

DATE: JAN 11, 2022

FROM: OCCRP

Dear Mr. Sargsyan,

We are journalists working for OCCRP, a web-based consortium of investigative journalists and media centers. We are preparing to publish a short series of articles covering the citizenship-by-investment program in St Kitts and Nevis.

The articles will consider Henley and Partners' role in redesigning and relaunching the St Kitts and Nevis citizenship scheme from 2006 and, when in the public interest, will assess the profiles of several individuals, including politically-exposed persons (PEPs) and businesspeople linked to sanctions or financial crime, who applied for St Kitts and Nevis passports via Henley and Partners.

We understand that:

In or about 2009 you purchased a St Kitts and Nevis passport with the help of Henley and Partners.

In or about 2019 your St Kitts and Nevis passport was renewed by Henley and Partners. On March 2, 2018, you were elected President of the Republic of Armenia.

We would like to offer you the opportunity to comment on any of the above statements and respond to the questions that follow.

1. How much have you invested in order to qualify under the program criteria? Did you choose the SIDF contribution or the real estate option?
2. According to the Armenian Constitution, article 124.2, any Presidential candidate must hold only the citizenship of the Armenian Republic for the six years preceding the elections. How do you comment on this?
3. What is the current status of your passport?

Please send your comments to this email address by end of business on Tuesday January 18, 2022. If you do not respond by this deadline, we will assume you do not wish to comment. If you wish to discuss this matter directly, in the first instance please direct any concerns you have to us via email. We would be most grateful if you would acknowledge receipt of this Letter.

Yours faithfully,
OCCRP

DATE: JAN 12, 2022

FROM: EMIL TARASYAN (CHIEF OF STAFF OF THE PRESIDENT)

Dear [REDACTED],

In response to your letter dated 11 January 2022 sent to the Office of the President, please be informed that the requested information contains personal data concerning Armen Sarkissian, and the Office of the President does not possess that information.

Thus, your letter has been forwarded to the President of the Republic Armen Sarkissian, and Mr President mentioned that he will respond to you personally or via his personal secretary.

Kind regards,
Emil Tarasyan

DATE: JAN 17, 2022

FROM: EMIL TARASYAN

Dear OCCRP,

We refer to your letter dated 11 January 2022 addressed to President Sarkissian.

It is correct that Mr Sarkissian was elected President of the Republic of Armenia on 2 March 2018. The reference in your letter to article 124.2 of the Armenian Constitution is also correct. Mr Sarkissian does not believe that other assertions made in your letter are accurate, but would be grateful if you could provide further details of the bases of the assertions made, including any documentary evidence supporting those assertions, so that he can properly consider and respond to them.

Please send any further letters to his private mail address: [REDACTED]

Yours faithfully,
Office of the President of the Republic of Armenia

DATE: 17 JAN, 2022

FROM: OCCRP

Dear Mr Sarkissian,

During our investigation into the citizenship-by-investment program in St. Kitts and Nevis, we came across documentary evidence that in or about 2009 you purchased a St. Kitts and Nevis passport via Henley and Partners. Documentary evidence also indicates that in or about 2019 your St. Kitts and Nevis passport was renewed by Henley and Partners. The passport in your name that we have sighted bears the number [REDACTED], expiring on [REDACTED].

In light of this, we would like to offer you the opportunity to comment on the above statements and respond to the questions that follow.

1. How much have you invested in order to qualify under the program criteria? Did you choose the SIDF contribution or the real estate option?
2. According to the Armenian Constitution, article 124.2, any Presidential candidate must hold only the citizenship of the Armenian Republic for the six years preceding the elections. How do you comment on this?
3. What is the current status of your passport?

Please send us your response by end of business on Thursday January 20, 2022. If we do not hear from you, we will assume that you do not wish to comment.

We are preparing to include text in the briefing that discusses the points raised in our questionnaire and anything you send us before the stated deadline will be considered for inclusion.

Yours faithfully,
OCCRP

DATE: JAN 19, 2022

From: ARMEN SARKISSIAN

Dear [REDACTED],

Thank you for your letter

I am not at my office for the moment. Will answer you today later

With kind regards,
Armen Sarkissian

DATE: JAN 20, 2022

From: ARMEN SARKISSIAN

Dear [REDACTED],

Thank you for your email and for bringing this matter to my attention. I am writing to you personally because I take an enquiry from your agency very seriously and am happy to explain the situation.

While it would be helpful to see copies of the documentary evidence referred to in your letter, I have looked over the limited number of historic files I have available relating to this matter to allow me to respond.

Between 2000 and 2013, I was a private citizen without any involvement in public office. During this time I was advisor to the board of several multinationals and used the income attained from such advisory work to invest in businesses globally, not in Armenia. One area which I was particularly interested in was hospitality and had signed an agreement with a group investors to acquire shares a Hyatt hotel in a major European city, at the same time as looking to invest in hotels in the Middle East and Caribbean.

The opportunity arose to make a significant investment of approximately \$500,000 in the development of a Park Hyatt in St. Kitts with an aim to increase the investment over time as the project took shape. This was not in 2009 as you mention in your letter but years later. I later understood that with such an investment came the St. Kitts passport, but since the investment was the driving factor I was not interested in the passport at all. I therefore wrote to the company who had organised the investment for me explaining the situation and requesting that my St. Kitts citizenship be put on hold until further notice

In August 2013, when I understood that I was shortly to be appointed Ambassador of the Republic of Armenia to the United Kingdom, I asked to arrange transfer of the ownership interest in the hotel to a family member. I asked my solicitor, Mr Anthony Bunker from Berwin Leighton Paisner, to return the St. Kitts passport and I assumed that my request was dealt with.

In late 2017, I understood that I might become a candidate for the President of the Republic of Armenia. I therefore contacted Mr. Anthony Bunker, to check that all my affairs are in order, during which Mr. Bunker discovered that the company that was organising the transaction, had not confirmed my original requests. I wrote to them again in December 2017 following up on my previous request. I did not receive a response to that letter.

Shortly after this, I learned that the person I had been sending the letters to had suffered ill health and had subsequently passed away, so my requests had not been dealt with. I wrote to his son, who also worked at the company, to explain the situation and repeat my request.

To ensure that there were no issues, I went with Mr. Bunker through a process of confirmation of renouncing of citizenship, including swearing affidavits confirming the above and filing a Declaration of Renunciation of Citizenship with St. Kitts. Since then I had not received any news on this matter from anyone.

I was therefore surprised to learn from your letter that there is apparently a passport in my name that was renewed in 2019. I cannot comment on this without seeing a copy but, so far as I am concerned, given that I have taken every possible step to renounce my St. Kitts citizenship, I do not have citizenship and should not have had it from when I first instructed that it be put on

hold. I was never notified by any authority in St. Kitts about renewal of any passport and had always considered that it had been renounced.

Finally, your letter claims that the passport was granted and renewed by Henley and Partners. To the best of my recollection, I have not previously dealt with them and our relationship was directly with the developer of the Park Hyatt project, Range Developments – but, again, I am not able to properly comment without seeing the documentary evidence referred to in your letter.

I hope you will give due consideration to my explanation, and that any reporting on these matters is fair and accurate. I am available to answer any specific questions you may have in order to put this matter to rest.

Yours sincerely,
Armen Sarkissian

DATE: JAN 21, 2022

FROM: OCCRP

Dear Mr Sarkissian,
Thank you for your email.

In light of the responses that you kindly provided us, we would like to put some additional questions to your attention:

1. When exactly did you invest into the development of Park Hyatt in St. Kitts and Nevis? Who did organise the investment for you?
2. When exactly did you start the process of confirmation of renouncing of citizenship? When exactly were the Sworn Affidavit and the Declaration of Renunciation of Citizenship filed? In this regard, any documents you might be able to share with us would be greatly appreciated.
3. It seems that authorities in St. Kitts and Nevis have followed up with your request to put your passport on hold, given that the status of your passport appears to be “suspended”, but not on the process of renouncing of citizenship. How do you comment on this?
4. Since the family members of the investors can also acquire the St. Kitts and Nevis citizenship by the investment program, had your family members also got the St. Kitts and Nevis citizenship? If yes, have they renounced the citizenship or remain citizens to this day?
5. Have you tried contacting the authorities of St. Kitts and Nevis regarding your first request to put your citizenship on hold after receiving our request for comment? If

yes, have they given you any additional information?

Please could you come back to us by the end of business on Monday January 24? If you do not respond by this deadline, we will assume you do not wish to comment.

Yours faithfully,
OCCRP

DATE: JAN 23, 2022

FROM: ARMEN SARKISSIAN

Dear **[REDACTED]**

Thank you for your further questions.

As you will imagine, I use professional advisers to assist in my business and administrative life. In relation to the St Kitt's transaction, as I have told you, I engaged Mr Anthony Bunker, a partner at the London law firm Berwin Leighton Paisner. Sadly he died recently. He was a man of utmost integrity as, I am sure, your research has shown. He was also, in my experience of him, very efficient. The reason I mention it is because once I had given my instructions to him in relation to the St Kitt's passport I believed all the necessary steps to suspend the application and then renounce the citizenship had been taken. I do not have a copy of his files and the details I have given you are from the few papers I retained.

Your research has, as I have indicated, given me more information than I previously knew. I had not, for example heard of Henley and you have now discovered that it seems as if the original request for the application to be suspended was received and acted upon which, logically, would make the need to renounce redundant. Either way, as I have stated, I also went through the process of renunciation for good measure. I therefore did not, and still do not, consider myself to be a citizen of St Kitt's.

As to your request for documents, I assume that, given your refusal to provide me what you have despite the seemingly changing basis of your enquiries, your request was not serious.

I have been very open with you in response to your questions, despite the fact that these are private matters. It is, of course, a matter for you whether you wish to write a story on this issue but, as you can see, I have acted entirely properly and there is, therefore, no legitimate reason for you to report or for me to provide you more than my very open and frank answers so far.

I trust that this puts the matter to rest.

Yours sincerely,
Armen Sarkissian