

U.S. DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK
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Criminal Case Voir DireUnited States v. Mehmet Hakan Atilla**I INTRODUCTION**

Members of the panel, good morning and welcome to the U.S. District Court for the Southern District of New York. I am Judge Richard M. Berman and this is my Law Clerk Christine Murray. If there is anyone who cannot hear me, please raise your hand.

I thank you for being here. Your presence reflects your commitment to your civic responsibilities, despite some inconvenience I know jury service may cause some of you. Jury service, however, is one of the most important duties of a citizen. Our system of justice depends on you and I, like all of my fellow judges and the parties in this case, am grateful to you for your sacrifice.

The pending case is a criminal (as opposed to a civil) action. I anticipate the trial to last approximately three to four weeks. However, unexpected events can always occur in a trial and there is the possibility that the presentation of evidence and jury deliberations might spill over a day or two. In terms of the actual trial schedule, I anticipate conducting the trial between 9:15 am to 12:45 pm and 2:15 pm to 4:45 pm each weekday beginning on Monday November 27, 2017. There would be no trial conducted between December 25, 2017 and January 3, 2018 in the event that the trial had not concluded by December 22, 2017.

After the case is presented, I will instruct or “charge” the jury on the law that applies to this case. The jury will then retire to the jury room to deliberate, and the deliberations can take as much time or as little time as you think appropriate.

Your duty for those selected as jurors will be to act as the determiners of the facts. As I just indicated, I am the determiner of the law and will instruct the jury on the law.

You are here this morning to start the proceedings by helping me to select a jury. The vital function of jurors in the U.S. system of justice is to accord parties in a litigation a **fair trial. To do so, jurors must be free from any preconceived notions or any sympathies to one side or the other or prejudices that might prevent them from returning a fair and just verdict based solely on the evidence.** In order to give the parties in this action comfort that you do not have anything in your background (which may, for example, include information posted or blogged on social networks such as Facebook, MySpace, Twitter, Instagram, Snapchat, Vines etc., in addition to your oral answers to my questions) that might improperly affect you as a juror in this case, I will be asking certain questions of you.

Although some of my questions may appear personal, the purpose of the questioning is not to embarrass you but simply to develop enough information to determine whether you will sit as a juror in this particular case. **If your response to any of my questions is personal in nature, you**

may ask to approach the bench at “sidebar” to respond privately.

After I ask my questions, some of you may be excused “for cause.” That means that, for a reason determined by me to be sufficient legal grounds, you are not going to sit as a juror as a matter of law in this case. An example might be that you know or are related to or are friends with one of the witnesses, parties or counsel. Others of you may later be excused “peremptorily.” That means that one of the attorneys will request, as is their right under our system, to have you excused without giving any reason. As you can well imagine, responses to a few questions cannot give a thorough picture of you as a person. Being excused either for cause or peremptorily is not a reflection of you as a citizen or as a person.

## II OATH

I will now begin asking you questions. Before I do, however, I request that you first stand up so that Christine Murray can give you the oath that you will respond **truthfully and completely** to my questions.

**[OATH IS ADMINISTERED]**

## III OUTLINE OF CASE

As I mentioned, this is a criminal case. It is entitled United States v. Mehmet Hakan Atilla. The defendant, Mr. Atilla, is a citizen of the Republic of Turkey and he is the only defendant in this trial. As you will hear, other persons have been charged with the same or similar crimes as Mr. Atilla, but they are not being tried in this case before you.

Mr. Atilla has been charged in a six count Indictment. A short summary of those counts or charges against Mr. Atilla is as follows:

Count One charges the defendant with participating in a conspiracy with others to defraud the United States by impairing and impeding the United States Department of Treasury’s lawful administration of United States economic sanctions against the Islamic Republic of Iran.

Count Two charges the defendant with participating in a conspiracy with others to violate the U.S. International Emergency Economic Powers Act (“IEEPA”) by providing financial services to Iran and Iranian entities, in violation of economic sanctions imposed by the United States, and by avoiding those sanctions .

Count Three charges the defendant with defrauding United States financial institutions by causing them to process financial transactions that were of benefit to Iran and Iranian entities in violation of economic sanctions imposed upon Iran by the United States.

Count Four charges the defendant with participating in a conspiracy with others to defraud United States financial institutions by engaging in the (defrauding) conduct alleged in Count Three.

Count Five charges the defendant with engaging in financial transactions from abroad but into the United States that were intended to promote the violations of IEEPA (conspiracy) alleged in Count Two, the bank fraud and bank fraud conspiracy alleged in Counts Three and Four. Count five also charges bribery of foreign officials.

Count Six charges the defendant with participating in a conspiracy with others to commit money laundering by engaging in the conduct alleged in Count Five.

Mr. Atilla denies all of the charges in the Indictment.

**IV FOR CAUSE EXAM**

**QUESTIONS RELATING TO THE PARTIES**

1. This action is being prosecuted by the United States Attorney's Office for the Southern District of New York. The (Acting) United States Attorney for this district is Joon Kim, who will be represented in this case by Assistant United States Attorneys Michael Lockard, Sidhardha Kamaraju, David Denton and (Special) Assistant United States Attorney Dean Sovolos. They will be assisted by Special Agent Jennifer McReynolds of the Federal Bureau of Investigation and by Michael Chang-Friedan, a paralegal in the U.S. Attorney's Office. I will ask them to please stand briefly and face the jurors.

2. Defendant Mehmet Hakan Atilla is represented by attorneys Victor Rocco, Thomas Thornhill and David Rosenfield, of the law firm Herrick Feinstein, LLP, and by Cathy Fleming and Robert Fettweis of the law firm of Fleming Ruvoldt PLLC; and by Todd Harrison and Joseph Evans of McDermott, Will & Emery. I will ask them to please stand briefly and face the jurors.

**[Please mention your juror number before you speak.]**

3. Do any of you know, know about, or have you had any dealings, personal or business, with any of these parties, entities or their counsel?

4. Do any of you know, know about, or have you had any dealings, personal or business, with any relatives or associates of the parties, entities or their attorneys?

**QUESTIONS RELATING TO WITNESSES**

I will be mentioning names of (and handing out a ten page list of) potential witnesses in this case and names that may come up during trial. I will indicate their place of employment or their county or country of residence. My mentioning of a name, however, imposes no burden or obligation on either side in this case (i.e. the Government or the defense) to call that person as a witness. Some of these individuals may not, in fact, testify and some names may not be mentioned. However, I will ask whether any of you know, know about or have had any dealings, or know others who have had dealings, with these people or entities.

I will also mention (physical) locations that may be discussed during the trial and will ask whether any of you know or are familiar with these locations. The locations will also be on the handout.

Please take your time and review the list of names and locations.

PLEASE REVIEW ATTACHED LIST OF NAMES WHO MAY BE WITNESSES OR WHOSE NAME MAY BE MENTIONED DURING TRIAL AND LOCATIONS.

1. Do any of you know, know about, or have you had any personal or business dealings with any of the named individuals?
2. Do you know, know about, or have you had any dealings with any relatives or associates of the named individuals?

Please review the list of locations and/or entities that may be mentioned during the trial.

1. Do you know or are you familiar with any of the locations and/or entities mentioned? By the way, even if you answer “yes” to any of my questions there will always be a follow up question. **That is, would your “yes” answer affect your ability to render a fair and impartial verdict in this case?**

QUESTIONS RELATING TO NATURE OF THE CASE

1. Because this is a criminal case, the government has the burden of proving its case beyond a reasonable doubt. The burden never shifts to the defendant. He is presumed innocent and cannot be convicted unless and until the jury decides that his guilt has been proved beyond a reasonable doubt. Would any of you not be able to follow this rule about innocent until proven guilty and proof beyond a reasonable doubt?
2. Do you, or any members of your family or close friends work for: (1) any Federal or state law enforcement agency, including the Federal Bureau of Investigation (FBI), the New York Joint Terrorism Task Force, the U.S. Department of Homeland Security, the Bureau of Immigration and Customs Enforcement (ICE), the U.S. Department of Treasury Office of Foreign Assets Control (“OFAC”), the U.S. Department of State; or (2) any other government agency or body? **Do you have any opinions as a result of this employment that would impair your ability to be fair and impartial to both sides in this case?**
3. Are you (already) familiar with this case? Such that you would be unable to render a fair and impartial verdict in this case?
4. Do you, or any members of your family or close friends have any opinions about or experience with economic sanctions instituted by the United States against Iran and/or Iranian entities? Such that you would be unable to render a fair and impartial verdict?
5. Do you, or any members of your family or close friends have any experiences (including employment or otherwise) with bank fraud? Such that you would be unable to render a fair and impartial verdict?



6. Are you, or any members of your family or close friends employed as investment bankers or by an international bank? Such that you would be unable to render a fair and impartial verdict?
7. Do you, or any members of your family or close friends have any familiarity or experiences with money laundering? Such that you would be unable to render a fair and impartial verdict?
8. Do you have any strongly held opinions about people of the Muslim faith or any other faith? Positive or negative. Such that you would be unable to render a fair and impartial verdict?
9. Do you have strongly held opinions about people from Turkey or from Iran? Positive or negative. Such that you would be unable to render a fair and impartial verdict?
10. I will instruct you, if you become a juror, going forward not to read about the case in the newspapers and not to follow other media accounts of the case (including online, on tv and cable tv, etc.) and not to discuss the case with others. So that you can decide the case solely on the basis of the evidence presented here in the courtroom. Would any of you not be able to follow this instruction?
11. Would any of you not be able to set aside your personal opinions or views and assess this case and render a verdict based solely on the evidence presented in Court, and in accordance with the law as explained by the Judge?

### GENERAL QUESTIONS

1. Do any of you have any religious, moral or ethical beliefs which would prevent you from passing judgment (guilt or innocence) on another person?
2. Do any of you have any physical or personal problems that would absolutely prevent you from serving in this case possibly into the latter part of December but before the holidays? **I am not referring to mere inconvenience.**
3. Do any of you have any difficulty with your sight or hearing that could affect your perception of the proceedings? Including translations from foreign languages to English.
4. Do any of you speak or understand Turkish?
5. Are you taking any medication that would prevent you from giving your full attention to all of the evidence at trial?
6. Do any of you have any difficulty understanding or reading the English language?
7. Under the law, the facts of this case are for the jury to determine and the law is for the Court to determine. The two areas are separate and distinct. At the end of the case, as I mentioned, I will instruct the jury on the law, through what are called “jury charges”, and jurors are required to

accept the law and apply it as it is explained to you. It will be your job to determine the facts and assess them under my explanation of the law. Do any of you feel that you would not be able to apply the law as I explain it? Even if, for any reason, you disagree with the law as I explain it, do any of you feel that you would not be able to apply the relevant law?

**[DISCUSS FOR CAUSE CHALLENGES WITH COUNSEL ON  
THE RECORD IF THIS HAS NOT ALREADY OCCURRED]**

**V FILLING THE BOX**

**PEREMPTORY CHALLENGE EXAM**

A certain number of you will be selected at random to sit in the jury box right now and I will be asking those of you in the box to respond to certain **additional** questions. Even those of you who are not selected right now should remain seated and listen very carefully to these questions because you may later be asked to come to the jury box and be asked these questions. Please circle on the piece of paper you are being handed, any questions, by number, that you would have answered "yes". This will save all of us time if you are later called up.

[PLEASE HAND OUT PEREMPTORY CHALLENGE QUESTIONNAIRE AND  
FILL THE BOX WITH 36 PEOPLE ].

**PEREMPTORY CHALLENGE QUESTIONS**

Please state your full name.

1. Have any of you ever sat as a juror before in any type of case? If so, please state whether the case was in state or federal court, whether it was a civil or criminal matter, and, without stating what your verdict was, whether a verdict was reached.
2. Have any of you ever served as a grand juror?
3. Have you or any member of your family or any close friends ever appeared as a witness at either a deposition, trial or a grand jury investigation? If so, what was the case about?
4. Have you or any member of your family or any close friends ever been a plaintiff or a defendant in a state or federal court case, whether criminal or civil? If so, what kind of case? And, what did it involve?

**If you answer yes to 1, 2, 3 or 4 above, is there something about that experience that would prevent you from acting as a fair and impartial juror in this case?**

5. What is your County of residence?

6. What level of school did you reach?
7. What is your occupation and title and how long have you been at your current position? If retired, what did you do before?
8. Are there other members of your household?
9. What do they do [occupation]? If retired, what did they do before?
10. What type of magazines, newspapers and books do you read? What kind of television shows do you watch?
11. What do you like to do in your spare time?
12. **Is there anything in your personal history or life experience -- whether I have asked specifically about it or not -- that would affect your ability to render a fair and impartial verdict in this case?**

## **VI CONFERENCES**

From time to time during the trial it may become necessary for me to talk with the lawyers out of the hearing of the jury, either by having a conference near (at the side of) the bench when the jury is present in the courtroom, or by calling a recess. I prefer not to have many sidebars, if possible. Please understand that while you are waiting we are working. The purpose of any conference outside your hearing/viewing is not to keep relevant information from you, but to decide certain procedural issues or how certain evidence is to be treated under the rules of evidence and to avoid confusion and error. Right now, we will be going to the Robing Room (which is my office behind the Courtroom) to discuss the peremptory challenges that counsel may have.

I will, of course, do what I can to keep the number and length of conferences to a minimum. I may not always grant an attorney's request for a conference. Do not consider my granting or denying a request for a conference as any indication of my opinion of any attorney or of the case or of what your verdict should be.

[EXCUSE CHALLENGED JURORS]

## **VII OATH TO JURORS**

## **VIII PRELIMINARY CRIMINAL INSTRUCTIONS**

## **IX OPENING STATEMENTS**

## **X PRESENTATION OF CASE**

Last	First	
Afacan	Funda	BGC Partners employee (Istanbul)
Aghazadeh	Behrooz	Iranian businessman
Ahmadinejad	Mahmoud	Former President of Iran
Ahmed	Firdaus	Dubai businessman and accountant
Akkaya	Halil Ibrahim	Former Turkish law enforcement
Aksoy	Kazim	Former Turkish law enforcement
Akturk	Yaser	Turkish businessman
Al Taher	Ali Sulaiman	Dubai businessman
Ala	Efkan	Former adviser to Turkish Prime Minister and former Turkish Minister of Interior
Alacaci	Taha Ahmet	Turkish businessman
Alakustekin	Selin	Former Halkbank employee
Alamdari	Babak	Iranian businessman
Albayrak	Berat	Turkish Minister of Energy and Natural Resource
Alipour	Bijan	Iranian businessman
Altinbas	Husamettin	Turkish businessman
Altinok	Selami	Turkish law enforcement
Altunyaldiz	Ziya	Dubai businesswoman
Alware	Shadab	Dubai businessman
Amiamgoggian	Miandapci Aresh	Iranian-Dubai businessman
Anello	Robert	Attorney for Reza Zarrab
Aslan	Fatma	Wife of Suleyman Aslan
Aslan	Suleyman	Former General Manager of Halkbank
Atasay	Murat	Friend of Hakan Atilla
Atilla	Mehmet Hakan	Defendant
Atwater	James	FBI Agent
Aydenir	Ekrem	Turkish prosecutor
Aydin	Elif	Halkbank employee
Aydogan	Hakkan	Halkbank Employee
Babacan	Ali	Former Turkish Deputy Prime Minister
Badalov	Vidali	Azerbaijani businessman



Bagis	Egemen	Former Turkish Minister for EU Affairs
Bahmani	Mahmoud	Former Governor of the Central Bank of Iran
Balkan	Levent	Former Halkbank Employee
Bardacki	Fatih	Halkbank Employee
Bayar	Ruchan	Turkish businessman
Bayraktar	Hakan	Turkish businessman
Bayraktar	Umut	Turkish businessman
Bazargan	Farzad	Iranian businessman
Berk	Sabri	Iranian businessman
Brafman	Benjamin	Attorney for Reza Zarrab
Brummond	David	Former Senior Sanctions Advisor at OFAC
Bulut	Bulent	FBI Linguist
Caglayan	Salih Kaan	Son of Mehmet Zafer Caglayan
Caglayan	Mehmet Senol	Brother of Mehmet Zafer Caglayan
Caglayan	Mehmet Zafer	Former Turkish Minister of the Economy
Canitez	Osman Zeki	Former auditor at Turkey's Banking Regulatory and Supervisory Intuition (BDDK)
Cesurturk	Murat	Turkish businessman
Cetinkaya	Murat	CEO, Istanbul Stock Exchange (Istanbul)
Cohen	David	Former U.S. Treasury official and former Deputy Director of the CIA
Deniz	Nesteren Zarei	Turkish-Iranian businesswoman
Denk	Benjamin	FBI Agent
Dubowitz	Mark	CEO of the Foundation for Defense of Democracies
Dundar	Can	Turkish Journalist
Eker	Ozgur	Turkish banking official
Erdogan	Bilal	Son of Recep Tayyip Erdogan
Erdogan	Recep Tayyip	President of Turkey
Eroglu	Emir	Turkish businessman
Fadillioglu	Serdar	Halkbank employee
Fathe Razi	Amir	Iranian businessman
Friehdham	Robert Bonte	Friend of Hakan Atilla (UK)
Geissler	Scott	FBI Agent

Geist	Scott	FBI Agent
Gelgec	Adem	Turkish businessman
Ghalebani	Ahmad	Former Managing Director of the National Iranian Oil Company
Ghasemi	Rostam	Former Iranian Minister of Petroleum
Giuliani	Rudolph	Former Mayor of New York City
Glaser	Daniel	Former U.S. Treasury Department official
Gülen	Fethullah	Founder of Gülenist Movement (Turkey)
Guler	Baris	Son of Muammer Guler
Guler	Fatih	Halkbank employee
Guler	Muammer	Former Turkish Minister of the Interior
Gundes	Ebru	Turkish pop star, wife of Reza Zarrab
Happani	Abdullah	Turkish businessman
Happani	Bilal	Turkish businessman
Happani	Cemellatin	Turkish businessman
Happani	Erol	Turkish businessman
Happani	Mehmet	Turkish businessman
Happani	Turgut	Turkish businessman
Hayyam	Emin	Turkish businessman
Hong	Will	Chinese businesswoman
Inal	Mustafa Dogan	Turkish attorney
Ince	Orhan	Former Turkish law enforcement official
Iqbal	Mohammad Asim	Dubai businessman
Isikgun	Irfan	Turkish businessman
Jafari	Mohammad	Iranian-Dubai businessman
Jamshidy	Kamelia	Turkish businesswoman
Jamshidy	Kasra	Turkish businessman, brother of Kamelia Jamshidy
Jashnsaz	Seifollah	Chairman of Naftiran Intertrade Company
Kalban	Emre	Turkish businessman
Kaplan	Servet	Turkish customs agent
Kara	Celal	Former Turkish prosecutor
Karakurdu	Vefa	Turkish law enforcement

Karaman	Ozgur	Halkbank employee
Kaya	Onur	Former assistant to Mehmet Zafer Caglayan
Kaynar	Mustafa Behcet	Former assistant to Mehmet Zafer Caglayan
Kazakos	Georges	Friend of Hakan Atilla (Greece)
Kazia	Shakeeb	Dubai businessman
Khamenei	Ayatollah Ali	Supreme Leader of Iran
Kilinc	Ebru Atamar	Friend of Hakan Atilla (Turkey)
Kirschenbaum	Joshua	Former U.S. Treasury Department official
Koc	Salih	Officer at Turkish charitable foundation
Kocabas	Mehtap Erkut	Halkbank employee
Korkmaz	Huseyin	Former Turkish Police Officer
Korkmaz	Muacet	Turkish customs agent
Korkmaz	Zafer	Friend of Hakan Atilla (Turkey)
Kovanci	Umut	Friend of Hakan Atilla (Turkey)
Kul	Murat	Friend of Hakan Atilla
Levey	Stuart	Former U.S. Treasury Department official
Lieberman	Michael	Former U.S. Treasury Department official
Mammadov	Ahmad	Azerbaijani businessman
Mammadov	Shalil	Azerbaijani businessman
McReynolds	Jennifer	FBI Agent
Mehdizadeh	Imam	Iranian businessman
Mukasey	Michael	Former U.S. Attorney General
Najafzadeh	Hossein	Bank Mellat official
Najafzadeh	Soheil	Son of Hossein Najafzadeh
Najafzadeh	Soroush	Son of Hossein Najafzadeh
Nazman	Arzun	Turkish law enforcement
Nenemoglu	Abdurrahman	Turkish businessman
Nikousokhan	Mahmoud	Finance Director of National Iranian Oil Company
Okumus	Aykut	Turkish businessman
Okur	Nurullah	Friend of Hakan Atilla (Turkey)
Okuran	Husnu	Former Goldman Sachs / Deutsche Bank employee (Istanbul)

Olangian	Reza	Resident of Metropolitan Correction Center
Oz	Zekeriya	Former Turkish prosecutor
Ozbek	Abdurrahman	Halkbank employee
Ozcelik	Oner	Assistant Professor, Indiana University
Ozcil	Yucel	Turkish businessman
Ozdemir	Ozgur	Turkish businessman
Ozis	Ahmet Murat	Turkish businessman
Ozkok	Suleyman	Friend of Hakan Atilla (Turkey)
Oztabak	Elvan	Halkbank employee
Peri	Robert	Citibank officer
Pouransari	Hashem	Naftiran Intertrade Company Official
Pourdara	Javad	Dubai businessman
Rajaeieh	Mohammad Reza	Bank Sarmayeh Official
Rastgarshishegh	Mohammadsadegh	Turkish businessman
Ricciardone, Jr.	Francis J.	US Ambassador to the Republic of Turkey, 2011-2014
Rona	Gokhan	Turkish businessman
Saeid	Jafar	Dubai businessman
Sardarlou	Mohammed	Iranian-Dubai businessman
Sari	Binnur	Halkbank employee
Sargin	Turker	Turkish businessman
Saygili	Yakoub	Former Turkish law enforcement
Schanzer	Jonathan	Senior Vice President of Foundation for Defense of Democracies
Simsek	Mehmet	Turkish Minister of Finance
Sirali	Hakan	Turkish law enforcement
Sloan	Douglas	Deutsche Bank official
Szubin	Adam	Former Director of the Office of Foreign Assets Control
Taheri	Gita	Royal companies employee
Tamimi	Ahad Khabbaz	Turkish businessman
Tamimi	Behram	Turkish businessman
Tamimi	Shahram	Turkish businessman
Taskesenlioglu	Ali Fuat	Former General Manager of Halkbank



Taymaz	Seyit Ahmet	Halkbank employee
Tessler	David	Former U.S. Treasury Department official
Topcu	Yasin	Former Turkish law enforcement
Tringale	Robert	FBI Agent
Tuner	Hikmet	Employee of Baris Guler
Tuzuner	Sumeyra	Turkish translator
Uner	Mehmet Akif	Former Turkish law enforcement
Urel	Aykut	Halkbank employee
Uzunkaya	Veysi	Turkish provincial director of commerce
Yagci	Olcay	Friend of Hakan Atilla
Yazdi	Lavida	Royal companies employee
Yildirim	Seyda	Turkish Attorney
Yildiz	Selami	Turkish law enforcement
Yilmaz	Afife Muge	Halkbank employee
Yilmaz	Turhan	Turkish businessman
Yuksel	Mete	TEB Investment employee (Istanbul)
Zanjani	Babak	Iranian businessman
Zarei	Habibollah	Turkish-Iranian businessman
Zarrab	Hossain	Father of Reza Zarrab
Zarrab	Mohammad	Alleged co-conspirator
Zarrab	Reza	Alleged co-conspirator

**Companies**

Ables (Tianjin) International Trading Co., Ltd.  
Aktif Yatirim Bankasi A.S. a/k/a "Aktif Bank"  
Al Hilal Exchange  
Al Nafees Exchange LLC  
Al Rostamani International Exchange  
Al Salam Exchange Centre  
Al-Fida General Trading a/k/a Al-Fida International General Trading

**Description**

Chinese trading company  
Turkish bank  
Dubai exchange house  
Dubai exchange house  
Dubai exchange house  
Dubai exchange house  
Dubai exchange house

Al-Hilal Exchange	Dubai exchange house
Anvil International Trading Company LLC	Dubai trading company
Are Havacilik AS	Turkish business
Asi Kiyetli Madenler Turizm Otom	Turkish business
Atlantis Capital General Trading LLC	Dubai trading company
Azza Computers	Dubai business
Bank Keshavarzi Iran	Iranian bank
Bank Mellat Iran	Iranian bank
Bank Melli Iran	Iranian bank
Bank of America, N.A.	American bank
Bank of New York Mellon, N.A.	American bank
Bank Parsian Iran	Iranian bank
Bank Pasargad Iran	Iranian bank
Bank Saderat Iran	Iranian bank
Bank Sarmayeh Iran	Iranian bank
Bella Insaat Turizm	Turkish business
Bella Investments Co LLC	Dubai business
Bin Sabt Jewellery LLC	Dubai trading company
Bunge Limited	International agribusiness
Cameron Denizcilik Kiyetli Madenler	Turkish business
Cargill	International agribusiness
Cemre Kiyetli Mad Turz Oto Gida	Turkish business
Central Bank of Iran a/k/a "Bank Markazi Jomhuri Islami Iran"	Iranian central bank
Central Bank of the UAE	United Arab Emirates central bank
Centrica General Trading	Dubai trading company
Cihan Kiyetli Madenler San Ve Dis Tic LTD STI	Turkish company
Citibank, N.A.	American bank
Credit Institution for Development	Iranian bank
Deutsche Bank North Americas N.A.	Bank
Durak Doviz Ve Kimyetli Madenler Ticaret AS	Turkish exchange house
Duru Doviz Ve Kiyetli Madenler Ticaret Anonim Sirketi	Turkish exchange house

ECB Kuyumculuk Ic Vedis Sana Ticaret Ltd Sirketi	Turkish business
Economy Investment Co. LLC	Dubai business
Emin General Trading LLC	Dubai trading company
Emin Kiyetli Madenler Turizm Otomo	Turkish business
Fadaei General Trading	Dubai business
First Islamic Investment Group	Maylasian bank
Foolad Kaveh Tikmeh Dash Steel a/k/a Kaveh Tiikme Dash Steel	Iranian business
Foundation for the Defense of Democracies	American not-for-profit organization
Hanedan General Trading LLC	Dubai trading company
Hicran General Trading LLC	Dubai trading company
Hicran Insaat Turizm Otomotiv Kuyumculuk Sanayi Ve Ticaret Ltd	Turkish business
Hicran Kuyumculuk a/k/a Hicran Jewelry	Turkish business
Hizballah	Foreign terrorist organization
HK Intertrade Company	Hong Kong business
HSBC Bank USA, N.A.	American bank
Ilsam Dis Tic. Danismanlik Sanayi Insaat ve Taahhut Ltd Sti	Turkish business
Inci Kuyumculuk Sanayi Ve Dis Ticaret A.S.	Turkish business
International Safe Oil	Malaysian oil company
Islamic Revolutionary Guard Corp	Iranian military unit
Islamic Revolutionary Guard Corp - Qods Force	Iranian military unit
Izmit (Tianjin) International Trading Co., Ltd.	Chinese trading company
JPMorgan Chase Bank, N.A.	American bank
Kağan İthalat Ve İhracat San Ve Dis Tic LTD STI	Turkish business
Kapital Kiyetli Madenler San Ve Dis Tic LTD STI	Turkish business
Kazia International Limited	Dubai business
Kont Investment Bank	Tajikistan bank
Kont Kosmetic	Turkish business
Kuzey Kiyetli Madenler Sn. Tic. Sti	Turkish business
Lord Metal İthalat İhracat Sanayi Ticaret	Turkish business
Mahan Airlines	Iranian airline
Marigold Exchange	Dubai exchange house

Marun Petrochemical	Iranian oil company
Master Sara Turizim Import and Export	Dubai business
Mellat Exchange	Iranian exchange house
Mesrkanloo Exchange	Iranian exchange house
MND (Tianjin) International Trading Co., Ltd.	Chinese trading company
Mumtaz Kuyumculuk a/k/a Mumtaz Jewelry	Turkish business
Nadir Gold	Turkish business
Naft Iran Intertrade Company a/k/a NICO a/k/a Naftiran	UK business
National Iranian Gas Company	Iranian state-owned gas company
National Iranian Oil Company	Iranian state-owned oil company
Ocean Development Company LLC	Dubai business
Omanye Gold Mining Limited	Ghana business
Osteon General Trading LLC	Dubai business
Pacific Lilly FZE (UAE)	Dubai business
Pirlanta Kiyetli Madenler San Ve Dis Tic STD STI	Turkish business
Rana Plastic Utensils Manufacturers LLC	Dubai business
Rona Dovis ve Kiyetli Maden Ticareti AS	Turkish business
Royal Denizcilik Ve Endustriyei Mak	Turkish business
Royal Emerald General Trading	Dubai business
Royal Emerald I	Dubai business
Royal Emerald Investments, LLC	Dubai business
Royal Equestrian	Turkish business
Royal Holdings, A.S.	Turkish business
Royal Mobilya Dekorasyon SAN. TIC. LTD STI	Turkish business
Sacem Exchange a/k/a Sagem Exchange a/k/a Sajem Exchange	Dubai exchange house
Safir Altin Ticaret Ithalatve Ihracat Limited Sikreti	Turkish business
Sarkuysan	Turkish business
Sarmeye Exchange a/k/a "Sarmayeh Exchange"	Iranian exchange house
Sorinet Commercial Trust Bankers a/k/a SCT Bankers	Dubai business
Sepanta International FZE	Dubai business
Simay Altin Ticaret Ithalat Ve Ithracat Ltd.	Turkish business



Sina Gold  
Standard Chartered Bank  
Swift International & Development Co. Ltd.  
Tasbasi Doviz Ve Kiyetli Madenler Ticareti AS  
Tianjian Cuynet International Trading Co., Ltd.,  
Togem-der Foundation  
Toseh Tejarat Paydar Qeshm  
Toseh Tejarat Sarmayeh Padyar Qeshm  
Trabzon (Tianjin) International Trading Co. Ltd  
Transguard  
Turgev Foundation  
Turkiye Halk Bankasi A.S. a/k/a "Halkbank"  
Türkiye Sima General Trading  
Turkmengaz Dowlet Konserni  
UBS Bank, N.A.  
Volgam Kuyumculuk ve Kiyetli Madenler Dis Tic LTD a/k/a "Volgam Gida"  
Wanoos General Trading Co.  
Wells Fargo, N.A.  
Ziraat Bankasi a/k/a "Ziraat Bank"

**Places**

Conrad Hotel, Istanbul, Turkey  
Dubai, United Arab Emirates  
Islamic Republic of Iran  
Orient Bazaar, Istanbul, Turkey  
Republic of Turkey  
Trump Towers, Istanbul, Turkey

Dubai business  
American bank  
Dubai business  
Turkish business  
Chinese trading company  
Turkish not-for-profit  
Iranian business  
Iranian business  
Chinese trading company  
Dubai transport company  
Turkish not-for-profit  
Turkish bank  
Turkish business  
Turkmenistan state-owned gas company  
Bank  
Turkish business  
Dubai trading company  
American bank  
Turkish bank