



HUMAN  
RIGHTS  
CAMPAIGN®

September 8, 2014

Adam J. Szubin  
Director  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

Dear Mr. Szubin,

On behalf of the Human Rights Campaign and its more than 1.5 million members and supporters, I am writing to ask the Office of Foreign Assets Control (OFAC) to open an investigation into a potential violation of recent executive orders prohibiting dealings with officials on the Department of the Treasury's Ukraine-related sanctions list.

Since March 6, 2014, President Barack Obama has issued three executive orders<sup>1</sup> that, among other things, authorize the Secretary of the Treasury, in consultation with the Secretary of State, to impose sanctions on "named officials of the Russian government, any individuals or entity that operates in the Russian arms industry, and any designated individual or entity that acts on behalf of, or that provides material or other support to, any senior Russian government official."<sup>2</sup> Yelena Mizulina, a (Russian) State Duma Deputy, and Vladimir Yakunin, chairman of the board of the Russian State Russian Railways, are named on the sanctions list.<sup>3</sup>

The World Congress of Families (WCF), a Rockford, IL-based organization, active in several nations across five continents, purportedly suspended a large international "pro-family" convention that was to be held this month in Moscow. The World Congress of Families has consistently praised Vladimir Putin as the standard-bearer for "traditional family values," and its connections to his regime are well-documented and widely-known. The conference would bring together the most fringe activists engaged in anti-LGBT extremism, but WCF cited the crisis in Ukraine as the reason for the original conference's cancellation.

Since then, however, a new conference has been advertised. While the name of the conference has changed, it is now known as "Large Families – the Future of Humanity," the agenda and many speakers are the same. Until last week, two staff members from WCF were on the list of organizers, and strong evidence suggests that both Mizulina and Yakunin are intimately involved in the planning of this conference.

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<sup>1</sup> Hereinafter "Executive Orders."

<sup>2</sup> Exec. Order No. 13661, 31 CFR 589, Appendix B (March 16, 2014).

<sup>3</sup> Available at <http://www.treasury.gov/press-center/press-releases/Pages/jl23331.aspx>.

The Executive Orders block property and interests of those listed on the sanctions list from being “transferred, paid, exported, withdrawn, or otherwise dealt in.”<sup>4</sup> It also prohibits “making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked, as well as the “the receipt of any contribution or provision of funds, goods, or services from any such person.”<sup>5</sup> Finally, “any transaction that evades or avoids, or has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.”<sup>6</sup>

According to today’s article in *Mother Jones*, three of the five sponsors of the newly titled conference are affiliated with Yakunin. For her part, Mizulina, who has sponsored anti-LGBT legislation, is listed on the conference’s organizing committee. On the entanglement of World Congress of Families staff, Mizulina, and Yakunin, the article notes: “the upcoming Large Families conference looks a lot like a barely-rebranded version of the original WCF congress.”<sup>7</sup>

As you are aware, the definition of property and property interest as defined by the Executive Order’s implementing regulations is broad. Assistance that Mizulina and Yakunin could be providing could easily include the transferal of “services of any nature whatsoever, contracts of any nature whatsoever, and any other property, real, personal, or mixed, tangible or intangible, or interest or interests therein, present, future, or contingent.”<sup>8</sup>

Information that we have read suggests that there is a connection between WCF, the newly organized conference, and the Russian officials listed on the Ukraine-related sanctions list, and therefore we urge the Office of Foreign Assets Control to investigate the matter and determine whether the World Congress of Families violated U.S. law through collaboration with sanctioned Russian officials.

Sincerely,

A handwritten signature in cursive script that reads "David Stacy".

David Stacy

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<sup>4</sup> See Section 1 of Executive Orders.

<sup>5</sup> See Section 4 of Executive Orders.

<sup>6</sup> See Section 5 of Executive Orders.

<sup>7</sup> Available at <http://www.motherjones.com/politics/2014/09/world-congress-families-russia-conference-sanctions>.

<sup>8</sup> 31 CFR § 589.308.