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## Submission of Analytical Memorandum – PJSC TogliattiAzot Corporate Control Conflict and Transnational Financial Structures

1 письмо

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Кому: Criminal.Division@usdoj.gov

Скрытая: Chairman@sec.gov, FinCENFOIA@fincen.gov, OFACReport@treasury.gov

Dear Sir or Madam,

Please find attached an **International Legal Memorandum** prepared by **ARGA Observatory**, the research and analytical division of the international association **Asylum Research & Global Assistance (ARGA)**.

The memorandum analyzes the corporate control conflict surrounding **PJSC TogliattiAzot**, one of the world's largest ammonia producers, and examines a series of related transnational corporate, financial, and commercial structures. The analysis addresses issues including international commodity trading operations, maritime logistics chains, and cross-border financial transactions potentially involving the international banking system.

The full analytical memorandum is publicly available via DOI: <https://doi.org/10.5281/zenodo.19005484>.

Supporting documentation, including legal materials, corporate records, financial information, analytical reports, and evidentiary documents referenced in the memorandum, is available in the following archive: [https://drive.google.com/drive/folders/1m2qW9qOWvvpBi4qAx1c4ujHLAhYlimB\\_?usp=drive\\_link](https://drive.google.com/drive/folders/1m2qW9qOWvvpBi4qAx1c4ujHLAhYlimB_?usp=drive_link).

The analytical materials identify potential cross-border financial flows and operational structures involving multiple jurisdictions. Particular attention is given to the possible use of **USD-denominated transactions, international correspondent banking relationships, and financial infrastructure connected to the United States**, which may be relevant in the context of applicable U.S. legal and regulatory frameworks.

This communication is respectfully transmitted for informational and analytical consideration within the competence of relevant U.S. authorities. In particular, the memorandum is being submitted to the following units within the **U.S.**

**Department of Justice Criminal Division:**

- **Fraud Section**
- **Money Laundering and Asset Recovery Section (MLARS)**
- **Organized Crime and Gang Section (OCGS)**
- **Office of International Affairs**

Prior to this submission, ARGAs conducted a preliminary phase of **international institutional notifications** intended to ensure awareness of the case among relevant regulatory and professional bodies. Analytical notifications were transmitted to several institutions, including:

### United States institutions

- U.S. Department of Justice (Criminal Division, Fraud Section, Money Laundering and Asset Recovery Section, Office of International Affairs)
- Financial Crimes Enforcement Network (FinCEN)
- Office of Foreign Assets Control (OFAC)
- U.S. Securities and Exchange Commission (SEC)

### International organizations

- Financial Action Task Force (FATF)
- Organisation for Economic Co-operation and Development (OECD)
- United Nations Office on Drugs and Crime (UNODC)
- Transparency International

**Financial regulators**

- Central Bank of the United Arab Emirates
- Dubai Financial Services Authority (DFSA)
- Financial Services Regulatory Authority (ADGM)
- Hong Kong Monetary Authority (HKMA)
- Securities and Futures Commission (SFC)
- Joint Financial Intelligence Unit (JFIU)

**International legal professional organizations**

- International Bar Association (IBA)
- International Commission of Jurists (ICJ)
- Council of Bars and Law Societies of Europe (CCBE)

These earlier communications were transmitted as **informational analytical materials** and were not intended to initiate formal investigative procedures. Their purpose was to establish institutional awareness of the case within relevant international compliance, regulatory, and professional environments.

ARGA is now providing the present memorandum for informational and analytical purposes and respectfully submits it for consideration within the competence of the relevant U.S. authorities, particularly in light of the potential connections to international financial transactions and cross-border commercial operations.

Should your institution require any additional information, supporting materials, or clarification regarding the matters described in the memorandum, we remain available for further communication.

Respectfully,

Sergei Khrabrykh,

President of Asylum Research & Global Assistance (ARGA)

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