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## **Department of Justice**

# **KleptoCapture Task Force**

## Media Kit



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Department of Justice

Office of Public Affairs

Wednesday, March 2, 2022

## **Attorney General Merrick B. Garland Announces Launch of Task Force KleptoCapture (3/2/22)**

**Task Force Will Surge Federal Law Enforcement Resources to Hold Accountable Corrupt Russian Oligarchs**

Today, Attorney General Merrick B. Garland announced the launch of Task Force KleptoCapture, an interagency law enforcement task force dedicated to enforcing the sweeping sanctions, export restrictions, and economic countermeasures that the United States has imposed, along with allies and partners, in response to Russia's unprovoked military invasion of Ukraine. Task Force KleptoCapture will ensure the full effect of these actions, which have been designed to isolate Russia from global markets and impose serious costs for this unjustified act of war, by targeting the crimes of Russian officials, government-aligned elites, and those who aid or conceal their unlawful conduct.

"The Justice Department will use all of its authorities to seize the assets of individuals and entities who violate these sanctions," said Attorney General Merrick B. Garland. "We will leave no stone unturned in our efforts to investigate, arrest, and prosecute those whose criminal acts enable the Russian government to continue this unjust war. Let me be clear: if you violate our laws, we will hold you accountable."

"To those bolstering the Russian regime through corruption and sanctions evasion: we will deprive you of safe haven and hold you accountable," said Deputy Attorney General Lisa O. Monaco. "Oligarchs be warned: we will use every tool to freeze and seize your criminal proceeds."

Task Force KleptoCapture will be run out of the Office of the Deputy Attorney General and staffed with prosecutors, agents, analysts, and professional staff across the Department who are experts in sanctions and export control enforcement, anticorruption, asset forfeiture, anti-money laundering, tax enforcement, national security investigations, and foreign evidence collection. It will leverage all the Department's tools and authorities against efforts to evade or undermine the economic actions taken by the U.S. government in response to Russian military aggression. The mission of the Task Force will include:

Investigating and prosecuting violations of new and future sanctions imposed in response to the Ukraine invasion, as well as sanctions imposed for prior instances of Russian aggression and corruption;

Combating unlawful efforts to undermine restrictions taken against Russian financial institutions, including the prosecution of those who try to evade know-your-customer and anti-money laundering measures;

Targeting efforts to use cryptocurrency to evade U.S. sanctions, launder proceeds of foreign corruption, or evade U.S. responses to Russian military aggression; and



Using civil and criminal asset forfeiture authorities to seize assets belonging to sanctioned individuals or assets identified as the proceeds of unlawful conduct.

The Task Force will be fully empowered to use the most cutting-edge investigative techniques — including data analytics, cryptocurrency tracing, foreign intelligence sources, and information from financial regulators and private sector partners — to identify sanctions evasion and related criminal misconduct.

Arrests and prosecution will be sought when supported by the facts and the law. Even if defendants cannot be immediately detained, asset seizures and civil forfeitures of unlawful proceeds — including personal real estate, financial, and commercial assets — will be used to deny resources that enable Russian aggression. Where appropriate, information gathered through Task Force investigations will be shared with interagency and foreign partners to augment the identification of assets that are covered by the sanctions and new economic countermeasures.

Task Force KleptoCapture will complement the work of the transatlantic task force announced by the President and leaders of the European Commission, France, Germany, Italy, the United Kingdom, and Canada on Feb. 26, which has a mission to identify and seize the assets of sanctioned individuals and companies around the world.

Task Force KleptoCapture will be led by a veteran corruption prosecutor assigned to the Deputy Attorney General's Office from the U.S. Attorney's Office for the Southern District of New York. This prosecutor has a long and successful track record of investigating Russian organized crime and recovering illicit assets. The Task Force leadership will include Deputy Directors from both the National Security and Criminal Divisions, and more than a dozen attorneys from these divisions, as well as the Tax Division, Civil Division, and U.S. Attorneys' Offices across the country.

The Task Force will include agents and analysts from numerous law enforcement agencies, including the FBI; U.S. Marshals Service, U.S. Secret Service; Department of Homeland Security—Homeland Security Investigations; IRS—Criminal Investigation; and the U.S. Postal Inspection Service.

The Task Force is authorized to investigate and prosecute any criminal offense related to its mission, including conspiracy to defraud the United States by interfering in and obstructing lawful government functions; money laundering; false statements to a financial institution; bank fraud; and various tax offenses. The maximum penalty under several of these authorities is 20 years in prison.

<https://www.justice.gov/opa/pr/attorney-general-merrick-b-garland-announces-launch-task-force-kleptocapture>



The New York Times

## Justice Dept. Announces Task Force to Go After Russian Oligarchs (NYT 3/2/22)

The task force adds to the raft of actions that Western leaders have taken in recent days in an effort to undercut Vladimir V. Putin and the politically connected elite in Russia.

March 2, 2022

By Katie Benner

WASHINGTON — The Justice Department announced on Wednesday the creation of a task force to go after billionaire oligarchs who have aided President Vladimir V. Putin in his invasion of Ukraine, part of an effort by the United States to seize and freeze the assets of those who have violated sanctions.



*The creation of the task force reflects the mounting scrutiny cast on Russia's wealthy elite. The Russian oligarch Roman Abramovich said on Wednesday that he would sell Chelsea, the Premier League soccer team. Credit...Martin Meissner/Associated Press*

The task force will marshal the resources of various federal agencies to enforce the sweeping economic measures that the United States has imposed as Russia continues its unprovoked assault on Ukraine.

"We will leave no stone unturned in our efforts to investigate, arrest and prosecute those whose criminal acts enable the Russian government to continue this unjust war," Attorney General Merrick B. Garland said in a statement.

The task force will be overseen by Lisa O. Monaco, the deputy attorney general. Andrew C. Adams, a veteran corruption prosecutor in the U.S. attorney's office in Manhattan, will run the day-to-day operations, according to multiple people briefed on his new role who spoke on the condition of anonymity to disclose his name.

The announcement of the task force came as the Biden administration is preparing another package of sanctions against more Russian oligarchs, according to a person familiar with the plans. And it followed a warning to oligarchs by President Biden in his State of the Union address on Tuesday night, in which he declared that the administration was "joining with European allies to find and seize their yachts, their luxury apartments, their private jets."



It is unclear how successful the Justice Department will be in pursuing wealthy Russians, but the department typically establishes task forces in a bid to underline its priorities and incentivize prosecutors to bring cases.

“Catastrophic events, like 9/11 or the invasion of Ukraine, often prompt the government to take stock of the full menu of its enforcement tools to address a singular threat to international security,” said David H. Laufman, a partner at Wiggin and Dana who oversaw the enforcement of U.S. sanctions laws as a Justice Department official during the Obama and Trump administrations. “That’s what the Biden administration is doing here.”

The creation of the team, called Task Force KleptoCapture, adds to the raft of actions that Western leaders have taken in recent days in an effort to undercut Mr. Putin and the politically connected elite in Russia who are believed to have close ties to him. By leveling potentially crippling sanctions on Russia’s financial institutions and beginning to freeze trillions of dollars in assets controlled by Moscow and by oligarchs, the United States and its allies hope to push Mr. Putin to withdraw from Ukraine.

The Biden administration has penalized several Russian entities, including the country’s main development and military banks, one of its sovereign wealth funds and a subsidiary of the state-controlled energy giant Gazprom. It has sought to freeze Mr. Putin’s assets as well as those of his foreign minister, Sergey V. Lavrov, and other Russian national security officials. And it has curbed purchases of Russian sovereign bonds, barred some Russian banks from Western financial markets and cut off Russia’s access to certain foreign technology products.

The European Union and Britain have taken similar punitive measures and also have banned some military-related exports to Russia. But Russia has forged ahead with its onslaught of attacks in Ukraine.

The creation of the task force reflects the harsh scrutiny cast on Russian oligarchs, many of whom built their fortunes because of their ties to Mr. Putin. Even though they may not be directly involved in Russia’s invasion of Ukraine, they enable Mr. Putin by helping him conceal his own assets and remain in power.

Russia’s oligarchs have invested their fortunes in assets around the world, and their ties to Mr. Putin have helped them gain influence and connections in the worlds of fine art, real estate, Wall Street and Silicon Valley.

Some of Russia’s elite are reportedly rushing to sell their assets to shield them from seizure, presumably in anticipation of sanctions. One of the country’s most prominent oligarchs, Roman Abramovich, said on Wednesday that he would sell Chelsea, the Premier League soccer team.

Other oligarchs with ties to Moscow have hired American lobbyists and white-shoe law firms to try to weaken U.S. sanctions laws like the Magnitsky Act, a 2012 measure that initially imposed sanctions on some Russian government officials in response to human rights abuses.

While many American law and lobbying firms have stopped representing Russian entities, not all have. For example, Skadden, Arps, Slate, Meagher & Flom, one of the nation’s largest law firms, appears to be continuing to work on litigation related to the 2016 election with Alfa Bank, which the United States placed under sanctions last week. The penalties on Alfa Bank were milder than those imposed on some



other Russian financial firms and did not require Skadden Arps to sever its ties; the law firm did not respond to requests for comment.

Alfa Bank was founded by the Ukrainian-Russian oligarch Mikhail Fridman, whom the European Union separately penalized this week, noting that he “has been referred to as a top Russian financier and enabler of Putin’s inner circle.”

Mr. Adams, who will lead the day-to-day operations of the task force, has a track record of investigating Russian organized crime and recovering illicit assets. He joined the U.S. attorney’s office in Manhattan in 2013 and worked in the violent and organized crime unit before helping oversee money laundering investigations.

He has helped lead the office’s money laundering and transnational criminal enterprises unit since 2018. Under his leadership, the unit has successfully prosecuted cases involving an Armenian criminal organization, a bribery and money-laundering scheme involving Brazilian public officials, and a racehorse doping ring, among others.

The task force will include Justice Department prosecutors and investigators who have expertise in enforcing laws regarding sanctions, export controls, corruption, asset forfeiture, money laundering and taxes. And it will work with investigators from the I.R.S., the F.B.I., the Marshals Service, the Secret Service, the Department of Homeland Security and the Postal Inspection Service.

The task force will target people and companies that are trying to evade anti-money laundering laws, hide their identities from financial institutions and use cryptocurrencies to evade sanctions and launder money. The Justice Department said that it would use civil and criminal asset forfeiture to seize assets belonging to people subject to sanctions.

The department said that its work would complement that of a trans-Atlantic task force announced this past weekend to identify and seize the assets of penalized Russian individuals and companies around the world.

**[Justice Dept. Announces Task Force to Go After Russian Oligarchs - The New York Times \(nytimes.com\)](https://www.nytimes.com)**





## Top prosecutor says Russian oligarchs have no 'escape hatch' around sanctions (NBC 3/16/22)

"The reason for coming to work is to chase the money and then to chase the crime underneath the money," said Andrew Adams, head of a new Justice Department task force.

March 16, 2022,

By Tom Winter and  
Chloe Atkins Andrew



*Adams is leading the Justice Department's task force on Russian oligarchs.*

The top Justice

Department prosecutor hunting Russian oligarchs' money is ratcheting up the pressure on the ultra-wealthy businessmen, warning that he will use every tool available to track down what he called the "fruits of a luxurious life that is ill-gained."

The world is becoming "smaller and smaller for people who have aided this regime in Russia," Andrew Adams, a veteran corruption prosecutor tapped to lead the KleptoCapture task force, said in an interview.

"There will not be an escape hatch around the sanctions through money launderers and opaque financial networks."

The task force — made up of prosecutors, agents, analysts and linguists — will investigate and prosecute current and future sanctions as a result of the Ukraine invasion. That will include combating illegal efforts to undermine the restrictions on Russian financial institutions, targeting efforts to use cryptocurrency to evade sanctions and using civil and criminal asset forfeiture authority to seize assets belonging to people subject to sanctions.

"The reason for coming to work is to chase the money and then to chase the crime underneath the money," said Adams, a longtime prosecutor in the U.S. Attorney's Office in Manhattan, New York.

"Real estate, yes. Bank accounts, yes," Adams said. "We're talking about luxury buildings, luxury real estate."



Adams said the task force's subpoena power is "critical." It gives the unit access to records and documents and allows it to review financial transactions when it is investigating a person or an organization.

Still, it can be a complex and lengthy process, requiring investigators to track down and interview multiple people, such as bankers and real estate agents, and comb through reams of records.

Depending on the case, law enforcement could uncover "tens of millions of documents," "thousands of bankers boxes of documents" and "interviews and witnesses that go back decades," Adams said.

Of the Russian oligarchs' possibly ill-begotten property, federal prosecutors have zeroed in on private jets, luxury real estate, bank accounts and even artwork. But for law enforcement to confiscate and ultimately gain ownership of an asset, they must "link the property to a crime," Adams said.

Prosecutors must go before judges and get warrants to seize the items.

"You have to be able to describe not only what crime was committed with a degree of probable cause, but you have to trace the property to the commission of the crime," Adams said.

Adams declined to name the oligarchs or organizations his office is specifically targeting, but he said those listed on the Treasury Department's sanctions list "are clearly in the crosshairs."

Nearly 900 Russian individuals and entities are on the U.S. sanctions list, including more than 200 added under a new round of sanctions imposed last year.

The Biden administration ordered new sanctions against Russian oligarchs and others in President Vladimir Putin's inner circle this month in response to the invasion of Ukraine. Among those targeted were Yevgeniy Prigozhin, a wealthy businessman known as "Putin's chef," and Alisher Burhanovich Usmanov, one of Russia's richest men and a close ally of Putin.

The KleptoCapture task force will also target financial institutions and entities that have helped oligarchs move dirty money and dodge U.S. sanctions. Those "who assist either knowingly or by turning a blind eye" are "running the risk of criminal liability," Adams said.

Early this month, federal prosecutors charged a U.S. citizen, John Hanick, with helping a Russian oligarch set up and operate a cable television news network in Russia. Hanick worked for Konstantin Malofeyev, identified as one of the primary sources of financing for efforts to promote Russian separatist groups in Ukraine, according to court documents.

Hanick was arrested in London, and the U.S. is seeking his extradition.

While U.S. sanctions against Russian elites sent shock waves worldwide, tracking down and seizing their assets will not be easy. Some oligarchs have taken elaborate steps to conceal their assets by using secret bank accounts, shell companies and offshore facilitators.

"The work is hard, and the people who do this work take it very seriously and are held to an extremely high standard," said Adams, adding that the task force is committed to taking the "time to get it right."

<https://www.nbcnews.com/news/investigations/top-prosecutor-says-russian-oligarchs-no-escape-hatch-sanctions-rcna20160>



**BBC**  
**NEWS**

## Ukraine War: US officials pursuing oligarchs say no place to hide (BBC 3/25/22)

"There will not be a place to hide." That's the message from the head of America's new task force pursuing sanctioned Russians.

March 25, 2022

By Gordon Corera

In an exclusive interview, Andrew Adams told the BBC that success would involve "disruption, discomfort, displacement" of the assets and the lifestyle of people who have supported Vladimir Putin.



*Andrew Adams said his team want to tackle Russia's ability to wage war*

The focus of Mr Adams's team - called the KleptoCapture task force - is on bringing criminal charges, and seizing assets.

He said it was not just yachts and houses that were attractive for those seeking to launder or hide money, but also artwork and cryptocurrency.

He also told the BBC his team would go after what are called the "enablers" - those who help people move and hide their money.

"That's a class of actors who are squarely within the crosshairs of this task force," Mr Adams said during a visit to London.

"We're looking at financial services companies, we're looking at real estate companies, we're looking at banks, we're looking at any number of enablers, people who wilfully assist in evading sanctions or who turn a blind eye to criminal activity, and are happy to take a fee for doing so."

Shutting of the "spigot of money" to individuals and institutions should he said, have an impact on Russia's ability to wage war and send a signal to those within Russia.

Mr Adams declined to discuss individual cases. The US, UK and European Union have targeted different individuals or moved at a different pace.

Roman Abramovich was sanctioned by Europe and the UK but not yet in the US - with some reports that this might be because of claims he could act as a go-between for the different parties in the conflict.



There have also been reports that Russians have been able to move assets around by giving them to family members and associates, but Mr Adams said his team would be working to trace those movements.

In recent years, he said, many of those targeted by sanctions had also moved into more shadowy places.

"Piercing that today is not an easy thing. But we have the tools and we have the experience in doing exactly that," Mr Adams said. "Cryptocurrency companies are not immune from the sanctions laws," he said adding that US authorities had become adept at identifying and tracing the movement of money in this way."

"Cryptocurrency may superficially present a route around sanctions. But I don't think ultimately it would be a particularly fruitful route."

London has often been accused of having a particular weakness for Russian money, but Mr Adams said it was one of a number of places that had a problem.

"Any location where there are significant, expensive assets in which to park dirty money in a system that enjoys the rule of law is attractive to people who are looking to launder massive amounts of money. That happens in London, it happens in New York, it happens in Florida."

The new task force was announced by US President Joe Biden in his State of the Union address. Housed in the Department of Justice, it draws on personnel from across the US government. Mr Adams has been a federal prosecutor in New York working on money laundering investigations and also international art fraud.

So what happens to seized yachts and artwork?

It goes through a legal process, Mr. Adams explains, with a judge eventually passing it on the US government which can then sell the items. But his team does not end up keeping any themselves.

"Personally, we don't have any yachts. It's not an eat what you kill situation," he said.

<https://www.bbc.com/news/world-us-canada-60872261>



The Washington Post

## Targeting the Oligarchs with Andrew Adams (WP 4/7/22)

*Washington Post Live*

WAR IN UKRAINE

# Targeting the Oligarchs

**Andrew Adams**  
Director, Task Force KleptoCapture

Thursday, April 7 at 3:30 p.m. ET / 8:30 p.m. BST

The Washington Post | LIVE

The U.S. Department of Justice is focusing on Russian oligarchs and the financial institutions that have helped them move money and evade U.S. sanctions. Andrew Adams, the veteran federal prosecutor tapped to lead the Justice Department's new "KleptoCapture" task force joins Washington Post columnist David Ignatius to discuss efforts to investigate, arrest and prosecute those whose unlawful accumulation of wealth enables the Russian government in its war against Ukraine.

[Click to watch video](#)

[Click for transcript](#)

<https://www.washingtonpost.com/washington-post-live/2022/04/07/targeting-oligarchs-with-andrew-adams/>



# Bloomberg

## **DOJ Russia Task Force Is Scrutinizing Putin's Wealth, Assets (Bloomberg 4/13/22)**

- Andrew Adams is leading the U.S. 'KleptoCapture' initiative
- Adams told Bloomberg his unit would look at cut-outs for Putin



Andrew Adams, head of the U.S. Justice Department's KleptoCapture task force.  
*Photographer: Anna MoneyMaker/Getty Images*

April 13, 2022

By Christian Berthelsen and Bob Van Voris

The Justice Department task force scrutinizing Russian oligarchs is targeting the personal wealth of Vladimir Putin and members of his family, the head of the unit said in interviews with Bloomberg.

"Putin is on the list, he's been sanctioned," said Andrew Adams, a New York federal prosecutor who was appointed to lead the initiative last month. "He's got family members who are sanctioned so that's certainly a part of the efforts that we're undertaking."



The head of the U.S. Justice Department's KleptoCapture task force targeting Russian assets says more countries are beginning to cooperate. Andrew Adams talks about how the department is seizing assets, such as massive luxury yachts, and trying to sell them. He's on "Balance of Power." Source: Bloomberg

Task force "KleptoCapture" was launched March 2, a week after the Russian invasion of Ukraine, and charged with tracking down and seizing the overseas assets of about 300 oligarchs and others close to Putin already subject to U.S. sanctions. Two of Putin's adult daughters were added to the U.S. sanctions list last week. The task force's goal is to pressure oligarchs close to Putin to cut off their support for the regime and crimp the sources of funding for Putin's projects and, indirectly, Russia's war effort.

Western governments have long suspected Putin has amassed a secret fortune through corrupt means, but little hard evidence has ever emerged. Jailed Russian opposition leader Alexei Navalny produced a report tying Putin to a \$1 billion mansion on the Black Sea, but the Russian leader has denied ownership.

Adams said in an interview that the U.S. may reach Putin's personal wealth by focusing on people who have agreed to hold assets on his behalf.

"Third party cut-outs are a frequent way of hiding assets for the people that are on this list," Adams said. "I wouldn't be surprised to find that Mr. Putin's name was not on a single document."

In a televised interview on Bloomberg's "Balance of Power," he added: "We would have to cut through shell companies, but it is a possibility and is something we will be looking at."

### **Complicit Facilitators**

Another major focus of the task's force's work are people and companies that knowingly assist efforts to launder money and disguise asset ownership, including bankers, real estate agents, art auction houses and law firms. Adams said half of the task force's efforts may wind up targeting so-called facilitators -- "places that have historically been either places where a money launderer can exploit the financial system or are themselves complicit in financial exploitation," he said.

Few of the assets under scrutiny are expected to be in the U.S. Instead, they are likely to turn up in the U.K., Italy and Spain, where it has historically been easier to hold and transact assets anonymously.

Adams noted that Russian oligarchs had been under investigations for decades in different jurisdictions, but he hailed a "sea change" in international cooperation since the war began. He there was new alignment between authorities in the U.S., U.K. and Europe focusing on uncovering Russian assets.

Foreign authorities were now seizing assets located abroad based on U.S. warrants, Adams said. "In other instances, we may be providing information or assisting foreign partners and identifying assets that can be frozen or blocked under European or U.K. sanctions, apart from U.S. sanctions."

### **DOJ Russia Task Force Is Scrutinizing Putin's Wealth, Assets - Bloomberg**



## DOJ unwinds complex web in hunt for Russian wealth belonging to Putin and influential players (CNN 5/5/22)

(CNN)The Department of Justice is quietly unraveling a complex web of shell companies and middlemen used by Russian oligarchs, and President Vladimir Putin himself, as it accelerates efforts to seize assets belonging to the Kremlin's most wealthy and influential players, the Justice official charged with leading the team hunting the assets told CNN on Thursday.

May 5, 2022

By Kara Scannell and Zachary Cohen

Like other Russian oligarchs on the US sanctions list, Putin is a target for the Justice Department's corruption task force as it wages a global campaign against money-laundering Kremlin insiders in response to Moscow's invasion of Ukraine.

"I can tell you nothing about what the US knows about any particular person, but he's certainly on the list," Andrew Adams, the head of the Justice Department's KleptoCapture task force, told CNN in an interview. He declined to answer any other direct questions about Putin and his wealth.

Thursday, US officials announced the seizure of a \$300 million yacht belonging to a Russian oligarch close to Putin, its second yacht seizure in recent weeks. The Justice Department's task force, which was launched in March to increase pressure on Putin and his closest allies amid the attack on Ukraine, is taking an expansive look at the scope of its powers and will target luxury real estate and enforce export laws to block Russia's access to sensitive technology, including military technology.

"I think, importantly, beyond very wealthy, very famous sort of celebrity oligarchs, there are people who are close to the Kremlin, who are in the Kremlin, people who have a role and have a voice within the Russian defense industry and the Russian Defense Ministry, who are on that list and who I think of as particularly important from a strategic point of view," Adams said.



Kara Scannell  
@KaraScannell

Andrew Adams, head of the Justice Department's KleptoCapture task force, says every Russian sanctioned by the US is a potential target in their crackdown. The biggest name on the list: Russian President Vladimir Putin.



9:51 PM · May 5, 2022 · SnapStream TV Search

[Link to interview](#)





Adams repeatedly sidestepped questions about whether the Justice Department is taking specific steps to seize assets belonging to Putin but suggested that prosecutors have mapped out how the Russian President and wealthy kleptocrats are attempting to hide their money.

"The kleptocrat playbook is to exploit your country to get as much money out of your country as possible and then to physically get your money out of the country that you have exploited," he told CNN. "And to do that you look to jurisdictions around the world. And to play it safe. You want to hedge your bets, put money across the world as you're doing this."

#### A major hurdle

Adams explained that Russian kleptocrats have developed a complex system of shell companies and middlemen to hide the money currently being hunted by the US and its allies.

"The way that people operate in terms of moving assets, when they're laundering assets, often includes family members that include shell companies that are shell companies within shell companies within shell companies," he said.

While Russian oligarchs have employed attorneys and law firms across the world who are willing to set up these shell companies and trust structures involving a paid middleman who's willing to put their name down as the beneficial owner, Adams told CNN that Justice Department officials have been monitoring these actions for years and have developed ways to identify who the true owner is.

"That's a typology I've seen for years, and I'm sure that it's one that has continued to be relied on," he said.

The layers upon layers of shell companies stand as one of the biggest and most time-consuming challenges.

"One major hurdle for us is piercing through shell companies," said Adams. "The difficulties there are amplified when you're having to deal with bank accounts and trustees who are located in jurisdictions scattered around the world, and often scattered around the world even for one person."

It's difficult, Adams said, to quantify the impact that seizures of yachts, bank accounts and other assets of those closely linked to Putin have had on the war, but he credits as important the public statements by some Putin allies who are distancing themselves from the Russian President.

"Certainly incentivizing people close to the Kremlin to take whatever actions they can to stop this war is part of the calculus in terms of who's on the list and the actions that we take," said Adams. "Largely public statements again, by people who previously were actively supportive of the Kremlin, or, or criminally silent about its actions, who have now come forward to complain about the latest effort to inflict damage in Ukraine. It's a little 'too little too late' in in many respects. But that is the signal that I would look for in terms of the solidity and stability of Putin's grip on these people."

"If they're saying it publicly, then that's, I think, all that we can ask them to do," he added.

The US and its partners have rolled out a series of sanctions in response to Russia's invasion of Ukraine, targeting key institutions and individuals who Adams said he believes "the Kremlin expected would be off the table."



"They were wrong about that," he added.

### Hunting assets

The Justice Department has successfully worked with a variety of countries to seize high-profile assets belonging to Russian oligarchs, including super yachts that were on the other side of the world.

For example, a \$300 million super yacht belonging to Russian oligarch Suleiman Kerimov was seized by Fijian authorities on Thursday at the request of the Justice Department.

That yacht will now be sailed to the US, where it will be kept at an undisclosed port until it can be auctioned off or liquidated another way, Adams said.

Adams declined to specify which port this or other super yachts seized by the Justice Department are being taken due to security concerns, but noted it has to be a location that "can handle the risk of having such a gigantic structure come in and sit there potentially for many months or years."

"You can't pull that one into the Potomac," he said about the yacht seized on Thursday.

Once the boat arrives in the US, there are maintenance costs, which are factored into the planning before a seizure takes place, Adams added.

While US officials have said the global enforcement of sanctions against Russian oligarchs and entities is eroding support for Putin within the Kremlin, Adams made clear on Thursday that the Justice Department is looking for other ways to crack down on various avenues of money laundering used by Moscow's most wealthy influencers.

The 192 ft super-yacht 'Phi' remains seized at 'Dollar Bay' in London Docklands, impounded by the UK's National Crime Agency because of sanctions against Putin associates during the Russian invasion of Ukraine, on March 30, in London.

The 192 ft super-yacht 'Phi' remains seized at 'Dollar Bay' in London Docklands, impounded by the UK's National Crime Agency because of sanctions against Putin associates during the Russian invasion of Ukraine, on March 30, in London.

That includes turning an eye to real estate investments within the US, including properties in New York and Miami.

"All sorts of assets are on the table, for sure. And bringing up real estate is particularly pertinent," Adams told CNN. "The way in which much money laundering is occurring is through large, stable value assets. Real estate is at the top of the list for that kind of investigation.

"Looking at jurisdictions where you have extremely expensive real estate in stable economies is where investigators are going to be looking for indications of money laundering."

Several wealthy Russians are known to own properties in New York City and Miami, often pouring hundreds of millions of dollars into real estate investments and hiding them under someone else's name.

However, real estate property is treated under federal forfeiture law, Adams noted.



"As a general matter, what you will not see is a seizure before the end of a litigation. We may sue the house and we may begin forfeiture proceedings with respect to a house, but in large part ... here won't be an immediate seizure and padlocking, kicking people out (when) you file suit," he said.

He also said there are other less obvious areas they're taking a "hard look at," including private investment holdings in asset managers and hedge funds, Russian ownership of corporations and the secondary market where debt instruments are traded.

Adams said they're getting cooperation from US financial institutions, which are required by law to flag suspicious transactions.

"We're looking at middlemen. We're looking at facilitators. We're looking at institutions that fail to maintain those obligations," he said.

Countries that have historically been havens for dirty money, he said, are cooperating with US authorities, driven in part by Russia's invasion of Ukraine.

"These seizures are, are going to continue apace, and people recognize that where the seizures are happening around the world are in pockets of the world that might not have been expected," he said, adding, "There are no safe havens."

While the US tracks and traces yachts, it is also following the money as Russians move assets into other jurisdictions that were once friendly places to hide it. But, Adams says, times are changing.

"There are pockets across the world. But those pockets are dwindling quickly," he said.

**DOJ unwinds complex web in hunt for Russian wealth belonging to Putin and influential players - CNNPolitics**



## The New York Times

### Seizing an Oligarch's Assets Is One Thing. Giving Them to Ukraine Is Another (NYT 5/8/22)

It could take years for Russian assets seized by the United States to be permanently confiscated and sold to benefit the Ukrainian people. The Biden administration wants to speed up the process.

May 8, 2022

By Matthew Goldstein

The U.S. government was so pleased with its swift seizure of a Russian oligarch's 255-foot yacht on the Mediterranean island of Majorca last month that it posted a video on YouTube of the moment F.B.I. agents and Spanish authorities clambered up the gangplank. The \$90 million yacht owned by Viktor Vekselberg, called the *Tango*, was the government's first big prize in a campaign against billionaires with close ties to the Kremlin.



*The Amadea, owned by Suleiman Kerimov, a Russian gold magnate, was seized in Fiji on Thursday. But that's just the start of the process. Credit...Leon Lord/Fiji Sun, via Agence France-Presse/Getty Images*

The *Tango* is just a sliver of the \$1 billion in yachts, planes and artwork — not to mention hundreds of millions in cash — that the United States has identified as belonging to wealthy allies of Russia's president, Vladimir V. Putin, since the invasion of Ukraine. U.S. Magistrate Judge Zia M. Faruqi, who approved the seizure, called the pursuit of the yacht by a new Justice Department team called task force kleptocapture "just the beginning of the reckoning that awaits those who would facilitate Putin's atrocities."

The reckoning may take a while.

Seizing assets, whether a yacht or a bank account, is the easy part. To permanently confiscate them, the government must usually navigate a potentially cumbersome process known as civil forfeiture, which requires proving to a judge that the assets were obtained from the proceeds of a crime or through money laundering. Only then does the government actually own the assets, and have the power to liquidate them.

All that can take years, especially if the former owner is inclined to fight the forfeiture action in court.



Hoping to speed things up — and quickly get the proceeds from seized assets turned over to the Ukrainian government — the White House announced a plan last week that would make it easier for U.S. authorities to go after some oligarch assets through an administrative procedure led by the Treasury Department. Although it has not provided details of its plan, administration officials said the new procedure will provide adequate due process and allow for an “expedited” review by a federal court.

The White House proposal would significantly change the way the government handles high-dollar asset seizures. Generally, administrative forfeiture is used in lower-profile cases, intended for assets worth \$500,000 or less. Such efforts are not really designed for luxury homes or massive yachts, let alone the huge sums of money that wealthy Russians are believed to have stashed away in U.S. bank accounts or invested with hedge funds and private equity firms.



*The Justice Department said Mr. Vekselberg purchased his \$90 million yacht with “illicit proceeds and laundered funds.” Credit...Francisco Ubilla/Associated Press*

“The idea of a yacht or jet valued in the hundreds of millions seized and liquidated administratively is new territory,” said Franklin Monsour Jr., a former federal prosecutor and a white collar defense lawyer with Orrick in New York.

Mr. Monsour said the administration and Congress may be banking that many Russian oligarchs will not muster a legal challenge to a new, expedited process because that would risk subjecting themselves to U.S. jurisdiction.

“It will likely be without challenge,” he said. “And the government knows that.”

Even if prosecutors are forced to proceed in some cases through the more typical civil forfeiture process, the litigation might go faster than normal for that same reason, Mr. Monsour said.

There are indications the pace of seizures is picking up. On Thursday, prosecutors said that authorities in Fiji working with the task force seized a \$300 million mega yacht belonging to Suleiman Kerimov, a Russian gold magnate. But in a sign the task force may be unwilling in some cases to expose its tradecraft in tracking down assets, the 24-page affidavit presented to a federal judge in support of the seizure was heavily redacted.

The more pricey assets the government seizes, the more reason it has to speed up the forfeiture process: Luxury property must be properly maintained, otherwise their value will drop before they can be sold off to someone else in the small pool of people who can afford them.

“For yachts that are languishing in ports, there will be assets spent to maintain the vehicles,” said Daniel Tannebaum, an expert on financial crimes at the consulting firm Oliver Wyman and former Treasury official. “Some of these assets can sit for an extremely long time.”



But authorities in the U.S. are looking to do more than just strip oligarchs of their prized possessions. Elizabeth Rosenberg, assistant secretary for terrorist financing and financial crimes at Treasury, said one goal is to “undermine the financial architecture that Russia uses to move money.”

Over the years, Russia and its oligarchs have become skilled at using a parade of shell companies in places like the British Virgin Islands to move money from Cyprus to the Cayman Islands to Jersey, in the Channel Islands, all places with a history of being seen by investors as tax havens. The task force will be looking for evidence of oligarchs taking steps to illegally evade sanctions by surreptitiously transferring money and property to an unsanctioned person or business entity.

Just last month, federal prosecutors in Manhattan filed criminal charges against Konstantin Malofeyev for illegally transferring \$10 million from a U.S. bank to a business associate in Greece. Mr. Malofeyev, who recently described Russia’s invasion of Ukraine as a “holy war,” was the subject of a sanctions order by the Treasury Department in 2014 after Russia’s invasion of Crimea, a part of Ukraine that it ultimately annexed.

In October, federal agents raided a mansion belonging to Russian billionaire Oleg Deripaska in Washington and seized a wide array of assets including a Diego Rivera painting. Authorities took action in response to suspicions that Mr. Deripaska had been trying to evade sanctions by moving some of his money around, Bloomberg reported last month.



*Federal agents raided the home of Oleg Deripaska last year as he was fighting a sanction order from 2018. Credit... Tom Brenner/Reuters*

U.S. authorities have pursued assets belonging to Mr. Deripaska, an industrialist with close ties to Mr. Putin, since a sanction order in 2018 that was partly in response to Russia’s meddling in the 2016 presidential election. A year later, Mr. Deripaska sued the U.S. government, claiming that the sanctions designation was based on rumor and had rendered him “radioactive” in the business community. Six weeks ago, a federal appellate court rejected his claims.

Since Russian forces invaded Ukraine in February, the Treasury Department has imposed sanctions on more than 530 well-connected Russians. Andrew Adams, the federal prosecutor directing the new kleptocapture task force, said much of his team’s early work has involved “unprecedented” sharing of information about those individuals with U.S. financial firms, Treasury officials and overseas law enforcement groups.

Even without taking possession of an asset, the task force can make it difficult for the owner to make use of it, said Mr. Adams, a veteran federal prosecutor in Manhattan who has focused on money laundering and asset forfeiture cases.



“In the past, I would consider a win to be getting a conviction,” Mr. Adams said. “Now it could be getting an insurance company to cancel policy coverage for an oligarch’s yacht.”

Although it’s possible for the government to seize assets as part of a criminal case, Mr. Adams said, the government was unlikely to take that route. Doing so would require the arrest and conviction of their owners — an even more daunting process than the civil process or the expedited administrative procedure that the White House is considering.

But even the civil forfeiture process requires the government to show evidence of criminal conduct.

In approving the seizure of the *Tango*, Judge Faruqui said federal authorities had shown probable cause that Mr. Vekselberg had purchased the yacht — held through a series of shell companies — with “illicit proceeds and laundered funds.” Permanent confiscation will require prosecutors to establish that Mr. Vekselberg actually committed bank fraud, money laundering or some other crime.

Although the United States imposed sanctions on wealthy Russians soon after the invasion, global efforts to seize their assets have mostly played out in Europe and the Caribbean.

The European Union has frozen about \$30 billion assets traced to Russian oligarchs since February. A few weeks ago, British officials said they had frozen some \$13 billion in assets tied to just one of them: Roman Abramovich. Mr. Abramovich, one of Russia’s wealthiest men and the longtime owner of London’s Chelsea Football Club, has faced significant pressure from British officials. He agreed to part with the team in March as officials were moving to impose sanctions, and the club said on Friday that it had accepted a \$3 billion bid from a consortium of buyers. The proceeds from the sale — the highest price in history for a sports team — will be placed in a frozen British bank account.

Mr. Abramovich, who has invested billions of dollars with offshore funds managed by U.S. firms and has an interest in several steel mills in the United States, has not been sanctioned by American officials, in part because he has served as an intermediary in negotiations between Ukraine and Russia. Mr. Adams, the leader of the kleptocapture task force, declined to discuss the matter.

But he did offer an explanation for why the Russian oligarchs his team is focused on seem to have fewer assets in the United States than in other countries: The sanctions that Treasury imposed following Russia’s invasion of Crimea seven years ago scared some away.

“We have had sanctions in place since 2014,” said Mr. Adams. “We have not been a friendly country to park your money in.”

<https://www.nytimes.com/2022/05/08/business/russia-oligarch-yacht-assets.html>



*Andrew Adams heads task force kleptocapture, a new team at the Justice Department that is tracking Russian assets. Credit...Isobel Rae for NYT*



## **‘KleptoCapture’ is about POLITICO more than Russian Yachts (Politico 6/2/22)**

**ANDREW ADAMS**, the federal prosecutor leading Task Force KleptoCapture, has a broad definition of success in his mission to take down oligarchs and other corrupt actors linked to the Kremlin — and it’s about much more than just seizing yachts.

June 2, 2022

By NAHAL TOOSI, ALEXANDER WARD  
and QUINT FORGEY

He and his team want to make Russian President VLADIMIR PUTIN’s cronies too nervous to travel. They want to make them so radioactive that insurance companies, banks and other private firms won’t do business with them. They want to find the assets their wealthy targets have hidden in obscure realms few would even imagine.

“Those are the quieter actions that we take,” Adams told NatSec Daily this week. “It’s not something that we can trumpet in a public way. But if you pull insurance on a boat, the boat doesn’t go anywhere. And you have largely the same impact that you would with a seizure.”

Adams’ task force, based at the Justice Department, is a key piece of President JOE BIDEN’s effort to punish Russia for invading Ukraine. It has grabbed early public attention due largely to its seizures of oligarchs’ super-yachts. But, as Adams sees it, the task force’s work builds on years of Justice Department efforts to root out money laundering and other financial corruption.

Here are some highlights from our own NAHAL TOOSI’s conversation with Adams:

— Adams’ biggest reservation about leading the task force turned into the nicest surprise. He worried other countries wouldn’t be helpful. Instead, many governments, especially in Europe, have worked in tandem to impose sanctions and make it easier to crack down on oligarchs and other Kremlin-linked figures.

“Even in cases where there is robust cooperation, there are linguistic hurdles, there are bureaucratic hurdles, there are just differences in sort of legal cultures that are challenging,” Adams noted. Still, for



*A view of the yacht "Lady M," owned by Russian oligarch Alexei Mordashov, at it is docked at Imperia's harbor, Italy, Saturday, March 5, 2022. | Antonio Calanni, File/AP Photo*





now, “what you really do see, again, is an alignment of foreign partners that makes that effort tangible. It makes it something that can be capitalized on in a way that it could not be capitalized on six months ago.”

— It might seem like it took a war for America to crack down on Russia’s corruption, but Adams says that’s not a fair assertion. Adams, who hails from the Southern District of New York and has spent years pursuing money laundering and transnational crime cases, insists it’s always been a priority. He also points out, however, that it’s hard work: the uber-wealthy often bury their assets under numerous layers of shell companies and through other individuals, and that just takes time to sift through.

“It is the case that this is a new context in which we’re operating,” Adams said. “But although the task force as it exists today didn’t exist four months ago, it is certainly the case that major parts of the U.S. law enforcement community including the largest prosecutor’s office in the country ... have been intensely focused on [fighting corruption] for years.”

— The U.S. attracts its share of illicit funds, but Adams says it’s not as safe a haven as many other countries, especially amid crackdowns in recent years.

“The U.S. is not a very attractive market to be an ostentatious oligarch in,” the prosecutor said. “It is an extremely attractive place if you want to find high-value assets in a stable economy where you can take advantage of the rule of law that doesn’t exist in your home country to protect assets, to protect value over the long term. But in part because of the focus on sanctions and sanctions evasion, and, specifically, sanctions in the context of traditional financial institutions in the U.S., there has been a culture of compliance largely instilled, I think, through the predominant percentage of U.S. financial institutions, such that it’s harder to operate in the U.S. than it has been historically in other parts of the world where you may find a similar kind of economic situation.”

— Adams hopes the Justice Department will create “a sort of permanent DOJ clearinghouse for thinking about sanctions.” Essentially, a single point of contact that can coordinate the work of multiple units within the department, some of whom are targeting Russia in their own ways.

“I think it’s useful, essentially, to leverage conversations with foreign partners,” he said. “A major part of the work in the first several months of the task force has been coordination, and coordination of foreign partners and essentially giving them an outlet to plug into for their own efforts. Going forward that should, that can, exist, and I think people understand that that should just exist as easy as plug and play for the next kind of crisis that exists in this space.”

— Will the task force broaden its mission beyond Russians? Adams wouldn’t exactly commit to that, and in fairness, it’s probably not his decision. He indicated, though, that the growth of public awareness about international corruption due to the Ukraine war would help keep the issue a priority.

“This task force exists in response to a particular crisis and particular time, but it’s not the end of the story for what the DOJ has done or can do or is doing today,” he said.

<https://www.politico.com/newsletters/national-security-daily/2022/06/02/kleptocapture-is-about-more-than-russian-yachts-00036743>



# **Department of Justice, Exports Controls Background Call Transcript (6/6/22)**

## **CORPORATE PARTICIPANTS**

**Nicholas Biase** – *SDNY and KleptoCapture Spokesperson*

**Andrew Adams** – *Director, Task Force KleptoCapture*

**Matthew Axelrod** – *Assistant Secretary of Commerce*

**John Sonderman** – *Director, Office of Export Enforcement*

## **Operator**

Good afternoon and welcome to the US Department of Justice Export Control Background Call. All participants will be in listen only mode. Should you need assistance please signal a conference specialist by pressing the star key followed by zero. After today's presentation, you have an opportunity to ask questions. Please note that this event is being recorded.

I'd now like to turn the conference over to Mr. Nicholas Biase, SDNY and KleptoCapture Spokesperson. Please go ahead.

## **Nicholas Biase**

Hi, thank you. Good afternoon, everyone. Thanks for joining the call. We're here to announce that the United States has obtained a seizure warrant for two airplanes of Russian oligarch, Roman Abramovich worth over \$400 million. Today speaking will be Andrew Adams, Task Force KleptoCapture Director, followed by Assistant Secretary of Commerce, Matthew Axelrod, and we'll have a brief Q&A afterwards. Thank you.

## **Andrew Adams**

Good morning and good afternoon, everybody. And thanks for the time and attention and participating on the call. In the early days of the department's Russian sanctions task force the Task Force KleptoCapture, we've worked to seize and forfeit two luxury yachts, to seize and forfeit millions of dollars held in accounts across the United States, we've announced the indictments of sanctioned oligarchs and their enablers and coordinated with foreign partners to facilitate their own detention of assets across Europe, and indeed across the world. Today, the department is announcing the issuance of seizure warrants for two US manufactured luxury jets, each of which is controlled by Roman Abramovich, and each of which flouted export controls that prohibited those planes to pass into Russian territory. Those vessels are not today taken into US custody, but they are now publicly known as wanted property as tainted assets subject to forfeiture and under active pursuit.

In support of the Task Force's efforts, including today's warrant, we relied daily and significantly on the expertise, the insights and the investigative acumen of our colleagues at the Commerce Department's Bureau of Industry and Security and on the prosecutors around the country, and particularly here at the Southern District of New York. But what the Task Force has relied on to an equal degree throughout the first 100 days of Russia's illegal war, has been the truly inspiring level of diligence and commitment of people of good faith working throughout the private sector: the effects of an insurance company pulling



coverage for a tainted yacht, a bank cutting off money flows for shell companies, the effect of people in all manner of service industries standing up for Ukraine by refusing to take part in the coddling of Kremlin enablers. Those are actions that can have as significant an impact on the Russian war machine and its supporters as anything that the DOJ or the US government might do through indictments and warrants.

With that as context, I'd like to make two points at the outset of today's call. First, these warrants today are filed without ceiling because of the Task Force's success to date in its dialogue with the private sector and foreign counterparts. While we pursue these assets, as we will, today's filings provide banks, insurance companies, aviation service providers and others with the details sufficient to understand the Department's view of various shell companies and of these assets, and sufficient to understand that any company that may assist in further moving these planes while they are under active pursuit, runs the risk of being viewed as obstructionists.

Second, today's warrants demonstrate the reach of US authority in the space. Commerce's export and re-export controls are robust, and they must be respected. They're a critical component of the US strategy to deprive Russia of the means of fully fueling its illegal war. The Task Force and the attorneys here at the Southern District of New York will aggressively pursue those who would flout those restrictions. So with that, let me turn it over to my colleague at Commerce.

**Matthew Axelrod**

Yes, thanks, Andrew. Hey, everyone, it's Matt Axelrod. I'm the Assistant Secretary for Export Enforcement over here at Commerce. And what we're announcing today between the Department of Justice and Commerce are two sort of related and parallel actions involving Roman Abramovich. As you just heard from Andrew DOJ has issued the seizure warrants for the two planes. What we've done on the Commerce side is we've issued an administrative charging letter against Abramovich based on—and I think that's important. It's not a criminal charge. It's an administrative charge, which I can talk about a little later. And our administrative charging letter has three alleged violations, in that they're all related to the two private planes owned or controlled by Abramovich that flew into Russia after the rules governing those types of flights changed on March 2 as a consequence of Russia's brutal and unwarranted invasion of Ukraine.

As I think the charging letter makes clear, there's a Gulfstream that is alleged to have committed two different violations, the first from flying from Istanbul to Moscow on March 12, and the second flying from Istanbul into Moscow on March 15. And then the second plane is a Boeing Dreamliner, and that's charged with one violation, and that's from flying from Dubai to Moscow on March 4. The maximum penalty for one of our administrative enforcement actions is 328,000 and change per violation or two times the value of the transaction. And here the Boeing is estimated to be worth approximately \$350 million and the Gulfstream approximately \$60 million.

This is the first time that the Department of Commerce has made a charging letter public when it's been filed, as opposed to public when the matter has been resolved. It used to be that we didn't make our charging letters public until resolution, which could be months or years later. But we changed our regulations on Friday, this past Friday. So this is the first. And our goal in doing that is to help with deterrence by letting everyone know that when there are violation of our rules we take action.

The only other things I'd say before opening up to questions is that the investigation is ongoing, and for those of you who are used to covering DOJ and maybe not as used to covering the Department of Commerce, I think the way to sort of think about the difference is between a DOJ criminal charge and a Department of Commerce administrative charge is the Department of Justice, it's beyond a reasonable



doubt standard. Usually you have to show willful conduct. In other words, the person's knew what they were doing was against the law. And then the penalty can be for an individual jail. For our administrative charges [indiscernible] preponderance of the evidence, is strict liability, and the penalty is fines and our ability to cut off people's ability to continue to have export privileges.

So I hope that's a good overview of what we've done here today, in partnership and in parallel with the Department of Justice, doing the seizure warrants and the Department of Commerce still taking the administrative enforcement action by issuing a charging letter.

I guess, Nick, does it go back to you to do questions?

**Nicholas Biase**

Yes, thanks very much, Matthew. We're ready to go to the other Nick, our operator, we're ready for the Q&A. Thank you.

## QUESTIONS AND ANSWERS

**Operator**

Thank you. We'll now begin the question and answer session. To ask a question, you may press star then one on your touchtone phone. When using a speakerphone please pick up your handset before pressing the keys. To withdraw your question please press star then two. At this time we'll pause a moment to assemble the roster.

The first question comes from Ryan Barber, Business Insider. Please go ahead.

**Ryan Barber**

Hi, everybody, thanks for holding this call. You know, I wanted to start off, I think immediately after Russia's invasion of Ukraine and when Russian oligarchs were beginning to be sanctioned, if memory serves Roman Abramovich was a notable standout as somebody on that list who was not immediately facing sanctions. And I think there was an idea at the time that there was some hesitancy to sanction him immediately because there was maybe a belief that he could be somewhat of an intermediary to try to end the conflict or be some sort of link between Russia and United States and the larger international community. So I'm sorry for the long wind up there, but I guess the upside of my question is, to what extent does this administrative action and the obtaining of this seizure warrant reflect a different approach to Abramovich and maybe giving up on him as a kind of intermediary?

**Andrew Adams**

Thanks. This is Andrew at DOJ. So I won't comment on what is ultimately an OFAC determination on who goes on or stays off the SDN list for whatever reason. I think that a key point to take away here and one that the Task Force has hammered on for the month that it's been operative, is that simply not being on the SDN list is not carte blanche for enabling violations of export controls or sanctions. Mr. Abramovich is not on the OFAC SDN list. Nevertheless, he is not above the law in any respect. And this action I think demonstrates that clearly.

**Matthew Axelrod**

Yes. And Ryan, it's Matt Axelrod, thanks for the question. Look, if people violate our rules, we take action. And actually specifically with regard to Abramovich, this is not the first action we've taken, it's not like we just waited until now and then brought this. We've been putting out lists of airplanes that we believe have



flown into Russia in violation of our controls. And we put out those lists, which we had never done something like that before. But we did it in order to put everyone on notice, because there's a separate part of our rules that if you provide service knowingly, provide service to an item that violated our rules, that itself is a separate violation of our rules. And so we wanted everyone to know, hey, if you're servicing these claims that we think violated our rules, you yourself risk running afoul of us, and we've had one of Abramovich's planes on that list for quite some time. And I think we just recently added the second one that are the subjects of today's action. So it's not like today is the first time the US government is taking some action related to Abramovich since the crisis started.

**Ryan Barber**

Yes, and thanks for that. I guess just if I could get a follow up, it just sounds like there's not a lot of optimism of actually seizing these planes. It sounds like this is really, as you said, more about deterrence and really sending a message to prevent anybody from even being tempted to enable further transport of these two planes. But if you could just elaborate, I guess I'd just ask if you could elaborate a little bit on what, if any, possibility you see of actually getting these planes? You know, given that they are, as you said, back in Moscow, or at least just back in Russia generally.

**Andrew Adams**

Sure. This is Andrew, again. We will take active steps to pursue seizure and we'll keep an eye out to see if they move jurisdictions going forward. I will emphasize that in a way that is unprecedented in I think most people's experience, the degree of foreign cooperation in the sanctions regime and export control regimes in the current circumstance is truly above any level I think that we've seen, really ever. So they may be in difficult spots now. That's not to say that we won't continue to pursue and that we won't be ultimately successful.

**Nicholas Biase**

Thank you. Next question.

**Operator**

Thank you. Next question will be from Aruna Viswanatha of Wall Street Journal. Please go ahead.

**Aruna Viswanatha**

Hi. Thanks for doing this. I just wanted to make sure I understood the hook. So is it that these two planes were made in the US, therefore, when they flew into Russia they needed to get a license from Commerce to do that? And then does that mean that any plane that was manufactured in the United States can't fly into Russia without a license?

**Matthew Axelrod**

It's an excellent question and apologies for not hitting that in my opening remarks. I would say you have most of the elements right in your question. You need for four things. First, it has to be US origin aircraft, here both were; we had a Boeing and a Gulfstream. Second, the aircraft has to be owned or controlled by Russia or a Russian national, and here that's Abramowicz. Three, it has to fly into Russia after March 2, which is when the rules changed concerning airplanes. And here that's true for all three violations. And then fourth, it has to be—I guess, so that's fourth. Sorry, fourth is after March 2, and fifth is it has to be without a license. So he could have applied to Commerce for a license, but didn't do so. So it's US origin aircraft, owned or controlled by a Russian that flew into Russia after March 2 without a license, and we've alleged that all five things are present here for both planes on the three occasions.



**Aruna Viswanatha**

Okay, got it. And is your understanding that they are both in Russia right now? I think we had tracked one of them to Dubai at some point, but I wasn't sure if it had left Dubai.

**Matthew Axelrod**

Yes, as far as the charging letter only specifies that the violation is that they flew to Moscow. Beyond that there's nothing in our charging letter one way or the other. But Dubai, I think I mentioned, is the Boeing we allege flew on March 4 from Dubai to Moscow. But where, if anywhere, it went beyond after that it's not within the four corners of our charging document. Andrew, I don't know if it's in any of your documents.

**Andrew Adams**

It is alleged that with respect to one of the two planes, its last known location was Dubai. But I won't comment beyond the four corners of the document in terms of where it may be today.

**Aruna Viswanatha**

Got it. Thanks.

**Operator**

Thank you. The next question will be from Tom Winter of NBC News. Please go ahead.

**Tom Winter**

Hi, Andrew. I suppose the question that I was going to ask is why choose Abramovich and why choose him now? Is it the proximity to Putin? Is it the proximity to the top of the upper echelon of Russian government? What's the focus there, if you can answer it? And then I'll hold for a follow up.

**Andrew Adams**

Sure. Hey, Tom, and thanks for that. I would say the facts with respect to these plans and in light of the actions that Commerce has already taken to date with respect to these planes makes this, I think, a clear choice for some action. Beyond that, I think the reason why here is the same as generally with respect to the short term goals of the DOJ's Task Force, that is demonstrating muscular enforcement of the sanctions regime, of incentivizing people who are close to the Kremlin to distance themselves from the Kremlin, from the Russian state as it continues to ramp up the war. And in the mid to long term to, in addition to just straightforward goals of punishment, to emphasize the impacts on Russian supply chains and the Russian economy that will have effects on Russian state and Russian war efforts now and for years to come by emphasizing the scope and robust powers that are within the Commerce Department's control.

**Tom Winter**

Sure. And then my follow up, from the FBI documents that you included this morning, it seems as though you've been able to get some cooperation, and maybe this is what you were touching on earlier, but been able to get some cooperation from the people that were involved in these transactions by effectively telling you the story behind the story of these various shell companies and back and forth with the transfers.

**Andrew Adams**

So you'll see in the affidavit, as you say information provided by private sector actors, information provided by foreign counterparts around the world. That has been a resounding success and a real theme throughout the work of the Task Force to date. And as I say, I think one reason that we are willing to make



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this kind of affidavit in the sort of warrant in an unsealed form, which is different than many warrants that DOJ pursues, is precisely because that kind of success requires dialogue with the private sector. And one clear way of engaging in dialogue from DOJ is to be able to speak publicly and one way to do that is by making its accusations and making its allegations publicly now.

**Nicholas Biase**

Thank you, Tom. Next question.

**Operator**

Thank you. The next question will be from Matthew Goldstein from the New York Times. Please go ahead.

**Matthew Goldstein**

Hi, thanks. Thanks for doing this. So, Andrew, we know that with Abramovich, he has like billions invested in US hedge funds. And while I understand he hasn't been sanctioned, and many of those hedge funds are obviously in offshore portfolios that might be covered by the UK sanctions, is this a signal that the task force may be willing to go after that money which is obviously a lot more than some yachts and aircrafts?

**Andrew Adams**

Thanks, Matt. I think it can be taken clearly the signal that the task force is looking at all manner of assets and that criminal violation of IEBA [ph], criminal violation of OFAC controls and criminal violations of Commerce Department controls will have consequences and will take action even on assets that may be in far-flung jurisdictions.

**Matthew Goldstein**

And in terms of just to get back to the idea basically being that Abramovich had sort of held out, seemed to be held out as a special case. I know you don't determine what OFAC does, but is this again should be wrong to interpret this as a signal that the administration's thoughts to Abramowicz might be changing?

**Andrew Adams**

At least from DOJ's perspective I won't comment broadly on administrative thoughts. What's clear I think is that no one is above the law and not being on OFAC's list doesn't give you a license to evade sanctions or export controls.

**Matthew Goldstein**

Okay, thank you.

**Matthew Axelrod**

Yes, and the only thing, this is Matt Commerce, the only thing I'd say to that, I think I mentioned this earlier that at least on the Commerce side, us for taking action related to Abramovich is not new. The Gulfstream went on our list of planes that I mentioned earlier all the way back on March 18, and then we added the Boeing on May 20. So it's not like this is the first time that an enforcement arm of the administration has taken some action related to Abramovich.

**Matthew Goldstein**

Okay, thanks.

**Nicholas Biase**

Thanks. Both Matts. Next question.



**Operator**

Thank you. The next question will be from Luke Cohen of Reuters. Please go ahead.

**Luke Cohen**

Hi, there. Thanks so much for doing this. First, just quickly, I wanted to see if you can confirm that the \$400 million value is both planes combined. And then just second, Andrew, you spoke about, you know, international cooperation from law enforcement counterparts abroad. Would that include some of the places that the planes are alleged to have departed from, so, Turkey, Israel, United Arab Emirates, were they helpful in this instance?

**Andrew Adams**

On the first, yes. That's the quote as to the value of both planes collectively. And on the second, again, not to speak specifically on what is an ongoing investigation and efforts by foreign counterparts, but we have, in general had tremendous success with foreign counterparts, including in jurisdictions that I think may historically have been viewed as safe havens for parking illicit assets.

**Luke Cohen**

Thanks. And then if I could just follow up for Matt quickly, what would have been the chances of getting a license here? Is there any sort of blanket policy of denial? And ever since you guys put these two planes on the Commerce list, is there any evidence that they've flown anywhere?

**Matthew Axelrod**

So those are good questions. Let me take the second one first. Actually, we have John Sonderman on the line, who's are the Director of our Office of Export Enforcement, and that's sort of a specific enough factual question that I'm going to ask John to take it. John, do you know the answer?

**John Sonderman**

Yes, thanks, Matt. First of all, there's a policy of denial. So it's a more strict standard than a presumption of denial. So the licenses that someone applied will be processed under that policy of denial and then the dates of the flights precede the dates we put the planes on our list.

**Luke Cohen**

Thanks, John.

**Nicholas Biase**

Great, thank you. If we can fit in another question, please.

**Operator**

Thank you. The next question will be from Greg Farrel of Bloomberg News. Please go ahead.

**Greg Farrel**

Hi. Thank you very much, Andrew, and also Matt. But Andrew, I wanted to follow up on what you had said about OFAC, and I take your point, that that's a separate decision. But presumably, there's got to be some kind of, you know, not operating completely in the dark from each other, that in order for this effort to work there's probably some kind of sharing of information. So, in a case like this, or in the case of the straw owner of that boat in Fiji, which has now been tangled up in the courts there, it would make things easier, I would imagine, to have OFAC designate certain individuals, not just Abramovich here, but the





THE UNITED STATES  
DEPARTMENT *of* JUSTICE

other individual and going forward to be able to have that that tool at your disposal or aiding you. Is that possible? Could you tell us at all about how this process works through the DOJ, and at BIS and OFAC? Thank you.

**Andrew Adams**

Sure, thanks. So at a high level, with respect to OFAC's list, Treasury compiles that list, announces it, it does so in consultation with all manner of folks around the US government including DOJ, including State Department, etc. So you are correct that there's communication, that there's dialogue, there's coordination in considering who goes on the list or doesn't go on the list, without, of course commenting specifically on Mr. Abramovich or as you point out the people involved in the action in Fiji.

What I would note, again, is that there are rules and regulations that are enforced, writ large for everybody in the world, and enabling or facilitating or laundering the proceeds of violations associated with both those regimes, with the Commerce export regime and OFAC sanctions regime, applies broadly. And that's the case in this instance, it's the case with respect to [indiscernible] in Fiji, where, as you know, Mr. Karamov [ph], who is the true owner of that boat, is on the list, but the people who stand in as straw men and shell companies have not been on the list. That didn't stop the action in Fiji from going forward any more than it stopped these warrants today.

**Nicholas Biase**

Thank you. Next question. Last question, please. Thank you.

**Operator**

Thank you. The last question will come from Karen Freidalz of Reuters. Please go ahead.

**Karen Freidalz**

I'm sorry. Are you speaking of Karen Freidalz? Hello?

**Nicholas Biase**

Go ahead, Karen. Thank you. This is Karen Freidalz from Reuters?

**Karen Freidalz**

Yes. Can you hear me?

**Nicholas Biase**

Yes, thank you. Go ahead.

**Karen Freidalz**

Hi. Yes. My colleague, Luke, asked one of my questions. But Matt had said something earlier about a rule change on Friday that allowed things to be made public. And so I'm wondering about that. What was the rule change on Friday and also, whether these administrative penalties, I know there was talk of possibly making those go higher, whether that's in the works?

**Matthew Axelrod**

Yes. Thanks, Karen. Apologies, I was overseas last week. So I think it was Friday. Maybe it was Thursday. Maybe one of my colleagues can correct me when I'm done speaking, but it was part of the Russia corrections rule that posted that did a couple of different things. But one of the things it did for us was it changed an existing regulation that said that documents related to our sort of administrative enforcement are charging letters weren't public until resolution. And so we changed that regulation so that our



administrative charging letters are not public once they're filed going forward from the rule change, our public ones filed with the administrative law judge, and since that was last week, this is the first one of those.

In terms of penalties, Karen, no update there. And I think on this one the max penalty would be pretty high. But, as I've said publicly before, we are taking a look at how we do our administrative enforcement and we want it to be, it's a powerful tool and we want to make sure, particularly in these days, these times, that we're using our tools to their full potential. And so we've made the change I mentioned last week on the rule, but we are evaluating whether to make additional changes as well, including raising penalties for violations.

And then the last thing I'd say is, I do think that today's action, the SDNY action, the DOJ action, sorry, and the Commerce action, they're good examples of how the United States government is aggressively enforcing our laws and our rules against anyone who violates them, no matter how wealthy, how powerful, that's what the rule of law stands for. And that's what we're working to implement. It's one of the, you know, the shining examples of what makes this country different from a lot of other countries in the world, including Russia. We have a sort of transparent legal system, and there were rules in place. And as we've alleged that Mr. Abramovich violated them, and we're taking actions. And you know, those actions will have consequences.

**Karen Freidalz**

Thanks, Matt. Just one quick follow up, when you said the penalty is quite high, you were saying 328,000 per violation?

**Matthew Axelrod**

Or twice the value of the transaction. And here the planes are worth, one of them is worth \$350 million, and the other is worth \$60 million. Now, if you look, you know, Karen, that when you talk potential maximums, and it's the same with DOJ all the time, what the actual sort of result of an administrative proceeding would be, I wouldn't want to predict but I think we'll see as this plays out what the resolution would be. But if the question is, is there some sort of cap that would be arbitrarily low? I don't think that's going to be an issue in this case.

**Karen Freidalz**

So you don't think it's just the cost of flying the plane or whatever? It would be the plane itself in terms of penalties, the value of the plane itself?

**Matthew Axelrod**

Yes. I think that's something that I imagine would be—there may be different views on that between the parties, but we'll see when we get there.

**Karen Freidalz**

Okay.

## CONCLUSION

**Operator**

Thank you. This concludes our question and answer session. I'd now like to turn the conference back over to Mr. Nicholas Biase for closing remarks. Please go ahead.



**Nicholas Biase**

Great. Thanks, everybody, for joining. That was a great conversation. And thanks to our colleagues at Commerce and our Task Force partners. Just to reiterate from the top, this is on background and can be paraphrased and attributed to a Justice Department or administration official. Thank you.

**Operator**

Thank you. The conference has now concluded. Thank you for attending today's presentation. You may now disconnect.



## The New York Times

# **U.S. moves to seize 2 planes believed to belong to Roman Abramovich (NYT 6/6/22)**

In new court filings, the F.B.I. said it had traced the aircraft to the Russian oligarch despite the shell companies involved in their ownership.

June 6, 2022

By Matthew Goldstein

Federal authorities intend to seize two aircraft believed to be owned by Roman Abramovich, saying the Russian oligarch violated strict U.S. export regulations linked to Russia's invasion of Ukraine, according to court filings.

The planes — a Boeing 787 Dreamliner and a Gulfstream jet — were both manufactured in the United States and are valued at over \$400 million.

In March, a few weeks after Russia invaded Ukraine, Mr. Abramovich had the planes flown to Russia, and in one case to another country, without securing the necessary licenses or approval from the Bureau of Industry and Security, a unit of the Department of Commerce, the filings said. The Boeing was flown to the United Arab Emirates and the Gulfstream to Russia.

Agents with the F.B.I. traced the aircraft to Mr. Abramovich, who owns them through a series of shell companies in the British Virgin Islands, Cyprus and Isle of Jersey, according to an affidavit submitted in federal court in Manhattan in support of the seizure warrants.

Representatives for Mr. Abramovich did not return requests for comment.

These moves stem from a new Department of Justice initiative, known as Task Force KleptoCapture, which was established in March to go after assets belonging to Russian oligarchs.

It's the first time the task force has taken action against Mr. Abramovich, who is believed to be one of Russia's wealthiest industrialists, with an estimated net worth in excess of \$13 billion. Mr. Abramovich, a former longtime owner of the Chelsea Football Club in London, has been placed under sanctions by Britain and the European Union but not by the United States.

American officials have held off on formal sanctions partly because Mr. Abramovich has served as an intermediary in negotiations between Ukraine and Russia. But the effort to seize assets believed to belong to him indicates that federal authorities are willing to pursue actions against any wealthy individual who is found to have violated U.S. laws and regulations.

In conjunction with the task force's action, the Commerce Department announced that it had filed administrative charges against Mr. Abramovich for violating the export control regulations. In early



March, after the invasion of Ukraine, the Commerce Department made it all but impossible for any aircraft manufactured in the United States to get a license to be moved to Russia.

Mr. Abramovich's vast wealth includes billions invested in dozens of offshore funds managed by hedge funds in the United States. Those accounts, many of which are in the Cayman Islands or Jersey, have been frozen because of British sanctions. Just as he did with his aircraft, Mr. Abramovich used a series of shell companies in the British Virgin Islands, Cyprus and Jersey to invest with hedge funds.

The kleptocapture task force has already moved to seize yachts owned by oligarchs who are under U.S. sanctions. Mr. Abramovich is believed to own at least five yachts, but none of his vessels have been seized by the United States.

The seizing of assets is just the first step in a long process called civil forfeiture, which requires prosecutors to prove in federal court that the assets were bought with the illicit proceeds of a crime. Only then can the federal government take permanent possession of them.

<https://www.nytimes.com/2022/06/06/business/roman-abramovich-planes-seizure.html>



Department of Justice  
U.S. Attorney's Office  
Southern District of New York

FOR IMMEDIATE RELEASE  
Monday, June 6, 2022

## **United States Obtains Warrant For Seizure Of Two Airplanes Of Russian Oligarch Roman Abramovich Worth Over \$400 Million (6/6/22)**

Damian Williams, the United States Attorney for the Southern District of New York, Andrew C. Adams, Task Force KleptoCapture Director, Michael J. Driscoll, the Assistant Director-in-Charge of the New York Office of the Federal Bureau of Investigation ("FBI"), and Matthew S. Axelrod, Assistant Secretary of Commerce for Export Enforcement, announced today that the United States of America has been authorized to seize a Boeing 787-8 aircraft and a Gulfstream G650ER aircraft owned and/or controlled by Russian oligarch Roman Abramovich, pursuant to a seizure warrant from the U.S. District Court for the Southern District of New York, which found that the airplanes are subject to seizure and forfeiture based on probable cause of violations of the Export Control Reform Act ("ECRA") and the recent sanctions issued against Russia.

U.S. Attorney Damian Williams said: "Today's affidavit and warrant demonstrate the Southern District's commitment to bring to bear every legal tool available for enforcement of sanctions and export controls imposed in response to Russia's illegal war in Ukraine. Our international partners — nations devoted to the rule of law — far outnumber those jurisdictions where these aircraft can safely hide, and our investigation of illegal exports in violation of U.S. law will continue unabated."

Task Force KleptoCapture Director Andrew C. Adams said: "Today's action reflects the global scope of the United States' response to illegal Russian aggression in Ukraine. While we seek to execute on these warrants, the Task Force eagerly anticipates working with international partners to uphold the rule of law and reminds members of the aviation, insurance, and financial industries that these aircraft constitute tainted property under active investigation by the United States."

FBI Assistant Director Michael J. Driscoll said: "These wealthy Russian oligarchs have helped foster an environment that enabled Russia to pursue its deadly war in Ukraine. The seizure of their valuable possessions, including these two aircraft, is just one way the U.S. government holds accountable those who break U.S. laws and support Russia in its attempt to conquer a sovereign nation. Our work has only just begun and we won't back away."

Assistant Secretary of Commerce for Export Enforcement Matthew S. Axelrod: "The Commerce Department has put in place unprecedented export controls in response to Russia's illegal war against Ukraine. Today's action, and our recent changes to make such actions public when brought, provides notice to the world of our commitment to enforce those controls aggressively in a transparent way, consistent with our commitment to the rule of law."

According to the seizure warrant and affidavit sworn out today:[\[1\]](#)



In response to Russia’s invasion of Ukraine, the U.S. Department of Commerce’s Bureau of Industry and Security (“BIS”) issued various sanctions against Russia that impose export controls and license requirements to protect U.S. national security and foreign policy interests. These Russia sanctions include expanded prohibitions on the export, reexport, or in-country transfer of U.S.-manufactured aircraft and aircraft parts and components to or within Russia without a BIS license, and eliminate the availability of any license exception for aircraft owned or controlled, or under charter or lease, by Russia or a Russian national.

The Boeing and the Gulfstream each were reexported to Russia (*i.e.*, flown from a foreign country to Russia) in violation of the ECRA and regulations issued thereunder, including the recent Russia sanctions. The Boeing was flown to Russia on March 4, 2022 without a BIS license and without a license exception, and is now in the United Arab Emirates. The Gulfstream was flown to Russia on March 12 and 15, 2022 without a BIS license and without a license exception, and remains in Russia. The Boeing and Gulfstream are owned and/or controlled by Roman Abramovich, a Russia national, through a series of shell companies in Cyprus, Jersey, and the British Virgin Islands.

The Boeing (pictured below), bearing tail number P4-BDL and manufacturer serial number 37306, is believed to be worth approximately \$350 million.

The Gulfstream (pictured below), bearing tail number LX-RAY and manufacturer serial number 6417, is believed to be worth approximately \$60 million.

\* \* \*

Mr. Williams praised the outstanding work of the FBI and BIS. In a charging letter that separately issued today, BIS initiated administrative proceedings against Roman Abramovich, seeking penalties of up to twice the value of the Boeing and the Gulfstream. Mr. Williams further thanked the Justice Department’s National Security Division and Office of International Affairs, the U.S. Treasury Department’s Office of Foreign Assets Control, and Her Majesty’s Attorney General for the Bailiwick of Jersey for their assistance in this investigation.

This case is being handled by the Office’s Money Laundering and Transnational Criminal Enterprises Unit and National Security and International Narcotics Unit. Assistant United States Attorneys Joshua A. Naftalis, Anden Chow, Michael D. Lockard, and Kaylan E. Lasky are in charge of the investigation.

The investigation was coordinated through the Justice Department’s Task Force KleptoCapture, an interagency law enforcement task force dedicated to enforcing the sweeping sanctions, export controls, and economic countermeasures that the United States, along with its foreign allies and partners, has imposed in response to Russia’s unprovoked military invasion of Ukraine. Announced by the Attorney General on March 2 and run out of the Office of the Deputy Attorney General, the task force will continue to leverage all of the Department’s tools and authorities to combat efforts to evade or undermine the collective actions taken by the U.S. government in response to Russian military aggression.

<https://www.justice.gov/usao-sdny/pr/united-states-obtains-warrant-seizure-two-airplanes-russian-oligarch-roman-abramovich>



## US Attorney SDNY Twitter (6/6/22)



US Attorney SDNY  
@SDNYnews



The Boeing (pictured below), bearing tail number P4-BDL and manufacturer serial number 37306, is believed to be worth approximately \$350 million



2:15 PM · Jun 6, 2022 · Twitter Web App



US Attorney SDNY  
@SDNYnews



The Gulfstream (pictured below), bearing tail number LX-RAY and manufacturer serial number 6417, is believed to be worth approximately \$60 million



2:15 PM · Jun 6, 2022 · Twitter Web App





## The New York Times

### **Fiji hands over a superyacht that the U.S. says is tied to a Russian oligarch (NYT 6/7/22)**

Fiji has handed over to the United States a \$325 million superyacht that American investigators say is owned by a Russian billionaire on a U.S. sanctions list, the island nation's top prosecutor said on Tuesday.

June 7, 2022

By Mike Ives

The handover of the yacht, the Amadea, was based on a decision by Fiji's Supreme Court and is a new development in a global effort to seize the assets of oligarchs with ties to President Vladimir V. Putin of Russia.

The Amadea was held in Fijian waters in April in response to a U.S. request for assistance and seized last month based on a warrant that

had been issued by a federal court in Washington and accepted by a Fijian court.

The Amadea's ownership structure is murky. American investigators say that the yacht was sold last year to Suleiman Kerimov, a Russian government official and billionaire investor who has been on the U.S. sanctions list since 2018. But Feizal Haniff, a lawyer in Fiji who represents a company in the British Virgin Islands that controls the vessel, has argued that its true owner is Eduard Khudainatov, a wealthy Russian who is not under U.S. sanctions.

Fiji's Court of Appeal dismissed Mr. Haniff's appeal in late May but said that the judgment would not take effect for seven days. Last week, he filed another application asking the Fijian authorities to delay enforcing the U.S. warrant.

On Tuesday, the country's Supreme Court ruled that the yacht could leave Fiji in the care of the U.S. authorities, Christopher Pryde, the country's director of public prosecutions, said in a statement.

<https://www.nytimes.com/2022/06/07/world/europe/fiji-superyacht-russia-oligarch.html?smtyp=cur&smid=tw-nytimes>



*The superyacht Amadea docked in Lautoka, Fiji, in April. Credit...Leon Lord/Fiji Sun, via Associated Press*



THE UNITED STATES  
DEPARTMENT *of* JUSTICE

**From:** Adams, Andrew (ODAG)  
**Subject:** Re: FY 2022 Ukrainian Supplemental Request Number 2 4.22.22 1440jolene  
**To:** Lauria, Jolene A. (JMD)  
**Cc:** Carlin, John P. (ODAG); Singh, Anita M. (ODAG); Kleppinger, Eric (JMD); Lofthus, Lee J. (JMD)  
**Sent:** April 22, 2022 9:37 PM (UTC-04:00)  
**Attached:** FY 2022 Ukrainian Supplemental Request 4.22.22 1440jolene.docx

Thank you. On the second point, I'm saying that (b) (5)

Sent from my iPhone

On Apr 22, 2022, at 9:19 PM, Lauria, Jolene A. (JMD) <(b) (6)> wrote:

Sent from my iPhone

On Apr 22, 2022, at 8:14 PM, Adams, Andrew (ODAG) <(b) (6)> wrote:

Thank you all. The numbers look right to me. Three questions/comments: first, (b) (5)  
I  
can see (b) (5)

Answer (b) (5)

Second, on the TFKC language, I believe we can say (b) (5)

(b) (5). Are you saying (b) (5)

Third, (b) (5)? Not sure,  
but thought I'd ask.

(b) (5)

We might just (b) (5). But I need to

run it by the GC. And Maggie is very involved in this so Monday we'll nail it down. Or this weekend.

Thank you all again,  
Andrew

Sent from my iPhone

On Apr 22, 2022, at 5:41 PM, Carlin, John P. (ODAG)  
<(b) (6)> wrote:

Yes thank you for the work on this.

On Apr 22, 2022, at 5:29 PM, Lauria, Jolene A. (JMD)  
<(b) (6)> wrote:

Is this version ok to share with Maggie? She asked me for it

Sent from my iPhone

On Apr 22, 2022, at 3:16 PM, Lauria, Jolene A.  
(JMD) <(b) (6)> wrote:

This is what we have so far. We have a 330 Prep with the AG for his Senate Hearing. If you need changes- please keep Eric on the email chain and he can update this document as you wish.

I have not shared the revised version with the AG's office at this moment – but will when you are ok with it.

**From:** (b)(6) per Treasury  
**Subject:** [EXTERNAL] Spontaneous Disclosures Question  
**To:** Adams, Andrew (ODAG); Khoo, Michael (CRM); Lim, David (NSD)  
**Cc:** Kirby, Jimmy [SES]; Donovan, Kim; Ferris, Laura  
**Sent:** June 2, 2022 6:16 PM (UTC-04:00)  
**Attached:** (b)(3) per Treasury

Hi Michael –

Quick question. (b)(5) per Treasury

As you know (b)(5) per Treasury

Thanks!

(b)(6) per Treasury

The enclosed information was collected and disseminated under provisions of the Bank Secrecy Act (the BSA) and U.S. Department of the Treasury regulations implementing the BSA. See 31 U.S.C. 5311, et seq.; 31 CFR Chapter X. The information is sensitive in nature and is to be treated accordingly. The information may be used only for a purpose consistent with a criminal, tax, or regulatory investigation or proceeding, or in the conduct of intelligence or counterintelligence activities, including analysis, to protect against international terrorism. See 31 U.S.C. 5311. The information cannot be further released, disseminated, disclosed, or transmitted without prior approval of the Director of Financial Crimes Enforcement Network or his authorized delegate. Suspicious activity reports filed under the BSA must be treated with particular care given that they contain unsubstantiated allegations of possible criminal activity, akin to confidential informant tips. Unauthorized release of information collected under the BSA may result in criminal or civil sanctions.

**From:** FinCENTraining@FinCEN.GOV  
**Subject:** [EXTERNAL] Multiple Training Events June 20-30, 2022  
**To:** FinCEN Distribution List  
**Sent:** June 14, 2022 6:00 PM (UTC-04:00)

*WARNING: This educational session will display BSA information. If you register and attend the session, you are certifying that you have authorized access to see BSA information and are current with your BSA Data Certification Training. NOTE: Unauthorized release or use of any information obtained in the session can result in criminal or civil sanctions. See 31 U.S.C 5311, ET SEQ; 31 CFR Chapter X; and FinCEN Re-dissemination Guidelines*

**You are invited to attend multiple FinCEN training events, all optional.**

**A “FinCEN Advanced Query” webinar presentation will be offered on Tuesday, June 21, 2022, at 5:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Demonstrates using the Advanced Query feature to conduct searches for reactive and proactive investigations to identify a variety of BSA filings, using a variety of search techniques, identifiers, keywords and import lists. Uses proactive searches to demonstrate how to identify new targets for investigation. Demonstrate saving and scheduling new queries, and adjusting user preferences in the results grid. Guidance will be provided on interpreting SARs and their attachments for financial intelligence, requesting SAR supporting documents from financial institutions, and protecting SARs from unauthorized disclosures. *Webinar presentation approximately 90 minutes.*

**A “Scheduled Queries” webinar presentation will be offered on Wednesday, June 22, 2022, at 1:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** This presentation demonstrates how to create and save a variety of FinCEN queries and how to activate the Scheduled Queries tool. Scheduled Query can automatically run the user's saved query criteria every day, week or month, to identify new BSA filings FinCEN received and matched on the criteria. Overview provided on modifying queries, archiving queries, activating and deactivating scheduled queries, reviewing FinCEN Portal secure mail notifications of scheduled query hits, modification of results grid preferences, and how to identify new SAR filings of the scheduled queries. *Webinar presentation approximately 60 minutes.*

**A “Cybercrime and FinCEN Query Research” WebEx webinar training will be offered on Thursday, June 23, 2022, at 9:00 am. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** This presentation covers common forms of cybercrime, such as ransomware and phishing, the perpetrators behind such attacks and their prospective motivation. Additionally, we will discuss information and identifiers that may be gleaned from such crimes, and how to use FinCEN Portal and FinCEN Query to follow up on these potential leads. *Webinar presentation approximately 120 minutes.*

**A “FinCEN 101” WebEx webinar presentation will be offered on Thursday, June 23, 2022,**

**at 11:00 am. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** The presentation will include FinCEN's mission, the Bank Secrecy Act (BSA), who is required to file, types of BSA records, value of the data, records maintained by the filing institutions, safeguarding BSA records, FinCEN's support to Law Enforcement (314(a) USA Patriot Act, Egmont program, Financial Advisories, and Geographic Targeting Orders). *Webinar presentation approximately 60 minutes.*

**An "i2 Downloads" WebEx webinar presentation will be offered on Thursday, June 23, 2022, at 1:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** FinCEN Query i2 Download training provides users the ability to use i2 Analyst Notebook to create link analysis charts. Live demonstrations show how to download i2 Specifications from FinCEN's Portal into a user's i2 Analyst Notebook, and how to create search queries and download those BSA filings from the results grid into i2. Finally, the training identifies files that automatically create the i2 Chart and/or i2 Timeline. *Webinar presentation approximately 60 minutes.*

**A "Follow the Money" Part 1, webinar presentation will be offered on Tuesday, June 28, 2022, at 1:00 pm. EDT. (Please Note: Attendees are recommended to take "Follow the Money" Part 1 prior to attending Part 2, and 3) To register, click on the link below:**

**(b) (6)**

**Training Details:** "Funds Transfers Correspondent Banking"; the Segment 1 presentation will point-out the long term systemic benefits in identifying, disrupting, and dismantling criminals' financial "life lines". The training is intended to be "user friendly" and practical oriented. It is geared toward benefiting all levels of attendees within the law enforcement investigative and analytical, prosecutorial, regulatory, and intelligence community realms - ranging from those who are beginning to delve into financial investigations and analyses to those who are further advanced therein. The presentation and accompanying modules and reference materials will enhance the audience's ability to "follow the money" trails tied-in with illicit finance methods. Particular emphasis will be placed upon understanding the fundamental concepts and "bridge building" stages of funds transfer processes and acquire the ability to trace the related financial trails. The presentation will especially focus upon and illustrate the following - sample domestic and cross-border funds transfer transaction flows and how and why they develop and "build-up", records which are generated and maintained for retrieval at financial institutions and other sources, the useful content of these records and related codes, correspondent banking channels and informational sources and "choke points", and recommended comprehensive - yet practical - investigative and analytical "check lists", strategies, and approaches to pursue. *Webinar presentation approximately 120 minutes.*

**A "LE Support Programs" webinar presentation will be offered on Tuesday, June 28, 2022, at 5:00 pm. EDT. To register, click on the link below:**

(b) (6)

**Training Details:** Overview of the 314(a) Program that enables law enforcement to contact participating U.S. financial institutions through FinCEN to locate accounts/transactions of subjects/entities involved in money laundering or terrorism. Overview of the Egmont Program that enables law enforcement to contact the financial intelligence unit of a foreign country through FinCEN to locate accounts/transactions of subjects/entities involved in money laundering or terrorism. Finally, an overview of the Rapid Response Program, an Egmont Group supported asset recovery program designed to freeze and/or repatriate international wires of proceeds of cyber-enabled crime. *Webinar presentation approximately 90 minutes.*

**A “Follow the Money” Part 2, webinar presentation will be offered on Wednesday, June 29, 2022, at 1:00 pm. EDT. (Please Note: Attendees are recommended to take “Follow the Money” Part 1 prior to attending Part 2, and 3) To register, click on the link below:**

(b) (6)

**Training Details:** “Centralized Funds Transfer Systems”; The Segment 2 follow-on presentation will cover the centralized funds transfer systems - Fedwire, SWIFT, CHIPS, and beyond; sample related transaction flows and step-by-step illustrative diagrams; illicit finance movements; message formats; records content and codes interpretation; contact points; and deciphering sample Suspicious Activity Report (SAR) narratives and other financial documents. The intent will be to further assist the audience in their ability to identify, investigate, and analyze illicit finance related money movement trails and ascertain records “choke points”. Sample SAR narratives and methods will also be illustrated and dissected. Attendees are highly recommended to first attend the Segment 1 training session prior to attending Segment 2. *Webinar presentation approximately 120 minutes.*

**A “Follow the Money” Part 3, webinar presentation will be offered on Thursday, June 30, 2022, at 1:00 pm. EDT. (Please Note: Attendees are recommended to take “Follow the Money” Part 1 prior to attending Part 2, and 3) To register, click on the link below:**

(b) (6)

**Training Details:** “Illicit Finance Methods”; The Segment 3 presentation will provide further detailed insights on illicit finance methods involving bank funds transfers, Money Service Business (MSBs) remittances, and frequent observed “hybrid” mixes thereof. Sample observed methods, related financial trails, and generated records and documents will be closely examined. Attendees are highly recommended to attend the Segment 1 and Segment 2 training sessions prior to attending Segment 3. *Webinar presentation approximately 120 minutes.*

**A “FinCEN Portal Only” webinar presentation will be offered on Thursday, June 30, 2022, at 1:00 pm. EDT. To register, click on the link below:**

(b) (6)

**Training Details:** Users enhance their skills on navigating the FinCEN Portal page. Demonstrations will show the benefits of the FinCEN Portal page (i.e. *Critical Announcements, Helpful Links, What’s Happening and FinCEN Tools*). The FinCEN Training guides will be



reviewed and downloaded. FinCEN's products will be highlighted and explained. Egmont Program and 314(a) Program request forms will be highlighted. BSA warnings and Re-dissemination guidelines documents will be explained. *Webinar presentation approximately 60 minutes.*

**Upcoming July webinars:** – FinCEN 101, Basic Portal and FinCEN Query, Advanced FinCEN Query, Follow the Money 1,2 &3, Using Import Lists for Proactive Search Queries, Interpreting SARs and Other BSA Filings, Saved Scheduled Queries, Public Corruption and Advanced Query Techniques, i2 Downloads, and Proactively Identifying Human Trafficking/Human Smuggling SAR's.

**WEBEX SYSTEM NOTES:** After registering, you will receive a WebEx confirmation email containing information about joining the webinar. The registration format has slightly changed for WebEx links. Users may have to click "register" and it will bring up the form with the standard required information. The WebEx webinar tool works for most agencies in their IT firewalls. If you do not receive the WebEx registration confirmation email within an hour after you registered, contact your IT helpdesk (firewall issue). On the day of event, use the confirmation email to log into the event 15 minutes before start time. If you are unable to log in, contact your IT helpdesk for assistance (firewall issue). WebEx system does not email reminders to you on the training event.

Thank you,

FinCENTraining

**From:** noreply@treasury.gov  
**Subject:** [EXTERNAL] Meeting with (b)(6) per Treasury at the U.S. Department of the Treasury - Action Required  
**To:** Adams, Andrew (ODAG)  
**Sent:** June 13, 2022 3:10 PM (UTC-04:00)

Dear Andrew Adams,

(b)(6) per Treasury has invited you to a meeting with (b)(6) per Treasury at the U.S. Department of the Treasury in Washington D.C on 6/16/2022 at 11:00 AM. The full details for the meeting are as follows:

- **Meeting Name:** DOJ meeting w/ OFAC
- **Treasury POC:** (b)(6) per Treasury
- **Date:** 6/16/2022 at 11:00 AM
- **Location:** Room 2251 in the Treasury FFB/Annex Building

**ACTION REQUIRED:** To visit Treasury, you are required to submit personal identification information (PII) to U.S. Secret Service (USSS), including your date of birth and Social Security number.

- Click [here](#) to verify your email address and name, then click “Retrieve my Information” to review and securely submit your PII to USSS.
- You must submit your PII in advance to be allowed into the building! Please allow 48+ hours for U.S. citizens, and 72+ hours for non-U.S. citizens.
- Please make sure that what you enter is an exact match to the information on the government-issued identification you plan to carry on the day of your visit.

Respectfully,

The Workers and Visitors Entry System (TWAVES) Team.

**From:** FinCENTraining@FinCEN.GOV  
**Subject:** [EXTERNAL] FinCEN Portal WebEx June 16, 2022-Corrected Time  
**To:** FinCEN Distribution List  
**Sent:** June 9, 2022 6:00 PM (UTC-04:00)

*WARNING: This educational session will display BSA information. If you register and attend the session, you are certifying that you have authorized access to see BSA information and are current with your BSA Data Certification Training. NOTE: Unauthorized release or use of any information obtained in the session can result in criminal or civil sanctions. See 31 U.S.C 5311, ET SEQ; 31 CFR Chapter X; and FinCEN Re-dissemination Guidelines.*

**Please note the correct time for the June 16th FinCEN Portal class is 5:00pm as stated below. Users who have already registered do not need to register again.**

**A “FinCEN Portal” WebEx webinar training will be offered on Thursday, June 16, 2022, at 5:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Users enhance their skills on navigating the FinCEN Portal page. Demonstrations will show the benefits of the FinCEN Portal page (i.e. *Critical Announcements, Helpful Links, What’s Happening and FinCEN Tools*). The FinCEN Training guides will be reviewed and downloaded. FinCEN’s products will be highlighted and explained. Egmont Program and 314(a) Program request forms will be highlighted. BSA warnings and Re-dissemination guidelines documents will be explained. *Webinar presentation approximately 60 minutes.*

**From:** donotreply@fincen.gov  
**Subject:** [EXTERNAL] You have received 1 new message in FinCEN secure mail  
**To:** Adams, Andrew (ODAG)  
**Sent:** June 7, 2022 12:02 PM (UTC-04:00)

**From:** donotreply@fincen.gov  
**Subject:** [EXTERNAL] You have received 1 new message in FinCEN secure mail  
**To:** Adams, Andrew (ODAG)  
**Sent:** June 1, 2022 5:37 PM (UTC-04:00)

**From:** donotreply@fincen.gov  
**Subject:** [EXTERNAL] You have received 1 new message in FinCEN secure mail  
**To:** Adams, Andrew (ODAG)  
**Sent:** May 31, 2022 6:07 PM (UTC-04:00)

**From:** FinCENTraining@FinCEN.GOV  
**Subject:** [EXTERNAL] Multiple Training Events June 1-17, 2022  
**To:** FinCEN Distribution List  
**Sent:** May 25, 2022 6:00 PM (UTC-04:00)

*WARNING: This educational session June display BSA information. If you register and attend the session, you are certifying that you have authorized access to see BSA information and are current with your BSA Data Certification Training. NOTE: Unauthorized release or use of any information obtained in the session June result in criminal or civil sanctions. See 31 U.S.C 5311, ET SEQ; 31 CFR Chapter X; and FinCEN Re-dissemination Guidelines*

**You are invited to attend multiple FinCEN training events, all optional. Please note: we are now offering evening presentations (Starting at 5:00 pm. EDT).**

**A “Basic Portal and FinCEN Query” WebEx webinar training will be offered on Wednesday, June 01, 2022, at 1:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Basic FinCEN Portal/Query training - Users enhance their skills on navigating the FinCEN Portal, FinCEN Query and are shown the benefits of the FinCEN Portal (*Critical Announcements, Helpful Links, What’s Happening and FinCEN Tools*), in “FinCEN Query”, “My Preferences” tab (user’s query results page). Users also experience live Query search of BSA data demonstrations on *Basic, Advanced, and Quick* search options and techniques, on reactive investigations. Demonstrations include, the use of “Networking”, “Saved Searches”, “Scheduled Queries”, “Point and Shoot” searches, filtering search results, identifying tabs for types of downloads, and an explanation of the use of the “Saved Items” tab. *Webinar presentation approximately 90 minutes.*

**A “Rapid Response Program Tool on FinCEN Portal” WebEx webinar training will be offered on Thursday, June 02, 2022, at 1:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Brief overview of the Egmont Group, the body of foreign financial intelligence units that collaborate to locate accounts/transactions of subjects/entities involved in money laundering or terrorism. Broader overview of the Rapid Response Program, the Egmont Group supported asset recovery program designed to freeze and/or repatriate international wires of proceeds of cyber-enabled crime. Conclude with a live demonstration of the Rapid Response submission process in the FinCEN Portal. *Webinar presentation approximately 60 minutes.*

**An “Interpreting SARs Training” WebEx webinar presentation will be offered on Tuesday, June 7, 2022, at 1:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Users enhanced their skills with live demonstrations in FinCEN Query reviewing and interpreting SARs, CTRs, RMSBs, FBARs, 8300s, CNIRs, and DOEPs to gather financial intelligence in support of criminal investigations. The course will pay particular attention to an in-depth interpretation of SARs, the attachments, requesting SAR supporting documents

from financial institutions, and protecting SARs from unauthorized disclosures. *Webinar presentation approximately 60 minutes.*

**An “Advanced Query: Public Corruption” WebEx webinar presentation will be offered on Wednesday, June 8, 2022, at 12pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Advanced FinCEN Query training specifically on Public Corruption. The training begins with financial trend data, tools and FinCEN intelligence work products for corruption investigations, and ends with a live query demonstration using specific key words and import lists to identify potential public corruption cases. Provides guidance on interpreting SAR’s and their attachments for financial intelligence. Provides information on saving and scheduling the query, and requesting Supporting Documents from the filing institutions. *Webinar presentation approximately 90 minutes.*

**A “Basic Portal and FinCEN Query” WebEx webinar training will be offered on Wednesday, June 08, 2022, at 5:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Basic FinCEN Portal/Query training - Users enhance their skills on navigating the FinCEN Portal, FinCEN Query and are shown the benefits of the FinCEN Portal (*Critical Announcements, Helpful Links, What’s Happening and FinCEN Tools*), in “FinCEN Query”, “My Preferences” tab (user’s query results page). Users also experience live Query search of BSA data demonstrations on *Basic, Advanced, and Quick* search options and techniques, on reactive investigations. Demonstrations include, the use of “Networking”, “Saved Searches”, “Scheduled Queries”, “Point and Shoot” searches, filtering search results, identifying tabs for types of downloads, and an explanation of the use of the “Saved Items” tab. *Webinar presentation approximately 90 minutes.*

**An “Advanced FinCEN Query” WebEx webinar training will be offered on Tuesday, June 14, 2022, at 1:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Demonstrates using the Advanced Query feature to conduct searches for reactive and proactive investigations to identify a variety of BSA filings, using a variety of search techniques, identifiers, keywords and import lists. Uses proactive searches to demonstrate how to identify new targets for investigation. Demonstrate saving and scheduling new queries, and adjusting user preferences in the results grid. Guidance will be provided on interpreting SARs and their attachments for financial intelligence, requesting SAR supporting documents from financial institutions, and protecting SARs from unauthorized disclosures. *Webinar presentation approximately 90 minutes.*

**A “Real Estate Geographic Targeting Order” WebEx webinar training will be offered on Wednesday, June 15, 2022, at 1:00 pm. EDT. To register, click on the link below:**

**(b) (6)**



**Training Details:** FinCEN Query users will enhance their skills with GTO searches using Import Lists for proactive searches making it possible for users to locate real estate transactions involving luxury property particularly when conducted with cash, certified check, personal check, and/or virtual currency and no traditional financing. *Webinar presentation approximately 60 minutes.*

**A “FinCEN Portal” WebEx webinar training will be offered on Thursday, June 16, 2022, at 1:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Users enhance their skills on navigating the FinCEN Portal page. Demonstrations will show the benefits of the FinCEN Portal page (i.e. *Critical Announcements, Helpful Links, What’s Happening and FinCEN Tools*). The FinCEN Training guides will be reviewed and downloaded. FinCEN’s products will be highlighted and explained. Egmont Program and 314(a) Program request forms will be highlighted. BSA warnings and Re-dissemination guidelines documents will be explained. *Webinar presentation approximately 60 minutes.*

**Upcoming June webinars:** – FinCEN 101, FinCEN Portal, Basic Portal and FinCEN Query, Advanced FinCEN Query, Cybercrime and FinCEN Query, New Rapid Response Program Tool on FinCEN Portal, Follow the Money 1, 2, and 3, i2 Downloads.

**WEBEX SYSTEM NOTES:** After registering, you will receive a WebEx confirmation email containing information about joining the webinar. The registration format has slightly changed for WebEx links. Users June have to click "register" and it will bring up the form with the standard required information. The WebEx webinar tool works for most agencies in their IT firewalls. If you do not receive the WebEx registration confirmation email within an hour after you registered, contact your IT helpdesk (firewall issue). On the day of event, use the confirmation email to log into the event 15 minutes before start time. If you are unable to log in, contact your IT helpdesk for assistance (firewall issue). WebEx system does not email reminders to you on the training event.

Thank you,

FinCENTraining

**From:** FinCENTraining@FinCEN.GOV  
**Subject:** [EXTERNAL] FinCEN Portal FinCEN Query Survey  
**To:** FinCEN Distribution List  
**Sent:** May 18, 2022 6:00 PM (UTC-04:00)  
**Attached:** FinCEN Portal-FinCEN Query Survey.pdf

The United States Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) commissioned the CFI Group, an independent research organization, to conduct a survey to assess the value of the FinCEN Portal and FinCEN Query applications. FinCEN has obtained permission from the Office of Management and Budget through control number 1090-0007 to conduct this survey in accordance with the Paperwork Reduction Act (44 U.S.C. § 3501-3520) and its implementing regulations (5 C.F.R. Part 1320).

The purpose of this letter is to notify you that the CFI Group will be sending you an email invitation asking you to participate in an online survey. Through the survey, we hope to learn more about your needs and identify opportunities to improve our products and services.

Please be assured that the survey questions will only pertain to the usability, of FinCEN Portal and FinCEN Query, there will not be any questions concerning specific searches or investigations. Additionally, the results of the survey will be reported only in the aggregate, and your individual responses will be grouped anonymously along with those of other FinCEN customers.

On behalf of FinCEN, thank you in advance for your participation and insight. Should you have any questions about this effort or want to provide additional feedback, please contact FinCEN at [FinCENTraining@fincen.gov](mailto:FinCENTraining@fincen.gov).



Financial Crimes Enforcement Network  
U.S. Department of the Treasury

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May 17, 2022

Dear Colleague:

The United States Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) commissioned the CFI Group, an independent research organization, to conduct a survey to assess the value of the FinCEN Portal and FinCEN Query applications. FinCEN has obtained permission from the Office of Management and Budget through control number 1090-0007 to conduct this survey in accordance with the Paperwork Reduction Act (44 U.S.C. § 3501-3520) and its implementing regulations (5 C.F.R. Part 1320).

The purpose of this letter is to notify you that the CFI Group will be sending you an email invitation asking you to participate in an online survey. Through the survey, we hope to learn more about your needs and identify opportunities to improve our products and services.

Please be assured that the survey questions will only pertain to the usability of FinCEN Portal and FinCEN Query, there will not be any questions concerning specific searches or investigations. Additionally, the results of the survey will be reported only in the aggregate, and your individual responses will be grouped anonymously along with those of other FinCEN customers.

On behalf of FinCEN, thank you in advance for your participation and insight. Should you have any questions about this effort or want to provide additional feedback, please contact FinCEN at [FinCENTraining@fincen.gov](mailto:FinCENTraining@fincen.gov).

Sincerely,

Lynda Gammon  
Office Director  
Operational Information and Development  
Strategic Operations Division

[www.fincen.gov](http://www.fincen.gov)

**From:** FinCENTraining@FinCEN.GOV  
**Subject:** [EXTERNAL] Multiple Training Events May 16-31, 2022  
**To:** FinCEN Distribution List  
**Sent:** May 11, 2022 6:00 PM (UTC-04:00)

*WARNING: This educational session may display BSA information. If you register and attend the session, you are certifying that you have authorized access to see BSA information and are current with your BSA Data Certification Training. NOTE: Unauthorized release or use of any information obtained in the session may result in criminal or civil sanctions. See 31 U.S.C 5311, ET SEQ; 31 CFR Chapter X; and FinCEN Re-dissemination Guidelines*

**You are invited to attend multiple FinCEN training events, all optional.**

**“Cybercrime and FinCEN Query Research” WebEx webinar training will be offered on Monday, May 16, 2022, at 2:30 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** This presentation covers common forms of cybercrime, such as ransomware and phishing, the perpetrators behind such attacks and their prospective motivation. Additionally, we will discuss information and identifiers that may be gleaned from such crimes, and how to use FinCEN Portal and FinCEN Query to follow up on these potential leads. *Webinar presentation approximately 120 minutes.*

**A “Follow the Money” Part 1, webinar presentation will be offered on Tuesday, May 17, 2022, at 1:00 pm. EDT. (Please Note: Attendees are recommended to take “Follow the Money” Part 1 prior to attending Part 2) To register, click on the link below:**

**(b) (6)**

**Training Details:** *“Follow the Money” Part 1-* The presentation and accompanying modules and reference materials will enhance the audience’s ability to “follow the money” trails tied-in with illicit finance methods. Particular emphasis will be placed funds transfer processes, sample transaction flows, records which are generated and maintained for retrieval at financial institutions and other sources, correspondent banking channels, centralized systems Fedwire, SWIFT, and CHIPS, contact points, and recommended investigative and analytical “check lists” and approaches. The session will point-out the long term systemic benefits in identifying, disrupting, and dismantling criminals’ financial “life lines”. The training is intended to be “user friendly” and practical oriented. It is geared toward benefitting all levels of attendees - ranging from those who are beginning to delve into financial investigations and analyses to those who are further advanced therein. *Webinar presentation approximately 90 minutes.*

**A “314(a) and Egmont Programs” webinar presentation will be offered on Tuesday, May 17, 2022, at 5:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** Overview of the 314(a) Program that enables law enforcement to contact participating U.S. financial institutions through FinCEN to locate accounts/transactions of subjects/entities involved in money laundering or terrorism. Overview of the Egmont Program that enables law enforcement to contact the financial intelligence unit of a foreign country through FinCEN to locate accounts/transactions of subjects/entities involved in money laundering or terrorism. *Webinar presentation approximately 90 minutes.*

**A “FinCEN 101” WebEx webinar presentation will be offered on Wednesday, May 18, 2022, at 1:00 pm. EDT. To register, click on the link below:**

**(b) (6)**

**Training Details:** The presentation will include FinCEN's mission, the Bank Secrecy Act (BSA), who is required to file, types of BSA records, value of the data, records maintained by the filing institutions, safeguarding BSA records, FinCEN's support to Law Enforcement (314(a) USA Patriot Act, Egmont program, Financial Advisories, and Geographic Targeting Orders). *Webinar presentation approximately 60 minutes.*

**A “FinCEN Advanced Query” webinar presentation will be offered on Thursday, May 19, 2022, at 1:00 pm EDT. To register, click on the link below:**

(b) (6)

**Training Details:** Demonstrates using the Advanced Query feature to conduct searches for reactive and proactive investigations to identify a variety of BSA filings, using a variety of search techniques, identifiers, keywords and import lists. Uses proactive searches to demonstrate how to identify new targets for investigation. Demonstrate saving and scheduling new queries, and adjusting user preferences in the results grid. Guidance will be provided on interpreting SARs and their attachments for financial intelligence, requesting SAR supporting documents from financial institutions, and protecting SARs from unauthorized disclosures. *Webinar presentation approximately 90 minutes.*

**A “Follow the Money” Part 2, webinar presentation will be offered on Friday, May 20, 2022, at 1:00 pm EDT. (Please Note: Attendees are recommended to take “Follow the Money” Part 1 prior to attending Part 2) To register, click on the link below:**

(b) (6)

**Training Details:** *“Follow the Money” Segment 2* – The follow-on presentation will cover the detailed interpretation of sample Suspicious Activity Report (SAR) narratives and other documents to identify, investigate, and analyze illicit finance related money movement trails and ascertain records “choke points”. Sample narratives and methods will be illustrated and dissected. The presentation will also provide insights on illicit finance methods involving bank funds transfers and money service business (MSBs) remittances. It is strongly recommended that attendees please first attend the Segment 1 training session prior to attending Segment 2. *Webinar presentation approximately 90 minutes.*

**A “FinCEN Portal Only” webinar presentation will be offered on Wednesday, May 25, 2022, at 1:00 pm EDT. To register, click on the link below:**

(b) (6)

**Training Details:** Users enhance their skills on navigating the FinCEN Portal page. Demonstrations will show the benefits of the FinCEN Portal page (i.e. *Critical Announcements, Helpful Links, What’s Happening and FinCEN Tools*). The FinCEN Training guides will be reviewed and downloaded. FinCEN’s products will be highlighted and explained. Egmont Program and 314(a) Program request forms will be highlighted. BSA warnings and Re-dissemination guidelines documents will be explained. *Webinar presentation approximately 60 minutes.*

**An “i2 Downloads” WebEx webinar presentation will be offered on Thursday, May 26, 2022, at 1:00 pm EDT. To register, click on the link below:**

(b) (6)

**Training Details:** FinCEN Query i2 Download training provides users the ability to use i2 Analyst Notebook to create link analysis charts. Live demonstrations show how to download i2 Specifications from FinCEN’s Portal into a user’s i2 Analyst Notebook, and how to create search queries and download those BSA filings from the results grid into i2. Finally, the training identifies files that automatically create the i2 Chart and/or i2 Timeline. *Webinar presentation approximately 60 minutes.*

**A “Proactively Identifying Human Trafficking/Human Smuggling SARs” WebEx webinar presentation will be**

offered on Tuesday, May 31, 2022, at 1:00 pm. EDT. To register, click on the link below:

(b) (6)

**Training Details:** Advanced FinCEN Query training specifically on Human Trafficking/Human Smuggling SAR's. Proactively identify new SARS on a variety of Human Trafficking/Human Smuggling financial crimes using specific key words and import lists within a state. In addition using the NEAR Tab to provide alternative Human Trafficking terms. Provides guidance on interpreting SAR's and their attachments for financial intelligence. Guidance saving and scheduling the query for future filings, and requesting Supporting Documents from the filing institutions. Follows up with additional information on Human Trafficking/Human Smuggling in FinCEN Portal and FinCEN's public webpage. *Webinar presentation approximately 90 minutes.*

**Upcoming June webinars:** – FinCEN 101, Basic Portal and FinCEN Query, Advanced FinCEN Query, Follow the Money 1&2, New Rapid Response Program Tool on FinCEN Portal, Using Import Lists for Proactive Search Queries, and Interpreting SARs and Other BSA Filings.

**WEBEX SYSTEM NOTES:** After registering, you will receive a WebEx confirmation email containing information about joining the webinar. The registration format has slightly changed for WebEx links. Users may have to click "register" and it will bring up the form with the standard required information. The WebEx webinar tool works for most agencies in their IT firewalls. If you do not receive the WebEx registration confirmation email within an hour after you registered, contact your IT helpdesk (firewall issue). On the day of event, use the confirmation email to log into the event 15 minutes before start time. If you are unable to log in, contact your IT helpdesk for assistance (firewall issue). WebEx system does not email reminders to you on the training event.

Thank you,

FinCENTraining

**From:** BSAAG  
**Subject:** [EXTERNAL] FW: Reminder for Registration: BSAAG Plenary: Zoom Registration Details for May 18th  
**To:** Adams, Andrew (ODAG)  
**Sent:** May 11, 2022 1:55 PM (UTC-04:00)

Good Afternoon, Andrew,

Just a reminder to please register for the May 18<sup>th</sup> BSAAG plenary meeting per the instructions below. If you have any questions, please feel free to reach out. Thanks, Kelly

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**From:** BSAAG (b) (6)  
**Sent:** Monday, May 9, 2022 12:19 PM  
**To:** BSAAG (b) (6)  
**Subject:** Reminder for Registration: BSAAG Plenary: Zoom Registration Details for May 18th

Hello BSAAG Members,

If you have not done so already, please register for the May 18<sup>th</sup> BSAAG plenary meeting per the instructions below. Please be sure to include the name of the organization that you are representing.

Betsy Maesen

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**From:** BSAAG (b) (6)  
**Sent:** Tuesday, May 3, 2022 12:43 PM  
**To:** BSAAG (b) (6)  
**Subject:** BSAAG Plenary: Zoom Registration Details for May 18th

Hello BSAAG Members,

Please register for the BSAAG Plenary meeting being held on May 18<sup>th</sup> by using the link in this email. Please make sure that you are able to access the Zoom platform in whatever environment you will be in for the BSAAG meeting. **Please register no later than Tuesday, May 10<sup>th</sup>.** Each organization is limited to two participants, so please coordinate within your organization about attendance.

After registering, you will receive meeting details including a link that is unique to your registration. If you have difficulty accessing Zoom in your work environment, you may want to use a personal internet connection and personal email address. If you do use a personal email address, please make sure that it is one that can be easily identified as belonging to you and please include the name of the organization that you are representing.

You are invited to a Zoom webinar.  
When: May 18, 2022 11:00 AM Eastern Time (US and Canada)  
Topic: BSAAG Plenary Meeting

Please click the link below to register for the webinar:

(b) (6)

Passcode: (b) (6)

Or One tap mobile :

US: (b) (6) or (b) (6)

Or Telephone:

Dial(for higher quality, dial a number based on your current location):

US: (b) (6) or (b) (6) or (b) (6) or (b) (6)

Webinar ID: (b) (6)

Passcode: (b) (6)

International numbers available: (b) (6)

Or an H.323/SIP room system:

H.323: (b) (6) (US West) or (b) (6) (US East)

Meeting ID: (b) (6)

Passcode: (b) (6)

SIP: (b) (6)

Passcode: (b) (6)

Betsy Maesen