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CASE 17

SUBJECT: ASSET UNBLOCKING REPORT

CASE ID	RUSSIA-EO14024-2024-1237750-1
APPLICANT / FULL NAME	*****
JURISDICTION / RESIDENCE	ISRAEL
TAX IDENTIFICATION NUMBER (TIN)	*****
APPLICANT'S ADDRESS	*****
DATE THE ASSETS BECAME BLOCKED	NOVEMBER 3, 2023
VALUE OF BLOCKED ASSETS	USD 190,280 <i>(Estimated value as of January 22, 2024)</i>
BLOCKING BASIS	RUSSIAN HARMFUL FOREIGN ACTIVITIES SANCTIONS
SANCTIONS PROGRAM	RUSSIA-EO14024
INITIAL SUBMISSION DATE	JANUARY 26, 2024
BASIS FOR REQUESTED RELIEF	NON-SDN AND NON-DESIGNATED INDIVIDUAL
INITIAL CUSTODIAN	T-INVEST LAB LLC/T-BANK JSC
CATEGORY OF SOURCE OF FUNDS	SALARY INCOME AND PERSONAL SAVINGS
EVIDENCE OF INCOME	INCOME TAX DECLARATIONS FOR 2020–2023
OMNIBUS CUSTODY COUNTERPARTY	PJSC SPB EXCHANGE (LEI: 1097800000440)/PJSC SPB BANK
BLOCKED PROPERTY SPECIFICATION	U.S. SECURITIES
ASSOCIATED SANCTIONS TARGETS	PJSC SPB EXCHANGE; PJSC SPB BANK; AND ANY OTHER BLOCKED PERSONS OR BLOCKED FINANCIAL INSTITUTIONS IDENTIFIED IN THE RELEVANT CUSTODY CHAIN IN CONNECTION WITH THE BLOCKED STATUS OF THE PROPERTY.
REASON FOR RELEASE/TRANSFER	SPECIFIC LICENSE NO. *****
CURRENT LICENSE STATUS	APPROVED / SPECIFIC LICENSE ISSUED; TRANSFER PENDING IMPLEMENTATION
TRANSACTION	REQUESTED RELEASE, UNBLOCKING, AND TRANSFER OF BLOCKED PROPERTY.

RECEIVING FINANCIAL INSTITUTION	
NAME OF FINANCIAL INSTITUTION	<u>BANK HAPOALIM B.M.</u>
TYPE	BANK, CUSTODIAN AND SECURITIES BROKER
JURISDICTION OF CUSTODY	ISRAEL
ADDRESS	50 ROTHSCHILD BOULEVARD, TEL AVIV, 6100001, ISRAEL

1. INTRODUCTION

Case No. 17 is notable for both the breadth of legal documentation summarized below and the destination jurisdiction selected for the proposed asset transfer—Israel. It was the first matter of this kind handled by our team involving an Israeli receiving institution. The client had initially considered transferring the assets to Interactive Brokers (UK) limited.

PAGE 2

The materials relating to Case No. 17 and the information contained in them are subject to confidentiality obligations owed by the client and Koch Securities. The non-confidential and anonymized aspects of the matter nevertheless provide practical insight for corporate and individual holders of blocked assets, as well as for legal counsel, compliance professionals, and service providers involved in asset-unblocking matters.

This report is provided for informational purposes only. It does not constitute legal or sanctions advice and should not be interpreted as a guarantee that a comparable result can be achieved in other matters.

2. DOCUMENTATION [JANUARY 26, 2024]

EXHIBIT 1	PASSPORT [NATIONAL ID]
EXHIBIT 2	RESIDENCE PERMIT / ISRAELI ID CARD
EXHIBIT 3	CUSTODIAN DEPOSITORY ACCOUNT INFORMATION
EXHIBIT 4	INFORMATION ON THE CONTRACTUAL RELATIONSHIP
EXHIBIT 5	DEPOSITORY ACCOUNT STATEMENT
EXHIBIT 6	HARDSHIP STATEMENT IN SUPPORT OF SPECIFIC LICENSE APPLICATION
EXHIBIT 7	APPLICATION FORM AND DEPOSITORY SERVICES AGREEMENT
EXHIBIT 8	LEGAL NOTICE
EXHIBIT 9	SANCTIONS LIST SEARCH RESULT
EXHIBIT 10	WAIVER NOTICE
EXHIBIT 11	SANCTIONED PARTY SCREENING RESULTS
EXHIBIT 12	LSEG SANCTIONS SCREENING
EXHIBIT 13	LEGAL OPINION PREPARED BY FENWICK & WEST
EXHIBIT 14	PROOF OF INCOME / SOURCE OF FUNDS
EXHIBIT 15	SCHEDULE OF BLOCKED PROPERTY AND LIST OF SECURITIES
 SPECIFIC LICENSE APPLICATION: REQUEST FOR THE UNBLOCKING AND TRANSFER OF PROPERTY UNDER THE RHFASP (E.O. 14024)	

- Fee for preparation, document collection, analysis, and regulatory submission: \$3,200
- Fee excludes the cost of obtaining a legal opinion from Fenwick & West, estimated at \$4,000.

TOTAL COST FOR THIS STEP: \$7,200

2. SUPPLEMENTAL SUBMISSION UPDATE [APRIL 20, 2026]

EXHIBIT A	COVER LETTER
EXHIBIT B	ASSET TRANSFER WORKFLOW AND CONFIRMATION FROM THE RECEIVING INSTITUTION
EXHIBIT C	ACCOUNT CONFIRMATION AND RECEIVING INSTRUCTIONS FROM BANK HAPOALIM B.M.
EXHIBIT D	INDEX OF EXHIBITS

The costs associated with this step were covered under the revised scope of services agreed with Koch Securities.

TOTAL FOR THIS STEP: \$0

3. RFI AND FOLLOW-UP CORRESPONDENCE [JULY 25, 2026]

WIRE-TRANSFER INSTRUCTION. THE TRANSFER OF ASSETS - BANK HAPOALIM B.M.
UNBLOCKING AND TRANSFER REPORT FORM

TOTAL FOR THIS STEP: \$635

4. TIMELINE

DATE	STATUS
JANUARY 26, 2024	LEGAL DOCUMENTATION FINALIZED AND SPECIFIC LICENSE APPLICATION SUBMITTED TO OFAC
JANUARY 27, 2024	APPLICATION STATUS RECORDED AS RECEIVED
MARCH 3, 2024	APPLICATION STATUS RECORDED AS IN PROGRESS — STAGE 1
SEPTEMBER 12, 2025	APPLICATION STATUS RECORDED AS IN PROGRESS — STAGE 2
APRIL 20, 2026	SUPPLEMENTAL SUBMISSION SUBMITTED
MAY 19, 2026	APPLICATION STATUS RECORDED AS PENDING MANAGEMENT REVIEW
JULY 25, 2026	OFAC REQUEST FOR INFORMATION RECEIVED; FOLLOW-UP DOCUMENTATION PREPARED AND SUBMITTED
SEPTEMBER 7, 2026	SPECIFIC LICENSE APPROVED AND ISSUED

TOTAL FEES
\$8,135

ELAPSED TIME
955 DAYS

*The fees and costs stated in this report reflect only the fees charged by Koch Securities and those third-party costs specifically identified in the relevant sections. The client incurred additional transaction-related costs that may not be fully reflected in this report, including costs charged independently by legal advisers, financial institutions, brokers, custodians, depositories, intermediaries, and other third-party service providers.

*Such costs fall outside the scope of services provided by Koch Securities. Koch Securities does not control, determine, invoice, or assume responsibility for any such third-party costs, including costs that were paid directly by the client or otherwise not disclosed to Koch Securities.

*It is explicitly affirmed that neither the representation in Case No. 17 nor the broader operational and legal practice of Koch Securities involves any affiliation with, engagement of, or reliance upon Russian service providers, legal professionals, or consultants based in the Russian Federation.

Our core expertise in institutional regulatory compliance and U.S. sanctions frameworks was established through extensive international private equity operations prior to the implementation of targeted sanctions regimes concerning Russian, Iranian, and Chinese entities and individuals.

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This report has been prepared by Koch Securities for informational and illustrative purposes only. It is based on the specific facts, documentation, custody arrangements, sanctions considerations, and regulatory circumstances of Case No. 17 as of the dates indicated herein.

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The issuance of a specific license by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) does not, by itself, guarantee the release, transfer, settlement, or receipt of blocked property. Any such transaction remains subject to the terms of the applicable authorization, the policies and requirements of relevant financial institutions, custodians, depositories, intermediaries, counterparties, and any applicable legal, regulatory, sanctions, anti-money-laundering, and compliance requirements.

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