FinCEN ALERT

FIN-2026-Alert006 **September 8, 2026**

FinCEN Alert to Counter Iranian Procurement Efforts for its Commercial Aviation Industry

Suspicious Activity Report (SAR) Filing Request:

FinCEN requests that financial institutions reference this Alert by including the key term "**FIN-2026-IRANAIR**" in SAR field 2 (Filing Institution Note to FinCEN) and the narrative.

The U.S. Department of the Treasury's (Treasury) Financial Crimes Enforcement Network (FinCEN) is issuing this Alert to assist financial institutions[1] in identifying and reporting procurement networks supporting Iran's aviation industry. This Alert supports Operation Economic Outcast, the Trump Administration's campaign to sever the economic lifelines that sustain the Iranian regime and the Islamic Revolutionary Guard Corps (IRGC).[2]

The information contained in this Alert is derived from analysis of Bank Secrecy Act data, as well as open-source reporting and law enforcement information.

Iranian Commercial Aviation Use and Procurement

Iran utilizes Iranian commercial airlines, such as Mahan Air and Iran Air, to support the IRGC and its terrorist proxies, including by ferrying fighters, shipping weapons and sensitive technologies, and moving gold and hard currency.[3] Mahan Air, for example, has transported weapons, funds, and personnel on behalf of the IRGC-Qods Force (IRGC-QF)[4] to support its terrorist proxies, such as Lebanese Hizballah and Ansarallah (more commonly known as the Houthis).[5] Iranian airlines are also involved in Iran's procurement and transport of unmanned aerial vehicle (UAV) systems, ballistic missiles, and other weapons to and from Iran.[6]

1. *See* 31 U.S.C. 5312(a)(2); 31 C.F.R. 1010.100(t).
2. *See* Treasury, Press Release, "Treasury Launches Unprecedented Campaign Against Iranian Regime on Economic D-Day" ("Aug. 2026 Treasury Press Release") (Aug. 24, 2026).
3. *See* Office of Foreign Assets Control (OFAC), Advisory, "Iran-Related Civil Aviation Industry Advisory" ("July 2019 OFAC Advisory") (July 23, 2019), at p. 1; *see also* Aug. 2026 Treasury Press Release, *supra* note 2.
4. For more information about the IRGC-QF's role in providing financial and material support to terrorist organizations, see FinCEN, FIN-2024-A001, "FinCEN Advisory to Financial Institutions to Counter the Financing of Iran-Backed Terrorist Organizations" (May 8, 2024).
5. Mahan Air was designated by Treasury's OFAC in October 2011 pursuant to Executive Order (E.O.) 13224 for providing financial, material and technological support to the IRGC-QF. *See* Treasury, Press Release, "Treasury Designates Iranian Commercial Airline Linked to Iran's Support for Terrorism" (Oct. 12, 2011); *see also* United States Mission to the United Nations, "Remarks at a UN Security Council Emergency Meeting on the Situation in Yemen" (July 13, 2026).
6. Treasury, Press Release, "Economic Fury Targets Iranian Missile and UAV Procurement Networks" (Apr. 21, 2026); *see also* Department of State, Press Release, "New Iran and Russia Sanctions Designations" (Sept. 10, 2024).

Iran employs deceptive schemes to illicitly procure U.S.- and Western-origin aircraft and aircraft parts. Iranian airlines procure aircraft, as well as needed parts and services, using front companies in Europe, the Middle East, Africa, and Asia.[7] Aircraft purchased by Iran's front company networks are often re-registered multiple times in different jurisdictions, undergo layered ownership transfers between geographically dispersed front companies, and move physically between several jurisdictions, including in Central Asia, before arriving in Iran.[8] Purchases may involve falsified or fabricated documentation relating to compliance with Office of Foreign Assets Control (OFAC) or Department of Commerce Bureau of Industry and Security (BIS) regulations or licenses, including aircraft registration information, insurance data, and overflight movements intended to conceal the ultimate end-users of aircraft or related goods, technology, or services.[9]

Front companies posing as technology, aviation, or logistics companies in third-country jurisdictions will often purchase aircraft components and related dual-use items from the United States or other Western countries for subsequent export to Iran.[10] To ship aircraft and aircraft parts to Iran, published sources and analysis of BSA data indicate that Iranian airlines rely on freight forwarding agents and smugglers in transshipment jurisdictions such as Türkiye or the United Arab Emirates to transport controlled items to Iran.[11]

Red Flag Indicators for Iranian Commercial Aviation Procurement

FinCEN has identified the following red flag indicators to help financial institutions detect, prevent, and report potentially suspicious activity involving Iran's procurement of aircraft and aircraft parts, including when Iran's direct involvement is not readily identifiable in transaction details. These red flags are in addition to the red flags identified in prior FinCEN products including in its Advisory on the Iranian Regime's Illicit Oil Smuggling Activities, Shadow Banking Networks, and Weapons Procurement Efforts[12] and in FinCEN Alert on the Use of Front Companies, Financial Facilitators, and Digital Asset Infrastructure by Iran's Islamic Revolutionary Guard Corps to Evade Sanctions and Launder Proceeds.[13] As no single red flag is determinative of illicit or suspicious activity, financial institutions should consider the totality of available facts and circumstances, such

7. *See* Treasury, Press Release, "Treasury Tightens Sanctions on Iran's Oil Network Supporting its Military" (Nov. 20, 2025); *see also* Treasury, Press Release, "Treasury Targets Procurement Networks and 31 Aircraft Associated with Mahan Air and Other Designated Iranian Airlines" (May 24, 2018); July 2019 OFAC Advisory, *supra* note 3, at p. 6.
8. *See, e.g.*, Department of Commerce Bureau of Industry and Security (BIS), "Order Renewing Order Temporarily Denying Export Privileges," 90 Fed. Reg. 48946 (Oct. 31, 2025).
9. *See* July 2019 OFAC Advisory, *supra* note 3. Aircraft and aircraft parts that are subject to the Export Administration Regulations generally cannot be exported, reexported, or transferred to Iran without authorization from Department of Commerce BIS. *See* 15 CFR Subtitle B, Chapter VII, Subchapter C.
10. *See* Department of Justice, Press Release, "Justice Department Announces Five Cases Tied to Disruptive Technology Strike Force" ("Sept. 2024 DOJ Press Release") (Sept. 16, 2024); *see also* Department of Justice, Press Release, "Indictment Charges California Man for Unlawfully Procuring Aircraft Components on Behalf of Iran" (Aug. 14, 2024).
11. *See, e.g.*, Treasury, Press Release, "Treasury Designates Key Actors in Mahan Air Illicit Procurement Operations" (Aug. 19, 2020); *see also* Sept. 2024 DOJ Press Release, *supra* note 10.
12. FinCEN, FIN-2025-A002, "FinCEN Advisory on the Iranian Regime's Illicit Oil Smuggling Activities, Shadow Banking Networks, and Weapons Procurement Efforts" (June 6, 2025).
13. FinCEN, FIN-2026-Alert002, "FinCEN Alert on the Use of Front Companies, Financial Facilitators, and Digital Asset Infrastructure by Iran's Islamic Revolutionary Guard Corps to Evade Sanctions and Launder Proceeds" (May 11, 2026).

as a customer's historical financial activity, whether the transactions are in line with prevailing business practices, and whether the customer exhibits multiple red flags before determining that a behavior or transaction is suspicious. Financial institutions are also encouraged to submit notifications to OFAC when they identify potential sanctions violations through the Disclosure Portal, while continuing to submit Suspicious Activity Reports as appropriate.

1 A recently incorporated technology, aviation, or logistics company with an opaque ownership structure and a limited online presence in a jurisdiction at high risk for transshipment to Iran makes a large number of purchases of aircraft parts or other components that may be used in the commercial aviation industry from U.S. or Western technology and aeronautics companies.

2 A recently incorporated technology, aviation, or logistics company in a jurisdiction at high risk for transshipment to Iran lists a residential address as its business address, shares beneficial ownership information with an unusual number of other companies, or is co-located at the same physical address or shares a PO Box with other companies that fit a similar profile and were established at or around the same time.

3 Documentation or due diligence associated with the sale of an aircraft indicates that the aircraft has been in storage for an extended period of time or has undergone frequent re-registrations, layered changes in ownership by companies in multiple jurisdictions, or an unusual number of moves between jurisdictions, particularly in Central Asia, in the lead up to the sale.

4 A customer with a nexus to Iran engaged in commercial aviation procurement claims that their activities are authorized by OFAC or BIS without providing copies of any OFAC or BIS authorizations, particularly if open-source aviation databases indicate that aircraft previously owned or handled by the company were subsequently transferred to Iran through one or more intermediary jurisdictions.

5 A company, particularly a general trading company, located in a free trade zone or a jurisdiction at high risk for Iranian commercial aviation procurement which does not ordinarily appear to deal in aviation goods attempts to place orders for U.S.- or Western-origin aircraft parts or components.

6 A customer located in a jurisdiction of concern for Iranian aviation procurement places orders for U.S.- or Western-origin aircraft parts or components from firms in one country for delivery to freight forwarding or logistics firms in a second country.

7 The movement of aircraft parts is handled by a logistics or air freight company that does business in Iran or works with sanctioned Iranian or Russian airlines or aviation companies.

FinCEN requests that financial institutions reference this Alert by including the key term "**FIN-2026-IRANAIR**" in SAR field 2 (Filing Institutions Note to FinCEN).

The mission of the Financial Crimes Enforcement Network is to safeguard the financial system from illicit use, counter money laundering and the financing of terrorism, and promote national security through strategic use of financial authorities and the collection, analysis, and dissemination of financial intelligence.

Updates, questions, or comments regarding the contents of this Alert should be addressed to the FinCEN Regulatory Support Section by submitting an inquiry at www.fincen.gov/contact.