



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

May 12, 2017

The Honorable Elizabeth Warren
United States Senate
Washington, DC 20510

Dear Senator Warren:

I write in response to your letter of February 22, 2017 concerning the enforcement of U.S. economic sanctions.

The Treasury Department's Office of Foreign Assets Control administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, proliferators of weapons of mass destruction, and others. OFAC is responsible for civil investigation and enforcement of economic sanctions violations. Where appropriate, OFAC may coordinate its investigative and enforcement activities with federal, state, local, or foreign regulators, or law enforcement agencies.

Treasury is committed to enforcing its economic sanctions programs with the utmost vigilance and to the fullest extent. Robust sanctions enforcement is a crucial tool for advancing the national security and foreign policy interests of the United States. A copy of your letter, like all Congressional inquiries concerning economic sanctions enforcement, has been provided to OFAC. Treasury's Office of Legislative Affairs stands ready to engage with your staff if you have any further questions or needs. Our office may be reached at (202) 622-1900.

Sincerely,

Matt Kellogg
Deputy Assistant Secretary
Office of Legislative Affairs

ELIZABETH WARREN
MASSACHUSETTS

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February 22, 2017

Steven T. Mnuchin
Secretary of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

Dear Secretary Mnuchin:

Last month, I sent you a letter raising my concern about Anthony Scaramucci – who at the time was acting as a “Trump translator” in Davos, Switzerland and was an informal member of Mr. Trump’s advisory team¹ – reportedly engaging in direct talks during the presidential transition regarding potential business transactions with the head of the Russian Direct Investment Fund (RDIF), a state-run entity currently subject to sanctions by the Treasury Department.²

The RDIF has been under sanction by the Department of the Treasury since July 2015 because it is part of the Russian financial services sector that contributes to Russia’s annexation of the Crimean region of Ukraine.³ Accordingly, U.S.-based persons or entities are prohibited from conducting certain financial transactions with this Russian fund.⁴

When I sent the letter, Mr. Scaramucci was slated to be White House Director of Intergovernmental Affairs and Senior Advisor to President Trump. I wrote to ask that you

¹ Miriam Elder, “Trump’s Translator Wants The Global Elite To Understand Him,” *Buzzfeed* (January 17, 2017) (online at: https://www.buzzfeed.com/miriamelder/trumps-translator-wants-the-global-elite-to-understand-him?utm_term=.cJLEL9DvaP#.cvwkd065mr); Kim Hjelmgaard, “In Davos, Anthony Scaramucci volunteers for ‘Trump translation’ duty,” *USA Today* (January 17, 2017) (online at: <http://www.usatoday.com/story/news/world/2017/01/17/trump-presidency-anthony-scaramucci-davos-world-economic-forum/96659762/>).

² Letter from Senator Warren and Senator Cardin to Steve Mnuchin, Treasury Secretary-Designate (January 19, 2017) (online at: http://www.warren.senate.gov/files/documents/2017-01-19Letter_to_Mnuchin.pdf).

³ U.S. Department of the Treasury, “Ukraine-Related Designations; Sectoral Sanctions Identifications; Cote d’Ivoire Designation Removals; Issuance of an Important Crimea Sanctions Advisory,” (July 30, 2015) (online at: <https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20150730.aspx>); Portia Crowe, “The US just sanctioned a fund that was connected to some of the biggest names in finance,” *Business Insider* (July 30, 2015) (online at: <http://www.businessinsider.com/russian-investment-fund-connected-to-us-investors-sanctioned-2015-7>); Executive Order 13662, “Blocking Property of Additional Persons Contributing to the Situation in Ukraine,” (March 20, 2014) (online at: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/ukraine_eo3.pdf).

⁴ U.S. Department of the Treasury, “Ukraine-Related Designations; Sectoral Sanctions Identifications; Cote d’Ivoire Designation Removals; Issuance of an Important Crimea Sanctions Advisory,” (July 30, 2015) (online at: <https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20150730.aspx>); U.S. Department of the Treasury, “Executive Order 13662 Directives,” (online at: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/eo_13662_directives.pdf).

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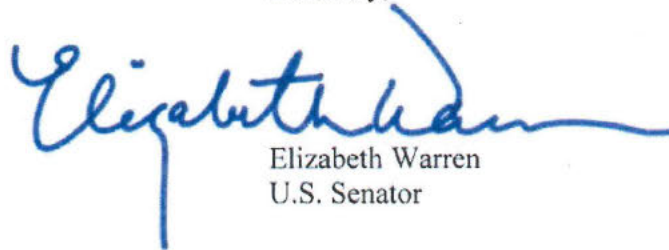
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conduct an investigation to determine if Mr. Scaramucci may have violated current U.S. sanctions law; if he made any implicit or explicit promises related to the relaxation of sanctions; if President Trump or other Trump Administration transition officials were aware of Mr. Scaramucci's contacts with the RDIF; and if Mr. Scaramucci had any financial interest in the RDIF.

In your January 30th response, you agreed to look into the matter. You wrote that you “intend to continue the Treasury Department’s history of taking reported sanctions violations seriously” and that you “will ensure the appropriate Department components assess whether further investigation of this matter is warranted.”⁵ Now that you have been confirmed as the head of the agency with primary responsibility for the enforcement of our Russia financial sanctions, I ask that you follow through on your commitment to investigate whether Mr. Scaramucci engaged in discussions to facilitate prohibited transactions with a sanctioned entity in violation of federal law, and whether other Trump Administration transition officials were aware of or approved his activities. I write to emphasize that the Department must vigorously pursue this investigation regardless of Mr. Scaramucci’s employment status with the Trump Administration.

Any conduct of current or former Trump Administration officials that appears to be an attempt to circumvent or override U.S. sanctions on Russia must be thoroughly investigated. I ask that you provide me with a briefing on the status of this investigation at the earliest possible opportunity.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elizabeth Warren", with a long horizontal flourish extending to the right and a vertical line extending downwards from the end of the signature.

Elizabeth Warren
U.S. Senator

⁵ Steven T. Mnuchin response to Warren-Cardin Letter on Scaramucci, Jan. 30, 2017 [on file with Senators].