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## United States Senate

COMMITTEE ON FINANCE

WASHINGTON, DC 20510-6200

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February 27, 2019

### VIA ELECTRONIC TRANSMISSION

The Honorable Steven Mnuchin  
Secretary  
Department of Treasury

Dear Secretary Mnuchin,

On March 31, 2017, I wrote to the Justice Department regarding Fusion GPS' actions on behalf of Russian interests via its work for Prevezon Holdings and its potential violations of the Foreign Agents Registration Act (FARA). Prevezon Holdings is owned by Russian Denis Katsyv, the son of a former Russian government minister, and it is a foreign principal under FARA.<sup>1</sup> In 2013, the Justice Department initiated a civil asset forfeiture case against Prevezon, arguing that the company had received millions of dollars laundered from a \$230 million identity theft conspiracy. Russian accountant Sergei Magnitsky had uncovered the fraud and was eventually murdered as a result.<sup>2</sup> In 2012, Congress passed the Magnitsky Act to punish Russian officials responsible for his murder. In 2014, Prevezon hired Fusion GPS to smear and undermine Magnitsky Act proponent Bill Browder's credibility in an effort to undermine the government's case against it. In 2016, Katsyv went even further and set up a lobbying firm, the Human Rights Accountability Global Initiative (HRAGI), to lobby the U.S. Congress against the Magnitsky Act. One of those lobbyists was Rinat Akhmetshin.

In order to further my investigation into those Russian interests and their FARA implications, as well as my investigation into Russian interference in the 2016 presidential election, on September 29, 2017, I transmitted a letter to the Financial Crimes Enforcement

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<sup>1</sup> FARA requires individuals to register with the Department of Justice (DOJ) if they act, even through an intermediary, "as an agent, representative, employee, or servant" or "in any other capacity" at the behest of a foreign principal, including a foreign political party, government, or corporation, for purposes of engagement with a United States official. The registration applies to anyone who attempts to influence a U.S. government official on behalf of a foreign principal in an effort to "formulat[e], adopt[,], or chang[e] the domestic or foreign policies of the United States." Likewise, an individual whose activities are subject to registration under FARA and who sends informational material "for or in the interest of [a] foreign principal" with the intent or belief that such material will be circulated among at least two persons must transmit the material to the Attorney General no later than 48 hours after actual transmission. Notably, an ongoing failure to register with the DOJ is a continuing offense. 22 U.S.C. § 611 – Definitions: The term "foreign principal" includes - (1) a government of a foreign country and a foreign political party; (2) a person outside of the United States, unless it is established that such person is an individual and a citizen of and domiciled within the United States, or that such person is not an individual and is organized under or created by the laws of the United States or of any State or other place subject to the jurisdiction of the United States and has its principal place of business within the United States; and (3) a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.

<sup>2</sup> *U.S. v. Prevezon Holdings Ltd., et al.*, No. 13-cv-6326 (SDNY).

Network (FinCEN), a bureau within the Treasury Department, requesting a copy of any and all documents relating to Suspicious Activity Reports (SARs) for individuals associated with the subject matter of my investigation. That letter is attached for your reference.

After transmission, Treasury requested a list of individuals and entities that could be prioritized in the context of the broader search and provided in advance of a full response to my September 29 letter. Accordingly, on October 18, 2017, my staff informed Treasury of a list of key priorities related to the following individuals and entities: Rinat Akhmetshin; Natalia Veselnitskaya; Berryle Trading; BakerHostetler; Glenn Simpson; Bean LLC; Fusion GPS; Kernel LLC; Caudex LLC; Perkins Coie; Orbis Business Intelligence, Christopher Steele; and Christopher Burrows.

However, as of December 20, 2017, the Committee still had not received any responsive documents. As a result of Treasury's inability to comply with my congressional oversight requests, I placed a hold on Mr. David Ryder, to be Director of the U.S. Mint. On January 26, 2018, Treasury provided the SARs related material that it identified as responsive to the narrowed priority list. As a condition for releasing the hold on Mr. Ryder, I asked Treasury to confirm that this January 26, 2018, production was responsive to "all" requested documents in my priority list. In response, on February 7, 2018, Treasury stated, "We have produced all documents that we have identified as responsive to your narrowed priorities list." Subsequently, I lifted my hold on Mr. Ryder.

On February 4, 2019, BuzzFeed released an article titled, "A Lobbyist At The Trump Tower Meeting Received Half A Million Dollars in Suspicious Payments."<sup>3</sup> The report referenced hundreds of thousands of dollars transferred among individuals and entities on my initial request as well as my narrowed priority list. The report also stated that "Wells Fargo and Bank of America submitted their findings to the Treasury Department in early November 2017" which was before Treasury alleged to have provided "all" relevant records to me under the narrowed list.<sup>4</sup>

By way of example, according to the report, Akhmetshin was paid \$97,400 over five months by BakerHostetler to assist with the Prevezon civil asset forfeiture case.<sup>5</sup> The payments were reportedly flagged by investigators at Wells Fargo as evidence that he potentially violated FARA.<sup>6</sup> In addition, the same month Akhmetshin registered to lobby for HRAGI, it received a half-million dollars in wire transfers from Denis Katsyv and other Russians.<sup>7</sup> Akhmetshin was

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<sup>3</sup> Emma Loop et. al., *A Lobbyist At The Trump Tower Meeting Received Half A Million Dollars In Suspicious Payments*, BuzzFeed (Feb. 5, 2019), <https://www.buzzfeednews.com/article/emmaloop/trump-tower-meeting-russian-lobbyist-akhmetshin-suspicious-p>

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

reportedly paid \$52,686 from HRAGI, which is allegedly \$30,000 more than what he declared on his lobbying disclosure forms.<sup>8</sup> He also received a \$100,000 wire transfer from Denis Katsyv around the time of the June 2016 meeting at Trump Tower during which the Magnitsky Act was discussed. Further, the report noted,

Examiners at Bank of America later turned a record of these transactions over to US Treasury officials, alerting them that the payments could be evidence of bribery or political corruption related to the Magnitsky Act.<sup>9</sup>

If this report is accurate, the information that it references, which is clearly responsive both to my narrowed list of priorities and my initial request, was in Treasury's possession on February 7, 2018, when it assured me that it had produced all records relevant to my priority request. However, it appears that none of the information that is referenced in the report was produced to my office.

Accordingly, no later than March 13, 2019, please provide all documents referenced in the BuzzFeed article and provide a detailed explanation as to why Treasury withheld documents from Congress during the course of a congressional investigation. In addition, please produce all documents responsive to my September 29, 2017, request no later than March 13, 2019. Should you have questions, please contact Josh Flynn-Brown of my Committee staff at 202-224-4515.

Sincerely,



Charles E. Grassley  
Chairman  
Committee on Finance

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<sup>8</sup> Emma Loop et. al., *A Lobbyist At The Trump Tower Meeting Received Half A Million Dollars In Suspicious Payments*, BuzzFeed (Feb. 5, 2019), <https://www.buzzfeednews.com/article/emmaloop/trump-tower-meeting-russian-lobbyist-akhmetshin-suspicious-p>

<sup>9</sup> *Id.*

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United States Senate  
COMMITTEE ON THE JUDICIARY  
WASHINGTON, DC 20510-6275

KOLAN L. DAVIS, Chief Counsel and Staff Director  
JENNIFER DUCK, Democratic Staff Director

September 29, 2017

**VIA ELECTRONIC TRANSMISSION**

Mr. Jamal El-Hindi  
Acting Director  
Financial Crimes Enforcement Network  
2070 Chain Bridge Road  
Vienna, VA 22182

Dear Acting Director El-Hindi:

The Senate Judiciary Committee is conducting an investigation into Russian interference in the 2016 presidential election, as well as the Department of Justice's enforcement of the Foreign Agents Registration Act. The Committee has jurisdiction to conduct oversight over the Department of Justice and Federal Bureau Investigation, anti-terrorism enforcement and policy, and espionage laws and their enforcement.

To assist the Committee with its examination of these matters, I am requesting a copy of any and all documents relating to Suspicious Activity Reports (SARs) that have been filed regarding the following individuals or entities:

- 1. Rinat Akhmetshin**
- 2. Edward Lieberman**
- 3. Akezhan Kazhegeldin**
- 4. Natalia Veselnitskaya**
- 5. Robert Arakelian**
- 6. Peter Zalmayev**
- 7. International Eurasian Organisation for Economic and Political Research**
- 8. International Eurasian Institute for Economic and Political Research**

**9. Human Rights Accountability Global Initiative Foundation**

**10. Eurasian Democracy Initiative**

**11. Berryle Trading Inc.**

**12. Baker & Hostetler LLP**

**13. John Moscow**

**14. Mark Cymrot**

**15. Glenn Simpson**

**16. Peter Fritsch**

**17. Thomas Catan**

**18. Edward Baumgartner**

**19. Bean, LLC**

**20. Fusion GPS**

**21. Kernel, LLC**

**22. Caudex, LLC**

**23. Perkins Coie LLP**

**24. Orbis Business Intelligence, LTD.**

**25. Christopher Steele**

**26. Christopher Burrows**

**27. Prevezon Holdings Ltd.**

**28. Prevezon Alexander, LLC**

**29. Prevezon Soho USA, LLC**

**30. Prevezon Seven USA, LLC**

**31. Prevezon Pine USA, LLC**

**32. Prevezon 1711 USA, LLC**

**33. Prevezon 1810, LLC**

**34. Prevezon 2009 USA, LLC**

**35. Prevezon 2011 USA, LLC**

**36. Ferencoi Investments, LTD.**

**37. Kolevins, LTD.**

Please provide these documents by October 13, 2017. Thank you for your prompt attention to this important matter. If you have any questions, please contact Patrick Davis of my Committee staff at (202) 224-5225.

Sincerely,



Charles E. Grassley  
Chairman  
Committee on the Judiciary

cc: The Honorable Dianne Feinstein  
Ranking Member  
Senate Committee on the Judiciary