



DEPARTMENT OF THE TREASURY

WASHINGTON, D.C. 20220

Ferrari & Associates, P.C.
1455 Pennsylvania Ave., N.W.
Suite 400
Washington, DC 20004

JAN 22 2020

Re: Oleg Deripaska

Dear Mr. Ferrari:

As you are aware, on April 6, 2018, the Department of the Treasury's Office of Foreign Assets Control (OFAC) designated Oleg Deripaska pursuant to Executive Order 13661 of March 16, 2014, Blocking Property of Additional Persons Contributing to the Situation in Ukraine, and Executive Order 13662 of March 20, 2014, Blocking Property of Additional Persons Contributing to the Situation in Ukraine. On June 20, 2019, you filed a lawsuit against OFAC in the United States District Court for the District of Columbia (case no. 19-cv-727), alleging, among other things, that OFAC had failed to provide notices of the bases for Mr. Deripaska's designation.

On April 29, 2019, OFAC, through the Department of Justice (DOJ), provided a copy of the administrative record regarding Mr. Deripaska, which contained redactions of classified or otherwise protected or sensitive information. On December 6, 2019, OFAC, through DOJ, agreed to endeavor to provide an unclassified summary of information in the administrative record that is classified.

As such, please find enclosed additional non-privileged and unclassified information regarding the basis for Mr. Deripaska's designations. This, coupled with our response dated April 29, 2019, completes the releasable information contained in the administrative record.

For the most direct response, please submit any follow up questions and correspondence to OFAC via the following email address: OFAC.Reconsideration@treasury.gov, or to our attorney at DOJ, Nicholas Cartier, at [REDACTED]

You may also contact OFAC at the following mailing address:

U.S. Department of the Treasury
Office of Foreign Assets Control
ATTN: Office of Global Targeting
1500 Pennsylvania Ave., N.W. (Freedman's Bank Building)
Washington, DC 20220

Sincerely,

Leila Baheri
Assistant Director
Global WMD, Middle East, Europe & Russia Division
Office of Global Targeting
Office of Foreign Assets Control

Enclosure

UNCLASSIFIED

UKRAINE-EO13661-13321

(U) As of late January 2012, then Prime Minister Vladimir Putin had reportedly compelled Russian oligarchs to invest in projects associated with the 2014 Sochi Olympics; this included an \$800 million investment by Oleg Deripaska.

(U) As of late January 2018, Deripaska was reported to have financed projects upon request of Vladimir Putin and senior Russian officials.

(U) Deripaska had reportedly once cancelled an IPO of his company, Gaz, to hide Russian President Vladimir Putin's money laundering through the company, as recently as September 2017.

(U) In December 2016, Deripaska was reportedly identified as one of the individuals holding assets and laundering funds on behalf of Russian President Vladimir Putin.

(U) In or before July 2011, Deripaska's business activity was reportedly used, on at least one occasion, as a cover to facilitate the transfer of funds for the personal use of then Russian Prime Minister Vladimir Putin.

(U) In late 2004, Deripaska reportedly acted on verbal instructions from President Vladimir Putin in a high-level bilateral meeting between Russian and Kyrgyz representatives.

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