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# United States Senate

COMMITTEE ON FINANCE

WASHINGTON, DC 20510-6200

KOLAN DAVIS, STAFF DIRECTOR AND CHIEF COUNSEL  
JOSHUA SHEINKMAN, DEMOCRATIC STAFF DIRECTOR

October 4, 2019

Ms. Andrea M. Gacki  
Director  
Office of Foreign Assets Control  
Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

Dear Director Gacki:

On July 31, 2018, I wrote to you about the Russia sanctions program, specifically about whether your office had investigated the relationships between Russian state-owned arms manufacturers and what appear to be Russian-linked United States arms manufacturers.<sup>1</sup> These companies included Rostec subsidiary Kalashnikov Concern, the largest firearms producer in Russia, and Tula Cartridge, as well as their corresponding U.S. entities Kalashnikov USA, and Tulammo USA. To date, your office has not responded to this request.

I recently released a report titled *The NRA and Russia: How a Tax-Exempt Organization Became a Foreign Asset*, on an investigation conducted by my Senate Finance Committee staff into the relationship between the National Rifle Association (NRA), convicted foreign agent Maria Butina, and sanctioned former Russian government official Alexander Torshin.<sup>2</sup> The report found that these Russian nationals working for the benefit of the Russian Federation enticed NRA officials and representatives to travel to Russia with offers of personally lucrative business deals with Russian arms manufacturers, including entities that appear to be wholly or partially owned subsidiaries of entities your office has listed as Specially Designated Nationals and Blocked Persons (SDNs).<sup>3</sup>

In particular, the report documents meetings between NRA officials and SDNs, including Dmitry Rogozin and Igor Shchyogolev.<sup>4</sup> It further reports on the meetings of NRA officials with employees, officers and other representatives of certain designated entities or entities owned or controlled by SDNs, including Kalashnikov Concern, Molot-Oruzhie, and Tula Cartridge Works.<sup>5</sup>

I am writing again to ask that you respond to my initial July 31, 2018 request and to ask that you investigate the findings in my Senate Finance Committee staff's report. Specifically:

- 1) Please provide an analysis of the ownership interests of Orsis, a purportedly privately held Russian arms manufacturer with close ties to former Deputy Prime Minister Dmitry Rogozin and

<sup>1</sup> Senate Finance Committee Press Release: [Wyden Questions Top Sanctions Enforcer on Ties Between US, Russian Arms Manufacturers and Russian Oligarchs, August 2, 2018](#)

<sup>2</sup> Senate Finance Committee Minority Staff Report, *The NRA and Russia: How a Tax-Exempt Organization Became a Foreign Asset*, September 2019

<sup>3</sup> *Id.*, at p.45.

<sup>4</sup> *Id.*, at p.34-37.

<sup>5</sup> *Id.*, at p.41.

Russian oligarch Konstantin Nikolaev.

- 2) Please provide an analysis of the ownership interests of Molot-Oruzhie. Molot-Oruzhie is a Russian arms manufacturer that your office listed in 2017 after Kalashnikov Concern advised an unnamed non-Russian company to falsify invoices by using Molot in an attempt to evade U.S. and E.U. sanctions.<sup>6</sup> Please also identify the non-Russian company that was instructed to falsify invoices.

I have attached copies of the July 31, 2018 request as well as the Senate Finance Committee minority staff report for your convenience. You may contact my Senate Finance Committee oversight staff at 202-224-4515 if you have any questions or concerns about this request. Thank you for your prompt attention to this matter.



Ron Wyden  
Ranking Member  
Senate Committee on Finance

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<sup>6</sup> [U.S. Department of the Treasury Press Release: Treasury Designates Individuals and Entities Involved in the Ongoing Conflict in Ukraine, June 20, 2017](#)