

Exhibit C

EXHIBIT

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DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Case ID: SDGT-12284

Erich C. Ferrari
Ferrari & Associates, P.C.
1455 Pennsylvania Ave., N.W.
Suite 400
Washington, DC 20004

Dear Mr. Ferrari,

As you are aware, on June 10, 2015, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated your client, Kassem Hejeij, a Specially Designated Global Terrorist pursuant to Executive Order (E.O.) 13224 and placed him on the list of Specially Designated Nationals and Blocked Persons (SDN list). Your client's designation was based upon evidence that he provided support and services to Hizballah, an entity that is also designated pursuant to E.O. 13224 and on the SDN list. Specifically, your client maintained direct ties with senior elements in Hizballah and provided support to the group for a number of years through Middle East and Africa Bank (MEAB), including by working on behalf of Hizballah to manage commercial ventures in Iraq.

The Reporting, Procedures and Penalties Regulations, 31 C.F.R. Part 501 (collectively, the Regulations), provide that designated persons may seek administrative reconsideration of their designation by submitting arguments or evidence that circumstances resulting in their designation no longer apply, or arguments or evidence that they believe establishes that an insufficient basis exists for the designation. Designated persons may also propose remedial steps, such as corporate reorganization, resignation from positions in a blocked entity, or similar steps that the person believes would negate the basis for designation.

In a letter dated October 2, 2017, your client requested that OFAC reconsider his designation as a Specially Designated Global Terrorist. After carefully reviewing all available information, including the evidence in the record regarding your client's designation, classified information, and all of the arguments raised in your written submissions and the material submitted by your client, OFAC has determined that your client has not put forth arguments or evidence establishing that an insufficient basis exists for his designation or that the circumstances resulting in the designation are no longer applicable.

Specifically, your client failed to provide sufficient evidence that he no longer provides support and services to Hizballah. Based on the Federal Bureau of Investigation's interview memo, in a December 2018 interview with the Federal Bureau of Investigation, your client claimed to have no relationship with Hizballah, yet he provided details on Hizballah funding mechanisms and business connections. Your client also provided details on multiple Hizballah-affiliated bankers and money launderers. OFAC has concluded that only a person having intimate familiarity with and ongoing access to senior elements of Hizballah would possess this knowledge. Accordingly,

