

UNITED STATES DISTRICT COURT

for the
District of Columbia

Fiona Havlish, et al.

Plaintiff

v.

bin Laden, et al.

Defendant

Civil Action No. 1:14-mc-00107

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: United States Department of the Treasury, Office of Foreign Assets Control

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Please see Exhibit A.

Table with 2 columns: Place (Wiggins, Childs, Pantazis, Fisher & Goldfarb, PLLC) and Date and Time (06/08/2015 2:00 pm)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 05/17/2015

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk OR s/ Timothy B. Fleming Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Fiona Havlish, et al., who issues or requests this subpoena, are:

Timothy B. Fleming, 1850 M Street, NW, Ste 720, Washington, DC 20036, tfleming@wigginschilds.com, (202)467-4489

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:14-mc-00107

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* US Dept. of Treasury, Ofc of Foreign Assets Control
on *(date)* _____ .

I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

EXHIBIT A

1) A list of the names and addresses of all banks or financial institutions that, since July 1, 2012, have held or that continue to hold corresponding or payable through accounts on behalf of any foreign financial institution that is currently prohibited from holding such accounts pursuant to the Iranian Financial Sanctions Regulations, 31 C.F.R. part 561 ("The 561 list"), reproduced in Appendix I, and the total such assets reported by each institution, rounded to the nearest \$100,000.

2) A list of the names and addresses of all banks or financial institutions that since July 1, 2012 have held corresponding or payable through accounts on behalf of entities comprising, or associated with, the Government of Iran, as defined in 77 C.F.R. §560.304, et seq., Hezbollah, al Qaeda, and/or the Taliban, or currently appearing on the OFAC list of SDN or on its list of FSE because of a nexus with Iran, and the total such assets reported by each institution, rounded to the nearest \$100,000.

3) A list of the names and addresses of all banks or financial institutions authorized by Treasury to repatriate funds to Iran as a result of the Jan. 12, 2014 Joint Plan of Action ("JPOA") between the P5+1 ("P5, or five permanent members of the UN Security Council, and Iran, as extended, to include identifying information on all parties to such transactions, and the date(s), currency, and amount(s) of such transactions.

4) A listing of any asset, account, or payable-through account in a U.S. bank or financial institution held directly by, or by any person the United States believes may be acting beneficially as the trustee or representative of, any entity or person listed in Appendix II.

5) A list of the names and addresses of all banks or financial institutions worldwide holding U.S. dollar accounts owned or controlled by the Government of the Islamic Republic of Iran, its political subdivisions, its agencies and instrumentalities, and the total such assets reported by each institution, rounded to the nearest \$100,000, broken down by the name of the account holder.

6) A list of the names and addresses of all banks or financial institutions worldwide holding U.S. dollar accounts owned or controlled by Babak Zanjani, the First Islamic Investment Bank, International Safe Oil, Sorinet Commercial Trust Bankers, Kont Kosmetik and Kont Investment Bank ("the Zanjani companies"), and the total such assets reported by each institution, rounded to the nearest \$100,000, broken down by the name of the account holder.

7) The list of Iranian government accounts supplied by OFAC to the Swiss government in 2011 that served as the basis of the Swiss government freeze on

Iran-linked accounts in November 2011, along with the names and addresses of the financial institutions holding those accounts.

APPENDICES

APPENDIX I (relating to Item 1 of EXHIBIT A):

a) BANK OF KUNLUN CO LTD (. KARAMAY CITY COMMERCIAL BANK CO LTD.; f.k.a. KARAMAY URBAN CREDIT COOPERATIVES), 172 Xibin Rd, Ranghulu District, (Daqing, Heilongjiang Branch), Daqing 163453, China; 9 Dongzhimen North Street, Dongcheng District, (Head Office), Beijing 100007, China; No. 7 Century Ave, (Registered Office), Xinjiang, Karamay 834000, China; No. 68 Zhongya South Rd, Economic and Technological Development Zone, (Urumqi, Xinjiang Branch), Urumqi 830026, China; SWIFT/BIC CKLB CN BJ [Part 561 List]

b) KARAMAY CITY COMMERCIAL BANK CO LTD. (a.k.a. BANK OF KUNLUN CO LTD; f.k.a. KARAMAY URBAN CREDIT COOPERATIVES), 172 Xibin Rd, Ranghulu District, (Daqing, Heilongjiang Branch), Daqing 163453, China; 9 Dongzhimen North Street, Dongcheng District, (Head Office), Beijing 100007, China; No. 7 Century Ave, (Registered Office), Xinjiang, Karamay 834000, China; No. 68 Zhongya South Rd, Economic and Technological Development Zone, (Urumqi, Xinjiang Branch), Urumqi 830026, China; SWIFT/BIC CKLB CN BJ [Part 561 List]

c) KARAMAY URBAN CREDIT COOPERATIVES (a.k.a. BANK OF KUNLUN CO LTD; f.k.a. KARAMAY CITY COMMERCIAL BANK CO LTD.), 172 Xibin Rd, Ranghulu District, (Daqing, Heilongjiang Branch), Daqing 163453, China; 9 Dongzhimen North Street, Dongcheng District, (Head Office), Beijing 100007, China; No. 7 Century Ave, (Registered Office), Xinjiang, Karamay 834000, China; No. 68 Zhongya South Rd, Economic and Technological Development Zone, (Urumqi, Xinjiang Branch), Urumqi 830026, China; SWIFT/BIC CKLB CN BJ [Part 561 List]

APPENDIX II (relating to Item 4 of Exhibit A)

a) Mahan Airways, aka Mahan Air Co. [SDGT]

Mahan Tower
No. 21, Azadegan St.
Karaj Highway, P.O. Box 411-14515
Tehran, Iran

b) Blue Sky Aviation Co FZE (BSA FZE) [SDGT]

Al Maktoum Street, al Dana Centre, 3rd Floor, Office No. 306, Dubai, United Arab Emirates (alternate address: G22 Dubai Airport Free Zone, P.O. Box 393754 DAFZA , Dubai, UAE

c) Avia Trust FZE [SDGT]

P.O. Box 54541, Dubai, UAE

d) Hamidreza Malekouti Pour [SDGT]

Regional manager for Mahan Air in the UAE and the managing director of Sirjanco Trading LLC and BSA FZE); DOB: October 18, 1960; Iranian Passport: B5660433

e) Pejman Mahmood Kosarayanifard [SDGT]

Owner of Avia Trust FZE); AKA Ali Pejman Mahmud Kosarayan Fard, Amir Kosarian

DOB: February 27, 1973 Passport: C20423657 P.O. Box: 52404, Dubai, UAE

f) Gholamreza Mahmoudi [SDGT]

Corporate director of Mahan Air

DOB: February 3, 1958 Nationality: Iran Passport: 5659068

g) Balli Group PLC

5 Stanhope Gate
London, UK
W1K 1AH

h) Balli Aviation

5 Stanhope Gate
London, UK
W1K 1AH

i) Balli Holdings

5 Stanhope Gate
London, UK
W1K 1AH

j) Vahid Alaghband

5 Stanhope Gate
London, UK
W1K 1AH

k) Hassan Alaghband

5 Stanhope Gate
London, UK
W1K 1AH

l) Blue Sky One Ltd

5 Stanhope Gate

London, UK
W1K 1AH

m) Blue Sky Two Ltd

5 Stanhope Gate
London, UK
W1K 1AH

n) Blue Sky Three Ltd

5 Stanhope Gate
London, UK
W1K 1AH

o) Blue Airways

8/3 D Angaght Street
376009 Yerevan
Armenia

p) Blue Airways

Riqa Road
Dubai 52404
UAE