

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

In the Matter of:

Hallewell Ventures, Ltd.
Albert Avdolyan
Quijano Chambers,
P.O. Box 3159,
Road Town, Tortola,
British Virgin Islands

Respondents

ORDER RELATING TO
HALLEWELL VENTURES, LTD. AND ALBERT AVDOLYAN

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) has notified Hallewell Ventures, Ltd of Tortola, British Virgin Islands (“Hallewell”) and Albert Avdolyan (“Avdolyan”) (collectively “Respondents”) of its intention to initiate an administrative proceeding against Respondents pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ through the issuance of a Proposed Charging Letter to Respondents that alleges that Respondents committed one violation of the Regulations.² Specifically:

GENERAL ALLEGATIONS

As described further below, on or about March 12, 2022, Respondents engaged in conduct prohibited by and contrary to the Regulations, by reexporting a controlled item, specifically a Bombardier Global 7500 Aircraft bearing Serial Number 70092, from the Maldives to Russia without the required BIS license, constituting one violation of Section 764.2(a) of the Regulations.

¹ The Regulations are issued under the authority of the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232, 132 Stat. 2208 (“ECRA,” 50 U.S.C. §§ 4801-4852).

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2024). The charged violations occurred in 2023. The Regulations governing the violations at issue are found in the 2023 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2023)). The 2024 Regulations set forth the procedures that apply to this matter.

BACKGROUND OF VIOLATION

As background³ to the violation identified above and at times material to this charging letter:

The Russia Sanctions Regime

The U.S. Department of Commerce, through BIS, responded to the Russian Federation's ("Russia") further invasion of Ukraine in 2022 by implementing a sweeping series of stringent export controls that severely restrict Russia's access to technologies and other items that it needs to sustain its aggressive military capabilities. These controls primarily target Russia's defense, aerospace, and maritime sectors and are intended to cut off Russia's access to vital technological inputs, atrophy key sectors of its industrial base, and undercut Russia's strategic ambitions to exert influence on the world stage.⁴

As part of those controls, effective February 24, 2022, BIS imposed expansive controls on aviation-related (*e.g.*, Commerce Control List Categories 7 and 9)⁵ items to Russia, including a license requirement for the export, reexport, or transfer (in-country) to Russia of any aircraft or aircraft parts specified in Export Control Classification Number (ECCN) 9A991. 15 C.F.R. § 746.8(a)(1).⁶ Thereafter, BIS reviews any export or reexport license applications for such items under a policy of denial. *See* § 15 C.F.R. 746.8(b).

Effective March 2, 2022, BIS excluded "any aircraft registered in, owned, or controlled by, or under charter or lease by Russia or Belarus or a national of Russia or Belarus" from being eligible for export or reexport to Russia pursuant to license exception Aircraft, Vessels, and Spacecraft ("AVS") (15 C.F.R. § 740.15).⁷ *See* 15 C.F.R. § 746.8(c)(2)(v). As a result, any U.S.-origin aircraft or foreign aircraft that includes more than 25% controlled U.S.-origin content, and that is registered in, owned, or controlled by, or under

³ This background section does not set forth every fact known or resulting from the investigation; rather, it provides certain additional information to further describe the nature of the below-listed violation.

⁴ U.S. Dep't of Commerce Press Release, Commerce Implements Sweeping Restrictions on Exports to Russia in Response to Further Invasion of Ukraine (Feb. 24, 2022), at <https://www.commerce.gov/news/press-releases/2022/02/commerce-implements-sweeping-restrictions-exports-russia-response>.

⁵ The Commerce Control List ("CCL") is found at 15 C.F.R. part 774, Supp. No. 1.

⁶ 87 Fed. Reg. 12226 (Mar. 3, 2022). Effective February 24, 2022, BIS imposed a license requirement for all items controlled under Categories 3-9 of the CCL when destined for Russia, and also imposed these controls on Belarus in a rule effective on Mar. 2, 2022. (87 Fed. Reg. 13048, Mar. 8, 2022). Additionally, BIS published a final rule effective April 8, 2022, which imposed a license requirement on items controlled on the Commerce Control List ("CCL") under Categories 0-2 that are destined for Russia or Belarus. Accordingly, all CCL items now require export, reexport, and transfer (in-country) licenses if destined for or within Russia or Belarus. 87 Fed. Reg. 22130 (Apr. 14, 2022).

⁷ 87 Fed. Reg. 13048 (Mar. 8, 2022).

charter or lease by Russia or a national of Russia, is subject to a license requirement before it can be exported or reexported to Russia.

Aircraft and other aviation items that would otherwise require a license may qualify for a license exception, such as that in 15 C.F.R. § 740.15 (the “AVS License Exception”). Section 740.15 provides an exception to the licensing requirement in cases where a “[v]essel[] subject to the EAR [is] reexported under this section on temporary sojourn.” See 15 C.F.R. § 740.15(d)(4). Note 1 to paragraph (d), however, limits a temporary sojourn to 14 consecutive days or less. See 15 C.F.R. § 740.15 (d) n.1 (“A vessel exported or reexported to a country pursuant to this paragraph (d) may not remain in that country for more than 14 consecutive days before it departs for a country to which it may be exported without a license or the United States.”).

Hallewell’s Relationship to the Aircraft and Flights at Issue

Avdolyan, born November 8, 1970, in Russia,⁸ is currently sanctioned by the governments of Ukraine, Switzerland, Monaco, France, Canada, and the European Union. See *Albert Avdolyan*, Open Sanctions, www.opensanctions.org/entities/Q4055562/ (last visited June 23, 2025) (citing sanctions.nazk.gov.ua). In addition to several other companies, Avdolyan owns or is the beneficial owner of Hallewell, a company incorporated in the British Virgin Islands with an unknown principal place of business.

On or about December 31, 2018, GlobalOne Management Group Ltd. (“Global One”), a company also owned by Avdolyan and incorporated in the British Virgin Islands, executed an Aircraft Purchase Agreement to purchase a Bombardier Global 7500 Aircraft, Serial Number 70092, Tail Number T7-7AA (*hereinafter*, “Aircraft 70092”) from Bombardier, Inc. Irina Belyanova was listed as Global One’s Point of Contact on this Aircraft Purchase Agreement. After intermediate assignments, Hallewell finalized the purchase of Aircraft 70092 on or about February 3, 2022, and completed payment of the \$73 million sale price.

At all times pertinent to the violations described herein, Hallewell, effectively owned, controlled, chartered or leased, a U.S.-origin aircraft that is subject to the EAR and classified under ECCN 9A991.b: to wit, Aircraft 70092. Aircraft 70092, a Bombardier Global 7500 aircraft, contains two GE Passport turbofan engines (ECCN 9A991.c), Serial Numbers 904303 and 904304, which are manufactured in the United States. Pursuant to the *de minimis* rule, because Aircraft 70092 contains more than 25% U.S.-origin goods, it is subject to the EAR. See 15 C.F.R. §§ 734.3(a)(3)(ii); 734.4(d).

⁸ On February 9, 2022, Avdolyan filed a Schedule 13G form with the Securities and Exchange Commission, declaring his citizenship as the Russian Federation and providing a Moscow business address.

Flight records for Aircraft 70092 reflect that, after the license requirement under Section 746.8 of the Regulations went into effect on or about February 24, 2022, Aircraft 70092 was reexported to Russia without the requisite BIS authorization.⁹

Specifically, on or about March 12, 2022, Aircraft 70092 flew from Male, Maldives to Moscow, Russia. Aircraft 70092 remained in Russia for 25 days, until it departed for Dubai, United Arab Emirates on April 6, 2022. Given the length of time the aircraft remained in Russia, the reexport of Aircraft 70092 was not eligible for the AVS License Exception to the licensing requirement because it would not qualify as a temporary sojourn.

Departure Date	Departure Airport	Departure Country	Arrival Date	Arrival Airport	Arrival Country
3/12/2022	Male Velana Int'l (VIA)	Maldives	3/13/2022	Moscow Vnukovo (VKO)	Russia (RU)
4/6/2022	Moscow Vnukovo (VKO)	Russia (RU)	4/6/2022	Dubai Al Maktoum Int'l (DWC)	United Arab Emirates (AE)

STATEMENT OF CHARGE

Charge 1 15 CFR. § 764.2(a)–Engaging in Prohibited Conduct: Unlicensed Reexport to Russia of a Bombardier Global 7500 Aircraft, Serial Number 70092

1. On or about March 12, 2022, Respondents engaged in conduct prohibited by and contrary to the Regulations, by reexporting a controlled item, specifically a Bombardier Global 7500 Aircraft bearing Serial Number 70092,¹⁰ from the Maldives to Russia without the required BIS license.
2. Pursuant to Section 746.8 of the Regulations, a BIS reexport license was required before the aircraft could be reexported to Russia.

In so doing, Respondents committed one violation of Section 764.2(a) of the Regulations, by taking any other action prohibited by or contrary to, or refraining from engaging in any transaction or taking any other action required by the Export Control

⁹ Flight records for Aircraft 70092 reflects over 70 additional flights and maintenance since the March 2022 changes to Section 746.8 of the Regulations. Pursuant to General Prohibition 10, 15 C.F.R. §736(b)(10), any flight after an unlicensed reexport constitutes a further violation.

¹⁰ The Bombardier Global 7500 aircraft is subject to the Regulations because it contains more than 25 percent controlled U.S.-manufactured parts, specifically two U.S.-manufactured GE Passport turbofan engines (Model No. 20-19BB1A, Serial Nos. 904303 and 904304) classified under Export Control Classification Number (“ECCN”) 9A991.c.

Reform Act (“ECRA”), the EAR, or any order, license or authorization issued thereunder.

WHEREAS, BIS and Respondents have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations, whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein;

WHEREAS, Respondents admit committing the alleged conduct described in the Proposed Charging Letter; and

WHEREAS, I have approved of the terms of such Settlement Agreement;
IT IS THEREFORE ORDERED:

FIRST, Respondents shall be assessed a civil penalty in the amount of \$374,474, the payment of which shall be made to the U.S. Department of Commerce within 30 days of this Order.

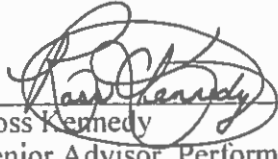
SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2012)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due dates specified herein, Respondents will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the full and timely payment of the civil penalty in accordance with the payment schedule set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Respondents. Accordingly, if Respondents should fail to pay the civil penalty in a full and timely manner, the undersigned may issue an order denying

all of Respondents' export privileges under the Regulations for a period of one year from the date of failure to make such payment.

FOURTH, the Proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.



Ross Kennedy
Senior Advisor, Performing the Non-Exclusive
Functions and Duties of the
Assistant Secretary for Export Enforcement

Issued this 30 day of September, 2025.

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

In the Matter of:

Hallewell Ventures, Ltd.
Albert Avdolyan
Quijano Chambers,
P.O. Box 3159,
Road Town, Tortola,
British Virgin Islands

Respondents

SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between Hallewell Ventures, Ltd. of Tortola, British Virgin Islands ("Hallewell") and Albert Avdolyan ("Avdolyan") (collectively "Respondents"), and the Bureau of Industry and Security, U.S. Department of Commerce ("BIS") (collectively the "Parties"), pursuant to Section 766.18(a) of the Export Administration Regulations (the "Regulations").¹

WHEREAS, BIS has notified Respondents of its intention to initiate an administrative proceeding against Hallewell pursuant to the Regulations;²

WHEREAS, BIS has issued a Proposed Charging Letter to Respondents that alleges that Respondents committed one violation of the Regulations, specifically:

¹ The Regulations are issued under the authority of the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232, 132 Stat. 2208 ("ECRA," 50 U.S.C. §§ 4801-4852).

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2024). The charged violations occurred in 2022. The Regulations governing the violations at issue are found in the 2022 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2023)). The 2025 Regulations set forth the procedures that apply to this matter.



GENERAL ALLEGATIONS

As described further below, on or about March 12, 2022, Respondents engaged in conduct prohibited by and contrary to the Regulations, by reexporting a controlled item, specifically a Bombardier Global 7500 Aircraft bearing Serial Number 70092, from the Maldives to Russia without the required BIS license, constituting one violation of Section 764.2(a) of the Regulations.

BACKGROUND OF VIOLATION

As background³ to the violation identified above and at times material to this charging letter:

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³ This background section does not set forth every fact known or resulting from the investigation; rather, it provides certain additional information to further describe the nature of the below-listed violation.

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As part of those controls, effective February 24, 2022, BIS imposed expansive controls on aviation-related (*e.g.*, Commerce Control List Categories 7 and 9)⁵ items to Russia, including a license requirement for the export, reexport, or transfer (in-country) to Russia of any aircraft or aircraft parts specified in Export Control Classification Number (ECCN) 9A991. 15 C.F.R. § 746.8(a)(1).⁶ Thereafter, BIS reviews any export or reexport license applications for such items under a policy of denial. *See* § 15 C.F.R. 746.8(b).

Effective March 2, 2022, BIS excluded “any aircraft registered in, owned, or controlled by, or under charter or lease by Russia or Belarus or a national of Russia or Belarus” from being eligible for export or reexport to Russia pursuant to license exception Aircraft, Vessels, and Spacecraft (“AVS”) (15 C.F.R. § 740.15).⁷ *See* 15 C.F.R. § 746.8(c)(2)(v). As a result, any U.S.-origin aircraft or foreign aircraft that includes more than 25% controlled U.S.-origin content, and that is registered in, owned, or controlled by, or under charter or lease by Russia or a national of Russia, is subject to a license requirement before it can be exported or reexported to Russia.

Aircraft and other aviation items that would otherwise require a license may qualify for a license exception, such as that in 15 C.F.R. § 740.15 (the “AVS License Exception”). Section 740.15 provides an exception to the licensing requirement in cases where a

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⁶ 87 Fed. Reg. 12226 (Mar. 3, 2022). Effective February 24, 2022, BIS imposed a license requirement for all items controlled under Categories 3-9 of the CCL when destined for Russia, and also imposed these controls on Belarus in a rule effective on Mar. 2, 2022. (87 Fed. Reg. 13048, Mar. 8, 2022). Additionally, BIS published a final rule effective April 8, 2022, which imposed a license requirement on items controlled on the Commerce Control List (“CCL”) under Categories 0-2 that are destined for Russia or Belarus. Accordingly, all CCL items now require export, reexport, and transfer (in-country) licenses if destined for or within Russia or Belarus. 87 Fed. Reg. 22130 (Apr. 14, 2022).

⁷ 87 Fed. Reg. 13048 (Mar. 8, 2022).



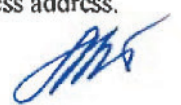
“[v]essel[] subject to the EAR [is] reexported under this section on temporary sojourn.”
See 15 C.F.R. § 740.15(d)(4). Note 1 to paragraph (d), however, limits a temporary sojourn to 14 consecutive days or less. *See* 15 C.F.R. § 740.15 (d) n.1 (“A vessel exported or reexported to a country pursuant to this paragraph (d) may not remain in that country for more than 14 consecutive days before it departs for a country to which it may be exported without a license or the United States.”).

Hallewell’s Relationship to the Aircraft and Flights at Issue

Avdolyan, born November 8, 1970, in Russia,⁸ is currently sanctioned by the governments of Ukraine, Switzerland, Monaco, France, Canada, and the European Union. *See Albert Avdolyan*, Open Sanctions, www.opensanctions.org/entities/Q4055562/ (last visited June 23, 2025) (citing sanctions.nazk.gov.ua). In addition to several other companies, Avdolyan owns or is the beneficial owner of Hallewell, a company incorporated in the British Virgin Islands with an unknown principal place of business.

On or about December 31, 2018, GlobalOne Management Group Ltd. (“Global One”), a company also owned by Avdolyan and incorporated in the British Virgin Islands, executed an Aircraft Purchase Agreement to purchase a Bombardier Global 7500 Aircraft, Serial Number 70092, Tail Number T7-7AA (*hereinafter*, “Aircraft 70092”) from Bombardier, Inc. Irina Belyanova was listed as Global One’s Point of Contact on this Aircraft Purchase Agreement. After intermediate assignments, Hallewell finalized the purchase of Aircraft 70092 on or about February 3, 2022, and completed payment of the \$73 million sale price.

⁸ On February 9, 2022, Avdolyan filed a Schedule 13G form with the Securities and Exchange Commission, declaring his citizenship as the Russian Federation and providing a Moscow business address.



At all times pertinent to the violations described herein, Hallewell, effectively owned, controlled, chartered or leased, a U.S.-origin aircraft that is subject to the EAR and classified under ECCN 9A991.b: to wit, Aircraft 70092. Aircraft 70092, a Bombardier Global 7500 aircraft, contains two GE Passport turbofan engines (ECCN 9A991.c), Serial Numbers 904303 and 904304, which are manufactured in the United States. Pursuant to the *de minimis* rule, because Aircraft 70092 contains more than 25% U.S.-origin goods, it is subject to the EAR. *See* 15 C.F.R. §§ 734.3(a)(3)(ii); 734.4(d).

Flight records for Aircraft 70092 reflect that, after the license requirement under Section 746.8 of the Regulations went into effect on or about February 24, 2022, Aircraft 70092 was reexported to Russia without the requisite BIS authorization.⁹

Specifically, on or about March 12, 2022, Aircraft 70092 flew from Male, Maldives to Moscow, Russia. Aircraft 70092 remained in Russia for 25 days, until it departed for Dubai, United Arab Emirates on April 6, 2022. Given the length of time the aircraft remained in Russia, the reexport of Aircraft 70092 was not eligible for the AVS License Exception to the licensing requirement because it would not qualify as a temporary sojourn.

Departure Date	Departure Airport	Departure Country	Arrival Date	Arrival Airport	Arrival Country
3/12/2022	Male Velana Int'l (VIA)	Maldives	3/13/2022	Moscow Vnukovo (VKO)	Russia (RU)
4/6/2022	Moscow Vnukovo (VKO)	Russia (RU)	4/6/2022	Dubai Al Maktoum Int'l (DWC)	United Arab Emirates (AE)

⁹ Flight records for Aircraft 70092 reflects over 70 additional flights and maintenance since the March 2022 changes to Section 746.8 of the Regulations. Pursuant to General Prohibition 10, 15 C.F.R. §736(b)(10), any flight after an unlicensed reexport constitutes a further violation.



STATEMENT OF CHARGE

Charge 1 15 CFR. § 764.2(a)–Engaging in Prohibited Conduct: Unlicensed Reexport to Russia of a Bombardier Global 7500 Aircraft, Serial Number 70092

1. On or about March 12, 2022, Respondents engaged in conduct prohibited by and contrary to the Regulations, by reexporting a controlled item, specifically a Bombardier Global 7500 Aircraft bearing Serial Number 70092,¹⁰ from the Maldives to Russia without the required BIS license.
2. Pursuant to Section 746.8 of the Regulations, a BIS reexport license was required before the aircraft could be reexported to Russia.
3. In so doing, Respondents committed one violation of Section 764.2(a) of the Regulations, by taking any other action prohibited by or contrary to, or refraining from engaging in any transaction or taking any other action required by the Export Control Reform Act (“ECRA”), the EAR, or any order, license or authorization issued thereunder.

WHEREAS, Respondents have reviewed the Proposed Charging Letter and are aware of the allegations made against them and the administrative sanctions that could be imposed against them if the allegations are found to be true;

WHEREAS, Respondents have reviewed, with the assistance of counsel, the terms of this Agreement, the Order (“Order”) that the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, will issue if he approves this Agreement as the final resolution of this matter, and the Proposed Charging Letter, and understand the terms of all three documents;

WHEREAS, Respondents enter into this Agreement voluntarily and with full knowledge of its rights, after having consulted with counsel;

¹⁰ The Bombardier Global 7500 aircraft is subject to the Regulations because it contains more than 25 percent controlled U.S.-manufactured parts, specifically two U.S.-manufactured GE Passport turbofan engines (Model No. 20-19BB1A, Serial Nos. 904303 and 904304) classified under Export Control Classification Number (“ECCN”) 9A991.c.



WHEREAS, Respondents state that no promises or representations have been made to it other than the agreements and considerations herein expressed;

WHEREAS, Respondents admit committing the alleged conduct described in the Proposed Charging Letter; and

WHEREAS, Respondents agree to be bound by the Order, if issued;

NOW THEREFORE, the Parties hereby agree, for purposes of this Agreement, as follows:

1. BIS has jurisdiction over Respondents, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. The following sanctions shall be imposed against Respondents:

a. Respondents shall be assessed a civil penalty in the amount of \$374,474, the payment of which shall be made to the U.S. Department of Commerce within 30 days of the date of the Order. Payment shall be made in the manner specified in the attached instructions.

b. The full and timely payment of the civil penalty agreed to in Paragraph 2.a above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Respondents. Failure to make full and timely payment of the civil penalty may result in the denial of all of Respondents' export privileges under the Regulations for one year from the date of the failure to make such payment.

3. Subject to the approval of this Agreement pursuant to Paragraph 7 hereof, Respondents hereby waive all rights to further procedural steps in this matter, including, without limitation, any right to: (a) an administrative hearing regarding the allegations in



any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Respondents also waive and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of ECRA or the Regulations arising out of the transactions identified in the Proposed Charging Letter or in connection with collection of the civil penalty or enforcement of this Agreement and the Order, if issued, from the date of the Order, until Respondents pay in full the civil penalty agreed to in Paragraph 2.a of this Agreement.

4. BIS agrees that upon successful compliance in full with the terms of this Agreement and the Order, if issued, BIS will not initiate any further administrative proceeding against Respondents in connection with any violation of the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

5. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

6. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if issued; nor shall this Agreement serve to bind, constrain, or otherwise limit



any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

7. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, approves it by issuing the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

8. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

9. Each signatory affirms that he/she has authority to enter into this Agreement and to bind his/her respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY
U.S. DEPARTMENT OF COMMERCE

STEVEN FISHER

Digitally signed by STEVEN
FISHER
Date: 2025.09.29 10:07:06 -04'00'

Steve Fisher
Acting Director of Export Enforcement

Date: _____

HALLEWELL VENTURES, LTD. AND
ALBERT AVDOLYAN


ALBERT AVDOLYAN


Date: September 22, 2025


Ruzanna Aghjoyan
Director



Date: September 22, 2025

Reviewed and approved by:


George N. Grammas
Squire Patton Boggs
Counsel for Respondents

Date: September 23, 2025



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Industry and Security
Office of Export Enforcement
1401 Constitution Avenue, Suite 4508
Washington, DC 20230

PROPOSED CHARGING LETTER
VIA EXPRESS COURIER & EMAIL

Hallewell Ventures, Ltd.
Albert Avdolyan
Quijano Chambers,
P.O. Box 3159,
Road Town, Tortola,
British Virgin Islands

Attention: Mr. Albert Avdolyan

Dear Mr. Avdolyan,

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Hallewell Ventures, Ltd. (“Hallewell”) and Albert Avdolyan (collectively the “Respondents”) have committed one violation of the Export Administration Regulations (the “EAR” or “Regulations”).¹ Specifically, BIS alleges the following violation:

Charge 1 15 CFR. § 764.2(a) –Engaging in Prohibited Conduct: Unlicensed Reexport to Russia of a Bombardier Global 7500 Aircraft, Serial Number 70092

1. On or about March 12, 2022, Respondents engaged in conduct prohibited by and contrary to the Regulations, by reexporting a controlled item, specifically a Bombardier Global 7500 Aircraft bearing Serial Number 70092,² from the Maldives to Russia without the required BIS license.
2. Pursuant to Section 746.8 of the Regulations, a BIS reexport license was required before the aircraft could be reexported to Russia.

¹ On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 (“ECRA”). The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2024). The charged violation occurred in 2022. The Regulations governing the violation at issue are found in the 2022 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2022)). The 2024 Regulations set forth the procedures that apply to this matter.

² The Bombardier Global 7500 aircraft is subject to the regulations because it contains more than 25 percent controlled U.S.-manufactured parts, specifically two U.S.-manufactured GE Passport turbofan engines (Model No. 20-19BB1A, Serial Nos. 904303 and 904304) classified under Export Control Classification Number (“ECCN”) 9A991.c.



3. In so doing, Respondents committed one violation of Section 764.2(a) of the Regulations, by taking any other action prohibited by or contrary to, or refraining from engaging in any transaction or taking any other action required by the Export Control Reform Act (“ECRA”), the EAR, or any order, license or authorization issued thereunder.

Background of Violation

As background³ to the violation identified above and at times material to this charging letter:

The Russia Sanctions Regime

4. The U.S. Commerce Department, through BIS, responded to the Russian Federation’s (“Russia”) further invasion of Ukraine in 2022 by implementing a sweeping series of stringent export controls that severely restrict Russia’s access to technologies and other items that it needs to sustain its aggressive military capabilities. These controls primarily target Russia’s defense, aerospace, and maritime sectors and are intended to cut off Russia’s access to vital technological inputs, atrophy key sectors of its industrial base, and undercut Russia’s strategic ambitions to exert influence on the world stage.⁴
5. As part of those controls, effective February 24, 2022, BIS imposed expansive controls on aviation-related (*e.g.*, Commerce Control List Categories 7 and 9)⁵ items to Russia, including a license requirement for the export, reexport, or transfer (in-country) to Russia of any aircraft or aircraft parts specified in Export Control Classification Number (ECCN) 9A991. 15 C.F.R. § 746.8(a)(1).⁶ Thereafter, BIS reviews any export or reexport license applications for such items under a policy of denial. *See* § 15 C.F.R. 746.8(b).
6. Effective March 2, 2022, BIS excluded “any aircraft registered in, owned, or controlled by, or under charter or lease by Russia or Belarus or a national of Russia or Belarus” from being eligible for export or reexport to Russia pursuant to license exception

³ This background section does not set forth every fact known or resulting from the investigation; rather, it provides certain additional information to further describe the nature of the above-listed violations.

⁴ U.S. Dep’t of Commerce Press Release, Commerce Implements Sweeping Restrictions on Exports to Russia in Response to Further Invasion of Ukraine (Feb. 24, 2022), *at* <https://www.commerce.gov/news/press-releases/2022/02/commerce-implements-sweeping-restrictions-exports-russia-response>.

⁵ The Commerce Control List (“CCL”) is found at 15 C.F.R. part 774, Supp. No. 1.

⁶ 87 Fed. Reg. 12226 (Mar. 3, 2022). Effective February 24, 2022, BIS imposed a license requirement for all items controlled under Categories 3-9 of the CCL when destined for Russia, and also imposed these controls on Belarus in a rule effective on Mar. 2, 2022. (87 Fed. Reg. 13048, Mar. 8, 2022). Additionally, BIS published a final rule effective April 8, 2022, which imposed a license requirement on items controlled on the Commerce Control List (“CCL”) under Categories 0-2 that are destined for Russia or Belarus. Accordingly, all CCL items now require export, reexport, and transfer (in-country) licenses if destined for or within Russia or Belarus. 87 Fed. Reg. 22130 (Apr. 14, 2022).

Aircraft, Vessels, and Spacecraft (“AVS”) (15 C.F.R. § 740.15).⁷ *See* 15 C.F.R. § 746.8(c)(2)(v). As a result, any U.S.-origin aircraft or foreign aircraft that includes more than 25% controlled U.S.-origin content, and that is registered in, owned, or controlled by, or under charter or lease by Russia or a national of Russia, is subject to a license requirement before it can be exported or reexported to Russia.

7. Aircraft and other aviation items that would otherwise require a license may qualify for a license exception, such as that in 15 C.F.R. § 740.15 (the “AVS Exception”). Section 740.15 provides an exception to the licensing requirement in cases where a “[v]essel[] subject to the EAR [is] reexported under this section on temporary sojourn.” *See* 15 C.F.R. § 740.15(d)(4). Note 1 to paragraph (d), however, limits a temporary sojourn to 14 consecutive days or less. *See* 15 C.F.R. § 740.15 (d) n.1 (“A vessel exported or reexported to a country pursuant to this paragraph (d) may not remain in that country for more than 14 consecutive days before it departs for a country to which it may be exported without a license or the United States.”).

Hallewell Relationship to the Aircraft and Flights at Issue

1. Avdolyan, born November 8, 1970, in Russia,⁸ is currently sanctioned by the Ukrainian government. *See Albert Avdolyan*, Open Sanctions, www.opensanctions.org/entities/Q4055562/ (last visited June 4, 2024) (citing sanctions.nazk.gov.ua). In addition to several other companies, Avdolyan owns or is the beneficial owner of Hallewell, a company incorporated in the British Virgin Islands with an unknown principal place of business.
2. On or about December 31, 2018, GlobalOne Management Group Ltd. (“Global One”), a company also owned by Avdolyan and incorporated in the British Virgin Islands, executed an Aircraft Purchase Agreement to purchase a Bombardier Global 7500 Aircraft, Serial Number 70092, Tail Number T7-7AA (*hereinafter*, “Aircraft 70092”) from Bombardier, Inc. Irina Belyanova was listed as Global One’s Point of Contact on this APA. After intermediate assignments, Hallewell finalized the purchase of Aircraft 70092 on or about February 3, 2022, and completed payment of the \$73 million sale price.
3. At all times pertinent to the violations described herein, Hallewell, effectively owned, controlled, chartered or leased, a U.S.-origin aircraft that is subject to the EAR and classified under ECCN 9A991.b: to wit, Aircraft 70092. Aircraft 70092, a Bombardier Global 7500 aircraft, contains two GE Passport turbofan engines (ECCN 9A991.c), Serial Numbers 904303 and 904304, which are manufactured in the United States. Pursuant to the *de minimis* rule, because Aircraft 70092 contains more than 25% U.S.-origin goods, it is subject to the EAR. *See* 15 C.F.R. §§ 734.3(a)(3)(ii); 734.4(d).

⁷ 87 Fed. Reg. 13048 (Mar. 8, 2022).

⁸ On February 9, 2022, Avdolyan filed a Schedule 13G form with the Securities and Exchange Commission, declaring his citizenship as the Russian Federation and providing a Moscow business address.

4. Flight records for Aircraft 70092 reflect that, after the license requirement under Section 746.8 of the Regulations went into effect on or about February 24, 2022, Aircraft 70092 was reexported to Russia without the requisite BIS authorization.⁹
5. Specifically, on or about March 12, 2022, Aircraft 70092 flew from Male, Maldives to Moscow, Russia. Aircraft 70092 remained in Russia for 25 days, until it departed for Dubai, United Arab Emirates on April 6, 2022. Given the length of time the aircraft remained in Russia, the reexport of Aircraft 70092 was not eligible for the AVS Exception to the licensing requirement because it would not qualify as a temporary sojourn.

Departure Date	Departure Airport	Departure Country	Arrival Date	Arrival Airport	Arrival Country
3/12/2022	Male Velana Int'l (VIA)	Maldives	3/13/2022	Moscow Vnukovo (VKO)	Russia (RU)
4/6/2022	Moscow Vnukovo (VKO)	Russia (RU)	4/6/2022	Dubai Al Maktoum Int'l (DWC)	United Arab Emirates (AE)

Conclusion

6. As set forth above, therefore, on or about March 12, 2022, Hallewell engaged in conduct prohibited by and contrary to the Regulations, by reexporting a controlled item, specifically a U.S.-origin Bombardier Global 7500, Aircraft 70092, to Russia without the required BIS license.

* * * * *

Accordingly, the Respondents are hereby notified that an administrative proceeding is instituted against them pursuant to Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including, but not limited to, any or all of the following:

- The maximum civil penalty of an amount not to exceed the greater of \$374,474 per violation or an amount that is twice the amount of the transaction that is the basis of the violation with respect to which the penalty is imposed;¹⁰
- Denial of export privileges;

⁹ Flight records for Aircraft 70092 reflects over 70 additional flights and maintenance since the March 2022 changes to Section 746.8 of the Regulations. Pending response to this letter, BIS continues to monitor the movement and maintenance of this aircraft, including the most recent flight to Turkey on November 20, 2024. Pursuant to General Prohibition 10, 15 C.F.R. §736(b)(10), any flight after an unlicensed reexport constitutes a further violation.

¹⁰ See 50 U.S.C. § 4819 (prescribing civil monetary penalty amount for ECRA violation); 15 C.F.R. §§ 6.3(c)(6), 6.4 (adjusting civil monetary penalty amount for inflation).

- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Respondents fail to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. *See* 15 C.F.R. §§ 766.6(a), 766.7(a). If Respondents default, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to respondents. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter. 15 C.F.R. § 766.7(a).

Respondents are further notified that they are entitled to an agency hearing on the record if they file a written demand for one with any answer. *See* 15 C.F.R. § 766.6. Respondents are also entitled to be represented by counsel or other authorized representative who has power of attorney to represent them. *See* 15 C.F.R. §§ 766.3(a) and 766.4.

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should Respondents have a proposal to settle this case, they should transmit it to the attorneys representing BIS named below.

Respondents are further notified that under the Small Business Regulatory Enforcement Flexibility Act, Respondents may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter. To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, Respondents' answer(s) must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center
40 S. Gay Street
Baltimore, Maryland 21202-4022

In addition, a copy of respondents' answer(s) must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Gregory Michelsen and B. Kathryn Debrason
Room H-3839
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Gregory Michelsen and B. Kathryn Debrason are the attorneys representing BIS in this case; any communications that Hallewell may wish to have concerning this matter should occur through them. Mr. Michelsen may be contacted by email at GMichelsen@doc.gov. Ms. Debrason may be contacted by email at KDebrason1@doc.gov.

Sincerely,
John Sonderman
Director
Office of Export Enforcement