

Exhibit 4

From: Russell, Lauren
Sent: Friday, December 20, 2024 12:26 PM
To: OFACFOIAOffice@treasury.gov
Cc: Staats, Emma; Fox, Molly Bruder
Subject: RE: Meeting Request 2025-OF-00030

Sean,

Checking in again to see if you can provide information on the status of the request. I believe you anticipated having information on whether any of the designation packages had already been processed for public release pursuant to other FOIA requests this week. We'd appreciate any updates you can provide ahead of the holidays.

Thank you,
Lauren

From: Russell, Lauren
Sent: Wednesday, December 18, 2024 11:32 AM
To: OFACFOIAOffice@treasury.gov
Cc: Staats, Emma <estaats@steptoe.com>; Fox, Molly Bruder <mbfox@steptoe.com>
Subject: RE: Meeting Request 2025-OF-00030

Sean,

Following up regarding our call last week, we understood you were going to send an email memorializing our conversation and any new information provided by the custodians that would facilitate the search of responsive records. Please send along as soon as you can.

Also, please let us know if you have identified already processed and released designation packages responsive to parts 7 and 8 of the FOIA request, and if we may anticipate receiving them on or by OFAC's December 27 deadline to respond to the request.

Thank you,
Lauren

From: Russell, Lauren
Sent: Friday, December 13, 2024 11:38 AM
To: OFACFOIAOffice@treasury.gov
Cc: Staats, Emma <estaats@steptoe.com>; Fox, Molly Bruder <mbfox@steptoe.com>
Subject: RE: Meeting Request 2025-OF-00030

Sean,

In the attached, we added specific date ranges to give to each custodian. Please let us know if the custodians have any additional insight once they review.

I am including Emma and Molly here in case you have follow-up questions or comments today.

Thank you,
Lauren

From: OFACFOIAOffice@treasury.gov <OFACFOIAOffice@treasury.gov>

Sent: Monday, December 9, 2024 9:13 AM

To: Russell, Lauren <russelll@ballardspahr.com>

Subject: RE: Meeting Request 2025-OF-00030

△ EXTERNAL

Dear Ms. Russell:

Thank you for your response. Based on your availability, we would like to schedule the meeting for **Thursday, December 12, 2024, at 1:00 pm ET**. Please use the following conference line below:

Dial-in number: **888-330-1716 or 713-353-7024**

Access Code: **491767#**

We look forward to speaking with you.

Sincerely,

OFAC FOIA

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From: Russell, Lauren <russelll@ballardspahr.com>

Sent: Friday, December 6, 2024 4:30 PM

To: OFAC FOIA Office <OFACFOIAOffice@treasury.gov>

Subject: RE: Meeting Request 2025-OF-00030

**** Caution:** External email from: [prvs=1070ee621d=russelll@ballardspahr.com] Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Thank you for reaching out. Would one of these times work for you? Thursday is preferred.

Thursday 9-10 AM, 1-2 PM, and after 3:30 PM

Friday 11-12

From: OFACFOIAOffice@treasury.gov <OFACFOIAOffice@treasury.gov>

Sent: Friday, December 6, 2024 1:31 PM

To: Russell, Lauren <russelll@ballardspahr.com>

Subject: RE: Meeting Request 2025-OF-00030

EXTERNAL

Dear Ms. Russell:

RE: FOIA No.: 2025-OF-00030

We would like to discuss the details of your request further. Please **provide your periods of availability for later next week, Wednesday – Friday** to further discuss your request with us via telephonic conference.

Thank you.

Sincerely,

OFAC FOIA

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From: Russell, Lauren <russelll@ballardspahr.com>
Sent: Friday, December 6, 2024 11:16 AM
To: OFAC FOIA Office <OFACFOIAOffice@treasury.gov>; mbfox@steptoe.com
Subject: RE: Meeting Request 2025-OF-00030

**** Caution:** External email from: [prvs=1070ee621d=russelll@ballardspahr.com] Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Mr. Haynes,

I hope you enjoyed your holiday. I wanted to confirm your receipt of the search terms and custodians, and that this request is queued up for processing. Please let us know if it would be helpful to discuss revising the suggested search parameters, and if OFAC can produce any previously released designation packages responsive to parts 7 and 8 soon.

Thank you,
Lauren

From: Russell, Lauren
Sent: Wednesday, November 27, 2024 10:11 AM
To: OFACFOIAOffice@treasury.gov; mbfox@steptoe.com
Subject: RE: Meeting Request 2025-OF-00030

Mr. Haynes,

Thank you for your time last week. Attached please find search terms and custodians for parts 1-5 of the request. We would appreciate it if you proceed with contacting all relevant custodians promptly and letting us know if these search

terms and custodians should be refined. As you know, we are not familiar with OFAC's structure and are trying our best to guess what would be helpful in identifying records of interest.

As for part 6, please use all the search terms as the names of the entities and individuals who could have submitted a reconsideration petition.

For parts 7 and 8 of the request, please move forward with determining if any designation packages have already been processed for release to other FOIA requests, and let us know if these will be produced soon.

We appreciate your assistance in facilitating process of this FOIA request and are available to discuss again to help focus OFAC's search and collection of records.

Thank you,
Lauren

From: OFACFOIAOffice@treasury.gov <OFACFOIAOffice@treasury.gov>
Sent: Wednesday, November 20, 2024 3:32 PM
To: Russell, Lauren <russell@ballardspahr.com>; mbfox@steptoe.com
Subject: RE: Meeting Request 2025-OF-00030

⚠ EXTERNAL

Dear Ms. Russell and Ms. Fox,

FOIA No.: 2025-OF-00030

I want to thank you both again for taking my telephone call this morning regarding your Freedom of Information Act (FOIA) request seeking records related to:

1. Documents containing factual information collected and reviewed by the Office of Foreign Assets Control ("OFAC") in connection with implementing the sanctions related to Executive Orders ("E.O.") 13692, 13808, 13827, 13835, 13850, 13857, and 13884.
2. Statements of policy and interpretation regarding E.O. 13692, 13808, 13827, 13835, 13850, 13857, and 13884 that were not published in the federal register.
3. Documents containing factual information collected and reviewed by OFAC in connection with implementing OFAC's Venezuela Sanctions Regulations at 31 CFR part 591.
4. Statements of policy and interpretation regarding OFAC's Venezuela Sanctions Regulations at 31 CFR part 591 that were not published in the federal register.
5. Documents containing factual information collected and reviewed by OFAC in connection with implementing any other U.S. sanctions on Venezuela.

6. Documents containing factual information collected and reviewed by OFAC in connection with any response to a reconsideration petition related to U.S. sanctions on Venezuela.

7. Documents containing factual information collected and reviewed by OFAC in connection with designating the following individuals and entities as Specially Designated Nationals and Blocked Persons under E.O. 13850: Raul Antonio Gorrin Belisario on January 8, 2019; Petroleos de Venezuela, S.A. on January 28, 2019; Evrofinance Mosnarbank on March 11, 2019; Banco Central de Venezuela on April 17, 2019; Cubametales on July 3, 2019; and Rosneft Trading S.A. on February 18, 2020.

8. Documents containing factual information collected and reviewed by OFAC in connection with designating the following individuals and entities as Specially Designated Nationals and Blocked Persons under E.O. 13692: Simon Alejandro Zerpa Delgado and Carlos Erik Malpica Flores on July 26, 2017; Rodolfo Clemente Marco Torres on January 5, 2018; Diosdado Cabello Rondón and José David Cabello Rondón on May 18, 2018; Manuel Salvador Quevedo Fernandez on February 15, 2019; Iliana Josefa Ruzza Terán on April 17, 2019.”

Per our conversation, you intend to provide clarifying search terms and custodians for parts 1-5 of your request and the entities or individuals of who’s reconsideration petition you are seeking for part 6 of your request. Additionally, you clarified the scope of your request for parts 7 and 8 to the administrative records (designation packages) supporting the designation of the individuals and entities listed.

Furthermore, if you are unable to provide the information for parts 1-6, you intend to withdraw these parts of the request and seek the clarified scope of parts 7 and 8.

If you disagree with the conversation as I have indicated above, please state your understanding of the conversation as you understand it.

If possible, please provide your return email by Tuesday, November 26, 2024. If we do not have your written communication by Tuesday, November 26, 2024, we will move forward with processing parts 7 and 8 of your request, as clarified.

If you have any further questions or concerns, please feel free to contact us at our FOIA Requester Service Center via at OFACFOIAOffice@treasury.gov or telephonically at 202-622-2500, option 3. Please ensure that you mention FOIA number 2025-OF-00030 in all communications regarding this FOIA request.

Very Respectfully,
Sean

Sean W. Haynes

Assistant Director
Information Disclosure and Records Management Division
Office of Sanctions Support and Operations
Office of Foreign Assets Control
U.S. Department of the Treasury

OFAC FOIA Requester Service Center

Email: OFACFOIAOffice@treasury.gov

Telephone: 202-622-2500, Option 3

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From: OFAC FOIA Office
Sent: Tuesday, November 19, 2024 3:54 PM
To: Russell, Lauren <russelll@ballardspahr.com>
Subject: RE: Meeting Request 2025-OF-00030

Good afternoon, Ms. Russell:

Thank you for your response. Based on your availability, we would like to schedule the meeting for **Tomorrow Wednesday, November 20, 2024, at 9:30 am ET**. Please provide our dial-in to Ms. Bruder the following conference line below:

Dial-in number: **888-330-1716 or 713-353-7024**
Access Code: **491767#**

We look forward to speaking with you.

Sincerely,

OFAC FOIA Office
Contact Information:
Information Disclosure and Records Management Division
Office of Sanctions Support and Operations
Office of Foreign Assets Control
Department of the Treasury
FOIA Requester Service Center
(202) 622-2500, option 3
F: (202) 622-1657
OFACFOIAOffice@treasury.gov

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From: Russell, Lauren <russelll@ballardspahr.com>
Sent: Tuesday, November 19, 2024 3:37 PM
To: OFAC FOIA Office <OFACFOIAOffice@treasury.gov>
Cc: Fox, Molly Bruder <mbfox@step toe.com>
Subject: RE: Meeting Request 2025-OF-00030

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9:30 works, thank you. Molly Bruder Fox is also counsel for Girard Street Investment Holdings LLC, and would like to attend the discussion as well. Here is a dial-in, if that is the best way for everyone to connect:
Dial-in: 888-857-7121
Passcode: 202-661-7605

From: OFACFOIAOffice@treasury.gov <OFACFOIAOffice@treasury.gov>
Sent: Tuesday, November 19, 2024 2:50 PM
To: Russell, Lauren <russelll@ballardspahr.com>
Subject: RE: Meeting Request 2025-OF-00030

⚠ EXTERNAL

Ms. Russell:

Thank you for your prompt response. Does 9 am or 9:30 am work for you? If not, please provide me with a few times that may work with your schedule.

Sincerely,

OFAC FOIA

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From: Russell, Lauren <russelll@ballardspahr.com>
Sent: Tuesday, November 19, 2024 2:46 PM
To: OFAC FOIA Office <OFACFOIAOffice@treasury.gov>
Subject: RE: Meeting Request 2025-OF-00030

**** Caution:** External email from: [russell@ballardspahr.com] Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Thank you for your review and consideration. Would you have availability tomorrow to discuss? I'm generally available. I'm traveling for a hearing and attending a hearing on Thursday and Friday, so tomorrow would be best.

Thank you,
Lauren

From: OFACFOIAOffice@treasury.gov <OFACFOIAOffice@treasury.gov>

Sent: Monday, November 18, 2024 10:21 AM

To: Russell, Lauren <russell@ballardspahr.com>

Subject: Meeting Request 2025-OF-00030

 **EXTERNAL**

Dear Ms. Russell:

RE: FOIA No.: 2025-OF-00030

This concerns your **November 12, 2024**, Freedom of Information Act (FOIA) to the Department of Treasury (Treasury). Treasury referred this matter to its Office of Foreign Assets Control (OFAC) for processing on November 15, 2024.

We would like to discuss the details of your request. Please **provide your periods of availability for this week**, to further discuss your request with us via telephonic conference.

Thank you.

Sincerely,

OFAC FOIA

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