

Exhibit A

The Washington Post

1301 K STREET, N.W.
WASHINGTON, D.C. 20071-7403

January 17, 2024

VIA FEDEX

FOIA/PA Request
FOIA and Transparency
Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220.

Re: Freedom of Information Act Request

Dear FOIA & Transparency Director Bittner:

Pursuant to the Freedom of Information Act (FOIA), I hereby request the following:

A. All licenses issued by the Office of Foreign Office Control (OFAC) to any entity permitting it to manage seized property—including licenses granted to the FBI, U.S. Marshals Service, the New York Department of Financial Services, and/or any U.S. Attorney's Office—between January 1, 2017 and the date this request is completed.

For your convenience, an example of one such license, granted by OFAC to the FBI, U.S. Attorney for the Southern District of New York, and N.Y. County District Attorney in 2008, is attached hereto as Exhibit A.

B. Copies of the OFAC-specific license database, for both individuals and companies, for every year including and since the year 2009. Note that OFAC published this database for the year 2008 at <https://home.treasury.gov/footer/freedom-of-information-act/electronic-read-room/ofac-frequently-requested>, and this request seeks copies of the equivalent database for 2009 through the present.

- C. *All licenses issued by OFAC to Amentum Services Inc. and CWS Asset Management & Sales Group between January 1, 2017 and the date this request is completed.*
- D. *All contracts awarded by the Department of Treasury to Amentum Services Inc. and CWS Asset Management & Sales Group between January 1, 2017 and the date this request is completed.*
- E. *All Treasury records, including but not limited to licenses and contracts, related to any assets in the possession of the Treasury, including OFAC and the Executive Office of Asset Forfeiture, seized from or forfeited by any Russian target targeted since February 1, 2022. This request includes but is not limited to licenses and contracts related to:*

The Motor Yacht Amadea, which the Justice Department stated on October 23, 2023, had been seized by the U.S. government and put “under the control of the U.S. Government in San Diego, California”¹;

The Motor Yacht Tango, which the Justice Department seized in Spain according to an April 4, 2022 DOJ press release²;

Any property previously owned by Viktor Vekselberg, including those described in a February 24, 2023 Department of Justice press release³; and

Records that mention any of following yachts: Lena; Sailing Yacht A (SY A); and Lady M, seized by Italian officials; Valerie, seized in Spain; and Amore Vero, seized by French officials.

¹ “Civil Forfeiture Complaint Filed Against \$300 Million Superyacht Amadea Involved In Sanctions Evasion,” October 23, 2023, <https://www.justice.gov/usao-sdny/pr/civil-forfeiture-complaint-filed-against-300-million-superyacht-amadea-involved#:~:text=The%20Amadea%20is%20currently%20under,request%20from%20the%20United%20States>.

² “\$90 Million Yacht of Sanctioned Russian Oligarch Viktor Vekselberg Seized by Spain at Request of United States, April 4, 2022, <https://www.justice.gov/opa/video/90-million-yacht-sanctioned-russian-oligarch-viktor-vekselberg-seized-spain-request-united#:~:text=Video-%2490%20Million%20Yacht%20of%20Sanctioned%20Russian%20Oligarch%20Viktor%20Vekselberg%20Seized,at%20Request%20of%20United%20States&text=Spanish%20law%20enforcement%20today%20executed,sanctioned%20Russian%20oligarch%20Viktor%20Vekselberg>.

³ “Civil Forfeiture Complaint Filed Against Six Luxury Real Estate Properties Involved In Sanctions Evasion And Money Laundering,” February 24, 2023, <https://www.justice.gov/usao-sdny/pr/civil-forfeiture-complaint-filed-against-six-luxury-real-estate-properties-involved>

If you regard these documents as potentially exempt from FOIA's disclosure requirements, I request that you nonetheless exercise your discretion to disclose them. As FOIA requires, under 5 U.S.C. § 552(a)(8), **please release all segregable, non-exempt portions** of documents. To permit me to reach an intelligent and informed decision whether to file an administrative appeal of any denied material, please describe any withheld records (or portions thereof) and explain the basis for your exemption claims.

Moreover, as FOIA requires, please review whether there is any foreseeable harm from disclosing the requested records, or if any potential harm would be limited in comparison to the public interest in disclosure.

As a representative of the news media, The Washington Post qualifies for **news media fee status** under 5 U.S.C. § 552(a)(4)(A)(ii)(II) and, therefore, may not be charged search and review fees. *See National Security Archive v. Department of Defense*, 880 F.2d 1381 (D.C. Cir. 1989). This request is made as part of a scholarly and news research project that is intended for publication and is not for commercial use. For details on the Post's news reporting activities please see our website at www.washingtonpost.com.

As you know, 5 U.S.C. § 552(a)(4)(A)(viii)(I) prohibits agencies from charging news media organizations duplication fees if the agency does not meet its twenty working day time limit (thirty working days for "unusual" requests).

Additionally, because this information will be used by the Post for the preparation of news articles that will be broadly disseminated to the general public, it will contribute significantly to public understanding of the operations or activities of the government and is not primarily in the Post's commercial interest. As such, please grant a **fee waiver** for any remaining fees incurred.

Please notify me before incurring any cost over \$100.

To expedite the release of the requested documents, please disclose them on an interim basis in **electronic format** as they become available to you, without waiting until all the documents have been processed. If you have any questions regarding my request, including its scope, please contact me at nate.jones@washpost.com

Sincerely,
/s/
Nate Jones

EXHIBIT A



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

LICENSE No. NPW-448

LICENSE

(Granted under the authority of 50 U.S.C. §§ 1701 *et seq.*, 50 U.S.C. §§ 1601 *et seq.*, 3 U.S.C. § 301, Executive Order 13382 and 31 C.F.R. Part 501.)

To: Federal Bureau of Investigation	U.S. District Attorney Court	N.Y. County District Attorney
Internal Revenue Service	Southern District of N.Y.	One Hogan Place
26 Federal Plaza	One St. Andrew's Plaza	New York, N.Y. 10013
New York, N.Y. 10278	New York, N.Y. 10007	Attn: AUSA-in-Charge
Attn: Special Agent-in-Charge	Attn: AUSA-in-Charge	

(collectively, the "Licensees")

1. Based on information available to the Office of Foreign Assets Control, the transactions and activities delineated in this License are hereby authorized.
2. This License is granted upon the condition, among others, that the Licensees comply in all respects with all regulations, rulings, orders, and instructions issued by the Secretary of the Treasury under the authority of the International Emergency Economic Powers Act, 50 U.S.C. §§ 1701 *et seq.*, the National Emergencies Act, 50 U.S.C. §§ 1601 *et seq.*, Section 301 of Title 3 of the United States Code, and the terms of this License.
3. The Licensees shall furnish and make available for inspection any relevant information, records, or reports requested by the Secretary of the Treasury or any other duly authorized officer or agency.
4. This License is not transferable and is subject to the provisions of the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 *et seq.*), Executive Order 13382 of June 28, 2005, the provisions of 31 C.F.R. Part 501, and rulings issued pursuant thereto. This License may be revoked or modified at any time at the discretion of the Secretary of the Treasury. If this License was issued as a result of willful misrepresentation, it may, at the discretion of the Secretary of the Treasury, be declared void from the date of its issuance or from any other date.
5. This License does not excuse compliance with any law or regulation administered by the Office of Foreign Assets Control or another agency (including reporting requirements) applicable to the transaction(s) herein licensed, nor does it release Licensee(s) or third parties from civil or criminal liability for violation of any law or regulation.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By Clara David 12/15/08
 Clara Y. David Date
 Acting Assistant Director for Licensing

Attention is directed to, *inter alia*, 50 U.S.C. § 1705 and 18 U.S.C. § 1001 for provisions relating to penalties.

LICENSE No. NPW-448

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SECTION I – AUTHORIZATION: (a) The United States Attorney’s Office, Southern District of New York, the New York County District Attorney, the Internal Revenue Service, the Federal Bureau of Investigation, local New York law enforcement agencies, and each of their agents and designees (collectively, the “Licensees”) are hereby authorized to engage in transactions in property or property interests of Assa Corporation, an entity incorporated under the laws of New York, which has been designated pursuant to Executive Order 13382 of June 28, 2005, “Blocking of Property of Weapons of Mass Destruction Proliferators and Their Supporters,” including all funds on deposit at any U.S. Bank in the name of Assa Corporation, and all funds traceable thereto (the “Blocked Property”), in furtherance of criminal investigation Case No. 315D-NY-295520, or in connection with any civil or criminal investigation, the execution of any search warrant, or any other civil or criminal action against or involving Assa Corporation, including forfeiture proceedings.

(b) Notwithstanding the authorization in Section I (a) above, the Blocked Property remains blocked and, except as authorized in Section I (a), may not be transferred or otherwise dealt in without a separate license from OFAC.

SECTION II – WARNING: The authorization set forth in this License permits certain transactions that are otherwise prohibited by laws or regulations administered by OFAC and should not be construed to interpret or excuse compliance with other laws or regulations to which the Licensees may be subject.

SECTION III – RECORDKEEPING AND REPORTING REQUIREMENTS: The Licensees are subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken pursuant to this License for a period of five years from the date of each transaction.

SECTION IV – PRECEDENTIAL EFFECT: This authorization is limited to the facts and circumstances described herein.
