

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:)
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Aviation Services International B.V.)
P.O. Box 418)
Heerhugowaard, Netherlands 1700AK)
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Aviation Services International B.V.)
Fleming Straat 36)
Heerhugowaard, Netherlands 1704SL)
)
Delta Logistics B.V.)
P.O. Box 418)
Heerhugowaard, Netherlands 1700AK)
)
Delta Logistics B.V.)
Fleming Straat 36)
Heerhugowaard, Netherlands 1704SL)
)
Robert Kraaiipoel)
P.O. Box 418)
Heerhugowaard, Netherlands 1700AK)
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Robert Kraaiipoel)
Fleming Straat 36)
Heerhugowaard, Netherlands 1704SL)
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Niels Kraaiipoel)
P.O. Box 418)
Heerhugowaard, Netherlands 1700AK)
)
Niels Kraaiipoel)
Fleming Straat 36)
Heerhugowaard, Netherlands 1704SL)
)
T.P.C. B.V.)
P.O. Box 418)
Heerhugowaard, Netherlands 1700AK)
)
)

T.P.C. B.V.)
Fleming Straat 36)
Heerhugowaard, Netherlands 1704SL)
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T.P.C. B.V.)
P.O. Box 11)
Heerhugowaard, Netherlands 1700AA)
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Mia Van Gemert)
P.O. Box 418)
Heerhugowaard, Netherlands 1700AK)
)
Mia Van Gemert)
Fleming Straat 36)
Heerhugowaard, Netherlands 1704SL)
)
Mojir Trading)
PO Box 18118)
Jabel-Ali Free Zone, Dubai-UAE)
)
Reza Amidi)
PO Box 18118)
Jabel-Ali Free Zone, Dubai-UAE)
)
Lavantia, Ltd.)
16 Kyraikou Matsi Ave)
3rd Floor)
1082 Nicosia, Cyprus)
)
Lavantia, Ltd.)
Strovolou 77)
Strovolos Center Suite 202)
Strovolos P.C. 2018)
Nicosia, Cyprus)
)
Mita Zarek)
16 Kyraikou Matsi Ave)
3rd Floor)
1082 Nicosia, Cyprus)
)

6) MIA VAN GEMERT, P.O. Box 418, Heerhugowaard, Netherlands 1700AK, and Fleming Straat 36, Heerhugowaard, Netherlands 1704SL.

7) MOJIR TRADING, PO Box 18118, Jabel-Ali Free Zone, Dubai-UAE.

8) REZA AMIDI, PO Box 18118, Jabel-Ali Free Zone, Dubai-UAE.

9) LAVANTIA, Ltd., 16 Kyriakou Matsi Ave, 3rd Floor, 1082 Nicosia, Cyprus, and Strovolou 77, Strovolos Center Suite 202, Strovolos P.C. 2018, Nicosia, Cyprus

10) MITA ZAREK, 16 Kyraikou Matsi Ave, 3rd Floor, 1082 Nicosia, Cyprus, and Strovolou 77, Strovolos Center Suite 202, Strovolos P.C. 2018, Nicosia, Cyprus

(hereinafter collectively referred to as the “Respondents”) for 180 days.

On October 1, 2007, I found that the evidence presented by BIS demonstrated that the Respondents have knowingly violated the EAR on multiple occasions between 2005 and 2007, by making false statements regarding the end-user and country of ultimate destination involving the export of items subject to the EAR from the United States. The evidence showed that Respondents concealed the true ultimate destination for the items, which was Iran, and that Respondents did not have the required U.S. Government authorization for the transactions. Additionally, in August 2007, Respondents Aviation Services International B.V. (“ASI”), Robert Kraaijpoel, Delta Logistics B.V. (“Delta”) and T.P.C. B.V. (“TPC”) were criminally charged with five counts for similar misconduct involving the unlicensed export of U.S. origin items to Iran, including criminal violations of IEEPA and false statements as well. I further found that such violations had been significant, deliberate and covert, and were likely to occur again, especially given the nature of the transactions. For these reasons, I found that an imminent violation existed within the meaning of Section 766.24(b)(2). As such, a Temporary Denial Order (“TDO”) was needed to give notice to persons and companies in the United States and abroad

that they should cease dealing with the Respondents in export transactions involving items subject to the EAR. Issuance of the TDO, rendered effective as of October 10, 2007, the date of publication in the Federal Register, was consistent with the public interest to preclude future violations of the EAR.

OEE has presented additional evidence showing that on multiple occasions Lavantia, Ltd. and its owner, Mita Zarek, have knowingly violated the TDO by continuing to engage in unauthorized transactions involving items subject to the EAR. Specifically, evidence shows that on or about November 26, 2007 and on or about February 9, 2008, shipper's export declarations ("SEDs") were filed in the Automated Tracking System, listing Lavantia, Ltd. as the ultimate consignee for exports involving U.S. origin items subject to the EAR. The SEDs show that Respondents Lavantia, Ltd. and Mita Zarek are using a different address in Cyprus to receive the items. The new address is Strovolou 77, Strovolos Center Suite 202, Strovolos P.C. 2018, Nicosia, Cyprus.

In addition, the criminal charges against ASI, Robert Kraaijpoel, Delta and TPC are still pending, and an arrest warrant is outstanding for Robert Kraaijpoel.

I now find, based on the circumstances that led to the initial issuance of the TDO and the additional evidence supplied by OEE, that the renewal of this TDO for a period of the 180 days is necessary and in the public interest, to prevent an imminent violation of the EAR. I also find it necessary to add the additional address for Respondents Lavantia, Ltd. and Mita Zarek to the Order. All parties to this TDO have been given notice of the request for renewal.

IT IS THEREFORE ORDERED:

FIRST, that the Respondents, AVIATION SERVICES INTERNATIONAL B.V., P.O. Box 418, Heerhugowaard, Netherlands 1700AK, and Fleming Straat 36, Heerhugowaard, Netherlands 1704SL; DELTA LOGISTICS, B.V., P.O. Box 418, Heerhugowaard, Netherlands 1700AK, and Fleming Straat 36, Heerhugowaard, Netherlands 1704SL; ROBERT KRAAIPOEL, Director and Principal Officer of Aviation Services International B.V., P.O. Box 418, Heerhugowaard, Netherlands 1700AK, and Fleming Straat 36, Heerhugowaard, Netherlands 1704SL; NIELS KRAAIPOEL, Aviation Services International Sales Manager, P.O. Box 418, Heerhugowaard, Netherlands 1700AK, and Fleming Straat 36, Heerhugowaard, Netherlands 1704SL; T.P.C., B.V., P.O. Box 418, Heerhugowaard, Netherlands 1700AK, and Fleming Straat 36, Heerhugowaard, Netherlands 1704SL, and P.O. Box 11, Heerhugowaard, Netherlands 1700AA; MIA VAN GEMERT, Managing Director of Aviation Services International, P.O. Box 418, Heerhugowaard, Netherlands 1700AK, and Fleming Straat 36, Heerhugowaard, Netherlands 1704SL; MOJIR TRADING, PO Box 18118, Jabel-Ali Free Zone, Dubai-UAE; REZA AMIDI, PO Box 18118, Jabel-Ali Free Zone, Dubai-UAE; LAVANTIA, LTD., 16 Kyraikou Matsi Ave, 3rd Floor, 1082 Nicosia, Cyprus, and Strovolou 77, Strovolos Center Suite 202, Strovolos P.C. 2018, Nicosia, Cyprus; and MITA ZAREK, owner of Lavantia, Ltd., 16 Kyraikou Matsi Ave, 3rd Floor, 1082 Nicosia, Cyprus, and Strovolou 77, Strovolos Center Suite 202, Strovolos P.C. 2018, Nicosia, Cyprus (collectively the "Denied Persons") may not, directly or indirectly, participate in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is

subject to the Export Administration Regulations ("EAR"), or in any other activity subject to the EAR, including, but not limited to:

- A. Applying for, obtaining, or using any license, License Exception, or export control document;
- B. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the EAR, or in any other activity subject to the EAR;
or
- C. Benefiting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the EAR, or in any other activity subject to the EAR.

SECOND, that no person may, directly or indirectly, do any of the following:

- A. Export or reexport to or on behalf of the Denied Persons any item subject to the EAR;
- B. Take any action that facilitates the acquisition or attempted acquisition by the Denied Persons of the ownership, possession, or control of any item subject to the EAR that has been or will be exported from the United States, including financing or other support activities related to a transaction whereby the Denied Persons acquires or attempts to acquire such ownership, possession or control;
- C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from the Denied Persons of any item subject to the EAR that has been exported from the United States;

D. Obtain from the Denied Persons in the United States any item subject to the EAR with knowledge or reason to know that the item will be, or is intended to be, exported from the United States; or

E. Engage in any transaction to service any item subject to the EAR that has been or will be exported from the United States and which is owned, possessed or controlled by the Denied Persons, or service any item, of whatever origin, that is owned, possessed or controlled by the Denied Persons if such service involves the use of any item subject to the EAR that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

THIRD, that, after notice and opportunity for comment as provided in section 766.23 of the EAR, any other person, firm, corporation, or business organization related to any of the Denied Persons by affiliation, ownership, control, or position of responsibility in the conduct of trade or related services may also be made subject to the provisions of this Order.

FOURTH, that this Order does not prohibit any export, reexport, or other transaction subject to the EAR where the only items involved that are subject to the EAR are the foreign-produced direct product of U.S.-origin technology.

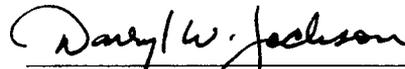
In accordance with the provisions of Section 766.24(e) of the EAR, the Respondents may, at any time, appeal this Order by filing a full written statement in support of the appeal with the Office of the Administrative Law Judge, U.S. Coast Guard ALJ Docketing Center, 40 South Gay Street, Baltimore, Maryland 21202-4022.

In accordance with the provisions of Section 766.24(d) of the EAR, BIS may seek renewal of this Order by filing a written request with the Assistant Secretary not later than 20

days before the expiration date and serving the request on the Respondents. The Respondents may oppose a request to renew this Order by filing a written submission with the Assistant Secretary of Commerce for Export Enforcement, which must be received not later than seven days before the expiration date of the Order.

A copy of this Order shall be served on the Respondents and shall be published in the Federal Register.

This Order is effective as of the date that it is signed and shall remain in effect for 180 days.



DARRYL W. JACKSON
Assistant Secretary of Commerce
for Export Enforcement

Entered this 4th day of April 2008.