



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

11 March 2022

Mr. Austin R. Evers
American Oversight
1030 15th Street N.W. - Suite B255
Washington, D.C. 20005

Email: foia@americanoversight.org

RE: Your FOIA Request to Treasury, Case Number 2020-01-042

Dear Mr. Evers,

This is the final response from the Department of the Treasury's Office of Intelligence and Analysis (OIA) to your Freedom of Information Act (FOIA) request dated 1/6/2020. You have requested access to the following records:

"All records reflecting communications (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat, Google Hangouts, Lync, Skype, or WhatsApp), telephone call logs, calendar invitations, calendar entries, meeting notices, meeting agendas, informational material, talking points, memos to file, any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, or other materials) between (i) any of the specified Treasury officials, and (ii) any of the specified external entities on the topic of Halkbank.

Government Officials

1. Steven Mnuchin, Secretary of the Treasury, and anyone communicating on his behalf, such as an executive or special assistant or scheduler
2. Justin Muzinich, Deputy Secretary of the Treasury
3. Brent McIntosh, Under Secretary for International Affairs
4. Geoffrey Okamoto, Deputy Assistant Secretary for International Finance
5. Sigal Mandelker, Under Secretary of the Treasury for Terrorism and Financial Intelligence
6. Bimal Patel, Assistant Secretary for Financial Institutions
7. Isabel Patelunas, Assistant Secretary for Intelligence and Analysis
8. Andrea Gacki, Director, Office of Foreign Assets Control
9. Bradley Smith, Deputy Director, Office of Foreign Assets Control
10. Charles Steele, Chief Counsel, Office of Foreign Assets Control
11. Eli Miller, Former Chief of Staff
12. Anyone serving as Chief of Staff to the Secretary, including in an
13. Dan Kowalski, Counselor to the Secretary
14. Adam Lerrick, Counselor to the Secretary
15. Anyone serving as White House Liaison or White House Advisor, including in an acting capacity External Entities

1. Recep Tayyip Erdogan, President, Turkey
2. Fuat Oktay, Vice President, Turkey
3. Binali Yildirim, Former Prime Minister, Turkey
4. Mehmet Simsek, Former Deputy Prime Minister, Turkey
5. Abdulhamit Gul, Minister of Justice, Turkey
6. Bekir Bozdag, Former Minister of Justice, Turkey
7. Berat Albayrak, Minister of Treasury and Finance, Turkey
8. Naci Agbal, Former Minister of Finance, Turkey
9. Mevlit Cavusoglu, Minister of Foreign Affairs"

Your request has been processed under the provisions of the FOIA, 5 U.S.C. § 552. A reasonable search was conducted for records responsive to your request. In response to the search, 3 pages were located within the Departmental Offices of Treasury Office of Intelligence and Analysis. After carefully considering these records, we are releasing 3 pages in part. The withheld information is protected from disclosure under the FOIA pursuant to 5 U.S.C. § 552(b)(6).

FOIA Exemption 6 exempts from disclosure "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy."

There are no fees assessed at this time since allowable charges fell below \$25.

You have the right to appeal this decision within 90 days from the date of this letter. By filing an appeal, you preserve your rights under FOIA and give the agency a chance to review and reconsider your request and the agency's decision. Your appeal must be in writing, signed by you or your representative, and should contain the rationale for your appeal. Please also cite the FOIA reference number noted above. Your appeal should be addressed to:

FOIA Appeal
FOIA and Transparency
Office of Privacy, Transparency, and Records
Department of the Treasury
1500 Pennsylvania Ave., N.W.
Washington, D.C. 20220

If you submit your appeal by mail, clearly mark the letter and the envelope with the words "Freedom of Information Act Appeal." Your appeal must be postmarked or electronically transmitted within 90 days from the date of this letter.

If you would like to discuss this response before filing an appeal to attempt to resolve your dispute without going through the appeals process, you may contact our FOIA Public Liaison for assistance via email at FOIAPL@treasury.gov, or via phone at (202) 622-8098. A FOIA Public Liaison is a supervisory official to whom FOIA requesters can raise questions or concerns about the agency's FOIA process. FOIA Public Liaisons can explain agency records, suggest agency offices that may have responsive records, provide an estimated date of completion, and discuss how to reformulate and/or reduce the scope of requests in order to minimize fees and expedite processing time.

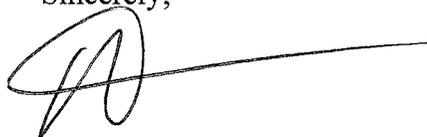
If the FOIA Public Liaison is unable to satisfactorily resolve your question or concern, the Office of Government Information Services (OGIS) also mediates disputes between FOIA requesters and federal agencies as a non-exclusive alternative to litigation. If you wish to contact OGIS, you may contact the agency directly by email at OGIS@nara.gov, by phone at (877) 684-6448, by fax at (202) 741-5769 or by mail at the address below:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road- OGIS
College Park, MD 20740-6001

Please note that contacting any agency official (including the FOIA analyst, FOIA Requester Service Center, FOIA Public Liaison) and/or OGIS is not an alternative to filing an administrative appeal and does not stop the 90-day appeal clock

You may reach the FOIA Office via telephone at 202-622-0930, extension 2; or via e-mail at FOIA@treasury.gov. Please reference FOIA case number 2020-01-042 when contacting our office about this request.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'M' followed by a long horizontal line extending to the right.

Michael Neufeld
U.S. Department of the Treasury
Office of Intelligence and Analysis

Enclosures

Responsive document set (3 pages)

From: Neufeld, Michael
To: Neufeld, Michael
Date: Monday, December 11, 2006 4:41:44 PM

(b) (6)

The Iraq Study Group Report (the "Report") provides an assessment of the situation in Iraq and a set of recommendations to deal with the key military and political challenges facing the country. Although several media reports have cited the Report when discussing foreign-based support for the Sunni Arab insurgency (e.g., \$25 million in Saudi money went to a top Iraqi Sunni cleric and was used to buy Strela), the Report provides only several general points pertaining to financial and other support networks for the Iraqi insurgency, terrorism, and other sources of violence in Iraq.

Listed below are the Iraq Study Group's (the "ISG") findings and recommendations pertaining to sources of violence in Iraq. Please note that since these points are very general, some of which do not mirror the knowledge of the Iraq Issues Team, you might deem them unsuitable for discussion during the TFI Strategic Targeting Meeting.

SOURCES OF VIOLENCE IN IRAQ

The ISG discussed the following sources of violence in Iraq:

- (1) Sunni Arab insurgency;
- (2) al Qaeda and affiliated jihadist groups;
- (3) Shi'a militias and death squads;
- (4) Organized criminality;
- (5) Facilities Protection Services; and
- (6) Neighboring States.

Sunni Arab Insurgency

- The Sunni Arab insurgency includes former elements of the Saddam Hussein regime, disaffected Sunni Arab Iraqis, and common criminals.
- The Sunni Arab Insurgency is the source of most attacks on multinational forces in Iraq.
- The Sunni Arab insurgency has no single leadership; it is a "network of networks."
- The insurgents have different goals, although nearly all oppose the presence of U.S. forces in Iraq. Most wish to restore Sunni Arab rule in Iraq; some aim at winning local power and control.

Al Qaeda and Affiliated Jihadist Groups

- "Al Qaeda is responsible for a small portion of the violence in Iraq, but that includes some of the more spectacular acts: suicide attacks, large truck bombs, and attacks on significant religious or political targets."
- Al Qaeda in Iraq (AQIZ) is now largely Iraqi-run and composed of Sunni Arabs.
- Foreign fighters - numbering an estimated 1,300-play a supporting role for carry out suicide operations.
- Al Qaeda's goals include instigating a wider sectarian war between Iraq's Sunni and Shia, and driving the United States out of Iraq.

Shi'a Militias

- Shi'a militias engaging in sectarian violence pose a substantial threat to immediate and long-term stability.
- Sectarian violence causes the largest number of Iraqi civilian casualties.
- Shi'a militias target: Sunnis Arab civilians, other militias, and government ministries.

Criminality

- Organized criminal rackets thrive, particularly in unstable areas like Anbar province. Some criminal gangs cooperate with, finance, or purport to be part of the Sunni insurgency or a Shi'a militia in order to gain legitimacy.
- The following four of Iraq's eighteen provinces are "highly insecure" - these provinces account for about 40 percent of Iraq's population of 26 million: (1) Baghdad (violence is primarily between Sunni and Shia); (2) Anbar (violence is attributable to the Sunni insurgency and to al Qaeda); (3) Diyala; and (4) Salah.

Facilities Protection Services

- The ISG also briefly discussed the Facilities Protection Services, which are armed units used by each Iraqi ministry to protect infrastructure.
- All together, these units total roughly 145,000 uniformed Iraqis under arms. However, these units have questionable loyalties and capabilities.
- In the ministries of Health, Agriculture, and Transportation - controlled by Moqtada al-Sadr - the Facilities Protection Service is a source of funding and jobs for the Mahdi Army.
- Several Iraqis have referred to the Facilities Protection Services as militias.

Neighboring States

Iran

- Iran has provided arms, funds, and political support to Shi'a militias.
- Iran has also supplied Sunni Arab insurgents with IEDs to attack multinational forces in Iraq.
- The Iranian border is porous, and millions of Iranians travel to Iraq each year to visit Shia holy sites.
- One Sunni politician was quoted by the ISG as follows: "If you turn over any stone in Iraq today, you will find Iran underneath."

Syria

- Syrians look the other way as arms and foreign fighters flow across their border into Iraq.
- Former Baathist leaders find a safe haven within Syria.
- Recommendation 12 provides, in part, for Syria to control its borders with Iraq to the maximum extent possible and work together with Iraqis on joint patrols on the border. Syria can also establish hotlines to exchange information with Iraqis.

Saudi Arabia and the Gulf States

- These countries for the most part have been passive and disengaged.
- Funding for the Sunni insurgency comes from private individuals within Saudi Arabia and the Gulf States.

Turkey

- The Turkish policy toward Iraq is focused on discouraging Kurdish nationalism.
- The Turks are deeply concerned about the operations of the PKK.
- The Turks are upset that the U.S. and Iraq have not targeted the **PKK** more aggressively.
- The Turks have threatened to go after the PKK themselves, and have made several forays across the border into Iraq.

Jordan and Egypt

- Jordan is currently home to 700,000 Iraqi refugees - equal to 10 percent of its population - and fears a flood of many more.
- Both Jordan and Egypt are concerned about the position of Iraq's Sunni Arabs and want constitutional reforms in Iraq to bolster the Sunni community.
- Both Jordan and Egypt also fear the return of insurgents to their countries.