



EXH-13

January 10, 2018

Michael Dondarski
Assistant Director for Enforcement
OFAC - Treasury Annex
1500 Pennsylvania Ave, NW
Washington, DC 20220

Reference: ENF 42110, Richard Chichakli
Subject: Claim against OFAC and the United States Government for
Theft/Misappropriation/and Illegal taking of Blocked Property

Gentlemen:

On May 16, 2017, in Dallas-Texas, the representative of OFAC met with Richard Chichakli; a formerly blocked person, for the alleged purpose of returning Chichakli property which was unfrozen pursuant to Executive Order 13710 of Nov/2015.

For the last few months I have been reconciling the records, and blessed by the return of my part of my documents at the Order of the United States Court to the DOJ; I was able to tabulate some of the losses of assets, properties, and personal effects which were frozen by OFAC. E.O. 13448 Authorized the freezing of assets, not plundering, not stealing, and not the taking. I contend that OFAC, its agents, and other US Government officials and agents has stolen my property, and for that I hereby – again – assert claim against OFAC, its agents, the DOJ, DEA-SOD, and the United States.

In April 2017, OFAC provided lists of the property it possessed as of April 2017, and stated that the listed property will be returned to Chichakli on May/16/2017; on the said date of May/16 OFAC's statement were proven FALSE as the representative FAILED to return item valued in excess of \$10,000 that include Gold, Jewelry with Gem stones, and collectible 1933 - \$1,000 US Bank Notes. THESE FACTS ARE INDISTUTABLE as RECORDED in OFAC Receipt – items 33-35. *It is my assertion that OFAC and its agents have stolen items number 33 through 35 from the inventory provided to me by OFAC two weeks earlier.*

I also assert that OFAC and their agents, and other agents, employees, officers, and contractors of the United States Government have stolen the large diamonds stones from the Chichakli's inventory – namely the item referred to as item#32 in OFAC report of 2014, and which contains Packets number 160 through 168. OFAC and governments' agent took (9) stones with a total weight of 8.2 carats of diamonds and replaced it with 5-stones with total weight of 1.04 carats. The Original US Customs lists, as well as the sequential-size numbering of the packets clearly prove that the higher numbered packets contained the largest stones.

In Total, more than 19-Carats of diamonds with a total value of nearly US \$45,000 are missing, of which the loss of the replaced diamonds is in excess of US \$27,000 as the US Customs importation documents clearly state. ***It is my assertion that the US Government agents representing OFAC, US Treasury, DOJ, and their agents and contractors have stolen the large stones from my diamond inventory, and deliberately replaced the stolen large stones with minute diamonds to conceal their act.***

OFAC has refused to account for the disposition of my assets, in violation of the Treasury Regulations 31 C.F.R. 593.601; thus, I further assert that OFAC's agent, and other agents of the United States Government have illegally taken, and misappropriate the original arts, silver articles, and antiques located in Chichakli's Public Accounting Office located at 811 S. Central expressway, Richardson, Texas. These assets, valued at nearly US \$250,000 are fully listed, accounted for, and verifide as of April 2005, in Chichakli's Business Tax returns for tax year 2004. I hereby claim the total amount stated herein.

I further assert that agents of the United States Government, namely OFAC have misappropriated, taken; and/or destroyed and illegally disposed-off my vehicles, namely One Ford Windstar industrial Van, and One Mercedes S-class, and One Kawasaki Motorcycles. OFAC retuned the Mercedes and the Motorcycles AFTER DESTROYING THE ECONOMICAL VALUE of these assets by storing them WITHOUT MAINTENANCE FOR 12-YEARS, and abusing these assets. OFAC FAILED TO RETURN and/or Account-for the Ford Industrial van. I hereby claim \$50,000 against OFAC as value of these assets which was seized and destroyed by the United States Treasury.

OFAC is required pursuant to Executive Order 13448, and its related regulations; namely, 31 CFR 509.201 et seq. to maintain accounting and reporting of all the assets subject to the EO and its regulation. The total of US \$2.2 million in frozen assets was officially reported by OFAC to the United Nations Security Council. OFAC refused and is still refusing to account for my assets, and for the disposition of my assets – particularly funds, accounts receivable, real estate holdings, original arts and collectibles. Accordingly, unless such accounting is provided, and damages claimed herein is paid; It is my intention to bring a legal suit against OFAC – the United States Government in the United States Court of federal Claims, within 90-days from the date of this letter, to recover against all the destruction and theft of my assets and funds.

Thank you, and best regards

A handwritten signature in black ink, appearing to read 'Richard A. Chichakli', with a stylized, cursive script.

Richard A. Chichakli



Richard Chichakli <richardchichakli@gmail.com>

RE: OFAC Case No. ENF 42110

1 message

Danielle.Pressler@treasury.gov <Danielle.Pressler@treasury.gov>
To: richardchichakli@gmail.com

Fri, Feb 2, 2018 at 1:48 PM

Dear Mr. Chichakli:

The U.S. Department of the Treasury's Office of Foreign Assets Control is in receipt of your correspondence dated January 10, 2018 and is currently reviewing and evaluating its contents.

Regards,

Danielle

Danielle Pressler

Office of Foreign Assets Control

U.S. Department of the Treasury

1500 Pennsylvania Avenue, N.W.

Washington, DC 20220

From: Richard Chichakli [mailto:richardchichakli@gmail.com]

Sent: Wednesday, January 10, 2018 12:51 PM

To: Pressler, Danielle <Danielle.Pressler@treasury.gov>

Subject: Re: OFAC Case No. ENF 42110

Dear Mr. Pressler

cc: Mr. Dondarski

reference is made to OFAC's File 42110, OFAC Receipt for returned Property dated May 16, 2017, and our previous correspondence including my notice of claim, and OFAC's letter of July 14, 2017; I attached herewith a partial list of my claims against OFAC for theft and misappropriation of assets, for OFAC has failed to return and/or the named assets. This is not complete list awaiting the finalization of of the final compilation of accounting and records. The original of the attached letter has been posted to OFAC this morning

As I stated in the letter to Mr. Dondarski, as in repetition to my earlier assertion, some of my claims are indisputable based on OFAC's own records - namely "Receipt for returned Property dated May 16, 2017", and OFAC's earlier

communications of April/2017. Other claims are based on other official U.S. government records. It is my intention to bring this matter to the US Court of Federal Claims if a settlement cannot be reached within the next 90 days.

Thank you and best regards

Richard Chichakli

On Fri, Jul 14, 2017 at 2:16 PM, <Danielle.Pressler@treasury.gov> wrote:

Dear Mr. Chichakli:

Attached please find a courtesy copy of a letter dated July 14, 2017 to you from Mr. Dondarski, Assistant Director for Enforcement, at the U.S. Department of the Treasury's Office of Foreign Assets Control. The original letter will follow via mail.

Regards,

Danielle

Danielle J. Pressler

Office of Foreign Assets Control

U.S. Department of the Treasury

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