

# **Pending Submitter Notice Process**

**(36 pages)**

**2021-1246 (CKK): 0000005584-0000005619**

**Pending Consultation with Other Government  
Agency**

**(95 pages)**

**2021-1246 (CKK): 0000005620-0000005714**

**Pending Consultation with Other Treasury  
Components**

**(2 pages)**

**2021-1246 (CKK): 0000005715-0000005716**

# **Pending Submitter Notice Process**

**(2 pages)**

**2021-1246 (CKK): 0000005717-0000005718**

**From:** Gacki, Andrea  
**To:** (b) (6)  
**Cc:** (b) (6); Smith, Bradley; Palluconi, Lisa; Thomas, Nikole; (b) (6); Jennings, Thomas; Quinby, Ripley; Gatianis, Gregory; Baheri, Leila; (b) (6); (b) (6); Christian, Alan; (b) (6)  
**Subject:** RE: Cover Memo and Attachment for STM Readbook: Dan Gertler + License  
**Date:** Wednesday, October 28, 2020 4:21:10 PM

---

All – (b) (5)

(b) (5)

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)

Duplicative of Material in 2021-1246 (CKK): 0000002134. 11th Interim Release.

**From:** (b) (6)  
**To:** (b) (6)  
**Cc:** (b) (6); [Gacki, Andrea](#); [Smith, Bradley](#); [Palluconi, Lisa](#); [Thomas, Nikole](#); (b) (6); [Jennings, Thomas](#); [Quinby, Ripley](#); [Gatianis, Gregory](#); [Baheri, Leila](#); (b) (6); (b) (6); [Christian, Alan](#); (b) (6)  
**Subject:** Re: Cover Memo and Attachment for STM Readbook: Dan Gertler + License  
**Date:** Tuesday, October 27, 2020 7:51:16 PM

---

Thank you (b) (6) - we'll flag for STM

---

Duplicative of Material in 2021-1246 (CKK): 0000002134. 11th Interim Release.

**Pending Consultation with Other Government  
Agency**

**(7 pages)**

**2021-1246 (CKK): 0000005721-0000005727**

# **Pending Submitter Notice Process**

**(2 pages)**

**2021-1246 (CKK): 0000005728-0000005729**



(b)(6), (b)(5): Deliberative Process Privilege



Duplicative of Material in 2021-1246 (CKK): 000000949-0000000953. 4th Interim Release.



**Duplicative of Material in 4<sup>th</sup> Interim Release**

**2021-1246 (CKK): 0000000949-0000000953**

**(5 pages)**

**2021-1246 (CKK): 0000005731-0000005735**

**(b)(6), (b)(5): Deliberative Process Privilege**



Duplicative of Material in 2021-1246 (CKK): 000000949-0000000953. 4th Interim Release.

**Duplicative of Material in 4<sup>th</sup> Interim Release**

**2021-1246 (CKK): 0000000949-0000000953**

**(6 pages)**

**2021-1246 (CKK): 0000005737-0000005742**

# **Pending Submitter Notice Process**

**(31 pages)**

**2021-1246 (CKK): 0000005743-0000005773**

# **Pending Submitter Notice Process**

**(5 pages)**

**2021-1246 (CKK): 0000005774-0000005778**

# **Pending Submitter Notice Process**

**(11 pages)**

**2021-1246 (CKK): 0000005779-0000005789**

# **Pending Submitter Notice Process**

**(6 pages)**

**2021-1246 (CKK): 0000005790-0000005795**



# **Pending Submitter Notice Process**

**(6 pages)**

**2021-1246 (CKK): 0000005796-0000005801**

**Pending Consultation with Other Treasury  
Components**

**(1 page)**

**2021-1246 (CKK): 0000005802**

**From:** (b) (6)  
**To:** (b) (6)  
**Subject:** GLOMAG-2021-373651-1 (Gertler) - Summary  
**Date:** Friday, April 9, 2021 11:24:00 AM  
**Attachments:** [Gertler Gov Relations Request Summary.docx](#)

---

PRE-DECISIONAL and DELIBERATIVE

Hi (b) (6)

I've attached the summary of GLOMAG-2021-373651-1, which requests authorization for Gertler and related designated persons, to receive and pay for government relations and public relations services. I included some background on related cases. Please let me know if you have any comments or edits I can incorporate!

Many thanks,

(b) (6)

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

**(1 page)**

**2021-1246 (CKK): 0000005804**

# **Pending Submitter Notice Process**

**(4 pages)**

**2021-1246 (CKK): 0000005805-0000005808**

**From:** (b) (6)  
**To:** [Palluconi, Lisa](#); (b) (6); [Unger, Seth](#); (b) (6)  
**Cc:** (b) (6) [Blackborow, Davin](#); (b) (6)  
**Subject:** [Unger, Seth](#); (b) (6)  
**Date:** RE: Sanctions policy question  
Tuesday, October 23, 2018 11:31:09 AM

---

+ [Licensing, Policy, Counsel](#) – (b)(5)  
(b)(5) Please provide any edits. Thank you!

(b)(5)

(b) (6)

---

**From:** Unger, Seth  
**Sent:** Tuesday, October 23, 2018 9:57 AM  
**To:** (b) (6)  
(b) (6)  
**Subject:** Fwd: Sanctions policy question

Hey (b) (6)

Will you please propose and circulate a response on this? Include OGC. (b)(5)

(b)(5)

Thanks!  
Seth

---

**From:** Stanley Pignal <[stanleypignal@economist.com](mailto:stanleypignal@economist.com)>  
**Date:** October 23, 2018 at 9:42:51 AM EDT  
**To:** Unger, Seth (b) (6)  
**Subject:** Re: Sanctions policy question  
Seth hi -

Sorry to come back to you again on this (I tried to call but gather you're on the road).  
I'm still lacking clarity on a fairly crucial part of the OFAC implementation here. Glencore claims they made their payment to Gertler "in consultation" with Treasury (they have said this publicly). The implication is that they got a green light to make a payment.  
WITHOUT SPECIFIC REFERENCE TO THEM, can I get an answer to this question, for the sake of clarity:

- Does Treasury allow companies to consult with them on the legality of their proposed dealings with sanctioned parties ?

Perhaps off-the-record/on background you could steer me on this. On June 14th Glencore announced publicly it had made a payment to Gertler-affiliated entities (not specifying which).

On June 15th, 14 Gertler-affiliated entities were added to the OFAC list. Is that coincidental?  
Thanks -- again happy to chat off-record/on background as needed on +33768244148.  
Stan

---

**Stanley Pignal**  
**The Economist**  
**Paris**

[stanleypignal@economist.com](mailto:stanleypignal@economist.com)

Mob: (b) (6)

Office: (b) (6)

Twitter: @spignal

On 15 October 2018 at 16:42, <[Seth.Unger@glencore.com](mailto:Seth.Unger@glencore.com)> (b) (6) wrote:

Hey Stanley,

I don't think we'll have additional information to share beyond the statement below at this point.

Thanks,

Seth

**From:** Stanley Pignal <[stanleypignal@economist.com](mailto:stanleypignal@economist.com)>

**Sent:** Thursday, October 11, 2018 6:59 AM

**To:** Unger, Seth (b) (6)

**Subject:** Re: Sanctions policy question

Hi Seth -

Wondering if anything fell out of the tree on Glencore, there was one matter to follow up on.

Am starting to dedicate reporting time to this next week, so if you feel it's worth having a chat with someone on your end, let me know.

S

---

**Stanley Pignal**  
**The Economist**  
**Paris**

[stanleypignal@economist.com](mailto:stanleypignal@economist.com)

Mob: (b) (6)

Office: (b) (6)

Twitter: @spignal

On 28 September 2018 at 16:23, <[Seth.Unger@glencore.com](mailto:Seth.Unger@glencore.com)> (b) (6) wrote:

Here's some general guidance:

**On background:** Treasury does not comment on potential investigations nor speculate publicly on an individual company's compliance with OFAC regulations, which are fact-specific.

However, we constantly monitor for global activity that might undermine the integrity of our sanctions, and do not hesitate to pursue potential violations when appropriate.

Dan Gertler is sanctioned under E.O. 13818, and this authority allows Treasury to sanction further entities owned or controlled by Dan Gertler, as well as any individual or entity that provides material support or other assistance to anyone sanctioned under E.O. 13818. Treasury sanctioned 14 additional Gertler-affiliated entities on June 15, 2018. (Here is the press release:



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

**Off record:** Let me check on your follow up.

Thanks,

Seth

**From:** Stanley Pignal <[stanleypignal@economist.com](mailto:stanleypignal@economist.com)>

**Sent:** Friday, September 28, 2018 4:40 AM

**To:** Unger, Seth (b) (6)

**Subject:** Re: Sanctions policy question

Hi Seth -

anything come back on your end? again, happy to get a background briefing if it helps.

There's one particular thing I think I need to establish, and it is whether US officials gave Glencore authorisation to make a payment to a sanctioned individual (as long as it was in euros).

Can I thus add a question: "Does the US government provide companies with guidance upon request of what would or would not be in keeping with the law when it comes to dealing with sanctioned entities?"

Thanks

SP

---

**Stanley Pignal**

**The Economist**

**Paris**

[stanleypignal@economist.com](mailto:stanleypignal@economist.com)

Mob: (b) (6)

Office: (b) (6)

Twitter: @spignal

On 24 September 2018 at 15:23, Stanley Pignal <[stanleypignal@economist.com](mailto:stanleypignal@economist.com)> wrote:

great thanks. if anything useful comes back let me know. It wasn't clear the DOJ investigation was immediately related to this particular field (it included activities in other countries) hence wanted to check.

S

---

**Stanley Pignal**

**The Economist**

**Paris**

[stanleypignal@economist.com](mailto:stanleypignal@economist.com)

Mob: (b) (6)

Office: (b) (6)

Twitter: @spignal

On 24 September 2018 at 15:10, <[Seth.Unger](#) (b) (6)> wrote:

Hey Stanley,

Tony forwarded your question to me, as I handle this policy portfolio. Moving him to BCC:

**Off record:** I don't suspect that there is much that we will be able to say, as we don't comment on investigations and would defer DOJ probe questions to them. That being said, I will check with our folks and see if anything we can share.

Thanks,



**Pending Consultation with Other Treasury  
Components**

**(3 pages)**

**2021-1246 (CKK): 0000005812-0000005814**

**Pending Consultation with Other Government  
Agency**

**(4 pages)**

**2021-1246 (CKK): 0000005815-0000005818**

**Pending Consultation with Other Treasury  
Components**

**(15 pages)**

**2021-1246 (CKK): 0000005819-0000005833**

**From:** (b) (6)  
**To:** (b) (6)  
**Subject:** RE: For clearance-Pres docs-GloMag  
**Date:** Friday, May 1, 2020 5:05:54 PM  
**Attachments:** [Pres docs-2020-06 GloMag-first OFAC clearance\\_OGT edit.pdf](#)

---

Hi (b) (6)

I have one target missing for December 6<sup>th</sup>. I added a comment in the attached with his name, he was designated for corruption. The rest of it is good for OGT.

Thanks!

V/r,

(b) (6)

Section Chief, Human Rights and Corruption  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
Work: (b) (6)  
Work Cell (b) (6)

---

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

**Sent:** Friday, May 1, 2020 12:30 PM

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

(b) (6)

**Subject:** RE: For clearance-Pres docs-GloMag

LIC clears.

Thanks

(b) (6)

---

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

**Sent:** Friday, May 1, 2020 11:05 AM

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

(b) (6)

**Subject:** RE: For clearance-Pres docs-GloMag

Hi (b) (6) - this is clear for Compliance!

Many thanks,

(b) (6)

---

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

**Sent:** Friday, May 1, 2020 11:01 AM

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

(b) (6)

**Subject:** For clearance-Pres docs-GloMag

Good morning,

Attached for your Division's review and clearance is the GloMag package. OGT, please make sure I didn't chop too much out of the designations/delistings.

I would appreciate receiving your response by Tuesday, May 5.

Thanks,

(b) (6)

PS—this will go to Reg Affairs after this clearance, so no need to add (b) (6) now... ☺

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

**(3 pages)**

**2021-1246 (CKK): 0000005835-0000005837**



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

OFFICE OF FOREIGN ASSETS CONTROL

Global Magnitsky Sanctions Regulations  
31 C.F.R. Part 583

GENERAL LICENSE NO. 1

**Authorizing Certain Activities Necessary to the Wind Down of  
Transactions Involving Ventspils Freeport Authority,  
Ventspils Attistibas Agentura, Biznesa Attistibas Asociacija,  
and Latvijas Tranzita Biznesa Asociacija**

(a) Except as provided in paragraph (b) of this general license, all transactions and activities prohibited by the Global Magnitsky Sanctions Regulations, 31 C.F.R. part 583, that are ordinarily incident and necessary to the wind down of transactions involving, directly or indirectly, one or more of the following entities, or any entity in which one or more of the following entities owns, directly or indirectly, a 50 percent or greater interest, are authorized through 12:01 a.m. eastern standard time, January 8, 2020:

- Ventspils Freeport Authority;
- Ventspils Attistibas Agentura (Ventspils Development Agency);
- Biznesa Attistibas Asociacija (Business Development Association); or
- Latvijas Tranzita Biznesa Asociacija (Latvian Transit Business Association).

(b) This general license does not authorize:

(1) Any debit to an account on the books of a U.S. financial institution of the entities listed in paragraph (a), or any entity in which one or more of the entities in paragraph (a) owns, directly or indirectly, a 50 percent or greater interest;

(2) Any transactions or dealings otherwise prohibited by the Global Magnitsky Sanctions Regulations, or any other part of 31 C.F.R. chapter V, or any transactions or dealings with any blocked person other than the blocked persons described in paragraph (a) of this general license;  
or

(3) The unblocking of any property blocked pursuant to any part of 31 C.F.R. chapter V, or any Executive order except as authorized by paragraph (a) of this general license.

Andrea Gacki  
Director  
Office of Foreign Assets Control

Dated: December 9, 2019

2021-1246 (CKK): 0000005838





DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

OFFICE OF FOREIGN ASSETS CONTROL

Global Magnitsky Sanctions Regulations  
31 C.F.R. Part 583

GENERAL LICENSE NO. 1A

**Authorizing Certain Activities Necessary to the Wind Down of  
Transactions Involving Ventspils Attistibas Agentura, Biznesa Attistibas Asociacija,  
and Latvijas Tranzita Biznesa Asociacija**

(a) Except as provided in paragraph (b) of this general license, all transactions and activities prohibited by the Global Magnitsky Sanctions Regulations, 31 C.F.R. part 583, that are ordinarily incident and necessary to the wind down of transactions involving, directly or indirectly, one or more of the following entities, or any entity in which one or more of the following entities owns, directly or indirectly, a 50 percent or greater interest, are authorized through 12:01 a.m. eastern standard time, January 8, 2020:

- Ventspils Attistibas Agentura (Ventspils Development Agency);
- Biznesa Attistibas Asociacija (Business Development Association); or
- Latvijas Tranzita Biznesa Asociacija (Latvian Transit Business Association).

(b) This general license does not authorize:

(1) Any debit to an account on the books of a U.S. financial institution of the entities listed in paragraph (a), or any entity in which one or more of the entities in paragraph (a) owns, directly or indirectly, a 50 percent or greater interest;

(2) Any transactions or dealings otherwise prohibited by the Global Magnitsky Sanctions Regulations, or any other part of 31 C.F.R. chapter V, or any transactions or dealings with any blocked person other than the blocked persons described in paragraph (a) of this general license; or

(3) The unblocking of any property blocked pursuant to any part of 31 C.F.R. chapter V, or any Executive order except as authorized by paragraph (a) of this general license.

(c) Effective December 18, 2019, General License 1, dated December 9, 2019, is replaced and superseded in its entirety by this General License 1A.

Andrea Gacki  
Director  
Office of Foreign Assets Control

Dated: December 18, 2019

2021-1246 (CKK): 0000005839

*Periodic Report on the National Emergency  
With Respect to Serious Human Rights Abuse and Corruption*

I hereby report to the Congress on developments and expenditures relating to the national emergency declared in Executive Order 13818 of December 20, 2017 (E.O. 13818), which blocks the property of persons involved in serious human rights abuse or corruption. This report covers actions taken in the exercise of national emergency authorities, pursuant to section 204(c) of the International Emergency Economic Powers Act (IEEPA), 50 U.S.C. 1703(c), and implementing regulations set forth at 31 C.F.R. Part 583. It also covers expenses that are directly attributable to the exercise of those authorities, pursuant to section 401(c) of the National Emergencies Act (NEA), 50 U.S.C. 1641(c).

IEEPA Reporting (from May 30, 2019, through October 28, 2019)

1. During this reporting period, the Department of the Treasury's Office of Foreign Assets Control (OFAC) designated 11 individuals and six entities pursuant to the authorities listed above. These designations included the July 18, 2019 designation of four Iraqi individuals associated with human rights abuse or corruption, including two militia leaders and two former governors, and the September 13, 2019 designation of the former Ugandan Inspector General of Police for being the leader of an entity engaged in serious human rights abuse and corruption. They also included the October 10, 2019 designation of four individuals for their engagement in corruption, including bribery and misappropriation of state assets, in South Africa, and the October 11, 2019 designation of two individuals for their involvement in bribery, kickbacks, and procurement fraud with senior government officials in South Sudan. Additionally, six companies were designated as they were determined to be owned or controlled by those individuals.

2. OFAC closed 17 licensing cases (which may take the form of specific licenses, license amendments, "return-without-action" letters, general information letters, interpretive guidance letters, denial letters, closed without determination letters, or withdrawals), and received reports of the blocking of six transactions totaling approximately \$16,000, pursuant to the authorities referenced above.

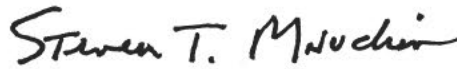


3. OFAC has continued to respond to public inquiries regarding this program during its numerous outreach events to the financial, securities, and international trade and other communities. Details of this program are available on the Department of the Treasury's website.

NEA Reporting (from June 20, 2019, through December 19, 2019)

4. The expenses incurred by the federal government that are directly attributable to the exercise of powers and authorities conferred by the declaration of a national emergency with respect to serious human rights abuse and corruption around the world are reported to be approximately \$1.9 million, most of which represent wage and salary costs for federal personnel. Personnel costs were largely centered in the Department of the Treasury, the Department of State, and the Department of Justice. This amount reflects only costs associated with the national emergency declared in E.O. 13818 of December 20, 2017, and does not include any costs incurred pursuant to other human rights or regional sanctions programs.

I shall continue to report periodically to the Congress on significant developments as required by law.

  
Steven T. Mnuchin

Department of the Treasury

Dated: **NOV 19 2019**

**Pending Consultation with Other Treasury  
Components**

**(12 pages)**

**2021-1246 (CKK): 0000005842-0000005853**

**Pending Consultation with Other Government  
Agency**

**(2 pages)**

**2021-1246 (CKK): 0000005854-0000005855**

**Pending Consultation with Other Government  
Agency and Pending Submitter Notice Process**

**(7 pages)**

**2021-1246 (CKK): 0000005856-0000005862**

**Pending Consultation with Other Government  
Agency and Pending Submitter Notice Process**

**(4 pages)**

**2021-1246 (CKK): 0000005863-0000005866**