



## OSCE Review Conference

Warsaw September 2017

# Religious Discrimination Directed at the Church of Scientology and Scientologists in Russia in Contravention of Fundamental Human Rights

## 1. St. Petersburg: Imprisonment of Local Religious Leaders

On June 6, 2017, over 60 Federal Security Bureau (FSB) officials and SWAT police raided the premises of the Church of Scientology religious group in St. Petersburg as well as the homes of four leaders of the religious group.

Five leaders of the religious group were arrested, interrogated and detained by the FSB. Four of these individuals, Anastasia Terentieva, Galina Shurinova, Ivan Matsitskiy and Sakhiliev were sentenced to two months pretrial imprisonment at detention centers by the Court. Under Russian law, two months is the maximum pretrial sentence; however, it may continue to be extended for another two months before it runs out (the same pretrial sentence handed down against Dennis Christensen, a Danish Jehovah's Witness, for practicing his faith in Russia). The fifth local leader, Konstanci Esaulkova, was sentenced to two months house arrest as she has an elderly mother she cares for at home.

The four imprisoned detainees filed appeals contesting their pretrial detention on the grounds that their imprisonment constituted arbitrary deprivation of liberty in violation of Article 5 of the European Human Rights Convention as well as violations of their right to freedom of religion, freedom of expression and freedom

of association under Articles 9, 10 and 11 of the Convention.

Appeals hearings for the imprisoned detainees have taken place. The pretrial detention sentences have all been upheld, with the exception that Galina Shurinova's sentence was changed to house arrest due to her medical condition.<sup>1</sup>

These five leaders of the religious group have been imprisoned or subjected to house detention for over three months. These pretrial sentences were recently extended by the Court until October 19, 2017. It is anticipated that pretrial imprisonment and detention will continue indefinitely, with extensions sought and granted every two months.

If convicted, these five individuals could face a six to ten-year prison term. Numerous human rights and interfaith groups have expressed concern that the actions of the FSB constitute an egregious violation of the right to freedom of religion.<sup>2</sup>

Based on the search warrants and public statements made by the FSB, the raid took place regarding charges concerning Article 171 (Illegal commercial activity without registration) and Articles 282 and 282.1 of the Criminal Code (Extremism). Additional extremism charges have been added under Article 282.2 of the criminal code (Leadership of or participation in an extremist organization) since the defendants' detention.

Recently, the St. Petersburg Human Rights Council, a human rights NGO composed of numerous human rights organizations, such as Citizen's Watch, the Human Rights Resource Center and Russian Lawyers Committee in Defense of Human Rights, issued a "Statement on the Scientology Case". The Human Rights Council called for the "immediate release" of the Scientology Five in an "obviously absurd and fabricated case". The Council noted that:

*"The very formulation of the accusation that the defendants have been deprived of their freedom for the third month solely for observing the principles and precepts of their religious tradition is not only absurd in content but also obviously anti-constitutional in nature: in fact, believers are charged of having their faith prescribing certain sanctions to those who violate religious orders in one way or another. Such charges, in fact, can be brought to any religion in general."*<sup>3</sup>

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<sup>1</sup> After her appeal hearing, Konstanci Esaulkova filed a complaint in Court that she was abused by FSB agents who transported her to the hearing in handcuffs and pressured her to plead guilty to the charges.

<sup>2</sup> See, e.g., July 12, 2017 International Religious Freedom Roundtable Letter, attached.

<sup>3</sup> A translated copy of the St. Petersburg Human Rights Council Statement is attached.

## A. Extremism Charges

The use of the Extremism law against religions has been criticized by the UN Human Rights Committee (28 April 2015), the PACE Monitoring Committee of the Council of Europe (14 September 2012), and the Venice Commission (1 June 2012), which found that the Extremism Law was exceptionally vague and arbitrary, allowing for unfettered discretion on the part of officials, resulting in discriminatory enforcement of the Law against targeted minority religions in violation of fundamental human rights.

Extremism Laws may be necessary to combat terrorism. However, these laws should not be used as a pretense to justify discrimination and suppression of peaceful religious organizations. In spite of the principles of non-discrimination and equality at the heart of the UN Bill of Rights and the OSCE Helsinki Accords, the Russian Government is systematically using the Extremism Law to: 1) seize and censor peaceful religious works that are regularly and widely used without incident the world over; 2) arrest and imprison members of minority faiths for reading and disseminating these religious materials; and 3) initiate proceedings to liquidate and shut down religious organizations in order to disrupt and suppress their right to conduct religious activities in contravention of the fundamental human right to religious freedom.

Over fifty cases regarding Russia's misuse of the Extremism Law against religions have been filed by numerous religious groups before the European Human Rights Court. The Moscow Church of Scientology currently has two cases pending before the Human Rights Court regarding distinct Scientology religious writings and related materials that have been improperly placed on the "Extremist Materials" list.

In the pretrial detention hearings, the Court accepted the prosecutor's unsupported argument, forwarded by the FSB, that the Church of Scientology is an "extremist organization" even though no Court in Russia or elsewhere has ever made such a finding. This fallacious finding that the Scientology Five were "dangerous extremists" who would imperil society if released on their own recognizance pending trial, supported by not a shred of evidence, provided the purported justification for their pretrial imprisonment and detention.

The Church of Scientology operates in over 150 countries throughout the world as a peaceful, law abiding group. One of Scientology Founder L. Ron Hubbard's directives to all Scientologists and the Church is to abide by the laws of a country.

People who come into the Scientology religion receive spiritual help, improve their lives and the lives of their loved ones. They also actively participate in social programs to improve their communities, to save children from the menace of drugs, to help in times of disaster, to provide assistance to victims and to work to better their local communities.

The parishioners of the religious group of St. Petersburg have, in just the past six months, held dozens of community events and distributed more than 20,000 *The Way to*

*Happiness* booklets, a guidebook for how to live a peaceful and moral life. The religious group also distributed more than 120,000 drug education leaflets to help the city cope with the drug addiction problem and the decline of moral standards. The religion and its members actively work to improve society for all. They are part of the solution, not part of the problem.

The Russian Constitution guarantees every citizen the right to practice the religion of their choice. Scientologists have been practicing their faith in Russia for more than thirty years, providing spiritual help to fellow citizens and actively participating in solving the most urgent problems of society.

## **B. Illegal Commercial Activity Without Proper Registration**

The charge of performing illegal commercial activity without proper registration of a legal entity is equally spurious. The reason that the religious group has not formed a legal entity is because the Russian government has refused to register it as a religious organization in contravention of the right to religious freedom and the right to freedom of association guaranteed by human rights treaties that Russia has signed and is obliged to follow.

Denial of access to legal entity status represents a grave and impermissible burden on the right to freedom of religion.<sup>4</sup> That is why laws governing incorporation and registration of religious organizations represent an important yardstick for assessing the shape of religious freedom in a given State.

In many instances, such laws have been used as a weapon by the State to restrict religious communities rather than facilitate religious freedom. Laws that mandate religious registration and impose criminal sanctions for non-registered religious activity constitute draconian methods used by States to repress religious freedom in violation of human rights.

Such methods have been uniformly condemned by the UN Human Rights Committee,<sup>5</sup> the UN Rapporteur for Religious Freedom,<sup>6</sup> the OSCE Panel of Religious Experts, in consultation with the Venice Commission,<sup>7</sup> the European Union<sup>8</sup> and the European Court of Human Rights in numerous cases, including *Church of Scientology Moscow v. Russia*.<sup>9</sup>

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<sup>4</sup> See, e.g., *Freedom of Religion or Belief: Laws Affecting the Structuring of Religious Communities*, OSCE Review Conference, September 1999.

<sup>5</sup> Human Rights Committee Report, Kazakhstan, CCPR/C/Kaz/Q/1, 2 September 2010.

<sup>6</sup> Report, UN Special Rapporteur, Freedom of Religion or Belief, Para 25, HRC 19/60, 22 December 2011.

<sup>7</sup> See, e.g., OSCE and Venice Commission Guidelines for Review of Legislation Pertaining to Religion or Belief, page 16.

<sup>8</sup> European Union Guidelines on the Promotion or Protection of Religion or Belief, Para. 40-41.

<sup>9</sup> *Metropolitan Church of Bessarabia v. Moldova*, (App. 4750/99), 2001; *Church of Scientology Moscow v. Russia*, (App. 18147/02).

Stripped of the fundamental human rights to form a legal religious entity, the religious group has been forced to rely on its religious leaders to act on behalf of the religious group, to open up bank accounts, to collect and spend monies to further its religious mission, and to rent a facility to serve as its place of worship.

Ironically, three of the imprisoned individuals, Anastasia Terentieva, Galina Shurinova and Ivan Matsitskiy, were applicants before the European Human Rights Court in the case *Church of Scientology of St. Petersburg and Others v. Russia*. There, the Human Rights Court determined that:

*“A ‘religious group’ without legal personality cannot possess or exercise the rights associated exclusively with the legal-entity status of a registered ‘religious organization’— such as the rights to own or rent property, to maintain bank accounts, to ensure judicial protection of the community, to establish places of worship, to hold religious services in places accessible to the public, or to produce, obtain and distribute religious literature – which are essential for exercising the right to manifest one’s religion. Thus, the restricted status afforded to ‘religious groups’ under the Religions Act did not allow members of such a group to enjoy effectively their right to freedom of religion, rendering such a right illusory and theoretical rather than practical and effective, as required by the Convention.”<sup>10</sup>*

Accordingly, the Court found that a refusal by the domestic authorities to grant legal-entity status to the applicant group amounted to an interference with the applicants’ rights under the right to freedom of religion (Article 9) interpreted in the light of the right to freedom of association (Article 11).

Rather than comply with this unequivocal decision by the Human Rights Court, Russian local authorities have refused to register the St. Petersburg religious group as a legal entity. Worse, they have determined to arrest and imprison the religious leaders who successfully challenged the government’s refusal to register the religious organization as a legal entity on the grounds that they are collecting and distributing funds for religious services and materials, renting a place of worship, and producing and distributing religious materials *“without proper registration of a legal entity.”* This constitutes a grave violation of fundamental religious freedom of these individuals and their Church.

When Russian authorities refused to register the St. Petersburg religious organization despite the favorable St. Petersburg ECHR decision, the religious group then returned to a Russian Court, seeking to re-open and register the St Petersburg Church on the basis of the European Court’s order and favorable decision. However, the Russian courts continued to ignore the Human Rights Court decision and refused to register the St Petersburg Church.

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<sup>10</sup> *Church of Scientology of St. Petersburg and Others v. Russia*, Paragraph 38, (Application no. 47191/06) (16 February 2015).

As a result, the religious group and its leaders, including some of the imprisoned local religious leaders, were once again forced to file an application before the ECHR arising from the continued refusal of Russian authorities to register the Church. This new application is now pending before the Human Rights Court.

Under these circumstances, an investigation on the spurious grounds that these religious leaders should be imprisoned for operating a religious group without registering a legal entity amounts to a bad faith prosecution in contravention of fundamental human rights.

## **2. Liquidation of the Moscow Church of Scientology**

The Moscow Church of Scientology was recognized and registered as a religious organization in Russia in 1994 under the 1990 Religion Law. In 1997, the new Religion Law was passed. Article 27 of the Law required previously registered religious organizations like the Moscow Church to be re-registered under the new law.

Rather than comply with the 1997 Religion Law, the Ministry of Justice refused to re-register the Church on approximately 11 occasions. After exhausting domestic remedies, the Moscow Church complained to the European Human Rights Court in Strasbourg that the refusal of Russian authorities to re-register it as a religious organization violated fundamental rights guaranteed by the European Convention on Human Rights.

The European Court of Human Rights agreed with the Moscow Church and in April 2007 unanimously confirmed that the Russian Federation violated the Church's rights under the European Convention on Human Rights, specifically Article 11 (freedom of assembly and association) of the European Convention on Human Rights read in the light of Article 9 (freedom of thought, conscience and religion). The Court also found that the Ministry of Justice acted in bad faith when it came up with trumped up technical reasons on eleven occasions not to register the Moscow Church. The Russian Federation has refused to comply with the 2007 ECHR decision ordering the Moscow Church to be registered under the 1997 Religion Law.

On 7 August 2014, the Moscow Justice Department lodged a claim with the Moscow City Court seeking an order to liquidate the Moscow Church pursuant to Article 14(1) of the 1997 Religion Law.

These liquidation claims were based on arbitrary and specious charges, including:

- Decisions of the Shcholkovo City Court and the Moscow City Court declaring certain Scientology publications “extremist” and banning their publication. The Church complied with these decisions and ceased using these publications in Russia. The Church also brought complaints regarding these rulings before the European Human Rights Court. These complaints are pending.



- The fact that the Moscow Church had not re-registered under the 1997 Religious Law even though the Church prevailed on this issue in the European Court and sought to re-register after the ECHR decision, only to have its registration applications rejected on the same kind of arbitrary reasons condemned by the Human Rights Court.
- The fact that the Church registered trademarks and copyrights for Scientology religious materials in Russia, even though many religions do so in order to ensure orthodoxy.

Despite the arbitrary nature of the Justice Department's claims, they were sustained by the Courts. In these proceedings, the Moscow Church was not permitted to provide critical evidence in support of its position. In June 2016, the Russian Supreme Court upheld the judgment ordering the liquidation of the Church of Scientology of Moscow. The Moscow Church has filed a complaint with the Human Rights Court noting that liquidation violates its right to freedom of religion and that the proceedings were unfair as the Courts ignored critical evidence proffered by the Church. That complaint is pending.

Under Russian law, the Church had six months to complete the liquidation process – until December 29, 2016. However, the Church was granted an extension on liquidation as the Tax Office has filed a VAT claim to attempt to tax the Church at a commercial rate due to the liquidation order. The Court granted an extension to August 2017, but the Tax Office objected and has filed an appeal requesting until June, 2017 to complete its inspection.

Liquidation constitutes a “death sentence” for religious groups, effectively banning them from religious rites and practices and shutting down their Church. The Administrative and regulatory burdens placed on the organization for contrived or, at best, minor corporate irregularities are patently disproportionate and violates basic human rights. Liquidation also violates fundamental doctrines of the European Convention on Human Rights, the OSCE Helsinki Accords and the UN Bill of Rights that prohibit using compulsory registration laws to shut down and suppress religious groups.

Such draconian actions are extraordinary. They cannot be countenanced with democratic ideals, the right to religious autonomy, religious pluralism and basic human rights. Nothing could be more destructive to the rights of religious freedom, freedom of expression and freedom of association. Yet, the Church of Scientology of Moscow faces the harsh reality of liquidation in the near future.

### **3. Other Investigations**

Scientology organizations in other areas of Russia have also been the target of intrusive investigations designed to repress the practice of the religion. Currently, criminal investigations are ongoing against officers of two Scientology Missions in Yekaterinburg and Saratov based on charges under Article 171 of the Criminal Code. The prosecution has

brought these charges by mischaracterizing Mission lectures and training of parishioners using Scientology Scriptures as “practicing education without a license”. These two cases are still in the investigative stage.

## **Conclusion**

The right to religious freedom is in serious peril in Russia for religious minorities as the government continues to foster an atmosphere of intolerance and discrimination throughout the entire country against these targeted religious communities and their members.

The Scientology religion, its parishioners and its religious and social organizations have been a primary target of this Russian national campaign of religious repression. The campaign has been chillingly wide-ranging. Jehovah’s Witnesses, Muslims, Evangelicals, Lutherans, Baptists, Pentecostals, Methodists, Presbyterians, Hindus, Buddhists and others have been targeted.

International and legal standards mandate that religious minorities be treated fairly and without discrimination in the same way as other religions. Yet, Russia has contravened these standards through misapplication of the Extremism Law to censor religious materials, to arrest and detain believers for reading or disseminating Scriptures, to refuse to register religious groups, to prosecute and harass religious groups that are refused registration, and to liquidate and close down places of worship for targeted religious faiths. Such oppressive measures have no place in a democratic society.

Millions of Scientologists around the world sincerely believe in freedom of religion and the religious tenets and practices of Scientology. For every one of these individuals, Scientology is their religion. Scientology is fully developed, by definition of religion, in its theology, religious practice and organization. The breadth and scope of the religion include nearly 8,000 Churches of Scientology, Missions and related organizations with over 20,000 full-time staff in 164 countries, all unified by a common religious goal.

Under these circumstances, efforts to suppress the religion violate human rights standards regarding the right to freedom of religion and freedom from religious discrimination.

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# ST. PETERSBURG HUMAN RIGHTS COUNCIL

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## STATEMENT ON THE “SCIENTOLOGISTS CASE”

The case on five members of the Church of Scientology who were detained during the next round of anti-extremist activity of the law enforcement bodies, threatens St. Petersburg with the unpleasant fame of the capital of absurd processes. The people who are currently detained in the FSB “SIZO” (detention center) and under house arrest are charged of illegal entrepreneurship and extremist activity that according to the investigation, is aimed at the fomenting social strife to the social group of “trouble sources”.

The very formulation of the accusation that the defendants have been deprived of their freedom for the third month solely for observing the principles and precepts of their religious tradition is not only absurd in content but also obviously anti-constitutional in nature: in fact, believers are charged of having their faith prescribing certain sanctions to those who violate religious orders in one way or another. Such charges, in fact, can be brought to any religion in general.

However, it seems that, in addition to the unfortunately frequent, unlawful application of the anti-extremist legislation in relation to religious minorities in Russia, we obviously face a direct square of accounts by the law enforcement agencies. The fact is that the Scientologists detained in this case are the same applicants who most recently won in the case against Russia in the European Court of Human Rights and Russia had to register the Church of L. Ron Hubbard (Scientology) in St. Petersburg. The chronological sequence of actions of the law enforcement agencies does not leave any doubt that we are facing a simple reprisal against those who at the European Court of Human Rights defended their right to believe and now, in essence, are prisoners of conscience.

In this situation, the St. Petersburg Human Rights Council calls, first of all, to immediately release the detainees in an obviously absurd and fabricated case, to release the arrested ones - Ivan Matsitsky, Konstantsija Yesaulkova, Anastasia Terentyeva, Sahib Aliyev and Galina Shurinova, to close the case for lack of evidence and execute the instruction of the European Court of Human Rights on the registration of the Church of Scientology in St. Petersburg.

# INTERNATIONAL RELIGIOUS FREEDOM R O U N D T A B L E

July 12, 2017

The Honorable Donald J. Trump  
President of the United States  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

Dear Mr. President,

We write as an informal group of organizations and individuals who are scholars, religious and secular leaders, and human rights advocates to express our deep concern about the deteriorating religious freedom situation in Russia; and urge you and Secretary of State Rex Tillerson to raise this issue in public statements and bilateral discussions, and leverage the growing network of foreign institutions that are eager to partner with the United States to advance international religious freedom.

We are a truly multi-faith group of organizations and individuals, representing an extremely broad diversity of theological views and political positions. But we all agree on the importance of religious freedom for all persons and communities, whether they are believers or not. It strengthens cultures and provides the foundation for stable democracies and their components, including civil society, economic growth, and social harmony. This is a major contributor to U.S. national security.

The Russian Constitution guarantees every citizen the right to practice the religion of their choice. Further, as a member of the Council of Europe, the Organization for Security and Co-operation in Europe (OSCE) and the United Nations, Russia has international obligations to uphold this right. Russia is a signatory to the European Convention of Human Rights (ECHR) and the Vienna Convention on the Law of Treaties, and has ratified the International Covenant on Civil and Political Rights (ICCPR), and international law instruments take precedence over national legislation according to Chapter 1, Article 15 of the Constitution.

But this fundamental right is in serious peril as the Russian government continues to foster an atmosphere of intolerance, discrimination and persecution against religious minorities throughout the entire country.

International and legal standards mandate that religious minorities be treated fairly and without discrimination in the same way as other religions. But Russia is dominated by the Russian Orthodox Church (ROC), and, to a much lesser extent, certain denominations of Islam, Judaism and Buddhism, which are regarded as the three “traditional” Russian religions apart from the ROC. This creates a three-tiered hierarchy of religions in Russia, with the Orthodox Church at the top, Islam, Judaism and Buddhism in the middle, and all other “non-traditional” religions at the bottom, to include Protestantism and Catholicism, which face the most discrimination.

The 2002 Extremism Law laid the foundation for an alarming trend in repressions against civil society and the “non-traditional” minority religions. The law was initially passed to combat terrorism after 9/11 but it provides no clear definition for the term “extremism,” thus rendering virtually any group or individual vulnerable to political and legal harassment. In fact, it has been frequently misused to target a vast multitude of peaceful and law-abiding civil society organizations and individuals; to censor religious materials, arrest and detain believers for reading or disseminating Scriptures, refuse to register religious groups, harass and prosecute religious groups that are refused registration, and liquidate and close down places of worship for targeted religious faiths. Such oppressive measures have no place in a democratic society.

Most recently, the Scientology religion, its parishioners and its religious and social organizations have become a primary target of this Russian national campaign of religious repression. The campaign has been chillingly wide-ranging. Russia’s Supreme Court has declared Jehovah’s Witnesses, a Christian denomination that rejects violence, as “extremist,” confirming an order by the Justice Ministry that the group be “liquidated” and thereby banning them from operating on Russian territory. Further, Muslims, Evangelicals, Lutherans, Baptists, Pentecostals, Methodists, Presbyterians, Hindus, Buddhists and others have been targeted.

On June 6, 2017, over 60 Federal Security Bureau (FSB) officials and SWAT police raided the premises of the Church of Scientology religious group in St. Petersburg as well as the homes of four of its leaders. Five local leaders of the religious group were arrested, interrogated and detained by the FSB. Four of these individuals—Anastasia Terentieva, Galina Shurinova, Ivan Matsitskiy and Sakhiliev—were sentenced to two months pretrial detention by the Court (the maximum pretrial sentence which may be extended before it runs out—the same pretrial sentence recently handed down against Dennis Christensen, a Danish Jehovah’s Witness, for practicing his faith in Russia). The fifth leader—Konstanci Esaulkova—was sentenced to two months house arrest as she has an elderly mother she cares for at home.

Based on the search warrants and public statements made by the FSB, the raid took place regarding charges concerning Article 171 (illegal commercial activity without registration) and Articles 282 and 282.1 of the criminal code (extremism). If convicted, these five individuals could face a six to ten-year prison term for practicing their faith.

The Church of Scientology operates in 164 countries throughout the world as a peaceful, law abiding group. In Russia, Scientologists have been peacefully practicing their faith for more than thirty years, providing spiritual help to fellow citizens and actively participating in solving the most urgent problems of society.

There have been no decisions by any Court in Russia or elsewhere that Scientology is “extremist.” Yet, the Russian government has routinely refused to register the Church of Scientology as a religious organization; and in the pretrial detention hearings, the Russian Court accepted the prosecutor’s argument, forwarded by the FSB, that the Church of Scientology is an “extremist organization.” This erroneous finding, supported by no evidence whatsoever, provided the basis for the pretrial sentencing, imprisoning religious leaders of a peaceful and law-abiding religious group on the fallacious grounds that they were “dangerous extremists” that would endanger society if released on their own recognizance pending trial.

It appears that the Russian government is attempting to concoct an “extremist” case much like the case that was brought against Jehovah’s Witnesses in April 2017 to shut them down.

In spite of the principles of non-discrimination and equal treatment at the heart of the UN Bill of Rights, the Russian Government is systematically using the Extremism Law to: 1) seize and censor peaceful religious scriptures read without incident the world over; 2) arrest and detain members of minority faiths for reading and disseminating these religious materials; and 3) initiate proceedings to liquidate and shut down religious organizations in order to disrupt and suppress their right to conduct religious activities in contravention of the fundamental human right to religious freedom.

This misuse of the Extremism Law against religions has been widely criticized by the UN Human Rights Committee (28 April 2015), the Parliamentary Assembly Monitoring Committee of the Council of Europe (14 September 2012), and the Venice Commission (1 June 2012), which found the law and its use against religions violated human rights and called on Russia to correct the law.

Over fifty cases regarding Russia’s misuse of the Extremism Law against religions have been filed by numerous religious groups before the European Court of Human Rights.

We urge you to raise this issue in public statements and bilateral discussions, and leverage the growing network of foreign institutions that are eager to partner with the United States to advance international religious freedom, including the International Contact Group on Freedom of Religion or Belief, the International Panel of Parliamentarians for Freedom of Religion or Belief, the Panel of Experts on Freedom of Religion or Belief at the OSCE Office for Democratic Institutions and Human Rights, the European Parliament Intergroup on Freedom of Religion or Belief and Religious Tolerance, and the Commonwealth Initiative for Freedom of Religion or Belief.

Thank you for your consideration.

Respectfully,

Greg Mitchell  
Co-Chair, International Religious Freedom Roundtable  
President, The Mitchell Firm

#### ORGANIZATIONS

21<sup>st</sup> CENTURY WILBERFORCE INITIATIVE

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CC: The Honorable Rex Tillerson, Secretary of State