

Begin General Statement of Case and Key Identifying Information

(U) Individual 1: Mahmud Bagheri Kazemabad

(U) Individual: Mahmud Bagheri Kazemabad
(U) AKA: Mahmud Bagheri-Kazemabad
(U) AKA: Mahmud Bagheri
(U) AKA: Mahmud Kazemabad Bagheri
(U) AKA: Mahmoud Bagheri Kazemabad
(U) AKA: Mahmoud Bagheri
(U) AKA: Mahmoud Bagheri Kzemabad
(U) Position: Commander of Islamic Revolutionary Guards Corps Aerospace Forces Al-Ghadir Missile Command
(U) DOB: 26 June 1965
(U) POB: Meybod, Iran
(U) Nationality: Iranian
(U) National ID: 448947941
(U) Passport Number: 132377129
(U) Passport Expiration: 31 August 2020
(U) Gender: Male

(U) Mahmud Bagheri Kazemabad is being designated pursuant to E.O. 13224 for acting for or on behalf of the IRGC Aerospace Forces Al-Ghadir Missile Command (ASF AGMC). Bagheri is the Commander of the IRGC ASF AGMC. Bagheri and Mohammad Agha Ja'fari oversee the transfer of missile components and the deployment of ballistic missile specialists across the region in support of the IRGC's activities. The IRGC ASF AGMC, which is responsible for Iran's deployed missile force, is designated pursuant to E.O.s 13224 and 13382.

(U) Individual 2: Mohammad Agha Ja'fari

(U) Individual: Mohammad Agha Ja'fari
(U) AKA: Mohammad Ja'fari
(U) Position: Senior AGMC Official
(U) DOB: 1966
(U) Alt DOB: 1967
(U) POB: Kashan, Iran

(U) Mohammad Agha Ja'fari is being designated pursuant to E.O. 13224 for acting for or on behalf of the IRGC ASF AGMC. Ja'fari is a senior IRGC ASF AGMC official. Bagheri and Ja'fari oversee the transfer of missile components and the deployment of ballistic missile specialists across the region in support of the IRGC's activities. The IRGC ASF AGMC, which is responsible for Iran's deployed missile force, is designated pursuant to E.O.s 13224 and 13382.

(U) Individual 3: Javad Bordbar Shir Amin

(U) Individual: Javad Bordbar Shir Amin
(U) AKA: Javad Bordbar
(U) AKA: Javad Bordbarsheramin
(U) AKA: Javad Ali Bordbarsheramin
(U) DOB: 27 October 1981
(U) Passport Number: A37845408
(U) Passport Expiration: 24 August 2021
(U) Nationality: Iranian
(U) Gender: Male

(U) Javad Bordbar Shir Amin is being designated pursuant to E.O. 13224 for acting for or on behalf of the IRGC. Javad Bordbar Shir Amin is an IRGC ASF official.

(U) Individual 4: Mehdi Azarpisheh

(U) Individual: Mehdi Azarpisheh
(U) AKA: Mehdi Mansuri
(U) DOB: 31 July 1983
(U) Passport Number: 26338775

(U) Mehdi Azarpisheh is being designated pursuant to E.O. 13224 for acting for or on behalf of the IRGC-Qods Force (IRGC-QF).

(U) Individual 5: Sayyed Mohammad Ali Haddadnezhad Tehrani

(U) Individual: Sayyed Mohammad Ali Haddadnezhad Tehrani
(U) AKA: Sayyed Mohammad Ali Jalal Haddadnezhad
(U) DOB: 1970
(U) Nationality: Iranian
(U) Passport Number: 32371002

(U) Sayyed Mohammad Ali Haddadnezhad Tehrani is being designated pursuant to E.O. 13382 for acting for or on behalf of, or for having provided, or attempted to provide, financial, material, technological or other support for, or goods or services in support of, the IRGC Research and Self-Sufficiency Jihad Organization (RSSJO). The IRGC RSSJO, which was designated pursuant to E.O. 13382 on July 18, 2017 and is responsible for the research and development of ballistic missiles, has supported the IRGC-led effort to improve the Huthis' ballistic missile capabilities.

(U) Individual 6: Gulnihal Yegane

(U) Name: Gulnihal Yegane
(U) AKA: Gulnihal Yegane Aksit
(U) AKA: Gulnihal Kulak Yegane
(U) Address: Merkez Mah. Hasat Sok. No. 52/6 Sisli, Istanbul 21344, Turkey

(U) Alternate Address: Egs Bloklari B-1 Blok K.1 No: 114, Yesilkoy-Bakirkoy, Istanbul, Turkey
(U) DOB: 15 September 1975
(U) POB: Karabuk, Kula, Turkey
(U) Alternate POB: Manisa, Kula, Turkey
(U) Nationality: Turkey
(U) Gender: Female
(U) Passport: 791029 (Turkey)
(U) National ID Number: 27224237098 (Turkey)

(U) Gulnihal Yegane is being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, Mahan Air. Yegane manages multiple businesses that purchase and/or receive aviation parts, including controlled U.S.-origin items, and send those parts to Mahan Air.

(U) The U.S. Department of Commerce's Bureau of Industry and Security (BIS) placed Gulnihal Yegane on the BIS Entity List in December 2013, denying her U.S. export privileges for her involvement in a procurement scheme that directly supported Mahan Air. On February 2, 2018, BIS issued a Temporary Denial Order presenting evidence that Gulnihal Yegane, as well as Trigron Lojistik, UFUK Avia, and RA Havacilik, are engaged in procurement activities relating to U.S.-origin aircraft engines and parts for or on behalf of one or more Iranian airlines, operating as transaction parties, and facilitating transactions structured to evade the Export Administration Regulations.

(U) Entity 1: Trigron Lojistik

(U) Name: Trigron Lojistik Kargo Limited Sirketi
(U) AKA: Trigron Cargo Logistics Ltd
(U) AKA: Trigron Kargo
(U) AKA: Trigron Kargo Lojistik
(U) Address: Airport Hill Sitesi C Blok D. 6, NO: 11-D, Degirmenbahce Caddesi 11-D-C Blok, Bahcelievler, Istanbul 34180
(U) Business Registration Document Number: 846711

(U) Trigron Lojistik is being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, Mahan Air, as well as for being owned or controlled by Gulnihal Yegane. Trigron Lojistik collects consignments of aviation parts, including controlled U.S.-origin items, and sends them to Mahan Air.

(U) Entity 2: 3G Lojistik

(U) Name: 3G Lojistik Ve Havacilik Hizmetlari Ltd
(U) Address: No. 3/182 Altintepe Bagdat Cad. Istasyon Yolu Sok., Istanbul 34840, Turkey

(U) 3G Lojistik is being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, Mahan Air. 3G Lojistik purchases aviation parts, including controlled U.S.-origin items, on behalf of Mahan Air and sends them to Mahan Air in Iran through Trigron Lojistik.

(U) Entity 3: RA Havacilik Lojistik

(U) Name: RA Havacilik Lojistik Ve Tasimacilik Ticaret Limited
(U) Address: No: 3/101, Yesilce Mahallesi Dalgic Sokak, Kagithane, Istanbul, Turkey
(U) Business Registration Document Number: 49840 (Turkey)
(U) Tax ID Number: 7340903161 (Turkey)

(U) RA Havacilik is being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, Mahan Air. RA Havacilik purchases aviation parts, including controlled U.S.-origin items, on behalf of Mahan Air and sends them to Mahan Air in Iran through Trigron Lojistik.

(U) Entity 4: Otik Aviation

(U) Name: Otik Aviation
(U) AKA: Otik Havacilik Sanayi Ve Ticaret Limited Sirketi
(U) Address: Kent Pasaji C Blok No: 2/33-3, Halaskargazi Caddesi Eftal Sokak Sisli, Istanbul 34371, Turkey
(U) Alternate Address: Halaskar Gazi Cad. Eftal Sk. Kent Pasaji No: 2/33 Sisli, Istanbul 31371, Turkey
(U) Business Registration ID Number: 844437 (Turkey)

(U) Otik Aviation is being designated pursuant to E.O. 13224 for providing material support to Mahan Air, in particular regularly supplying the Iranian airline with U.S.-origin aircraft parts. Over the last several years, Otik Aviation has procured and delivered millions of dollars in aviation-related spare and replacement parts for Mahan Air, some of which were procured from the United States and the European Union. As recently as 2017, Otik Aviation continued to provide Mahan Air with replacement parts worth well over \$100,000 per shipment, such as aircraft brakes. Representatives of Otik Aviation wittingly ship the aviation-related goods they procure for Mahan Air to Blue Airways.

(U) Entity 5: Blue Airways

(U) Name: Blue Airways
(U) AKA: Blue Sky Sze
(U) Address: Mahan Air Tower, Azadegn Street, Karaj Highway, Tehran, Iran

(U) Blue Airways is being designated pursuant to E.O. 13224 for providing material support to, and for acting for or on behalf of, Mahan Air, primarily through the procurement and provision of aircraft parts. Blue Airways, which is co-located with Mahan Air, is a Mahan Air-operated shell company with no aircraft or discernable assets. To disguise Mahan Air as the actual buyer and final recipient of prohibited U.S. goods, Blue Airways is often listed on commercial documents in place of Mahan Air. This tactic is used by Mahan Air to procure goods from neighboring countries, China, and Europe.

(U) Individual 7: Iraj Ronaghi

(U) Name: Iraj Ronaghi
(U) Address: No. 3-11 Tower B, Tehran Towers, Hormozan St. Phase 2, Shahrak, Qods, Tehran, Iran
(U) DOB: 18 November 1952
(U) POB: Tehran, Iran
(U) Nationality: Iran
(U) Gender: Male

(U) Iraj Ronaghi is being designated pursuant to E.O. 13224 for acting for or on behalf of Meraj Air. Meraj Air was designated pursuant to E.O. 13224 on August 29, 2014, for ferrying illicit cargo, including weapons, from Iran to the Syrian regime since at least 2013.

(U) Individual 8: Touraj Zanganeh

(U) Name: Touraj Zanganeh
(U) AKA: Tooraj Dehghani Zanganeh
(U) AKA: Touraj Dehghani Zangene
(U) AKA: Touraj Dehghani Zangeneh
(U) Location: Iran
(U) DOB: 5 August 1958
(U) POB: Kermanshah, Iran
(U) Nationality: Iran
(U) Gender: Male

(U) Touraj Zanganeh is being designated pursuant to E.O. 13224 for acting for or on behalf of Meraj Air. Meraj Air was designated pursuant to E.O. 13224 on August 29, 2014, for ferrying illicit cargo, including weapons, from Iran to the Syrian regime since at least 2013.

(U) Entity 6: Dena Airways

(U) Name: Dena Airways
(U) AKA: Dena Airlines
(U) Location: Tehran, Iran

(U) Dena Airways is being designated pursuant to E.O. 13224 for being owned or controlled by Ronaghi and Zanganeh, and for acting for or on behalf of Meraj Air. Meraj Air transferred VIP flight operations for the Government of Iran to Dena Airways in November 2017.

(U) Aircraft 1: EP-CAQ

(U) Aircraft Operator Caspian Air
(U) Aircraft Manufacture Date 01 Oct 1992
(U) Aircraft Model B737
(U) Aircraft Manufacturer's Serial Number (MSN) 26467

(U) Aircraft 2: EP-CAR

(U) Aircraft Operator Caspian Air
(U) Aircraft Manufacture Date 21 Jun 1993
(U) Aircraft Model B737
(U) Aircraft Manufacturer's Serial Number (MSN) 26451

(U) Aircraft 3: EP-CAS

(U) Aircraft Operator Caspian Air
(U) Aircraft Manufacture Date 31 Aug 1999
(U) Aircraft Model DC-9
(U) Aircraft Manufacturer's Serial Number (MSN)

(U) Aircraft 4: EP-CPD

(U) Aircraft Operator Caspian Air
(U) Aircraft Manufacture Date Aug 1995
(U) Aircraft Model DC-9
(U) Aircraft Manufacturer's Serial Number (MSN) 53188

(U) Aircraft 5: EP-CPU

(U) Aircraft Operator Caspian Air
(U) Aircraft Manufacture Date Apr 1994
(U) Aircraft Model DC-9
(U) Aircraft Manufacturer's Serial Number (MSN) 53223

(U) Aircraft 6: EP-CAP

(U) Aircraft Operator Caspian Air
(U) Aircraft Manufacture Date 18 Sep 1992
(U) Aircraft Model B737
(U) Aircraft Manufacturer's Serial Number (MSN) 26466

(U) Aircraft 7: EP-CPV

(U) Aircraft Operator Caspian Air
(U) Aircraft Manufacture Date 20 Oct 1990
(U) Aircraft Model DC-9
(U) Aircraft Manufacturer's Serial Number (MSN) 49938

(U) Aircraft 8: EP-CPX

(U) Aircraft Operator Caspian Air
(U) Aircraft Manufacture Date Jul 1994
(U) Aircraft Model DC-9
(U) Aircraft Manufacturer's Serial Number (MSN) 53463

(U) Aircraft 9: EP-CPZ

(U) Aircraft Operator Caspian Air
(U) Aircraft Manufacture Date Aug 1994
(U) Aircraft Model DC-9
(U) Aircraft Manufacturer's Serial Number (MSN) 53464

(U) Aircraft 10: EP-MOS

(U) Aircraft Operator Mahan Air
(U) Aircraft Manufacture Date 15 Mar 1999
(U) Aircraft Model BAe RJ85
(U) Aircraft Manufacturer's Serial Number (MSN) 2347

(U) Aircraft 11: EP-MOR

(U) Aircraft Operator Mahan Air
(U) Aircraft Manufacture Date 20 Nov 2001
(U) Aircraft Model BAe RJ85
(U) Aircraft Manufacturer's Serial Number (MSN) 2392

(U) Aircraft 12: EP-MOQ

(U) Aircraft Operator Mahan Air
(U) Aircraft Manufacture Date 24 Mar 1995
(U) Aircraft Model BAe RJ85
(U) Aircraft Manufacturer's Serial Number (MSN) 2261

(U) Aircraft 13: EP-MOP

(U) Aircraft Operator Mahan Air
(U) Aircraft Manufacture Date 14 Mar 1995
(U) Aircraft Model BAe RJ85
(U) Aircraft Manufacturer's Serial Number (MSN) 2257

(U) Aircraft 14: EP-MOM

(U) Aircraft Operator Mahan Air
(U) Aircraft Manufacture Date 12 May 1990
(U) Aircraft Model BAe 146-300
(U) Aircraft Manufacturer's Serial Number (MSN) 3165

(U) Aircraft 15: EP-MOD

(U) Aircraft Operator Mahan Air
(U) Aircraft Manufacture Date 12 Nov 1990

- (U) Aircraft Model BAe 146-300
- (U) Aircraft Manufacturer's Serial Number (MSN) 3162

(U) Aircraft 16: EP-MNF

- (U) Aircraft Operator Mahan Air
- (U) Aircraft Manufacture Date 07 Aug 1990
- (U) Aircraft Model A310-304
- (U) Aircraft Manufacturer's Serial Number (MSN) 547

(U) Aircraft 17: EP-MMV

- (U) Aircraft Operator Mahan Air
- (U) Aircraft Manufacture Date 12 Aug 1987
- (U) Aircraft Model BAe 146-200
- (U) Aircraft Manufacturer's Serial Number (MSN) 2079

(U) Aircraft 18: EP-MMJ

- (U) Aircraft Operator Mahan Air
- (U) Aircraft Manufacture Date 05 Oct 1989
- (U) Aircraft Model A310-304
- (U) Aircraft Manufacturer's Serial Number (MSN) 526

(U) Aircraft 19: EP-MMC

- (U) Aircraft Operator: Mahan Air
- (U) Aircraft Manufacture Date: 18 Jun 1999
- (U) Aircraft Model: A340-313X
- (U) Aircraft Manufacturer's Serial Number (MSN): 282

(U) Aircraft 20: EP-MMB

- (U) Aircraft Operator: Mahan Air
- (U) Aircraft Manufacture Date: 07 Dec 1994
- (U) Aircraft Model: A340-311
- (U) Aircraft Manufacturer's Serial Number (MSN): 56

(U) Aircraft 21: EP-MMA

- (U) Aircraft Operator: Mahan Air
- (U) Aircraft Manufacture Date: 08 Sep 1993
- (U) Aircraft Model: A340-311
- (U) Aircraft Manufacturer's Serial Number (MSN): 20

(U) Aircraft 22: EP-SIG

- (U) Aircraft Operator: Meraj Air
- (U) Aircraft Manufacture Date: 15 Feb 1995
- (U) Aircraft Model: A300
- (U) Aircraft Manufacturer's Serial Number (MSN): 750

(U) Aircraft 23: EP-SIF

(U) Aircraft Operator: Meraj Air
(U) Aircraft Manufacture Date: 19 Oct 1995
(U) Aircraft Model: A300
(U) Aircraft Manufacturer's Serial Number (MSN): 762

(U) Aircraft 24: EP-AJI

(U) Aircraft Operator: Meraj Air
(U) Aircraft Manufacture Date: 11 Aug 2000
(U) Aircraft Model: A320
(U) Aircraft Manufacturer's Serial Number (MSN): 1300

(U) Aircraft 25: EP-AJH

(U) Aircraft Operator: Meraj Air
(U) Aircraft Manufacture Date: 27 Oct 2000
(U) Aircraft Model: A320
(U) Aircraft Manufacturer's Serial Number (MSN): 1353

(U) Aircraft 26: EP-AJC

(U) Aircraft Operator: Meraj Air
(U) Aircraft Manufacture Date: 28 Feb 1995
(U) Aircraft Model: A320
(U) Aircraft Manufacturer's Serial Number (MSN): 530

(U) Aircraft 27: EP-PUM

(U) Aircraft Operator: Pouya Air
(U) Aircraft Manufacture Date: 2002
(U) Aircraft Model: An-74
(U) Aircraft Manufacturer's Serial Number (MSN): 3654701211059

(U) Aircraft 28: EP-PUL

(U) Aircraft Operator: Pouya Air
(U) Aircraft Manufacture Date: 1983
(U) Aircraft Model: IL-76
(U) Aircraft Manufacturer's Serial Number (MSN): 33448393

(U) Aircraft 29: EP-PUA

(U) Aircraft Operator: Pouya Air
(U) Aircraft Manufacture Date: 1998
(U) Aircraft Model: An-74
(U) Aircraft Manufacturer's Serial Number (MSN): 3654701211055

(U) Aircraft 30: EP-LDC

(U) Aircraft Operator: Pouya Air
(U) Aircraft Manufacture Date: 26 Sep 1997
(U) Aircraft Model: ERJ-145
(U) Aircraft Manufacturer's Serial Number (MSN): 145026

(U) Aircraft 31: EP-LDA

(U) Aircraft Operator: Pouya Air

(U) Aircraft Manufacture: Date 17 Sep 1997

(U) Aircraft Model: ERJ-145

(U) Aircraft Manufacturer's Serial Number (MSN): 145025

End Key Identifiers and Statements of Case