



CORPORATE JET INVESTOR LATIN AMERICA · SÃO PAULO

Knowing Your Customer in Export Transactions

Ticking all the due diligence boxes — and the consequences of missing one.

MARCO REININGER

CEO, ValiAir

OPEN

An A340-600 was taxiing for takeoff in central France.



We had minutes to stop it from being smuggled to Iran.

We'll come back to this.

What is KYC / AML?

Know Your Customer · Anti-Money Laundering

01

IDENTIFY

Establish who you are dealing with — natural persons, ultimate beneficial owners, controllers, source of funds.

02

VERIFY

Independently confirm identity, sanctions status, adverse media, and the legitimacy of the transaction.

03

MONITOR

Continuous re-screening, flight data, open-source intelligence and trusted-agent reporting through the life of the relationship.

Who has to do it — and how it gets done right.

WHO

- **Trustees & Owner-Trust Companies**

registered owner of record at the FAA

- **Brokers & Dealers**

principals and intermediaries on the bill of sale

- **Escrow Agents**

the choke-point where funds and title meet

- **Lessors & Financiers**

anyone whose money funds the asset

- **Maintenance & Operating Partners**

anyone whose certificate touches the airframe

THE STANDARD WE HOLD OURSELVES TO



Association of Certified Anti-Money Laundering Specialists

Valiair is an ACAMS member company.

Our compliance officers are individually ACAMS-certified.

If your counterparty cannot tell you what framework they screen against — they don't have one.

PART TWO

Why bother?

Three categories of consequence:

01

LEGAL

02

REPUTATIONAL

03

EXISTENTIAL

United States — the regimes that bite.

OFAC / IEEPA

Treasury sanctions enforcement. Applies to U.S. persons and to U.S.-origin goods (aircraft) anywhere in the world.

Export Control Reform Act / EAR

BIS controls the re-export of U.S.-origin aircraft and parts. License required for embargoed destinations.

Foreign Narcotics Kingpin Act

Asset blocking and criminal exposure for transactions with designated narcotics traffickers.

Iran-Specific Regimes (ITSR / CAATSA)

Strict-liability civil penalties — knowledge is presumed. Secondary sanctions reach non-U.S. parties.

Bank Secrecy Act / Patriot Act

Customer Due Diligence, Beneficial Ownership Rule, SAR/CTR obligations.

WHAT IT COSTS

\$1MM

max fine per IEEPA violation, per transaction.

20 years

criminal exposure for willful violations — for the company and the individuals.

Brasil — same gravity, different flag.

Brazilian counterparties face parallel — and overlapping — exposure.

Lei nº 9.613/1998

Lavagem de dinheiro — up to 10 years' imprisonment plus fines; Conselho de Controle de Atividades Financeiras (COAF) reporting obligations.

Lei nº 13.260/2016

Anti-terrorism financing — criminal exposure for facilitating, financing, or providing assets to designated entities.

Lei nº 12.846/2013 (Lei Anticorrupção)

Strict liability for legal entities; fines up to 20% of gross revenue; debarment from public contracts.

Lei nº 14.286/2021 + Resoluções BCB

Foreign-exchange and capital-flow controls; Banco Central scrutiny on cross-border aircraft transactions.

Receita Federal & ANAC

Customs, import-export and aeronautical-registry consequences — including aircraft seizure and registration cancellation.

The damage that no court can quantify.

“

*It takes 20 years
to build a reputation
and five minutes to ruin it.*

WARREN BUFFETT

WHAT YOU LOSE — and never fully get back

- **Banking access** — correspondent banks de-risk your name within hours.
- **FAA standing** — registry privileges and trustee status come under review.
- **Insurance** — underwriters re-rate or non-renew across the portfolio.
- **Counterparties** — OEMs, MROs, escrow agents, and lessors quietly walk away.
- **The next deal** — every future KYC team will find the headline within seconds.

CASE STUDY ONE

01

**When the system
stops you at the door.**

The deal we walked away from.

WHAT KYC SURFACED

- Buyer charged by the Federal Public Prosecutor's Office (Ministério Público Federal) with money laundering.
- Charges accepted by the 4ª Vara Federal do Tocantins — Operação Flak.
- Original case nº 1008161-51.2019.4.01.4300; subsequently severed and renumbered to 1002447-37.2024.4.01.4300.
- Surfaced through standard sanctions / adverse-media screening before funding.

WHAT WE DID


Declined.

Significant push-back from the buyer.

We held the line. We advised the escrow agent to do the same — they did.

Lesson: KYC is only worth the paper it's printed on if you're willing to lose the deal.

The deal we walked away from.



100%

CATEGORY


INDIVIDUAL

TYPE




OB SIC

Identity Information
Further Information
Keywords / Classifications
Connections / Relationships
Sources

IDENTITY INFORMATION

Field Name	Record Information
Name	[REDACTED]
Gender	Male
Citizenship	 Brazil

COMPARISON DATA

Field Name	Submitted Data	Matched Data
Name	✔	[REDACTED]
Date of Birth	✘	[REDACTED]
Gender	✔	Male
Place of Birth	✘	 Brazil
Citizenship	✔	 Brazil
Country Location	✔	 Brazil
Identification Numb...	✔	[REDACTED]

KEY DATA
Further Information
Aliases
Keywords
Connections / Relationships
Sources

OB
SIC

Name [REDACTED]

Record Update Update Categorization C4

Entered Date 29-Apr-2024

Updated Date 30-May-2024

Category INDIVIDUAL

Special Interest Categories Money Laundering
Organized Crime

Gender MALE

Citizenship Brazil

Location Details

Street	City	Region
[REDACTED]	Goiania	Goias
[REDACTED]	Palmas	Tocantins
[REDACTED]	Porto Nacional	Tocantins

KEY DATA
FURTHER INFORMATION
Aliases
Keywords
Connections / Relationships
Sources

FURTHER INFORMATION
Language
Original Language
Show all Updated Dates
off

BIOGRAPHY

Member of a narcotics trafficking ring (reported Mar 2024).

IDENTIFICATION

Tax ID no: [REDACTED]

REPORTS

Mar 2024:

- Charged by the Federal Public Prosecutor's Office with money laundering, charges accepted by the 4th Federal Court of Tocantins (Operação Flak) (case no: 1008161-51.2019.4.01.4300).
- Case subsequently separated and a new number was given (case no: 1002447-37.2024.4.01.4300).

Apr 2024:

No further information reported.

KEY DATA
Further Information
Aliases
Keywords
CONNECTIONS / RELATIONSHIPS

CONNECTIONS / RELATIONSHIPS
Connection Risk Analyzer

LINKED INDIVIDUALS

Name	Conne...	Type
[REDACTED]	Associate	OB SIC
[REDACTED]	Associate	OB SIC
[REDACTED]	Associate	OB SIC
[REDACTED]	Associate	OB SIC
[REDACTED]	Associate	OB SIC

CASE STUDY TWO

02

**When the system
stops you on the runway.**

How Iran has been smuggling widebodies.

LATE 2022

4× ex-Turkish Airlines A340-200

Registered in Burkina Faso. Departed South Africa for Uzbekistan.
Transponders off over the Middle East. Landed in Iran.

EARLY 2024

2× ex-Virgin Atlantic A340-600

Registered to Macka Invest, Gambia (C5-MIA, C5-MIC). Departed Lithuania
for Dubai. Declared an in-flight emergency. Transponders off. Landed in
Iran.

Same playbook, twice. Five widebodies behind sanctions.

Then they came for a sixth.

How Iran has been smuggling widebodies.

Mahan Air - Airbus A340



Mahan Air - Boeing 777



How a third A340 ended up on our desk.

01

Grounded in Lithuania

A third A340-600 — sister to C5-MIA / C5-MIC — couldn't depart that day due to a maintenance issue. Lithuanian authorities proactively grounded it after the other two reached Iran.

02

Quick resale by Macka Invest

Realising the aircraft would not be allowed to leave under their name, Macka Invest sold the airframe rapidly to a new owner.

03

On to the U.S. registry — through Valiair

The new owner came to us to register the aircraft on the FAA registry. We took the file knowing exactly what its sister ships had just done.

04

Standard KYC + a deeper layer

Full KYC / KYB, sanctions, adverse media — all clean. Given the back-story, we added a second perimeter: our trusted-agent network in the region was put on alert.

The aircraft was already taxiing in Châteauroux.

THE LEAD-UP

- Aircraft ferried Lithuania → Châteauroux for additional maintenance and a possible part-out.
- Captain (FAA certificate, U.S. green card) briefed directly: alert us if anything looks off.
- Owner pivots — airframe is in great condition; decision to keep operating.
- Nigerian carrier — already operates an A340-600 — proposes a dry lease for Hajj.
- Africa nexus flagged. Standard channels: clean. Trusted-agent network: stay vigilant.

THE MESSAGE WE RECEIVED

“

Mahan Air intends to add the sistership of the A340-642 MSN 0765 to its fleet. The aircraft, A340-642 MSN 0764, is acquired by Azman Air from Extremed Aviation Srl for Mahan Air — delivery flight scheduled for December 20, 2024. The aircraft will receive EP-MGI registration in Mahan Air's service.

RECEIVED — AS THE AIRCRAFT WAS TAXIING.

The aircraft was already taxiing in Châteauroux.

Mahan Air intends to add sistership of the A340-642 MSN 0765, to its fleet. The aircraft, A340-642, MSN 0764 is acquired by Azman Air from Extremed Aviation Srl for Mahan Air with its delivery flight scheduled for December 20, 2024. The aircraft will receive EP-MGI registration code in Mahan Air's service

2:01 AM



Crisis averted — by minutes.

WHAT WE DID — IMMEDIATELY

Called French customs.

Aircraft stopped on the taxiway and seized.

Notified U.S. authorities.

OFAC / BIS notified through proper channels.

Activated the captain.

Briefed on his exposure; he refused departure.

Documented everything.

Time-stamped record from intake to seizure.

HAD THE PROCESS FAILED

- Federal investigation under IEEPA / ITSR.
- Personal exposure for the captain.
- FAA registration privileges under review.
- Years of expensive U.S. litigation.
- Permanent reputational damage.

The process worked. It was close.

We won that one. The pattern hasn't stopped.

While we were relieved about Châteauroux, Iran was already running the next plays.

SUBSEQUENTLY

2× ex-Hong Kong Airlines A330-200

Smuggled from Oman to Iran. Same playbook — quiet repositioning, change of registry, end-state Iran.



AND AGAIN

5× ex-Singapore Airlines 777-200ER

Stored in Cambodia, then transferred to Iran. Transponders went dark over Afghanistan and never came back on.



Five widebodies in 2022. Two more in 2024. Then seven more.

What robust KYC actually looks like.

Don't do KYC yourself? Then your partner had better be doing all of this — and able to explain it.

01**Deep KYC / KYB**

Beneficial-ownership graphs, controllers, and source-of-funds tracing.

02**Sanctions & watchlist screening**

OFAC, EU, UN, UK HMT, plus sectoral and PEP lists — continuous re-screen.

03**ID verification & biometrics**

Independent identity proofing, liveness, and document authenticity checks.

04**Open source & adverse media**

Multilingual press, court records, regulatory actions, leak databases.

05**Flight data monitoring**

ADS-B / Mode S signatures; deviations, transponder anomalies, blocked tail-numbers.

06**Open-source intelligence**

Beneficial corporate webs, social signals, jurisdictional risk overlays.

07**Trusted-agent network**

Human eyes on the ground — reputation checks where databases stop.

THE TAKEAWAY

**Robust KYC is expensive.
Being in the wrong transaction is more
expensive.**

If you don't run it yourself, work with a partner who does — and make them prove it.

MARCO REININGER

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Questions?

5 minutes – and as long as you'll have me afterwards.

MARCO REININGER · VALIAIR