



Ministry of Defence

Secretariat
Defence Infrastructure Organisation
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E-mail: diosec-parli@mod.uk
www.gov.uk/DIO

Ref: FOI 2016/06083

15 July 2016

Dear

Thank you for your email of 10 June 2016 requesting the following information:

"1. What steps were taken by the Ministry of Defence or its agents to check the provenance of the funds used to buy the above property?"

2. Was information about the buyer of the property Dmytro Firtash and the funds used to purchase it reviewed in relation to checks required under the Money Laundering Regulations and the Proceeds of Crime Act by:

- A. *A lawyer or other official directly employed by the Ministry of Defence, or*
- B. *A lawyer employed by the sales agent Jones Lang LaSalle or*
- C. *Both*
- D. *Neither*

3. Were any red flag indicators detected by the Ministry of Defence or its agents in any dealings with the buyer Dmytro Firtash or his employees or agents in relation to the sale of the property suggesting there were reasonable grounds for knowing or suspecting, that the buyer was engaged in, or attempting, money laundering or terrorist financing?"

4. Was a Suspicious Activity Report (SAR) sent to the National Crime Agency (NCA) in relation to the buyer of the property Dmytro Firtash or the funds used to purchase the property?"

5. Did the NCA give its consent to the transaction?"

6. Did the NCA make any other comments in relation to the transaction, and if so, what were they?"

I am treating your correspondence as a request for information under the Freedom of Information Act 2000 (FOIA).

A search for the information has now been completed within the Ministry of Defence (MOD) and I can confirm that some information in scope of your request is held. I have answered each question below.

1. *What steps were taken by the Ministry of Defence or its agents to check the provenance of the funds used to buy the above property?*

Under Section 21 (available to applicant by other means) of the FOIA has been applied to this request as the information is available via other means.

2. *Was information about the buyer of the property Dmytro Firtash and the funds used to purchase it reviewed in relation to checks required under the Money Laundering Regulations and the Proceeds of Crime Act by:*

- A. *A lawyer or other official directly employed by the Ministry of Defence, or*
- B. *A lawyer employed by the sales agent Jones Lang LaSalle or*
- C. *Both*
- D. *Neither*

Under Section 21 (available to applicant by other means) has been applied to this request as the information is available via other means.

3. *Were any red flag indicators detected by the Ministry of Defence or its agents in any dealings with the buyer Dmytro Firtash or his employees or agents in relation to the sale of the property suggesting there were reasonable grounds for knowing or suspecting, that the buyer was engaged in, or attempting, money laundering or terrorist financing?*

4. *Was a Suspicious Activity Report (SAR) sent to the National Crime Agency (NCA) in relation to the buyer of the property Dmytro Firtash or the funds used to purchase the property?*

5. *Did the NCA give its consent to the transaction?*

6. *Did the NCA make any other comments in relation to the transaction, and if so, what were they?"*

In relation to points 3, 4, 5 and 6. The MOD neither confirms nor denies whether it holds any information within the scope of your request by virtue of section 23(5) (Information supplied by, or relating to bodies dealing with security matters) which is an absolute exemption and does not require a public interest test to be conducted.

If you are not satisfied with this response or you wish to complain about any aspect of the handling of your request, then you should contact me in the first instance. If informal resolution is not possible and you are still dissatisfied then you may apply for an independent internal review by contacting the Information Rights Compliance team, 2nd Floor, Zone N, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.uk). Please note that any request for an internal review must be made within 40 working days of the date on which the attempt to reach informal resolution has come to an end.

If you remain dissatisfied following an internal review, you may take your complaint to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not investigate your case until the MOD internal review process has been completed. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website, <http://www.ico.org.uk>.

Yours sincerely,

DIO Secretariat,