

**Comments:**

**To:** Aventura Aviation  
**Fax:** (212) 308-1115  
**Phone:**  
**Date:** Thursday, September 13, 2007  
**Pages:** 3  
**From:** Dale Thompson (Dale.Thompson@do.treas.gov)  
**Re:** Cease and Desist Order / Requirement to Furnish Information

**Fax**

**Office of Foreign Assets Control**  
 United States Department of the Treasury

**Enforcement Division**  
 1500 Pennsylvania Ave NW  
 Washington DC 20220  
**Phone:** (202) 622-2430  
**Fax:** (202) 622-2606

As a U.S. person, Aventura and its representatives are subject to the comprehensive prohibitions on trade with SDNs. Therefore, your involvement with Mr. Chichakli appears to be in violation of the Taylor Sanctions Regulations. Aventura is hereby ordered to cease and desist from any further involvement with Mr. Chichakli, or any other SDN, that violates the prohibitions set forth in the Taylor Sanctions Regulations and is directed to provide confirmation in writing to such effect, identifying the actions it has taken to end such involvement, see Part 593, and section 501.602 of the Reporting and Procedures Regulations, 31 C.F.R. Part 501.

In addition, Aventura is directed to segregate from its bank accounts any funds received from Mr. Chichakli, or in which Mr. Chichakli or any other SDN has an interest, as those funds are

into the business account of Aventura.

OFAC has reason to believe that Aventura Aviation ("Aventura") has contracted to sell two aircraft (Boeing 737 and Boeing 727) to Mr. Richard Chichakli ("Mr. Chichakli"), an SDN. In addition, OFAC has reason to believe that payment for the aircraft has already been deposited

The Former Liberman Regime of Charles Taylor Sanctions Regulations, 31 C.F.R. Part 593 (the "Taylor Sanctions Regulations") implement E.O. 13348 and prohibit any transactions of dealing by a U.S. person in property or interest in property of SDNs, including the making or receiving of any contribution of funds, goods, or services to or for the benefit of such persons, unless authorized by a license from OFAC.

Please be advised that Executive Order 13348, "Blocking Property of Certain Persons and Prohibiting the Importation of Certain Goods From Liberia" ("E.O. 13348") blocks all property that is in the United States, that hereafter comes within the United States, or that hereafter comes within the possession or control of United States persons, in which there is any interest of former Liberman President Charles Taylor and other individuals and entities included in an Annex to the E.O. 13348 or subsequently designated by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"), in consultation with the State Department (collectively "Specially Designated Nationals" or "SDNs").

Dear Mr. Blattner and Mr. Gayer:

Allen Blattner  
Henry Gayer  
Aventura Aviation  
18626 Phantom St.  
Victorville, CA 92394

FAC No: LB-368398

**DEPARTMENT OF THE TREASURY**  
**AND**  
**CEASE AND DESIST ORDER**  
**REQUIREMENT TO FURNISH INFORMATION**

WASHINGTON, D.C. 20220



SEP 13 2007

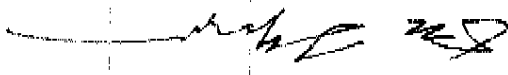
TOTAL P.03

blocked. If such funds exist and are segregated they must be reported to OFAC, Annex, Compliance Programs Division, U.S. Department of the Treasury, Treasury Annex, 1500 Pennsylvania Avenue, N.W., Washington D.C. 20220 within 10 business days of the date of this letter, as required by section 501.603 of the Reporting, Procedures and Penalties Regulations, 31 C.F.R. Part 501.

Aventura is further directed to provide detailed information concerning all transactions involving Mr. Chichakli, or in which Mr. Chichakli or any other SDN has an interest, including all underlying transactional documents, invoices, sales contracts, shipping documents, letters of credit, wire transfers, deposits or other documents, dating back to September 15, 2002. You are directed to mail this information to OFAC within four weeks of the date stamped above to OFAC's Enforcement Division, U.S. Department of the Treasury, 1500 Pennsylvania Ave., N.W., Washington, DC 20220.

Please be advised that violation of OFAC's regulations could result in criminal prosecution and/or the imposition of civil penalties by OFAC. Failure to respond to this requirement to furnish information, pursuant to section 501.602, may result in a civil penalty. Thank you for your cooperation on this matter. If you have any questions regarding any aspect of this order, please call (202) 622-2430.

Sincerely,



Dale Thompson  
Chief, General Investigation & Field Operations  
Enforcement Division  
Office of Foreign Assets Control

(200762-1523)