

From: "MOFFA, JONATHAN C. (DO) (FBI)" <JCMOFFA@fbi.sgov.gov>  
To: "PRIESTAP, E. W. (CD) (FBI)" <EWPRIESTAP@fbi.sgov.gov>  
Subject: Alfa --- [REDACTED]  
Sent: Mon, 24 Jul 2017 10:33:34 +0000  
CommExploitation AlfaBank 10032016.docx  
Examination of Alfa-Bank Servers by Russian IT Company Group-IB.pdf  
030917 TPs re CH cases - final.docx  
White Paper Report TOR Final.docx

Classification: [REDACTED]

[REDACTED]

=====

Bill,

Here are a few things I could find related to Alfa Bank. Hope they help. I would definitely recommend reaching out to Brian/Joe/Paul et al though since more may have been done, the below may have been adjusted (and I know theUSIC examined this as well but I don't have those results electronically I don't think)...

The third attachment below are some talking points that were put together by Lisa and the 7<sup>th</sup> floor but the doc contains a few summary bullets on Alfa.

Thanks,

J

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Classification: [REDACTED]

SCO-FBIPROD\_021320

SCO\_094866





[REDACTED]  
**FBI INTERNAL USE ONLY**

Effective 11-23-2015

## COMMUNICATIONS EXPLOITATION

Chicago Division, Squad I-4

3 October 2016  
[REDACTED]

[REDACTED]

[REDACTED] FBI Chicago assesses Alfa-Bank and Trump Organization-related servers almost certainly<sup>a</sup> did not communicate intentionally or covertly. [REDACTED]

[REDACTED] FBI Chicago has high confidence<sup>c</sup> in this assessment, which is based on a highly reliable sensitive source with excellent access and corroborates FBI investigative activity conducted to date.

(U) Scope Note

(U) Information in this document was derived from searches of DWS and Sentinel.

<sup>a</sup> Appendix A: Expressions of Likelihood (or Probability)

b [REDACTED]

<sup>c</sup> Appendix B: Confidence in Sources Supporting Assessments and Judgments

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Effective 11-23-2015  
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[REDACTED]  
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[REDACTED] FBI Chicago assesses Alfa-Bank and Trump Organization servers almost certainly did not communicate intentionally, based on an examination of Alfa-Bank servers [REDACTED] Alfa-Bank IT employees. Their examination hypothesized Alfa-Bank DNS servers may have conducted DNS lookups of mail1.trump-email.com in response to spam e-mail sent by US digital marketing companies Listrak or Cendyn One, which are associated with IP subnet 66.216.133.0/24 and domain mail1.trump-email.com, respectively. Furthermore, [REDACTED] Alfa-Bank set up new monitoring and filtering sensors to detect and block future connection attempts.

- [REDACTED] According to a sensitive source with excellent access, on an unknown date Stuart Bruseth, using email address sbruseth@letterone.com<sup>d</sup>, sent four individuals scans of documents which allegedly proved there was an active link between Alfa-Bank DNS servers and the domain mail1.trump-email.com.

[REDACTED]  
(U) Investigation Background

[REDACTED] On or about 19 September 2016, an anonymous third party provided the US Department of Justice (DOJ) a whitepaper indicating a US-based server owned by the Trump Organization – domain mail1.trump-email.com, associated with IP address 66.216.133.29 – had been covertly communicating with servers at Alfa-Bank in Moscow, Russia – IP addresses 217.12.97.15 and 217.12.96.15 – between 4 May 2016 and 4 September 2016.

(U) Source: [REDACTED] FBI; Create Case Request: 23 September 2016; 19 September 2016; [REDACTED]  
[REDACTED] serial 1: [REDACTED] Opening EC - ALFA BANK; [REDACTED]  
Information from an anonymous source of unknown reliability

[REDACTED]  
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[REDACTED]  
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- [REDACTED]
- [REDACTED]

[REDACTED] Alfa-Bank's conclusions corroborate current FBI investigative activity, which has not identified any evidence to support the whitepaper's hypothesis that Alfa-Bank and Trump Organization servers intentionally, covertly communicated via DNS channels.

- (U//FOUO) On 23 September 2016, the Director of US company Cendyn One informed the FBI that domain trump-email.com had very limited traffic over its lifespan. The domain had received approximately 14 e-mails over several years, all of which were blocked as spam or malware.<sup>7</sup>
- [REDACTED]
- [REDACTED]

(U) Investigative/Intelligence Gaps

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[REDACTED]



[REDACTED]  
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- [REDACTED] On what date and from whom did Stuart Bruseth acquire information about the potential connection between Alfa-Bank servers and mail1.trump-email.com?
- [REDACTED] To what degree is LetterOne influenced by, directed by, or indebted to Alfa-Bank and the Government of Russia? In what ways does the relationship influence LetterOne's investment activities in the United States?

**Consumer:** SSA Daniel Wierzbicki  
SA Allison Sands

**Approval:** SIA Terry Ober

**Contacts:** IA Jessie Marie Eisenbart

(U) This Communication Exploitation was prepared FBI Chicago and addresses the following threat citation, HQ-CD-201-II-17.

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[REDACTED]  
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**(U) Appendix A: Expressions of Likelihood (or Probability)**

(U) Phrases such as “the FBI judges” and “the FBI assesses,” and terms such as “likely” and “probably” convey analytical judgments and assessments. The chart approximates how expressions of likelihood and probability correlate with percentages of chance.

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Terms of Likelihood	Almost No Chance	Very Unlikely	Unlikely	Roughly Even Chance	Likely	Very Likely	Almost Certain(ly)
Terms of Probability	Remote	Highly Improbable	Improbable (Improbably)	Roughly Even Odds	Probable (Probably)	Highly Probable	Nearly Certain
	1-5%	5-20%	20-45%	45-55%	55-80%	80-95%	95-99%

(U) Unless otherwise stated, the FBI does not derive judgments via statistical analysis.

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[REDACTED]  
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**(U) Appendix B: Confidence in Sources Supporting Assessments and Judgments**

(U) Confidence levels reflect the quality and quantity of the source information supporting judgment. Consequently, the FBI ascribes high, medium, or low levels of confidence to assessments, as follows:

(U) **High confidence** generally indicates the FBI's judgments are based on high quality information, from multiple sources. High confidence in a judgment does not imply the assessment is a fact or a certainty; such judgments might be wrong. While additional reporting and information sources may change analytical judgments, such changes are most likely to be refinements and not substantial in nature.

(U) **Medium confidence** generally means the information is credibly sourced and plausible but not of sufficient quality or corroborated sufficiently to warrant a higher level of confidence. Additional reporting or information sources have the potential to increase the FBI's confidence levels or substantively change analytical judgments.

(U) **Low confidence** generally means the information's credibility or plausibility is uncertain, the information is too fragmented or poorly corroborated to make solid analytic inferences, or the reliability of the sources is questionable. Absent additional reporting or information sources, analytical judgments should be considered preliminary in nature.

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September 2016:

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<sup>9</sup> (U//FOUO) FBI: DWS: PIDs 261835281E, 261847133E: [REDACTED]  
September 2016; [REDACTED] [REDACTED]

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**FEDERAL BUREAU OF INVESTIGATION**  
Import Form

Form Type: TacticalProduct

Date: 10/03/2016

Approved By: SIA Terry J Ober

Drafted By: Jessie Marie Eisenbart

Case ID #:

ALFA BANK;  
FCI RUSSIA - CONTACTS /  
AGENTS  
SENSITIVE INVESTIGATIVE  
MATTER

SCO-FBIPROD\_021328

SCO\_094874



[REDACTED]  
Title: [REDACTED]

Re: [REDACTED]  
[REDACTED]

**Synopsis:** [REDACTED] FBI Chicago assesses Alfa-Bank and Trump Organization-related servers almost certainly did not communicate intentionally or covertly, [REDACTED] and subsequent preventative steps employed by the companies. FBI Chicago has high confidence in this assessment, which is based on a highly reliable sensitive source with excellent access and corroborates FBI investigative activity conducted to date.

**Enclosure(s):** Enclosed are the following items:

1. [REDACTED]  
[REDACTED]

♦♦

[REDACTED]  
2  
SCO-FBIPROD\_021329

SCO\_094875



**Talking Points re Crossfire Hurricane Cases**  
**March 8, 2017**

**Introduction:**

- (U//FOUO) There has been an extraordinary amount of speculation regarding the FBI's investigative efforts into potential ties between Russia and members of the Trump campaign. I'm here today to describe what the FBI is and is not doing with regard to these matters.
- [REDACTED] Hostile foreign governments deploy a wide range of foreign influence techniques. Foreign influence—also known as political influence—is defined as foreign-directed perception management or active measures operations intended to influence U.S. priority policies or policymakers in order to adversely affect national security. The FBI has always worked to disrupt foreign influence activities; this effort existed in the lead-up to the 2016 Presidential election and continues today. Of course the FBI's work in this regard is not just focused on Russia.
- [REDACTED] Of primary concern to us are intelligence officers: those people trained to identify, recruit, and direct people to do things like gain access to classified information and otherwise clandestinely act as their agents. In the years preceding the election, the FBI is aware of contact between Russian intelligence officers and Carter Page; however, we did not see contact between Russian intelligence officers and members of the Trump campaign or administration, either in the months preceding the election or afterwards.
- [REDACTED] A second category includes overt diplomats and government officials, people who, while not trained intelligence officers, still interact with U.S. government officials in many different contexts in order to pursue their nation's policy objectives. This category includes people like Russian Ambassador Sergey Kislyak [REDACTED]  
[REDACTED]
- [REDACTED] A final group are personnel who function as co-optees, access agents, or agents of influence, who are not employed by a foreign government but nonetheless are used to advance governmental aims. For example, the FBI commonly encounters individuals who are Russian oligarchs or businessmen who may be motivated by a confluence of personal, business, and patriotic reasons. The FBI's challenge and objective is to discern whether a particular action is motivated by the individual's own interest, the foreign nation they are associated with, or some combination of both. As part of this current effort, the FBI is looking at these types of Russian actors and their efforts targeting



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individuals affiliated with the Trump campaign and administration, which I will describe next.

**Predication:**

- [REDACTED] On July 27, 2016, a friendly foreign government contacted the FBI to advise that in May 2016, George Papadopoulos, an individual identified at that time by then-Presidential Candidate Trump as an official foreign policy advisor for the Trump campaign, told him/her that Papadopoulos was aware that, as described by the foreign government, "the Trump team had received some kind of suggestion from Russia that it [Russia] could assist [the campaign] with the anonymous release of information during the campaign that would be damaging to Mrs. Clinton (and President Obama)." This statement predicated the CROSSFIRE HURRICANE umbrella investigation.
  - [REDACTED] Papadopoulos did not identify the campaign individual who purportedly received the suggestion from Russia, nor did he identify how or whether the Trump team reacted to the offer. In an effort to identify the potential recipient of the "suggestion," the FBI identified four individuals who it deemed more likely to have engaged in such contact with the Russians.
- [REDACTED] The below summaries provide a snapshot as of this moment of the current status of the still ongoing investigations.

**Crossfire Hurricane Cases:**

- [REDACTED] **George Papadopoulos** [REDACTED] - In mid-March 2016, George Papadopoulos was identified by then-Presidential Candidate Trump as an official foreign policy advisor for the Trump campaign.
  - [REDACTED] The FBI interviewed Papadopoulos on multiple occasions in late January and early February, 2017. Papadopoulos admitted to receiving information in early 2016 from a UK-based think tank director with professed connections to the Government of Russia. According to Papadopoulos, the think tank director stated Russia possessed "dirt on [Clinton]" in the form of "thousands" of emails. Papadopoulos also admitted to contact with the same friendly foreign government that provided the FBI with the predicated information. However, Papadopoulos has not confirmed the information reported by the friendly foreign government source regarding Papadopoulos's knowledge of contact between the Trump team and the Russians.
  - [REDACTED] Since his last interview in mid-February, Papadopoulos has refused to meet with the FBI.
- [REDACTED] **Carter Page** [REDACTED] - In mid-March 2016, Carter Page was identified by then-Presidential Candidate Trump as an official foreign policy advisor for the Trump campaign. Page also has a long history of ties to the Russian Federation, including business relationships, financial investments, travel, and direct contact with Russian Foreign Intelligence Service (SVR) intelligence officers, and had been an FBI CI subject prior to the Crossfire Hurricane investigation.
  - [REDACTED] In reports prepared by CROWN, a former FBI CHS, Page was reported to have had "secret meetings" in early July 2016 with a named individual in Russia's



[REDACTED]

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Presidential Administration during which they discussed Russia's release of damaging information on Hillary Clinton in exchange for alterations to the GOP platform regarding U.S. policy towards Ukraine. (This statement has not yet been corroborated). The reports prepared by CROWN further indicated that Paul Manafort was reported to have initially "managed" the relationship between Russian government officials and the Trump campaign, using Carter Page as an intermediary. In the wake of increased media scrutiny over his dealings with Russia, Page's role in the campaign was publicly disavowed in late September 2016, and after that time there appears to be minimal contact between Page and members of the Trump campaign and administration.

- [REDACTED] coverage of Page was authorized on October 21, 2016, and renewed in mid-January 2017. No drafts of the [REDACTED] applications were "denied" by the Court.
- [REDACTED] **Paul J. Manafort, Jr.** [REDACTED] - Paul Manafort was the campaign chairman and chief strategist for then-Presidential candidate Donald Trump between May and August 2016. Manafort has long standing ties to current and former members of the pro-Russian political faction in Ukraine, including ties with former Ukrainian president Viktor Yanukovich, and he has conducted business deals with Russian and Ukrainian oligarchs.
  - [REDACTED] In reports prepared by CROWN, a former FBI CHS, Manafort was reported to have initially "managed" the relationship between Russian government officials and the Trump campaign, using Carter Page as an intermediary. (This statement has not yet been corroborated). In the wake of increased media scrutiny over his dealings with Russia and Ukraine in mid-August 2016, Manafort was initially demoted within the Trump campaign and subsequently resigned.
- [REDACTED] **Michael Flynn** [REDACTED] - Retired Lieutenant General and former DIA Director Michael T. Flynn was a foreign policy advisor to then-Presidential Candidate Trump since late 2015. Flynn has a history of ties to the Russian Federation, including professional relationships, travel, and direct contact with staff at the Russian Embassy in Washington, D.C.
  - [REDACTED] Flynn engaged in a series of telephone calls with Russian Ambassador Kislyak in late December 2016, including discussions about a UN vote on Israeli settlements and discussions regarding the U.S. expulsion of Russian diplomats and facility closures.
    - These calls were collected via traditional FBI [REDACTED] coverage of the Russian Embassy in Washington, D.C.
    - This collection did not involve Section 702.
    - The FBI routinely monitors foreign establishments to understand their clandestine intelligence activities here in the U.S. Importantly, while this activity targets the foreign power, in pursuit of its counterintelligence mission, the FBI monitors this collection in an effort to discover U.S.



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persons who may be targeted by the foreign power, or engaged in clandestine intelligence gathering on behalf of a foreign power.

- o (U//FOUO) Flynn was interviewed by the FBI on January 24, 2017.

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**Potential Questions and Answers re Crossfire Hurricane Cases  
March 8, 2017**

[REDACTED]

**(U//FOUO) If asked about POTUS Tweets:**

- [REDACTED] To date, the FBI has not conducted electronic surveillance targeting Candidate Trump or President Trump, his "server," or any member of his administration, now, or during the campaign. Media reports indicating otherwise are inaccurate.
- [REDACTED] Additionally, no draft [REDACTED] applications regarding these areas were presented to the [REDACTED] Court and withdrawn. That reporting is also inaccurate.
  - [REDACTED] **Alfa Bank:** In fall 2016, the FBI received an allegation that Alfa Bank, a Russian bank with close ties to the Kremlin, was covertly communicating with the Trump campaign. In assessing this allegation, the FBI determined that a U.S.-based server, which housed an email domain previously used to send advertising emails on behalf of President Trump's hotel business, was trying to communicate with the bank's server.
  - [REDACTED] A U.S.-based company administered the email domain and the related hotel business marketing campaign, and a separate U.S.-based company ran a U.S.-based server that housed it. The administering company indicated the email domain had been discontinued by Trump's hotel business. Ultimately, the FBI (and two private computer security companies) found no evidence of emails being sent between the bank and the candidate's discontinued business domain.
  - [REDACTED] And contrary to press reports, no [REDACTED] surveillance was used to investigate the Alfa Bank allegation regarding the server, and no draft applications were presented to the FISC.

**If asked about CROWN/Steele:**

- [REDACTED] CROWN, a former FBI CHS, is a former friendly foreign intelligence service employee who has reported for about three years, and some of whose reporting has been corroborated. CROWN has been previously compensated by the FBI, however, the



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information regarding Russian activities directed at the Trump campaign was collected by CROWN on behalf of private clients.

- [REDACTED] CROWN maintains a network of sub-sources, who, in many cases, utilize their own sub-sources. CROWN's reporting in this matter is derived primarily from a Russian-based source, who uses a network of sub-sources. The FBI has no control over the Russian-based sub-source or any of the sub-sources used by the Russian-based sub-source.
- [REDACTED] The FBI did not pay CROWN for the information on Russia's activities relating to Trump and the Trump campaign. The FBI only paid for CROWN's travel arrangements to meet with us.
  - Independent of his pre-existing source relationship to the FBI, CROWN was retained by an individual who been hired, first by a Republican primary challenger to Trump (identity unknown to the FBI), and later by an entity related to the Democratic Party (identity also unknown to the FBI).
  - Following his collection and production of information to his client(s), CROWN approached and voluntarily provided the FBI with the information he had collected, based on his stated patriotic concern about the nature of the information.
  - [REDACTED] After receiving the information, the FBI met with CROWN and told him that while the allegations in the reports were significant, the FBI needed evidence to support the allegations made in the reporting. The FBI stated that depending on the nature of such evidence, the FBI might be willing to pay for such material.

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**Redlines re Crossfire Hurricane Cases  
March 7, 2017**

- Discussion of the identity of the foreign nation providing the predicated information.
- [REDACTED]
- Discussion related to the FBI's input into the AG's recusal decision, on deliberative process grounds.
- Discussion of whether any US Attorney's office has been assigned to any case, as well as detail regarding future investigative strategy or prosecutive discussion.

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[REDACTED]

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[REDACTED]

**INTELLIGENCE MEMO**

FBI Counterintelligence Division, Special Project  
26 September 2016  
[REDACTED]

[REDACTED]

**Server in Russia Registered to Alfa Bank Communicating with Trump Organization Server**

[REDACTED] FBI Counterintelligence Division has reviewed material provided by a source to the FBI on 19 September 2016. The material concluded a Trump Organization server is covertly communicating with a server registered to Alfa Bank, one of Russia's largest banks. According to the source-provided material, these communications have taken place directly between servers as well as through multiple layers of obfuscation using (a) TOR and (b) a compromised server owned by Spectrum Health in Michigan.

[REDACTED] Although FBI Chicago and FBI Miami are continuing to investigate, including obtaining log data, the preliminary assessment is that it is unlikely, though possible, that the server was used in the way described in the source-provided material.

[REDACTED] *FBI Summary of Source-Provided Report on Identified Trump Organization Server*

(U) The Trump Organization server, mail1.trump-email.com hosted by Pennsylvania-based Listrak, highly restricts the sources from which it accepts emails, and this server only had look-ups from 19 IP addresses between 4 May and 4 September 2016. During this time period, the majority of look-ups came from an Alfa Bank server.

- (U) The report provided to the FBI characterizes this activity as highly suspect considering the size of the organization and how much email activity it would typically process over a 90-day period.
- (U) Listrak handles mass marketing emails for which many recipient servers conduct tens or hundreds of thousands of look-ups to verify a server (e.g., for spam or malware), and

[REDACTED]

[REDACTED]

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such look-ups would be equally distributed among organizations associated with the IP addresses.

- (U) The majority of look-ups from Alfa Bank suggested to the report's authors that this mail server was set up to masquerade as a regular, non-mail server, and that it may be facilitating a form of secure communications.

[REDACTED] The source-provided report identified the Trump Organization server-in-question as a mail server, mail1.trump-email.com, using IP address 66.216.133.29. The parent domain was noted as trump-email.com, which is registered to the Trump Organization. FBI Miami confirmed that trump-email.com is a mail server used by Trump Hotels. Central Dynamics, in partnership with Trump Organization, established the mail1.trump-email.com in 2009. The domain was never used by Central Dynamics and does not currently point to an active mail server. A review of the domain's spam filter showed receipt of 15 inbound emails, one of which passed through the server's filter, and an additional email marked as spam and blocked. The receipt dates of these emails are unknown at this time.

- (U) The mail server mail1.trump-email.com is hosted by Pennsylvania-based Listrak, which is a customer relationship management company providing large-scale distribution of marketing emails.
- (U) The mail server mail1.trump-email.com is configured to only accept emails from pre-determined and pre-approved IP addresses, which indicates that this is an active mail server, though it highly restricts the sources from which it will accept emails.

(U) From 4 May to 4 September 2016, 19 IP addresses attempted to send email to mail1.trump-email.com. Further, the IP addresses which attempted to contact this server the most belonged to Alfa Bank, Spectrum Health, and Domo, Inc., a VPN provider in Salt Lake City, Utah.

- (U) The majority of look-ups coming from Alfa Bank IP addresses were for the A (regular) record as opposed to MX (mail record), which implies that this mail server was set up to masquerade as a regular (non-mail) server. Further, A record look-ups are appropriate for another form of communication (e.g., VPN, secure connection, text connection, etc.).

[REDACTED]

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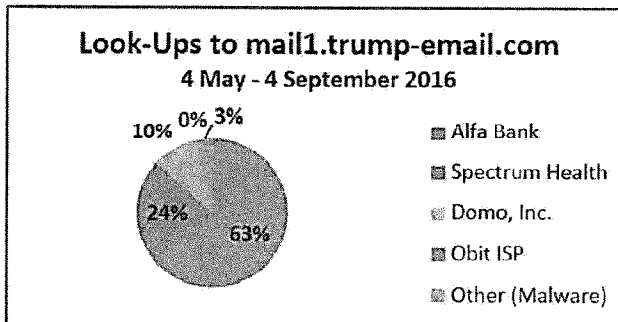


[REDACTED]

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(U) The activity breakdown for this time period (975 total look-ups for this email server) is as follows:

IP Address Org.	Look-Ups
Alfa Bank	614
Spectrum Health	230
Domo, Inc.	98
Obit ISP <sup>1</sup>	1
Other	32



(U) The Spectrum Health IP address 167.73.110.8 is being used by Alfa Bank as a TOR exit node to communicate with the mail1.trump-email.com server. This implies that this IP address is either the victim of a computer intrusion or internal entities intentionally configured it as a TOR node. *[ANALYST COMMENT: The report does not include substantiation regarding Alfa Bank's use of the Spectrum Health IP address as a TOR exit node, but that information may be gleaned from the TOR Project.]*

• [REDACTED]

**[REDACTED] FBI Reporting on Alfa Bank and Its Connection to Russian Government Officials and Russian Intelligence Services (RIS)**

(U) Alfa [Alpha] Group Consortium (aka Alfa Group) is one of Russia's largest privately-owned investment groups. Open source reporting on Alfa Bank, owned by Alfa Group, identifies Mikhail Fridman, German Khan, Petr Aven, and Alexei [Aleksey] Kuzmichev as its key executives.

[REDACTED] From 2008 to 2015, FBI reporting described ties between Alfa Bank and/or key executives and the Russian intelligence services (RIS).

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<sup>1</sup> (U) Obit ISP is located in St. Petersburg and is owned by Alfa Bank.

[REDACTED]

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[REDACTED]

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- [REDACTED] In 2003, FBI reporting stated that the Solntsevo Organized Crime Syndicate, founded by members of the KGB, allegedly used Alfa Bank to move unknown funds. The group's leaders have close affiliations with Mikhail Fridman. In April 2014, a source reported that German Khan represented the interests of Solntsevo within the Alfa Group Consortium (Alfa Group). In comparison to Mikhail Fridman and Petr Aven, the source noted that Khan had the most criminal background. Additionally, the source reported that Fridman and Aven did business for the KGB.<sup>1,2,3</sup>
  - [REDACTED]
    - [REDACTED] From February 2008 to February 2012, Rogozin served as the Vice Counsel at the Russian Consulate in New York. In 2013, he was on a three-month temporary duty assignment (TDY) to the Russian Embassy in Washington, DC. The U.S. Department of State declared Rogozin persona non grata before the completion of his TDY.<sup>5</sup>
    - [REDACTED]
    - From 19 January 2016 to 21 September 2016, 138 applicants listed their employer as Alfa Bank, or a variant thereof, on their NIV application. Three of these individuals listed Alfa Bank's address as their own. Of possible interest, seven applicants listed their occupation as 'Computer Science.' The applicants were of the following nationalities: Russia (128); Belarus (4); Uzbekistan (2); Kyrgyzstan (2); Ukraine (1); Israel (1). Additionally, the largest number of applicants, 28 in total, arrived the week of 24 April 2016.
  - [REDACTED] On 28 July 2015, an FBI contact reported that Mikhail Fridman received financial support from the Government of Russia (GOR). Fridman had been trying to ally himself with Western businesses (NFI).<sup>7</sup>
  - [REDACTED] Petr Aven, the president of Alfa Bank from 1994 to June 2011, maintains a close relationship with Vladimir Putin. According to an FBI report, the two men were business partners in the early 1990s and, as of late 1998, Putin was on Alfa Bank's payroll. Aven currently sits as the chairman to Alfa Bank's Luxembourg-based investment holding company.<sup>8,9,10</sup>
- [REDACTED]

[REDACTED]

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<sup>8</sup> (U) Web site; Wikipedia.com; "Pyotr Aven"; 9 September 2016; [https://en.wikipedia.org/wiki/Pyotr\\_Aven](https://en.wikipedia.org/wiki/Pyotr_Aven); accessed on 21 September 2016; Wikipedia is a web-based, free-content encyclopedia project.

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