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: 3510-DT-P

DEPARTMENT OF COMMERCE

Bureau of Industry and Security

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Order Renewing Temporary Denial of Export Privileges

Pursuant to Section 766.24 of the Export Administration Regulations, 15 C.F.R. Parts 730-774 ("EAR" or "the Regulations"),[1] I hereby grant the request of the Office of Export Enforcement ("OEE") to renew the temporary denial order ("TDO") issued in this matter on September 16, 2025. I find that renewal of this order is necessary in the public interest to prevent an imminent violation of the Regulations and that renewal for an extended period is appropriate because PJSC Aeroflot ("Aeroflot") has engaged in a pattern of repeated, ongoing and/or continuous apparent violations of the EAR.

I. Procedural History

On April 7, 2022, the then-Assistant Secretary of Commerce for Export Enforcement ("Assistant Secretary") signed an order denying Aeroflot export privileges for a period of 180 days on the grounds that issuance of the order was necessary in the public interest to prevent an imminent violation of the Regulations. The order was issued *ex parte* pursuant to Section

[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"). Section 4820(a)(5) of ECRA authorizes the issuance of temporary denial orders. 50 U.S.C. § 4820(a)(5).

766.24(a) of the Regulations and was effective upon issuance.[2] This temporary denial order was subsequently renewed in accordance with Section 766.24(d) of the Regulations.[3] The renewal order was issued on October 3, 2022,[4] and was effective upon issuance. Subsequent renewal orders were issued on March 29, 2023, September 23, 2023, September 20, 2024, and September 16, 2025 respectively, and were also effective upon issuance.[5]

On August 3, 2026, BIS, through OEE, submitted a written request for renewal of the TDO that was issued on September 16, 2025. The written request was made more than 20 days before the TDO's scheduled expiration and, given the temporary suspension of international mail service to Russia, OEE has attempted to deliver a copy of the renewal request to Aeroflot by alternative means in accordance with Sections 766.5 and 766.24(d) of the Regulations. No opposition to the renewal of the TDO has been received.

II. Renewal of the TDO

A. Legal Standard

Pursuant to Section 766.24, BIS may issue an order temporarily denying a respondent's export privileges upon a showing that the order is necessary in the public interest to prevent an "imminent violation" of the Regulations, or any order, license or authorization issued thereunder. 15 C.F.R. §§ 766.24(b)(1) and 766.24(d). "A violation may be 'imminent' either in time or degree of likelihood." 15 C.F.R. § 766.24(b)(3). BIS may show "either that a violation is about to occur, or that the general circumstances of the matter under investigation or case under

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[2] The TDO was published in the *Federal Register* on April 12, 2022 (87 Fed. Reg. 21611).

[3] At the time of the renewal, Section 766.24(d) provides that BIS may seek renewal of a temporary denial order for additional 180-day renewal periods, if it believes that renewal is necessary in the public interest to prevent an imminent violation. Renewal requests are to be made in writing no later than 20 days before the scheduled expiration date of a temporary denial order.

[4] The October 3, 2022 renewal order, which was effective upon issuance, was published in the *Federal Register* on October 7, 2022 (87 Fed. Reg. 60985).

[5] The March 29, 2023 renewal order was published in the *Federal Register* on April 3, 2023 (88 Fed. Reg. 19609). The September 23, 2023 renewal order was published in the *Federal Register* on September 28, 2023 (88 Fed. Reg. 66807). The September 20, 2024 renewal order was published in the *Federal Register* on September 25, 2024 (89 Fed. Reg. 78283). The September 16, 2025 renewal order was published in the *Federal Register* on September 19, 2025 (90 Fed. Reg. 45178).

criminal or administrative charges demonstrate a likelihood of future violations." *Id*. As to the likelihood of future violations, BIS may show that the violation under investigation or charge "is significant, deliberate, covert and/or likely to occur again, rather than technical or negligent[.]" *Id*. A "lack of information establishing the precise time a violation may occur does not preclude a finding that a violation is imminent, so long as there is sufficient reason to believe the likelihood of a violation." *Id*.

If BIS believes that renewal of a denial order is necessary in the public interest to prevent an imminent violation, it may file a written request for renewal, with any modifications if appropriate. 15 C.F.R. § 766.24(d)(1). The written request, which must be filed no later than 20 days prior to the TDO's expiration, should set forth the basis for BIS's belief that renewal is necessary, including any additional or changed circumstances. *Id*. "In cases demonstrating a pattern of repeated, ongoing and/or continuous apparent violations, BIS may request the renewal of a temporary denial order for an additional period not exceeding one year."[6] *Id*.

B. The TDO and BIS's Request for Renewal

Effective February 24, 2022, BIS imposed controls on aviation-related (e.g., Commerce Control List Categories 7 and 9) 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 (Section 746.8(a)(1) of the EAR).[7] BIS will review any export or reexport license applications for such items under a policy of denial. *See* Section 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 a national of Russia from being eligible for license exception Aircraft, Vessels, and Spacecraft ("AVS") (Section 740.15 of the EAR).[8] Any

[6] 88 Fed. Reg. 59791 (Aug. 30, 2023).

[7] 87 Fed. Reg. 12226 (Mar. 3, 2022). Additionally, BIS published a final rule effective April 8, 2022, which imposed licensing requirements on items controlled on the Commerce Control List ("CCL") under Categories 0-2 that are destined for Russia or Belarus. Accordingly, now all CCL items require export, reexport, and transfer (in-country) licenses if destined for or within Russia or Belarus. 87 Fed. Reg. 22130 (Apr. 14, 2022).

[8] 87 Fed. Reg. 13048 (Mar. 8, 2022).

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 travel to Russia.

OEE's request for renewal for a period of one year is based upon the facts underlying the issuance of the initial TDO and the renewal orders subsequently issued in this matter, as well as other evidence developed during this investigation. These facts and evidence demonstrate that Aeroflot has continued, and continues, to disregard U.S. export controls and the terms of previously issued TDOs. Specifically, the initial TDO, issued on April 7, 2022, was based on evidence that Aeroflot engaged in conduct prohibited by the Regulations by operating multiple aircraft subject to the EAR and classified under ECCN 9A991.b on flights into Russia after March 2, 2022 from destinations including, but not limited to, Beijing, China, Delhi, India, and Dubai, United Arab Emirates, without the required BIS authorization.[9] Further evidence submitted by BIS indicated that Aeroflot was continuing to operate aircraft subject to the EAR domestically on flights within Russia, potentially in violation of Section 736.2(b)(10) of the Regulations.

As discussed in the prior renewal orders, evidence presented by BIS indicated that, after the initial order was issued, Aeroflot continued to operate aircraft subject to the EAR and classified under ECCN 9A991.b on flights both into and within Russia, in violation of the Regulations and the TDO itself.[10] Specifically, the October 3, 2022 renewal order detailed flights into and out of Russia from/to Minsk, Belarus, Delhi, India, and Istanbul, Turkey, as well as within Russia.[11] The March 29, 2023 renewal order detailed flights into and out of Russia

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[9] Publicly available flight tracking information shows that on March 6, 2022, serial number (SN) 65309 flew from Beijing, China to Moscow, Russia, and SN 41690 flew from Dubai, UAE to Moscow, Russia. In addition, on March 7, 2022, SN 63511 flew from Delhi, India to Moscow, Russia.

[10] Engaging in conduct prohibited by a denial order violates the Regulations. 15 C.F.R. §§ 764.2(a) and (k).

[11] Publicly available flight tracking information shows that SN 41690 flew from Istanbul, Turkey to Moscow, Russia on September 20, 2022 and from Delhi, India to Moscow, Russia on September 23, 2022. In addition, on September 1, 2022, SN 41214 flew from Minsk, Belarus to Moscow, Russia. On September 13, 2022, SN 41214 flew from Moscow, Russia to Sochi, Russia.

from/to Yerevan, Armenia, Shanghai, China, Bangkok, Thailand, and Urgench, Uzebekistan, as well as within Russia.[12] The September 23, 2023 renewal order detailed flights into and out of Russia from/to Beijing, China, Delhi, India, and Antalya, Turkey.[13] The September 20, 2024 renewal order detailed flights into and out of Russia from/to Antalya, Turkey, Tashkent, Uzbekistan, and Sharm el-Sheikh, Egypt.[14] Additionally, the September 16, 2025 renewal order detailed flights into and out of Russia from/to Cairo, Egypt, Antalya, Turkey, and Phuket, Thailand, as well as within Russia.[15]

Since that time, Aeroflot has continued to engage in conduct prohibited by the applicable TDO and Regulations. In its August 3, 2026 request for renewal of the TDO, BIS submitted evidence that Aeroflot is operating aircraft subject to the EAR and classified under ECCN 9A991.b, both on flights into and within Russia, in violation of the September 19, 2025 renewal order and/or the Regulations. Specifically, BIS's evidence and related investigation demonstrates that Aeroflot continued to operate aircraft subject to the EAR, including, but not limited to, on flights into and out of Russia from/to Minsk, Belarus; Cairo, Egypt; Antalya, Turkey; and Phuket, Thailand, as well as domestically within Russia. Information about those flights includes, but is not limited to, the following:

Tail Number	Serial Number	Aircraft Type	Departure/Arrival Cities	Dates
RA-73126	41214	737-8LJ (B738)	Antalya, TR / Novosibirsk, RU	July 16, 2026

[12] Publicly available flight tracking information shows that SN 41214 flew from Yerevan, Armenia to Moscow, Russia on February 16, 2023 and from Urgench, Uzbekistan to Moscow, Russia on March 1, 2023. In addition, on March 2, 2023, SN 41214 flew from Moscow, Russia to Sochi, Russia. On February 4, 2023, SN 41690 flew from Bangkok, Thailand to Moscow, Russia. On March 5, 2023 and March 19, 2023, respectively, SNs 65309 and 41690 flew from Shanghai, China to Moscow, Russia.

[13] Publicly available flight tracking information shows that on August 31, 2023, SN 41690 flew from Beijing, China to Moscow Russia. On September 19, 2023, SN 65309 flew from Delhi, India to Moscow, Russia. On September 17, 2023, SN 65307 flew from Antalya, Turkey to Moscow, Russia.

[14] Publicly available flight tracking information shows that on September 10, 2024, SN 41214 flew from Nizhny Novgorod, Russia to Antalya, Turkey. On August 14, 2024, SN 41214 flew from Moscow, Russia to Tashkent, Uzbekistan and on August 9, 2025 SN 41214 flew from Sharm el-Sheikh, Egypt to Moscow, Russia.

[15] Publicly available flight tracking information shows that on August 17, 2025, SN 41214 flew from Cairo, Egypt to Moscow, Russia. On July 25, 2025, SN 65309 flew from Antalya, Turkey to Moscow, Russia. On August 8, 2025, SN 65307 flew from Phuket, Thailand to Moscow, Russia and flew from Moscow, Russia to Yuzhno-Sakhalinsk, Russia on August 14, 2025.

RA-73126	41214	737-8LJ (B738)	Yekaterinburg, RU / Hurghada, EG	July 8, 2026
RA-73126	41214	737-8LJ (B738)	Sharm el-Sheikh, EG / Yekaterinburg, RU	July 7, 2026
RA-73126	41214	737-8LJ (B738)	Moscow, RU / Makhachkala, RU	July 6, 2026
RA-73126	41214	737-8LJ (B738)	Antalya, TR / Moscow, RU	July 5, 2026
RA-73144	41690	777-3M0 (ER) (B77W)	Phuket, TH / Vladivostok, RU	July 14, 2026
RA-73144	41690	777-3M0 (ER) (B77W)	Moscow, RU / Male, MV	July 7, 2026
RA-73144	41690	777-3M0 (ER) (B77W)	Vladivostok, RU / Moscow, RU	July 5, 2026
RA-73144	41690	777-3M0 (ER) (B77W)	Khabarovsk, RU / Moscow, RU	July 3, 2026
RA-73144	41690	777-3M0 (ER) (B77W)	Bangkok, TH / Moscow, RU	June 30, 2026
RA-73146	65309	777-300 (ER) (B77W)	Bangkok, TH / Moscow, RU	July 13, 2026
RA-73146	65309	777-300 (ER) (B77W)	Moscow, RU / Vladivostok, RU	July 7, 2026
RA-73146	65309	777-300 (ER) (B77W)	Petropavlovsk-Kamchatsky, RU / Moscow, RU	July 5, 2026
RA-73146	65309	777-300 (ER) (B77W)	Bangkok, TH / Moscow, RU	June 22, 2026
RA-73146	65309	777-300 (ER) (B77W)	Moscow, RU / Bangkok, TH	June 21, 2026
RA-73150	65307	777-3M0 (ER) (B77W)	Male, MV / Moscow, RU	July 12, 2026
RA-73150	65307	777-3M0 (ER) (B77W)	Moscow, RU / Vladivostok, RU	July 5, 2026
RA-73150	65307	777-3M0 (ER) (B77W)	Moscow, RU / Male, MV	July 3, 2026
RA-73150	65307	777-3M0 (ER) (B77W)	Male, MV / Moscow, RU	July 2, 2026
RA-73150	65307	777-3M0 (ER) (B77W)	Phuket, TH / Vladivostok, RU	June 9, 2026

III. Findings

Under the applicable standard set forth in Section 766.24 of the Regulations and my review of the entire record, I find that the evidence presented by BIS convincingly demonstrates that Aeroflot has acted in violation of the Regulations and the TDO; that such violations have

been significant and deliberate; and that given the foregoing and the nature of the matters under investigation, there is a likelihood of imminent violations. Moreover, I find that renewal for an extended period is appropriate because Aeroflot has engaged in a pattern of repeated, ongoing and/or continuous apparent violations of the EAR. Therefore, renewal of the TDO for one year is necessary in the public interest to prevent imminent violation of the Regulations and to give notice to companies and individuals in the United States and abroad that they should avoid dealing with Aeroflot, in connection with export and reexport transactions involving items subject to the Regulations and in connection with any other activity subject to the Regulations.

IV. Order

IT IS THEREFORE ORDERED:

FIRST, **PJSC Aeroflot**, 1 Arbat St., 119019, Moscow, Russia, when acting for or on their behalf, any successors or assigns, agents, or employees 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 EAR, or in any other activity subject to the EAR including, but not limited to:

A. Applying for, obtaining, or using any license (except directly related to safety of flight), 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 except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations, or engaging in any other activity subject to the EAR except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations; or

C. Benefitting 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 from any other activity subject to

the EAR except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations.

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

A. Export, reexport, or transfer (in-country) to or on behalf of Aeroflot any item subject to the EAR except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations;

B. Take any action that facilitates the acquisition or attempted acquisition by Aeroflot 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 Aeroflot acquires or attempts to acquire such ownership, possession or control except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations;

C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from Aeroflot of any item subject to the EAR that has been exported from the United States except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations;

D. Obtain from Aeroflot 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 except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations; 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 Aeroflot, or service any item, of whatever origin, that is owned, possessed or controlled by Aeroflot if such service involves the use of any item subject to the EAR that has been or will be exported from the United States except directly related to safety of flight and authorized by BIS pursuant to

Section 764.3(a)(2) of the Regulations. 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 Aeroflot by ownership, control, position of responsibility, affiliation, or other connection in the conduct of trade or business may also be made subject to the provisions of this Order.

In accordance with the provisions of Sections 766.24(e) of the EAR, Aeroflot 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 not later than 20 days before the expiration date. A renewal request may be opposed by Aeroflot as provided in Section 766.24(d), 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 provided to Aeroflot, and shall be published in the *Federal Register*.

This Order is effective immediately and shall remain in effect for one year.

Dated: September 11, 2026.

David A. Peters,
Assistant Secretary of Commerce Secretary for Export Enforcement.

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