

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

OLEG DERIPASKA,)
)
)
 Plaintiff,)
)
 v.)
)
 STEVEN T. MNUCHIN, Secretary of)
 the Department of the)
 Treasury, *et al.*,)
)
 Defendants.)

Civil Action No. 1:19-cv-00727

**NOTICE OF FILING OF CERTIFIED LIST OF CONTENTS
OF ADMINISTRATIVE RECORD**

Pursuant to Local Rule 7(n)(1) and the Court’s scheduling order, ECF No. 4, attached hereto is a certified index of the contents of the Administrative Record in this case. A redacted copy of the Administrative Record was transmitted to counsel for plaintiff on April 29, 2019.

Dated: May 21, 2019

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

DIANE KELLEHER
Assistant Director

/s/ Nicholas Cartier
NICHOLAS CARTIER
Trial Attorney (DC Bar # 495850)
U.S. Department of Justice
1100 L Street, N.W.
Washington, DC 20005
Tel: (202) 616-8351

Attorneys for Defendants

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
OLEG DERIPASKA,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No. 1:19-cv-00727
)	
STEVEN T. MNUCHIN, Secretary of)	
the Department of the)	
Treasury, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
_____)	

CERTIFICATION OF ADMINISTRATIVE RECORD

I, Leila Baheri, declare as follows:

1. I am currently employed as the Assistant Director in the Global Weapons of Mass Destruction (WMD), Middle East Europe & Russia Division (GME) of the Office of Global Targeting at the U.S. Department of the Treasury, Office of Foreign Assets Control (OFAC).

2. I have served in this capacity since 2017. I have been employed by OFAC since 2003, first as a Sanctions Investigator, later as a Section Chief and then Assistant Director of other Divisions within OGT, before assuming my current position. I lead a unit within OFAC that is responsible for, among other things, designations under Executive Order 13661 of March 16, 2014, "Blocking Property of Additional Persons Contributing to the Situation in Ukraine," Executive Order 13662 of March 20, 2014, "Blocking Property of Additional Persons Contributing to the Situation in Ukraine," and the Ukraine Related Sanctions Regulations, 31 C.F.R. Part 589. As such, I am authorized to certify the truth and correctness of official records of OFAC, and of other documents recorded or filed with OFAC.

3. The facts attested to herein are based on my personal knowledge or information made available to me in the course of my official duties.

4. I hereby certify to the best of my knowledge and belief that the documents described in the attached index constitute a true, correct, and complete copy of the non-privileged documents that were directly or indirectly considered in connection with OFAC's decision to designate plaintiff Oleg Deripaska. The administrative record, as well as the index, was redacted to remove classified or privileged information, before production to the Plaintiff.

In accordance with 28 U.S.C. § 1746, I certify and declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 21, 2019

/s/ Leila Baheri
Leila Baheri
Assistant Director
Global WMD, Middle-East, Europe & Russia
Office of Global Targeting
Office of Foreign Assets Control
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Freedman's Bank Building
Washington, DC 20220

TOP SECRET//

(U) UKRAINE-EO13661-13321 Oleg Vladimirovich DERIPASKA Document Index

	Document Title	Bates Number
A.	(U) E.O. 13661 Designation and Blocking Memorandum	0001 – 0004
B.	(U) E.O. 13662 Designation and Blocking Memorandum	0005 – 0008
C.	(U) UKRAINE-EO13661-13321 Clearance Sheet	0008a
D.	(U) UKRAINE-EO13661-13321 Designation Evidentiary	0009 – 0017
E.	(U) Exhibits from UKRAINE-EO13661-13321 Designation Evidentiary	0018 – 0186
1.	(U) Executive Order 13661 of March 16, 2014, “Blocking Property of Additional Persons Contributing to the Situation in Ukraine,” 79 Fed. Reg. 15535 (March 19, 2014).	0018 – 0020
2.	(U) Executive Order 13662 of March 20, 2014, “Blocking Property of Additional Persons Contributing to the Situation in Ukraine,” 79 Fed. Reg. 16169 (March 24, 2014). (U)	0021 – 0023
3.	(U// FOUO) U.S. Department of the Treasury, “Determination Pursuant to Section 1(a)(i) of Executive Order 13662,” July 16, 2014.	0024
4.	(U) Bloomberg, “Bloomberg Billionaires Index #179 Oleg Deripaska,” available at www.bloomberg.com/billionaires/profiles/oleg-deripaska/ , accessed January 31, 2018.	0025 – 0030
5.	(U) Web site of Oleg Deripaska, Family, available at www.deripaska.com/about/biography/ , accessed January 31, 2018.	0031 – 0040
6.	(U) Forbes, Oleg Deripaska, available at www.forbes.com/profile/oleg-deripaska/ , accessed January 31, 2018.	0041 – 0042
7.	(U) The Guardian, “Mega-Rich Homes Tour Puts Spotlight on London’s Oligarchs,” Luke Harding, February 4, 2016, available at www.theguardian.com/uk-news/2016/feb/04/mega-rich-homes-tour-london-oligarchs-russia-alexei-navalny-putin .	0043 – 0045
8.	(U) Google.com, 5 Belgrave Square London, available at www.google.com/maps/ , accessed February 28, 2018.	0046
9.	(U) The Telegraph, “Oligarch Linked to Politicians ‘Ordered Murder of Banker,’” Sam Marsden, July 10, 2012, available at www.telegraph.co.uk/finance/financial-crime/9387913/Oligarch-linked-to-politicians-ordered-murder-of-banker.html .	0047 – 0048
10.	(U) The Times, “Billionaire ‘With Mafia Links Spied on Rivals,’” Roger Boyes and Alex Spence, July 9, 2012, available at www.thetimes.co.uk/article/billionaire-with-mafia-links-spied-on-rivals-5bgt5k5brb6 .	0049 – 0051
11.	(U) Financial Times, “Close to the Wind: Russia’s Oligarchs,” Catherine Belton, October 24, 2008, available at www.ft.com/content/d96aa8ac-a1f9-11dd-a32f-000077b07658 .	0052 – 0056
12.	(U) OCCRP, “Russian Billionaire Linked to Trump, Manafort Has New Cyprus Passport,” Sara Farolfi and Stelios Orphanides, March	0057 – 0060

TOP SECRET//

TOP SECRET// [REDACTED]

- 5, 2018, available at: www.occrp.org/en/goldforvisas/russian-billionaire-linked-to-trump-manafort-has-new-cyprus-passport.
13. (U) U.S. Department of Justice, Foreign Agents Registration Act Filing – Endeavor Group, May 8, 2009. 0061 – 0064
 14. (S// [REDACTED]) 0065 – 0067
 15. (S//NF) [REDACTED] 0068 – 0071
 16. (S//NF) [REDACTED] 0072 - 0075
 17. (U) Declaration of Oleg Deripaska in Opposition to Gliklad’s Motion for Summary Judgement and in Support of Deripaska’s Cross Motion, Alexander Gliklad v. Oleg Deripaska, 652641/2015 (Supreme Court of the State of New York County of New York), filed on June 9, 2016. 0076 – 0079
 18. (S//NF) [REDACTED] 0080 – 0082
 19. (S//NF) [REDACTED] 0083 – 0085
 20. (S//NF) [REDACTED] 0086 – 0090
 21. (U) U.S. Department of the Treasury web site, Press Release, “Announcement of Additional Treasury Sanctions on Russian Financial Institutions and on a Defense Technology Entity,” July 29, 2014, available at www.treasury.gov/press-center/press-releases/Pages/jl2590.aspx. 0091 – 0092
 22. (U) The Nation, “McCain’s Kremlin Ties,” Mark Ames and Ari Berman, October 1, 2008, available at www.thenation.com/article/mccains-kremlin-ties/. 0093 – 0110
 23. (TS// [REDACTED]) 0111 – 0114
 24. (U) Web site of Oleg Deripaska, Initiatives, available at www.deripaska.com/business/, accessed March 22, 2018. 0115 – 0119
 25. (U) Web site of Oleg Deripaska, Business, available at www.deripaska.com/business/, accessed January 31, 2018. 0120 – 0132
 26. (U) EN+ Group, “Prospectus,” November 3, 2017, available at www.enplus.ru/content/dam/enplus/corporate/investors/regulatory-news/enplus-group-prospectus.pdf. 0133 – 0160
 27. (U) Web site of EuroSibEnergo, www.eurosib.ru/en/, accessed February 12, 2018. 0161 – 0168
 28. (S//NF) [REDACTED] 0169 – 0174
 29. (U) Complaint - Oleg V. Deripaska v. The Associated Press, 1:17-cv-00913, May 5, 2017 (DC). 0175 - 0186

TOP SECRET// [REDACTED]