
From: Jide Zeitlin [REDACTED]
Sent: Friday, May 11, 2018 11:34 PM
To: jeffrey E.
Subject: Re:

Good lunch today in Zug re sanctions solution. Interest piqued.

On May 5, 2018, at 7:28 PM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gmail.com> > wrote:

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

On Sat, May 5, 2018 at 1:55 PM Jide Zeitlin [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>

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 intial transaction. . the lack of control shoudl give treasury comfort. must not run afoul of financing rules.

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