
From: jeffrey E. <jeevacation@gmail.com>
Sent: Saturday, May 5, 2018 6:28 PM
To: Jide Zeitlin
Subject: Re:

understood. not sure if the co is sanctioned. i have tried to research for you sanctions and the case law. not much. . if you had a meeting with the appropriate division of treasury, im sure you can structure around it. = trust swap. option, . for ex can a financial institution trade in the debt of the co.? public debt ,private debt. ? are adr equivalents covered. . etc
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On Sat, May 5, 2018 at 6:55 PM Jide Zeitlin <[REDACTED]> <mailto:[REDACTED]> > wrote:

Yes. Just hung up with our mutual friend having discussed this topic. He agrees with your view that a full divestiture may be required.

The challenge is structuring the option in such away that it does not make me appear to be a strawman--legally or simply in terms of political perception given the mid-terms.

On May 5, 2018, at 13:44, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gmail.com> > wrote:

<https://www.rferl.org/a/us-treasury-provides-way-three-russian-companies-gaz-rusal-en-plus-avoid-us-sanctions-mnuchin/29203690.html></=>

<<https://www.rferl.org/a/us-treasury-provides-way-three-russian-companies-gaz-rusal-en-plus-avoid-us-sanctions-mnuchin/29203690.html>>

he divests of all. take a note interest to mirror return minus . option to buy back in 5 years if sanctions have been lifted . otherwise another 3 then another 2. . . treasury would need to opine on initial transaction. . the lack of control should give treasury comfort. must not run afoul of financing rules.

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