

Exhibit C



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

March 1, 2024

FOIA No.: 2024-OF-00056

Nate Jones
The Washington Post
1301 K Street, N.W.
Washington, D.C. 20071-7403

VIA ELECTRONIC MAIL: nate.jones@washpost.com

Dear Mr. Jones:

This acknowledges receipt of your January 17, 2024, Freedom of Information Act (FOIA), 5 U.S.C. § 552, request to the Department of the Treasury (Treasury), seeking:

- “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 FBL US Marshals Service, the New York Department of Financial Services, and/or any US 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, US 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 OF AC-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 US. government and put "under the control of the US Government in Dan Diego, California”;

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

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

Treasury referred this matter to its Office of Foreign Assets Control (OFAC) for processing on February 28, 2024.

OFAC FOIA has transitioned to a new internal processing platform. Due to this change, your FOIA number has been modified. Please be aware, your FOIA number has changed from 2024-FOIA-00285 to **2024-OF-00056**.

OFAC is experiencing a substantial backlog of FOIA requests that has adversely affected its response time; we may encounter some delay in processing your request. Per Section 1.4(a) of the Treasury FOIA regulations, 31 C.F.R., Subtitle A, Part 1, Subpart A, the Department ordinarily processes FOIA requests according to their order of receipt. Although Treasury’s goal is to respond within 20 business days of receipt of your request, the FOIA does permit a 10-day extension of this time period. Because of what you have requested, OFAC must search multiple component divisions of OFAC to appropriately respond to your request. Due to these unusual circumstances, Treasury will invoke a 10-day extension for your request, as allowed by Title 5 U.S.C. § 552(a)(6)(B). If you care to narrow the scope of your request, please contact our office. We will make every effort to comply with your request in a timely manner; however, there are currently 409 open requests ahead of yours.

For fee purposes, we have determined that you are a “media” requester. The FOIA, specifically 5 U.S.C. § 552(a)(4)(A), and Treasury FOIA regulations at 31 C.F.R. § 1.7, allow us to recover part of the cost of addressing your request. As a “media” requester, you will be charged the cost of duplication only, excluding charges for the first 100 pages. Duplication will be assessed at 15-cents per page. You stated in your request that you are willing to pay assessable fees up to \$100.00. You requested a fee waiver. We have determined that your request for a fee waiver is moot because OFAC will process our response(s) to you in electronic format, and this cost will be de minimis.

We will query the appropriate OFAC components for responsive records. If responsive records are located, they will be reviewed for determination on release. One of our analysts will respond to your request. We appreciate your patience as we proceed.

Please be aware that, should records responsive to your request exist, they may contain sensitive business information. OFAC is required to process such records through its submitter notice process. This process can add, at minimum, an additional 30 days to the processing of your request. Please see 31 C.F.R. § 1.5.

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Please be advised that OFAC will neither confirm nor deny the existence of investigative records, pursuant to exemption (b)(7)(A) of the FOIA, unless there was an actual investigation that resulted in a designation or enforcement action, or the investigation is publicized. The mere acknowledgement of an investigation could reveal classified information and thereby cause harm to our national security posture. Until an actual designation, enforcement action or public acknowledgement of an investigation by Treasury has occurred, release of any information confirming or denying the existence of an investigation could conceivably tip off the subjects of pending investigations. The mere acknowledgement of an OFAC investigation would allow the subject of the investigation the opportunity to engage in asset flight and change their habits and routines such that an enforcement action or designation would be impossible to obtain. Conversely, if OFAC were to acknowledge that it was not investigating an individual that was actually involved in criminal activity, that information alone may embolden the individual in their continued criminal activities.

Additionally, to the extent that your request seeks records which are subject to the Foreign Narcotics Kingpin Designation Act (Kingpin Act) [21 U.S.C. §§ 1901-08], please be aware that all records or information obtained or created pursuant to the Kingpin Act is exempt from the provisions of the FOIA (5 U.S.C. § 552(b)(3)) pursuant to 21 U.S.C. § 1904(e)(3).

Your request has been assigned **FOIA No. 2024-OF-00056**. Please reference this number in any future communication. If you have any questions regarding this matter, you may contact us at our FOIA Requester Service Center via email at OFACFOIAOffice@treasury.gov or via telephone at (202) 622-2500, option 3.

Sincerely,

**Sean W.
Haynes**

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Sean W. Haynes
Date: 2024.03.01
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Sean W. Haynes
Assistant Director
Information Disclosure and Records Management
Office of Sanctions Support and Operations
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