(6)> <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) <(b)(6)>
<(b)(6)> <(b)(6)> (b)(6) <(b)(6)> (b)(6) <(b)(6)>
<(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Sure, will do –

From: Moriarty, Kellen <(b)(6)>
Sent: Friday, February 19, 2021 9:36 AM
To: Thannhauser, Sara <(b)(6)> <(b)(6)>
<(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) <(b)(6)>
<(b)(6)> <(b)(6)> (b)(6) <(b)(6)> (b)(6) <(b)(6)>
<(b)(6)> <(b)(6)> <(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

(b) (5)

From: Thannhauser, Sara <(b)(6)>
Sent: Friday, February 19, 2021 8:52 AM
To: Moriarty, Kellen <(b)(6)> <(b)(6)> <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) <(b)(6)>
<(b)(6)> <(b)(6)> (b)(6) <(b)(6)> (b)(6) <(b)(6)>
<(b)(6)> <(b)(6)> <(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Hi (b) (6),

(b) (5)

From: Moriarty, Kellen <(b)(6)>
Sent: Thursday, February 18, 2021 10:49 PM
To: (b)(6) <(b)(6)>
Cc: Thannhauser, Sara <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
(b)(6) <(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Sara – Let us know if you'd like to look before this goes to Lisa.

[illegible]

2021-1246 (CKK): 007413

Please use this version of the memo (b) (5)

Let me know should you have any other questions.

Regards,

(b) (6)

From: (b) (6)

Sent: Thursday, February 18, 2021 9:47 PM

To: (b) (6) (b)(6) <(b)(6)>

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

<(b)(6)> Joca, Amanda P (b) (6)

(b)(6)

<(b)(6)> (b)(6) <(b)(6)> Thannhauser, Sara

<(b)(6)> (b)(6) <(b)(6)> Moriarty,

Kellen <(b)(6)> (b)(6) <(b)(6)> (b)(6) (b)(6)

<(b)(6)> (b)(6) (b) (6)

Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Hi Mike – (b) (5)

My apologies for the delay, but we are aiming to put it in tonight.

(b) (5)

Thanks,

(b) (6)

From: (b) (6)

Sent: Thursday, February 18, 2021 9:44 PM

To: (b) (6) <(b) (6)> (b) (6)

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

<(b) (6)> Joca, Amanda P. (b) (6)

(b) (6)

(b) (6)

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

<(b) (6)> (b) (6) <(b) (6)> Thannhauser, Sara

<(b) (6)> (b) (6) <(b) (6)> Moriarty,

Kellen <(b) (6)> (b) (6) <(b) (6)> (b) (6) (b) (6)

<(b) (6)> (b) (6) (b) (6)

(b) (6)

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(b) (6)

(b) (6)

Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Colleagues,

Thank you for your attention to this memo. (b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

Let me know should you have any other questions.

Regards,

(b) (6)

From: (b) (6) <(b) (6)>

Sent: Thursday, February 18, 2021 5:31 PM

To: (b) (6)

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

<(b) (6)> Joca, Amanda P. (b) (6) >; (b) (6)

(b) (6)

Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

(b) (6) ,

(b) (5)

Thanks,

(b) (6)

From: (b) (6)

Sent: Thursday, February 18, 2021 4:36 PM

To: (b) (6)

(b)(6) <(b)(6)> (b)(6)

<(b)(6)> Joca, Amanda P. (b) (6) ; (b) (6)

(b)(6)

(b)(6)

(b)(6)

<(b)(6)> (b)(6) <(b)(6)> Thannhauser, Sara

<(b)(6)> Moriarty, Kellen <(b)(6)> (b)(6)

<(b)(6)> (b)(6) (b)(6) <(b)(6)> (b)(6)

(b) (6)

(b)(6)

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(b)(6)

(b)(6)

Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Hi (b) (6) —

(b) (5)

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

(b) (5)

[Redacted]

[Redacted]

Thanks!

(b) (6)

From: (b) (6)

Sent: Thursday, February 18, 2021 3:44 PM

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

<(b) (6)> (b) (6) <(b) (6)> Joca, Amanda

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

[Redacted]

[Redacted]

(b) (6)

<(b) (6)> (b) (6) <(b) (6)> Thannhauser, Sara

<(b) (6)> Moriarty, Kellen <(b) (6)> (b) (6)

<(b) (6)> (b) (6) (b) (6) <(b) (6)> (b) (6)

(b) (6)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

(b)(5)

From: (b) (6)

Sent: Thursday, February 18, 2021 3:29 PM

To: (b) (6) <(b) (6)> (b) (6)

<(b) (6)> Joca, Amanda P. (b) (6) ; (b) (6)

[Redacted]

[Redacted]

[Redacted]

(b) (6)

<(b) (6)> (b) (6) <(b) (6)> Thannhauser, Sara

<(b) (6)> Moriarty, Kellen <(b) (6)> (b) (6)

<(b) (6)> (b) (6) (b) (6) <(b) (6)> (b) (6)

(b) (6)

(b) (6)

Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

Thanks everyone for including others. (b) (5)

From: (b)(6) <(b)(6)>

Sent: Thursday, February 18, 2021 3:22 PM

To: (b)(6) <(b)(6)> Joca, Amanda P. (b) (6);

(b) (6)

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

<(b)(6)> Thannhauser, Sara <(b)(6)> Moriarty,

Kellen <(b)(6)> (b)(6) <(b)(6)> (b)(6) (b)(6)

<(b)(6)> (b)(6) (b) (6)

Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

(b)(5)

[Happy to have a look once items have been plugged in.](#) (b) (5)

From: (b)(6) <(b)(6)>

Sent: Thursday, February 18, 2021 2:53 PM

To: Joca, Amanda P. (b) (6); (b) (6)

<(b)(6)> (b)(6) <(b)(6)> Thannhauser, Sara

<(b)(6)> Moriarty, Kellen <(b)(6)> (b)(6)

<(b)(6)> (b)(6) (b)(6) <(b)(6)> (b)(6)

<(b) (6)> (b)(6) <(b)(6)>

(b) (6)

(b) (6)

Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

(b)(5)

From: Joca, Amanda (b) (6)

Sent: Thursday, February 18, 2021 2:51 PM

To: (b) (6)

Cc: (b) (6)

Subject: RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

+ (b)(5)

V/r,

Amanda Joca

Office Director, Eastern Hemisphere

Global Investigations Division | FinCEN

Mobile: (b) (6)

From: (b) (5)

Sent: Thursday, February 18, 2021 2:42 PM

To: (b) (6)

Joca, Amanda

(b) (6)

(b) (6)

(b)(6)

(b)(6)

(External)

<(b)(6)>

Cc: Park, (b)(6) (External) <(b)(6)>

Subject: [TREASURY] RE: CLEARANCE COB: Memo JLY call with Secretary Blinken

(b)(5) My apologies.

From: (b) (6)

Sent: Thursday, February 18, 2021 2:40 PM

To: (b) (6)

(b) (6)

Subject: CLEARANCE COB: Memo JLY call with Secretary Blinken

Dear Colleagues,

Requesting your comments on a memo for JLY call with Secretary of State Blinken by COB. We plan to send to (b)(6) tomorrow OOB. (b) (5)

. Please find the sharepoint link for the [memo](#).

Let us know should you have any questions.

Regards,

(b) (6)

2021-1246 (CKK): 007422-007475
Duplicate of Bates Stamp 007408-007421 in 25th Interim

2021-1246 (CKK): 007476-007480

Duplicate of Bates Stamp 006057-006058 in 25th Interim

From: [Thomas, Nikole](#)
To: [Palluconi, Lisa](#); [Rasmussen, Mary](#); (b)(6) (b)(6) [Smith, Bradley](#); [Christian, Alan](#); (b)(6)(b)(6)
Cc: [Thannhauser, Sara](#); [Moriarty, Kellen](#)
Subject: RE: Follow Up on GloMag/Gertler
Date: Monday, January 25, 2021 9:46:34 AM

+ Alan and (b)(6)

From: Palluconi, Lisa <(b)(6)>
Sent: Monday, January 25, 2021 9:43 AM
To: Thomas, Nikole <(b)(6)> Rasmussen, Mary
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> Smith, Bradley <(b)(6)>
Cc: Thannhauser, Sara <(b)(6)> Moriarty, Kellen
<(b)(6)>
Subject: RE: Follow Up on GloMag/Gertler

Dropping (b)(6); adding Brad

Pre-decisional and Deliberative

Brad – See request from (b)(5) (b)(6) below. (b)(5)

(b)(6)

(b)(6)

Best,
Lisa

Pending Consultation with other
Treasury Components - 2021-1246
(CKK): Bates Nos.: 007481-007489

From: [Palluconi, Lisa](#)
To: [Prince, Jason](#)
Subject: RE: FLASH REQUEST: Information Memo for JY
Date: Monday, January 25, 2021 12:51:05 PM

(b) (5)



From: Prince, Jason <(b)(6)>
Sent: Monday, January 25, 2021 12:40 PM
To: Palluconi, Lisa <(b)(6)>
Subject: RE: FLASH REQUEST: Information Memo for JY

Many thanks for keeping me in the loop, Lisa!

From: Palluconi, Lisa <(b)(6)>
Sent: Monday, January 25, 2021 8:57 AM
To: Prince, Jason <(b)(6)>
Subject: FW: FLASH REQUEST: Information Memo for JY

Hi - FYI – another tasking

(b) (5)

Just wanted you to be tracking.

Best,
Lisa

From: Palluconi, Lisa
Sent: Monday, January 25, 2021 8:54 AM
To: Thannhauser, Sara <(b)(6)> Moriarty, Kellen
<(b)(6)> <(b)(6)> <(b)(6)> Sun, Lauren
<(b)(6)> <(b)(6)> <(b)(6)> <(b)(6)>
<(b)(6)> <(b)(6)> <(b)(6)>
<(b)(6)> <(b)(6)>
Cc: Scheinert, Lawrence <(b)(6)> Gatjanis, Gregory
<(b)(6)> Quinby, Ripley <(b)(6)>
Subject: FW: FLASH REQUEST: Information Memo for JY

Hi All – Most of you are tracking this tasking. (b) (5)

(b) (5)

Best,
Lisa

From: (b)(6)(b)(6) <(b)(6)>

Sent: Monday, January 25, 2021 8:48 AM

To: (b)(6) <(b)(6)> Thannhauser, Sara

<(b)(6)> Moriarty, Kellen <(b)(6)> (b)(6)

<(b)(6)> (b)(6) (b)(6) (b)(6)

<(b)(6)> Palluconi, Lisa <(b)(6)> (b)(6)

<(b)(6)> (b)(6) (b)(6)

<(b)(6)> (b)(6) (b)(6) <(b)(6)>

Cc: (b)(6)(b)(6) <(b)(6)> (b)(6) (b)(6)

<(b)(6)> (b)(6) (b)(6) <(b)(6)> (b)(6)

Subject: FLASH REQUEST: Information Memo for JY

Hello Team – (b) (5)

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

No need to put this into a memo format, the FO can do that. If you could send your cleared input by 1145 today, that will give us the time needed to finalize the memo.

Please let us know if you have any questions or concerns. And feel free to forward to anyone I may have missed.

Thanks!

(b)(6)

[REDACTED]

Senior Advisor

Office of Terrorism and Financial Intelligence

Department of the Treasury

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

2021-1246 (CKK): 007493-007495
Duplicate of Bates Stamp 007490-007492 in 25th Interim

Pending Consultation with Treasury Components
2021-1246 (CKK): Bates Nos.: 007496-007497

2021-1246 (CKK): 007498

Duplicate of Bates Stamp 007496 in 25th Interim

From: [Thomas, Nikole](#)
To: [Smith, Bradley](#); [Palluconi, Lisa](#)
Subject: RE: Draft Gertler materials
Date: Wednesday, February 24, 2021 11:24:32 AM

Thanks, Brad!

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: (b)(6) <(b)(6)>
Sent: Wednesday, February 24, 2021 10:44 AM
To: Trew, Heather <(b)(6)> Schaffer, Laurie
<(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

(b) (5) Thanks!

From: Trew, Heather <(b)(6)>
Sent: Wednesday, February 24, 2021 10:12 AM
To: Schaffer, Laurie <(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)> (b)(6) <(b)(6)>
Subject: RE: Draft Gertler materials

Predecisional/Deliberative/Privileged/Draft

(b) (5)

From: Schaffer, Laurie <(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)> (b)(6) <(b)(6)>

Subject: RE: Draft Gertler materials

Thanks Heather and Jason. Please loop in (b) (6)

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)> Schaffer, Laurie <(b)(6)>

Cc: Prince, Jason <(b)(6)>

Subject: Draft Gertler materials

Predecisional/Deliberative/Privileged/Draft

Everyone - (b) (5)

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

Thanks,
Heather

2021-1246 (CKK): Bates No. 007501
Duplicate of Bates No. 007499 in 25th Interim

From: [Thomas, Nikole](#)
To: [Palluconi, Lisa](#)
Cc: [Christian, Alan](#); (b)(6)(b)(6) (b)(6)(b)(6)
Subject: RE: Draft Email for Treasury Leadership on Gertler Request
Date: Tuesday, October 27, 2020 12:37:45 PM

Thanks, Lisa! (b) (5)

From: Palluconi, Lisa <(b)(6)>
Sent: Tuesday, October 27, 2020 9:10 AM
To: Thomas, Nikole <(b)(6)>
Cc: Christian, Alan <(b)(6)> (b)(6)(b)(6) <(b)(6)>
(b)(6)(b)(6) <(b)(6)>
Subject: RE: Draft Email for Treasury Leadership on Gertler Request

(b) (5)

From: Thomas, Nikole <(b)(6)>
Sent: Monday, October 26, 2020 10:30 PM
To: Palluconi, Lisa <(b)(6)>
Cc: Christian, Alan <(b)(6)> (b)(6)(b)(6) <(b)(6)>
(b)(6)(b)(6) <(b)(6)>
Subject: Draft Email for Treasury Leadership on Gertler Request

PRE-DECISIONAL and DELIBERATIVE

Hi Lisa,

(b) (5)

Please let us know if you have any edits.

Thanks!
Nikole

Hi (b)(6)

(b) (5)

(b) (5)

Thanks,
Andrea

2021-1246 (CKK): 007504-007505

Duplicate of Bates Stamp 007502-007503 in 25th Interim

From: (b)(6)(b)(6)
To: [Palluconi, Lisa](#); (b)(6)(b)(6)
Cc: [Thomas, Nikole](#); [Rasmussen, Mary](#)
Subject: (b) (5)
Date: Monday, August 10, 2020 3:28:11 PM

Okay, thank you for the feedback, and update, on this and the Gertler request.

(b)(6)

From: Palluconi, Lisa <(b)(6)>
Sent: Monday, August 10, 2020 3:18 PM
To: (b)(6)(b)(6) <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Rasmussen, Mary
<(b)(6)>
Subject: (b) (5)

Pre-decisional and Deliberative

(b)(6) and (b)(6) Per my other email, (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

Best,
Lisa

From: (b)(6)(b)(6) <(b)(6)>
Sent: Monday, August 10, 2020 11:03 AM
To: Palluconi, Lisa <(b)(6)> (b)(6)(b)(6) <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Rasmussen, Mary
<(b)(6)>
Subject: (b) (5)

Yes, (b) (5)

From: Palluconi, Lisa <(b)(6)>
Sent: Monday, August 10, 2020 10:58 AM
To: (b)(6)(b)(6) <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Rasmussen, Mary
<(b)(6)> (b)(6)(b)(6) <(b)(6)>
Subject: (b) (5)

(b)(6) – Thanks for this. (b) (5)

[REDACTED]

(b) (5)

Best,
Lisa

From: (b)(6)(b)(6) <(b)(6)>
Sent: Monday, August 10, 2020 10:17 AM
To: Palluconi, Lisa <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Rasmussen, Mary
<(b)(6)> (b)(6)(b)(6) <(b)(6)>
Subject: (b) (5)

(b) (5)

Thanks,
(b)(6)

From: (b)(6)(b)(6)
Sent: Monday, August 10, 2020 10:04 AM
To: Palluconi, Lisa <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Rasmussen, Mary
<(b)(6)> (b)(6)(b)(6) <(b)(6)>
Subject: (b) (5)

Hi Lisa,

(b) (5)

Thanks,
(b)(6)

(b)(6)

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

2021-1246 (CKK): 007508-007513

Duplicate of Bates Stamp 007506-007507 in 25th Interim

2021-1246 (CKK): 007514-007523
Duplicate of Bates Stamp 007145-007147 in 25th Interim

2021-1246 (CKK): 007524-007526
Duplicate of Bates Stamp 007152-007154 in 25th Interim

2021-1246 (CKK): 007527-007531

Duplicate of Bates Stamp 007145-007147 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): 007532-007533

2021-1246 (CKK): 007534-007546

Duplicate of Bates Stamp 007154-007147 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007547-007548

2021-1246 (CKK): 007549-007552
Duplicate of Bates Stamp 007154-007147 in 25th Interim

2021-1246 (CKK): 007553-007602

Duplicate of Bates Stamp 007532-007533 in 25th Interim

2021-1246 (CKK): 007603-007605
Duplicate of Bates Stamp 007231-007233 in 25th Interim

From: [Prince, Jason](#)
To: (b)(6)
Cc: (b)(6) (b)(6) [Palluconi, Lisa](#)
Subject: RE: For Jason Review: Venezuela (b)(5)
Date: Thursday, February 25, 2021 4:30:42 PM
Attachments: [20210226 Venezuela Sanctions Key Decisions Paper_clea-jep.docx](#)

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

(b) (5) Thanks.

From: Prince, Jason
Sent: Thursday, February 25, 2021 4:05 PM
To: (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> Palluconi, Lisa <(b)(6)>
Subject: RE: For Jason Review: Venezuela (b)(5)

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

(b) (5) . More to follow. Thanks.

From: Prince, Jason
Sent: Thursday, February 25, 2021 3:52 PM
To: (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> Palluconi, Lisa <(b)(6)>
Subject: RE: For Jason Review: Venezuela (b)(5)

PRIVILEGED

Hi (b) (6),

(b) (5), but I appear to have a window now to review these documents. I'll flip them to you on a rolling basis. Thanks for your patience.

Thanks,
Jason

From: (b)(6) <(b)(6)>
Sent: Thursday, February 25, 2021 1:51 PM
To: Prince, Jason <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6)> Palluconi, Lisa <(b)(6)>
Subject: RE: For Jason Review: Venezuela (b)(5)

Hi Jason,

(b) (5)

Thank you and please let (b) (6) /me know if you have any questions or concerns.

(b) (6)

From: (b)(6)

Sent: Thursday, February 25, 2021 11:50 AM

To: Prince, Jason <(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)> Palluconi, Lisa <(b)(6)>

Subject: RE: For Jason Review: Venezuela (b)(5)

Hi Jason, I'm circling back with clean versions of the first two papers for your review. Thank you.

(b) (6)

From: (b)(6)

Sent: Thursday, February 25, 2021 10:27 AM

To: Prince, Jason <(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Subject: RE: For Jason Review: Venezuela (b)(5)

Understood, thank you Jason and apologies for that. (b) (5)

I will circle back with clean, final versions as soon as I'm able.

From: Prince, Jason <(b)(6)>

Sent: Thursday, February 25, 2021 10:21 AM

To: (b)(6) <(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Subject: RE: For Jason Review: Venezuela (b)(5)

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

Good morning, (b) (6):

(b) (5)

(b) (5)

I'll review as quickly as possible and will send the two documents back to you on a rolling basis, but 3:00 is likely are more realistic target based on my call/meeting schedule today.

Thanks,
Jason

From: (b)(6) <(b)(6)>

Sent: Thursday, February 25, 2021 7:53 AM

To: Prince, Jason <(b)(6)>

Cc: (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Subject: For Jason Review: Venezuela (b)(5)

Good morning Jason:

I hope you're having a good week. (b) (5)

(b)(5)

(b)(5)

(b)(5)

Many thanks in advance, and please don't hesitate to reach out to (b) (6) and me with any questions or concerns.

(b) (6)

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007609-007614

2021-1246 (CKK): 007615-007618

Duplicate of Bates Stamp 007606-007614 in 25th Interim

From: (b)(6) (b)(6)
To: (b)(6)
Cc: (b)(6) (b)(6) [Moriarty, Kellen](#); [Thannhauser, Sara](#); [Palluconi, Lisa](#)
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo
Date: Wednesday, March 24, 2021 3:54:16 PM
Attachments: [2021025 DRC NGO Meeting Memo_TFI.docx](#)

(b)(6) and others – Here is the version cleared by Paul. (b)(5)

(b)(6)

(b)(6)

Thanks for your help moving this through so quickly.

(b)(6)

From: (b)(6) (b)(6)
Sent: Tuesday, March 23, 2021 11:14 PM
To: (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) <(b)(6)>
Moriarty, Kellen <(b)(6)> Thannhauser, Sara
<(b)(6)> Palluconi, Lisa <(b)(6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Will do, and (b)(5). Thanks!

From: (b)(6) <(b)(6)>
Sent: Tuesday, March 23, 2021 10:12 PM
To: (b)(6) (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) <(b)(6)>
Moriarty, Kellen <(b)(6)> Thannhauser, Sara
<(b)(6)> Palluconi, Lisa <(b)(6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

That sounds great, thanks! (b)(5)

(b)(6)

Have a great night!

(b)(6)

From: (b)(6) (b)(6) <(b)(6)>
Sent: Tuesday, March 23, 2021 9:02 PM
To: (b)(6) <(b)(6)>
Cc: (b)(6) <(b)(6)> (b)(6) <(b)(6)>
Moriarty, Kellen <(b)(6)> Thannhauser, Sara
<(b)(6)> Palluconi, Lisa <(b)(6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Thanks (b) (6) I'll pass this up and highlight edits and additions. I'll cc you once Paul clears!

From: (b) (6) <(b) (6)>
Sent: Tuesday, March 23, 2021 6:05 PM
To: (b) (6) (b) (6) <(b) (6)>
Cc: (b) (6) <(b) (6)> (b) (6) <(b) (6)>
Moriarty, Kellen <(b) (6)> Thannhauser, Sara
<(b) (6)> Palluconi, Lisa <(b) (6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Thanks (b) (6)! (b) (5) Please see attached and let us know if you need anything else. Have a great night.

(b) (6)

From: (b) (6) (b) (6) <(b) (6)>
Sent: Tuesday, March 23, 2021 3:41 PM
To: (b) (6) <(b) (6)>
Cc: (b) (6) <(b) (6)> (b) (6) <(b) (6)>
Moriarty, Kellen <(b) (6)> Thannhauser, Sara
<(b) (6)> Palluconi, Lisa <(b) (6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

(b) (6) – Great, and thank you for clarifying. (b) (5)

Thanks for the input and keep me posted!

(b) (6)

From: (b) (6) <(b) (6)>
Sent: Tuesday, March 23, 2021 3:32 PM
To: (b) (6) (b) (6) <(b) (6)>
Cc: (b) (6) <(b) (6)> (b) (6) <(b) (6)>
Moriarty, Kellen <(b) (6)> Thannhauser, Sara
<(b) (6)> Palluconi, Lisa <(b) (6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Hi (b) (6),

(b) (5)

(b) (6)

[REDACTED]
Senior Sanctions Policy Advisor
Office of Foreign Assets Control
Department of the Treasury
Desk: (b) (6)
Mobile: (b) (6)

From: (b) (6) (b) (6) <(b) (6)>
Sent: Tuesday, March 23, 2021 3:30 PM
To: (b) (6) Joca, Amanda P. <(b) (6)> (b) (6)
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Cc: (b) (6) <(b) (6)> (b) (6)
<(b) (6)> (b) (6) <(b) (6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Thanks all for the input edits on a quick turn! I'll accept all the edits, clean up, and move forward.

Also, we/the FO would welcome component attendance on Thursday. Let me know if you're interested, and I'll consolidate a list of folks to add to the invite.

From: (b) (6)
Sent: Tuesday, March 23, 2021 2:10 PM
To: Joca, Amanda P. (b) (6)
[REDACTED]
[REDACTED] (b) (6) (b) (6) <(b) (6)>
_DL_TFI_Africa <DL_TFI_Africa@treasury.gov> (b) (6)
[REDACTED]
[REDACTED]
[REDACTED]
Cc: (b) (6) <(b) (6)> (b) (6)
<(b) (6)> (b) (6) <(b) (6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Thanks, (b) (6)

(b) (5)

Thanks,

(b) (6)

From: Joca, Amanda P. (b) (6)

Sent: Tuesday, March 23, 2021 9:55 AM

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

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

(b)(6) <(b)(6) _DL_TFI_Africa <DL_TFI_Africa@treasury.gov>; (b) (6)

Cc: (b)(6) <(b)(6) (b)(6)

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

Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Hi all –

Please see the attached from FinCEN/GID.

V/r,

Amanda Joca

Office Director, Eastern Hemisphere

Global Investigations Division | FinCEN

Mobile: (b) (6)

From: (b) (6)

Sent: Tuesday, March 23, 2021 8:38 AM

To: (b)(6) (b)(6) (External) <(b)(6)

(b) (6) (b)(6) DL_TFI_Africa@treasury.gov;

JING.DENG@treasury.gov; (b) (6)

Joca, Amanda (b) (6)

Cc: (b)(6) (External) <(b)(6) (b)(6)

(b)(6) (External) <(b)(6)

Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

+ Amanda Joca

Thank you!

From: (b)(6) <(b)(6)>
Sent: Monday, March 22, 2021 7:43 PM
To: (b)(6) (b)(6) DL_TFI_Africa@treasury.gov;
(b)(6); (b)(6)
(b)(6)
(b)(6)
(b)(6) >
Cc: (b)(6) (External) <(b)(6)> (b)(6)
(b)(6) (External) <(b)(6)>
Subject: [TREASURY] RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Initial edits in the attached.

(b)(6)
Work: (b)(6)
Cell: (b)(6)
(b)(6)

From: (b)(6) (b)(6) <(b)(6)>
Sent: Monday, March 22, 2021 5:54 PM
To: (b)(6); (b)(6) (b)(6)
<(b)(6) <DL_TFI_Africa@treasury.gov>; (b)(6)>
<(b)(6)>
(b)(6)
(b)(6)
(b)(6)
Cc: (b)(6) <(b)(6)> (b)(6)
<(b)(6) (b)(6) <(b)(6)>
Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

++ more POL, as I'm not sure who is on the TFI Africa distro. Thanks!

(b)(6)
Work: (b)(6)
Cell: (b)(6)
(b)(6)

From: (b)(6)
Sent: Monday, March 22, 2021 5:37 PM

To: (b)(6) (b)(6) <(b)(6)> _DL_TFI_Africa
< DL_TFI_Africa@treasury.gov>; (b) (6)

Subject: RE: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

+ (b) (6) re: NGO angle (att sent separately)

From: (b)(6) (b)(6) <(b)(6)>

Sent: Monday, March 22, 2021 5:20 PM

To: _DL_TFI_Africa < DL_TFI_Africa@treasury.gov>; (b) (6)

Subject: For Clearance by 2pm Tuesday: NGO/DRC Andrea Memo

Good afternoon Africa watchers – (b) (5)

Please send any comments
and clearance by 2pm Tuesday and thanks in advance for accommodating the short turnaround.

Best,
(b) (6)

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

Office of Terrorist Financing & Financial Crimes
U.S. Department of the Treasury

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

Withheld in full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007625-007630

2021-1246 (CKK): 007631-007647

Duplicate of Bates Stamp 007619-007630 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007648-007653

2021-1246 (CKK): 007654-007658

Duplicate of Bates Stamp 007619-007630 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007659-007664

2021-1246 (CKK): 007665-007675

Duplicate of Bates Stamp 007619-007630 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007676-007681

2021-1246 (CKK): 007682-007687
Duplicate of Bates Stamp 007619-007630 in 25th Interim

2021-1246 (CKK): 007694-007731

Duplicate of Bates Stamp 007619-007630 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007732-007737

2021-1246 (CKK): 007738-007764
Duplicate of Bates Stamp 007619-007630 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007765-007766

2021-1246 (CKK): 007767-007769
Duplicate of Bates Stamp 007755-007759 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007770-007771

2021-1246 (CKK): 007772-007774
Duplicate of Bates Stamp 007755-007759 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007775-007776

2021-1246 (CKK): 007777-007783
Duplicate of Bates Stamp 007755-007759 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007784-007785

2021-1246 (CKK): 007786-007797

Duplicate of Bates Stamp 007755-007759 in 25th Interim

Pending Consultation with other Treasury Components
2021-1246 (CKK): Bates Nos.: 007798-007807

2021-1246 (CKK): 007808-007821
Duplicate of Bates Stamp 007798-007807 in 25th Interim

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 007822-007823

2021-1246 (CKK): 007824-007831
Duplicate of Bates Stamp 007799-007807- in 25th Interim

From: (b)(6)(b)(6)
To: [Prince, Jason](#)
Cc: [Palluconi, Lisa](#); [Thomas, Nikole](#); [Christian, Alan](#)
Subject: RE: Gertler
Date: Friday, January 15, 2021 3:51:36 PM
Attachments: [Gertler Draft cover letter .docx](#)
[Gertler Draft License.docx](#)
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
2021-1246 (CKK): Bates Nos.: 007833-007837

2021-1246 (CKK): 007838-007844 Duplicate of
Bates Stamp 007799-007807 in 25th Interim

Pending Consultation with Treasury Component
2021-1246 (CKK): Bates Nos.: 007845-007846

2021-1246 (CKK): 007847
Duplicate of Bates Stamp 007845 in 25th Interim

From: (b)(6) (b)(6)
To: (b)(6) (b)(6) Thomas, Nikole; (b)(6) (b)(6)
Cc: (b)(6)(b)(6) Christian, Alan; Rasmussen, Mary; (b)(6) (b)(6)(b)(6)
(b)(6) (b)(6) (b)(6) Paliuconi, Lisa; Thannhauser, Sara; Monarty, Kellen; (b)(6)
(b)(6)
Subject: RE: Gertler & OFAC
Date: Monday, January 25, 2021 7:33:45 AM

Colleagues - Just flagging that The Sentry published a separate article on the license yesterday (pasted below):

<https://thesentry.org/2021/01/24/5249/secret-action-trump-administration-granted-license-sanctioned-mining-billionaire-dan-gertler/>

In Secret Action, Trump Administration Granted License to Sanctioned Mining Billionaire Dan Gertler

Experts Recommend Banks Maintain Blocks on Gertler-Linked Assets and Transactions

January 24, 2021 (Washington, DC) – In a secret, last-minute action, the Trump administration gave Israeli mining tycoon Dan Gertler and his businesses a license to, in effect, nullify sanctions previously imposed by the US Department of the Treasury. The Sentry is urging banks to maintain blocks on transactions and assets linked to Gertler and his network of businesses and affiliates.

Brad Brooks-Rubin, Managing Director of The Sentry, and a former U.S. Treasury Department sanctions attorney, said: “The issuance of a specific license to a designated individual as an end-run around a delisting, general license, or other public statement, absent any discernible intelligence or national security rationale, threatens the integrity, implementation, and impact of economic sanctions programs as a whole. In particular, for a sanctions designation issued specifically for corrupt and secretive activities in the DR Congo and elsewhere, to have been privately undercut under a cloud of haste and secrecy at the very end of the Trump administration strikes a terrible blow to the heart of one of the most lauded and effective anti-corruption programs of the last decade.”

Gertler is an international businessman and billionaire who amassed a fortune through hundreds of millions of dollars’ worth of opaque and corrupt mining and oil deals in the Democratic Republic of the Congo (DRC), according to official Treasury statements. The sanctions were imposed by the Treasury Department’s Office of Foreign Assets Control (OFAC) through Executive Order 13818, pursuant to the Global Magnitsky Act, which targets serious human rights abuse and corruption.

After years of extensive lobbying, which reportedly included working with well-known lawyers close to former President Trump, Dan Gertler and much of his network received a license from OFAC, based on an application prepared by one of DC’s most prestigious law firms, just days before the end of the Administration.

John Prendergast, Co-Founder of The Sentry, said: “Gertler has looted the DRC for years. Finally, he faced some measure of accountability due to US sanctions, which had the knock-on effect of affecting the calculations of his main business partner, President Joseph Kabila, sufficiently to influence him not to alter or defy the Constitution and run for a third term. In literally one of its last actions, the Trump administration reversed that initiative and put at risk one of its most unheralded accomplishments in Africa. This is something the Biden administration can quickly remedy with the requisite political will.”

Sasha Lezhnev, Deputy Director of Policy at The Sentry, said: “Letting Dan Gertler off the hook sends a message to the world’s most corrupt businesspeople that the US will let them walk free after a bit of

lobbying. It greatly undermines US global anti-corruption policies. The Biden administration should revoke this effective pardon for Gertler and his companies so that Global Magnitsky sanctions can continue to help roll back the tide of corruption in the DR Congo and beyond.”

This license, which was issued extraordinarily quickly for OFAC, appears to have been granted without the involvement or consultation of many of the career officers who would normally review and approve such a license, though signed by OFAC’s director, as required.

The license does not remove Gertler and his network from the sanctions list, but it effectively undermines the sanctions by (i) allowing all transactions and activities moving forward with Gertler and his network and (ii) authorizing a group of named banks and financial institutions to unblock, i.e. unfreeze, any accounts/funds/property they have held. The license shows that, in the end, the firm helping Gertler was one of DC’s biggest and most prestigious.

The Sentry makes the following critical recommendations to banks and financial institutions around the world:

The eight named financial institutions (AIG, on behalf of AIG Europe Limited, Netherlands; American Express Travel Related Services Company Co. Inc.; Bank of China Limited; Bloomberg LP; Citibank NA; Deutsche Bank Trust Company Americas; Bank of New York Mellon; and Wells Fargo Bank National Association) should decline to unblock and return funds of Dan Gertler, any designated individual or entity in his network, or any other entity 50% owned or controlled by Gertler or his network. Gertler and the individuals and entities in his network remain designated, and the risk of being connected to corrupt or illicit financial activity is simply too high for otherwise reputable institutions to take the extreme step of unblocking funds in response to a license issued under, at best, dubious circumstances.

Neither these institutions nor any other should open accounts or otherwise conduct transactions for or on behalf of Gertler and his network until this matter is fully investigated and resolved.

For media inquiries or interview requests, please contact: Greg Hittelman, Director of Communications, [+1 310 717 0606, gh@thesentry.org](mailto:gh@thesentry.org)

From: (b)(6) (b)(6) <(b)(6)>
Date: January 23, 2021 at 9:58:38 PM EST
To: Thomas, Nikole <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) (b)(6)
Cc: (b)(6) (b)(6) <(b)(6)> Christian, Alan
<(b)(6)> Rasmussen, Mary <(b)(6)>
(b)(6) <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> (b)(6)
<(b)(6)> (b)(6) <(b)(6)>
(b)(6) <(b)(6)> Palluconi, Lisa
<(b)(6)> Thannhauser, Sara <(b)(6)>
Moriarty, Kellen <(b)(6)> (b)(6)
<(b)(6)> (b)(6) >
Subject: RE: Gertler & OFAC

(b) (5) . Can sort out further if we need on Monday.

From: (b)(6) <(b)(6)>

Sent: Saturday, January 23, 2021 9:52 PM

To: (b)(6) (b)(6) <(b)(6)>

Cc: (b)(6) (b)(6) (b)(6)

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

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

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

Subject: RE: Gertler & OFAC

Hi All,

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Thanks!

Nikole

From: (b)(6) (b)(6) <(b)(6)>

Sent: Saturday, January 23, 2021 7:52 PM

To: (b)(6) (b)(6) <(b)(6)>

Cc: Thomas, Nikole <(b)(6)> (b)(6) <(b)(6)>

Christian, Alan <(b)(6)> Rasmussen, Mary <(b)(6)>

(b)(6) <(b)(6)> (b)(6) (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)> (b)(6) <(b)(6)> (b)(6)

<(b)(6)>

Subject: Fwd: Gertler & OFAC

(b)(6) -

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted]

[Redacted]

Thanks,

(b)(6)

From: Michael Kavanagh <mjkavanagh@gmail.com>

Date: January 23, 2021 at 2:07:47 PM EST

To: (b)(6) (b)(6) <(b)(6)> MICHAEL KAVANAGH, BLOOMBERG/

NEWSROOM: <mkavanagh9@bloomberg.net>

Subject: Gertler & OFAC

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

Hi Andy,

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.

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

+1 917 862 7883

Michael J. Kavanagh

Worldwide (& WhatsApp): +1 917 862 7883

DR Congo: +243 (0)81 715 2746

mjkavanagh@gmail.com

mkavanagh9@bloomberg.net

PGP: BFACA49AEDEDAB7A

2021-1246 (CKK): 007852-007856 Duplicate of
Bates Stamp 007848-007851 in 25th Interim

From: (b)(6)(b)(6)
To: [Thomas, Nikole](#); [Christian, Alan](#); [Palluconi, Lisa](#); [Manfull, Alexandre](#); [Scheinert, Lawrence](#); (b)(6) (b)(6)
[Jennings, Thomas](#); [Quinby, Ripley](#); [Gatjanis, Gregory](#)
Cc: (b)(6)(b)(6)
Subject: RE: Gertler - Arnold & Porter Annual Report of Legal Services
Date: Monday, February 1, 2021 5:34:56 PM
Attachments: [1-29-2021 - Gertler - Annual Report of Legal Services Fees.pdf](#)

PRE-DECISIONAL AND DELIBERATIVE

Hi everyone,

(b) (5)

(b)(6)

Pending Submitter Notice Process
2021-1246 (CKK): Bates Nos.: 007858-007860

From: (b)(6) (b)(6)
To: [Smith, Bradley](#)
Cc: [Palluconi, Lisa](#); [Thannhauser, Sara](#); [Moriarty, Kellen](#); (b)(6) (b)(6) (b)(6)
Subject: RE: FYI: DRC Status Update
Date: Tuesday, June 16, 2020 3:35:39 PM
Attachments: [DRC sanctions status update OFAC v3.docx](#)

Good afternoon Brad,

(b) (5)

Please let us know if you have any questions or concerns.

Best,

(b)(6)

(b) (6) | Legislative Affairs Coordinator | Office of Foreign Assets Control | m: (b) (6)

From: Smith, Bradley <(b)(6)>
Sent: Friday, June 5, 2020 4:25 PM
To: (b)(6) (b)(6) <(b)(6)> Palluconi, Lisa <(b)(6)>
Cc: Thannhauser, Sara <(b)(6)> Moriarty, Kellen
<(b)(6)> (b)(6) (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Subject: RE: FYI: DRC Status Update

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

From: (b)(6) (b)(6) <(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) (b)(6) <(b)(6)> (b)(6)
<(b)(6)>
Subject: FYI: DRC Status Update

Brad and Lisa,

(b) (5)

(b) (5)

[Redacted]

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)

Withheld in Full FOIA Exemption (b)(5)
2021-1246 (CKK): Bates Nos.: 007863-007864

From: (b)(6)
To: [Prince, Jason](#)
Cc: [Thomas, Nikole](#); [Palluconi, Lisa](#); [Moriarty, Kellen](#); [Thannhauser, Sara](#); [Quinby, Ripley](#); (b)(6) (b)(6) (b)(6)
Subject: RE: For OCC Review: DRC-related public messaging
Date: Friday, March 5, 2021 7:54:07 AM
Attachments: [Treasury IfAsked License 25Feb2021 Imp iep hmt av nat.docx](#) -
[03032021 - Statement - Gertler Revocation for Associates iep.docx](#)
[EB AF PG - Gertler Revocation - XX MAR 2021 for Associates Imp iep.docx](#)

Hi Jason,

Thanks again for the quick turn on these last night, (b) (5)

(b)(6)

(b)(6)

(b)(6)

Thanks!

(b) (6)

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

From: Prince, Jason <(b)(6)>
Sent: Thursday, March 4, 2021 6:48 PM
To: (b)(6) <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Palluconi, Lisa <(b)(6)>
Moriarty, Kellen <(b)(6)> Thannhauser, Sara
<(b)(6)> Quinby, Ripley <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas
<(b)(6)>
Subject: RE: For OCC Review: DRC-related public messaging

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

Hi (b) (6),

(b) (5)

Thanks,
Jason

From: (b)(6) <(b)(6)>
Sent: Thursday, March 4, 2021 5:53 PM
To: Prince, Jason <(b)(6)>
Cc: Thomas, Nikole <(b)(6)> Palluconi, Lisa <(b)(6)>
Moriarty, Kellen <(b)(6)> Thannhauser, Sara
<(b)(6)> Quinby, Ripley <(b)(6)> (b)(6) (b)(6)
<(b)(6)> (b)(6) <(b)(6)> Jennings, Thomas
<(b)(6)>
Subject: For OCC Review: DRC-related public messaging

Pre-decisional/Deliberative

Hi Jason,

Thanks for taking the time to connect with us this afternoon on the attached press documents.
Attached you will see OFAC's feedback on both.

(b) (5)

Have a great night!

(b) (5)

Senior Sanctions Policy Advisor
Office of Foreign Assets Control

Department of the Treasury

Desk: (b) (6)

Mobile (b) (6)

From: (b)(6)

Sent: Thursday, March 4, 2021 4:06 PM

To: Palluconi, Lisa <(b)(6)> Quinby, Ripley <(b)(6)>

Cc: Christian, Alan <(b)(6)> (b)(6)(b)(6) <(b)(6)>

Thannhauser, Sara <(b)(6)> Moriarty, Kellen

<(b)(6)> Thomas, Nikole <(b)(6)> (b)(6)

<(b)(6)> (b)(6) (b)(6) <(b)(6)> Jennings,

Thomas <(b)(6)>

Subject: Request for Associate-level review by 4:30 pm today: DRC-related public messaging

Dear Lisa and Rip,

(b) (5)

Thanks so much and please let us know if you have questions!

(b) (6)

From: (b)(6)

Sent: Thursday, March 4, 2021 3:19 PM

To: Thannhauser, Sara <(b)(6)> Moriarty, Kellen

<(b)(6)> Christian, Alan <(b)(6)> (b)(6)(b)(6)

<(b)(6)> Thomas, Nikole <(b)(6)> (b)(6)

<(b)(6)> (b)(6) (b)(6) <(b)(6)>

Cc: Palluconi, Lisa <(b)(6)> Quinby, Ripley <(b)(6)>

Subject: Quick Turn Review by 3:45 pm today: DRC-related public messaging

Good Afternoon,

(b) (5)

Thanks in advance and please reach out if you have questions! (and forward to anyone I missed!!

(b) (6)

[REDACTED]

Senior Sanctions Policy Advisor
Office of Foreign Assets Control
Department of the Treasury

Desk: (b) (6)

Mobile: (b) (6)

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007869-007872

2021-1246 (CKK): 007873-007883

Duplicate of Bates Stamp 007865-007868 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates No.: 007884

2021-1246 (CKK): 007885-007898
Duplicate of Bates Stamp 007865-007868 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007899-007902

2021-1246 (CKK): 007903-007914
Duplicate of Bates Stamp 007451-007463 in
25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 007915-007917

2021-1246 (CKK): 007918-008000

Duplicate of Bates Stamp 007903-007913 in 25th Interim

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 008001-008002

2021-1246 (CKK): 008003-008033
Duplicate of Bates Stamp 007903-007913 in 25th Interim

Pending Consultation with other Treasury Components
2021-1246 (CKK): Bates Nos.: 008034-008043

Withheld in Full FOIA Exemption (b)(5) Draft document
2021-1246 (CKK): Bates Nos.: 008044-008048

From: [Smith, Bradley](#)
To: [Prince, Jason](#); [Thomas, Nikole](#); [Palluconi, Lisa](#)
Subject: RE: Gertler License Update
Date: Tuesday, February 23, 2021 5:02:55 PM

Sorry. I was (ironically) in the basement SCIF, but I am dialing in now.

From: Prince, Jason <(b)(6)>
Sent: Tuesday, February 23, 2021 5:01 PM
To: Thomas, Nikole <(b)(6)> Palluconi, Lisa <(b)(6)>
Smith, Bradley <(b)(6)>
Subject: RE: Gertler License Update

Happy to open my bridge now – (b) (5) If Brad can't join us, I can catch him up at his convenience this evening.

From: Thomas, Nikole <(b)(6)>
Sent: Tuesday, February 23, 2021 4:42 PM
To: Palluconi, Lisa <(b)(6)> Prince, Jason <(b)(6)> Smith, Bradley <(b)(6)>
Subject: RE: Gertler License Update

I can be available on the lowside then too.

From: Palluconi, Lisa <(b)(6)>
Sent: Tuesday, February 23, 2021 4:37 PM
To: Prince, Jason <(b)(6)> Smith, Bradley <(b)(6)>
Thomas, Nikole <(b)(6)>
Subject: Re: Gertler License Update

Thanks much. (b) (6) Happy to jump on a low side, ideally 5pm or after on my end.

From: Prince, Jason <(b)(6)>
Date: February 23, 2021 at 4:35:47 PM EST
To: Smith, Bradley <(b)(6)> Palluconi, Lisa <(b)(6)>
Thomas, Nikole <(b)(6)>
Subject: Gertler License Update

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

Any chance you have a few minutes for an update on the Gertler license matter? (b) (5)

(b)(5) (b) (5). Thanks.

2021-1246 (CKK): 008051-008061
Duplicate of Bates Stamp 008034-008043 in 25th Interim

From: [Palluconi, Lisa](#)
To: [Gacki, Andrea](#); [Thomas, Nikole](#); [Rasmussen, Mary](#)
Cc: [Smith, Bradley](#)
Subject: RE: Gertler license application
Date: Monday, August 10, 2020 11:29:02 AM

Sounds good. Thanks!

From: Gacki, Andrea <(b)(6)>
Sent: Monday, August 10, 2020 11:28 AM
To: Palluconi, Lisa <(b)(6)> Thomas, Nikole <(b)(6)>
Rasmussen, Mary <(b)(6)>
Cc: Smith, Bradley <(b)(6)>
Subject: RE: Gertler license application

Let's do 2:30! I will send out an invite.

From: Palluconi, Lisa <(b)(6)>
Sent: Monday, August 10, 2020 11:27 AM
To: Gacki, Andrea <(b)(6)> Thomas, Nikole
<(b)(6)> Rasmussen, Mary <(b)(6)>
Cc: Smith, Bradley <(b)(6)>
Subject: RE: Gertler license application

Thanks. (b) (6) (b) (6) and I am not sure we will be back by then (but I should be back and up and running by 1:30). I could also do 2:30, as you look booked at 1:30.

From: Gacki, Andrea <(b)(6)>
Sent: Monday, August 10, 2020 11:24 AM
To: Palluconi, Lisa <(b)(6)> Thomas, Nikole
<(b)(6)> Rasmussen, Mary <(b)(6)>
Cc: Smith, Bradley <(b)(6)>
Subject: RE: Gertler license application

Hi Lisa! Do you all want to chat on this briefly at 1:00? If that works, I will send a call in for this small group. (b) (5)

From: Palluconi, Lisa <(b)(6)>
Sent: Monday, August 10, 2020 11:12 AM
To: Gacki, Andrea <(b)(6)> Thomas, Nikole
<(b)(6)> Rasmussen, Mary
<(b)(6)>
Cc: Smith, Bradley <(b)(6)>
Subject: RE: Gertler license application

Hi Andrea – Would you like for us to catch you on the margins of senior managers today? Happy to connect another time as well.

Best,
Lisa

From: Gacki, Andrea <(b)(6)>
Sent: Sunday, August 9, 2020 2:30 PM
To: Palluconi, Lisa <(b)(6)> Thomas, Nikole
<(b)(6)> Rasmussen, Mary
<(b)(6)>
Cc: Smith, Bradley <(b)(6)>
Subject: Gertler license application

Hi and apologies for the Sunday interruption! (b) (5)
Just
planting a flag so we can discuss for 5 min on Monday, at your convenience.

Andrea

2021-1246 (CKK): 008064-008069

Duplicate of Bates Nos.: 008063-008064 in 25th Interim