







**Special Report** 

# How a Drug Kingpin is Running Flights from Damascus to the Rest of the World

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Date: 08 September 2023

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## **Summary**

A new travel agency with offices in Damascus and Dubai recently announced direct flights from Damascus to European cities for the first time in over a decade. Our research reveals that the agency and its Greece-based "exclusive" partner airline are associated with drug kingpin Mahmoud Abdulilah al-Dj,<sup>(1)</sup> who has been sentenced to death in Libya for drug trafficking. Al-Dj is also the exclusive agent of US-sanctioned Cham Wings in Libya, which has been accused of "[laundering] money throughout the region" and "[moving] weapons and equipment for the Syrian regime." We're concerned that the Greek airline, Air Mediterranean, could wittingly or unwittingly be doing the same. Air Mediterranean might have also engaged in the unsafe aviation practice of switching a transponder off during a flight.

#### **Recommendations**

- In compliance with existing sanctions regulations, the EU, US, and other Western countries should sanction al-Dj and his affiliated persons and companies, such as his brother Abdulfattah and FreeBird Travel and Tourism.
- Due to Air Mediterranean's connections to drug kingpin Mahmoud al-Dj and the Syrian regime, and its potentially unsafe aviation practices, the European Union (EU) should consider blocking the airline from operating in EU airports until an investigation is completed and, in accordance with EU regulations, threaten it with sanctions if it continues its affiliation with al-Dj.
- Western governments should coordinate with Emirati authorities to investigate FreeBird's operations in Dubai.
- Western governments should coordinate with authorities in Eastern Libya to halt Air Mediterranean and Cham Wings flights to Benghazi.
- The report highlights the need for enhanced monitoring of the activities of drug kingpins and the affiliates of the Assad regime.

<sup>(1)</sup> The family name has also been spelled "Al-Dajj" and "Dajj" in sources we cite in this report.

# SECTION 1: "Hello, Europe – We Are Back"

On 5 March 2023, news began circulating about direct flights between Damascus and European countries, which has not happened in over a decade following the Syrian uprising. A <u>Facebook post</u> from a company called FreeBird Tourism and Travel (FreeBird) invited readers to guess which new destinations in Europe the company was about to announce.

The next day, FreeBird proclaimed in a new Facebook <u>post</u>, "Hello, Europe—We are back." In that same post, FreeBird named itself "the exclusive agent of Greek [airline] Air Mediterranean." The post did not mention whether FreeBird is the exclusive Air Mediterranean (AirMed) agent in Syria *alone* or the exclusive agent for Air Mediterranean *overall*.

The response was generally shocked but positive, with over 150 comments on the post. A few people asked why someone in Europe would call a Syrian phone number to book a flight *from* Europe, but for the most part people seemed excited.

On 9 March, FreeBird <u>announced</u> that the first plane from Athens to Damascus had landed.

The "Contact Us" <u>page</u> on FreeBird's website lists two branch offices, one in Athens and another in Dubai. While the physical office in Dubai is operational, our research showed no evidence of a FreeBird branch in Athens.





Photos (1&2): The Dubai branch of FreeBird Tourism and Travel

# SECTION 2: FreeBird Travel's Owner and His Link to Narcotics: Does He Also Ultimately Own Air Mediterranean?

#### 2.1 FreeBird Travel and Tourism

**According to its <u>Facebook page</u>**, FreeBird Travel and Tourism is a Syrian company based in the Free Zone in Damascus with one <u>branch</u> in Dubai. (2) It claims to be a Licensed General Sales Agent for AirMed, described as a Greek carrier. Because of strict business secrecy laws in the Free Zone of Damascus, we could not access the incorporation documents.



Photo (3): FreeBird Travel and Tourism Logo. Source: Facebook Page "FreeBird Travel Agency Int." <u>profile picture</u>

#### FreeBird maintains three Facebook pages:

- FreeBird Travel Agency Int.
- Freebird Dubai
- <u>Freebird</u> (FreeBird Damascus) [the part in parentheses has been added since we began this report, as well as the address for a Damascus office]

The company's <u>booking website</u> suggests that FreeBird's work is limited solely to cooperation with AirMed. Flights are routed from Damascus to Athens and then on to 11 European cities, at least according to the Facebook page (from a graphic in one <u>post</u>). But the booking site lists only three European destinations from Damascus—Düsseldorf, Stockholm, and Athens itself—plus what appears to be an upcoming addition of a flight between Athens and Erbil, Iraq (site accessed 24 August 2023).<sup>(3)</sup> (4)

<sup>(2)</sup> There is a legitimate business called <u>Free Bird Travel</u> in Antalya, Turkey, selling tickets on numerous airlines (IATA member), and a legitimate Turkish charter airline called <u>Freebird Airlines</u> that has operated since 2001. Both companies are subsidiaries of <u>Gözen Holdings</u> in Istanbul (Gözen's business profile can be found <u>here</u>) and have no known connection with FreeBird Syria or Dubai.

<sup>(3)</sup> FreeBird also advertises "Luxury Dubai City Trips" on this page of their website, but there is no way to book such a trip from the site—Dubai is not mentioned on the main booking page. A separate page on the site announces flights to other destinations, but they cannot be booked either. It is possible that these flights can be booked from FreeBird's offices but are operated by a carrier other than AirMed.

<sup>(4)</sup> On 14 August 2023, the FreeBird Dubai Facebook <u>Page</u> began advertising Tourist packages for Umrah (the Muslim pilgrimage to Mecca) by both bus and flight. Not mentioned on the website, bookings seem to be available only via phone, email, or WhatsApp. This Facebook page also <u>advertises</u> South Asian destinations and Egypt—but names no carrier for them.

Our open-source research revealed that FreeBird is owned by Mahmoud Abdulilah al-Dj. His Facebook work page list includes FreeBird, AirMed, and Cham Wings, a Syrian air carrier currently under <u>US sanctions</u> and <u>sanctioned by the EU</u> from December 2021 to 18 July 2022.

The US sanctions on Cham Wings were <u>imposed</u> because the Treasury Department's Office of Foreign Assets Control claimed that Cham Wings continues to have ties to the country's already sanctioned national carrier, Syrian Air (RB, Damascus), as well as the Syrian government at large. Cham Wings was further <u>accused</u> by the US Treasury of "[laundering] money throughout the region" and "[moving] weapons and equipment for the Syrian regime."

EU sanctions on Cham Wings were <u>lifted</u> on 18 July 2022. They had initially been imposed in December 2021 because the EU had accused Cham Wings "of flying people to Belarus so they could then illegally cross the EU's external borders in what flared up into a migration and humanitarian crisis."

FreeBird is part of a commercial group called "ALDJ GROUP," which is owned by Mahmoud Abdulilah al-Dj (Chairman of the Board of Directors). According to his <u>Facebook page</u>, he has been the General Manager of FreeBird in Damascus, Dubai, and Athens since 2017, although we found no public evidence of the company's activity in Syria before 2023.

But there may be more of a connection between al-Dj, FreeBird, and AirMed than a simple booking arrangement.

#### 2.2 ALDJ Group

FreeBird commenced its <u>activities</u> in Syria in conjunction with the start of AirMed's flights between Athens and Damascus on <u>8 March 2023</u>. Additionally, on 22 June 2023, an obscure Facebook page called Watani Press published a <u>post</u> about a launch party of FreeBird that revealed key leads into the person behind the venture:

- FreeBird Travel and Tourism was introduced as an airline rather than a travel agency.
- A photo of the inauguration (below) showed a singer with ALDJ Group's logo in the background.
- The post states that the launch was attended by representatives from "the embassies of Greece, the Czech Republic, Serbia, and Romania."



Photo (4): ALDJ Launch Party for FreeBird. Source: "وطني برس" ("Watani Press") Facebook Page <u>post</u> 22 June 2023

As mentioned earlier, Mahmoud al-Dj states on his Facebook page that he is also the <u>exclusive travel agent for Cham Wings</u> in Libya (sometimes referred to as Sham or Al-Sham Wings). The promotional <u>photo for ALDJ Group</u>, published 20 February 2023, contains a Cham Wings plane and an AirMed plane, suggesting continuous relations between FreeBird and Cham Wings (although Cham Wings flights cannot be booked on the FreeBird website).

Tracking ALDJ Group online confirmed it is owned by Mahmoud Al-Dj. We also found a promotional header that appears to showcase all of ALDJ's holdings or subsidiaries. Among them is AirMed



Photo (5): Promotional image for ALDJ Group. Note the Air Mediterranean logo on the plane on the left, the Cham Wings logo on the plane in the center, and the FreeBird logo atop the mountain peak just to the right of the Cham Wings plane.

Logos for other holdings are also visible in the image.

[Source: ALDJ Group Facebook post 20 February 2023]

Work	
	Works at عضو ورجل أعمال في جامعة الدول العربية 8 June 2023 - Present
	يملك مطعم ومنتزة نسمة شام طريق المطار 8 June 2019 - Present
	Air Mediterranean وكيل حضري لشركة 8 June 2018 - Present
	ي دمشق و دبي وأثينا Freebird مدير عام مؤسسة الطير الحر 8 June 2017 - Present
	رئيس مجلس إدارة مجموعة الدج التجارية القابضة 8 June 2017 - Present
	وكيل حصري لأجنحة الشام في ليبيا 8 April 2017 - Present

Works at Member and Businessman at the Arab League 8 June 2023–present;

- Owns Nasmet Sham Restaurant & Park on Airport Road, 8 June 2019–present;
- Exclusive Agent for Air Mediterranean, 8 June 2018–present;
- Director General of al-Tayr al-Hor (FreeBird) in Damascus, Dubai, and Athens 8 June 2017–Present;
- Chairman of ALDJ Commercial Holding Group, 8 June 2017–present;
- Exclusive Agent for Cham Wings in Libya, 8 April 2017–present.

Photo (6): The Work listing from Mahmoud Abdulilah al-Dj's Facebook profile. English translation: Source: "אבאפנ אַג ועל וובק" (Google Translate: "Mahmoud Abdel-Ilah Al-Daj") Facebook page, <u>About: Work and Education</u>, accessed 4 September 2023.

Of note in al-Dj's work listing on his Facebook profile is that he lists himself as the exclusive agent for AirMed. yet lists himself as the exclusive agent *in Libya* for Cham Wings. This suggests that he considers himself the exclusive agent for AirMed *everywhere*. The fact that AirMed passenger flights cannot be booked on the airline's website, but only through FreeBird, suggests the latter is indeed the exclusive AirMed agent everywhere.

#### 2.3 Who is Mahmoud al-Dj?

Mahmoud al-Dj first appeared publicly in August 2013. Syrian state TV published an <u>interview</u> with him after his arrest on charges of transferring money abroad without a license and <u>financing terrorism</u> through the al-Tayr "company" (more below). No information has been released about the time al-Dj spent in detention, if arrested at all, or whether he was tried for the crime in the first place. Al-Dj disappeared from public view until 2018.



Photo (7): Image from Mahmoud al-Dj's interview on Syrian state television. Source: Screenshot from a <u>video</u> of the interview

According to various sources, al-Dj is linked to drug trafficking, including hashish and captagon. He has been allegedly linked to a gang that receives smuggled narcotics for distribution; that gang was part of a notable drug seizure in 2018. However, the latest round of sanctions from the <u>US</u>, <u>UK</u>, and <u>EU</u> targeting individuals involved in producing and smuggling narcotics did not include al-Dj.

A <u>report</u> by *The New Arab* from 2021 included a document obtained from a court case in Benghazi related to the "Noka shipment." The *Noka*, as outlined in a subsequent <u>OCCRP research</u> report, is a cargo ship that, in December 2018, set off from the port of Latakia destined for eastern Libya, but was seized by the Greek authorities before reaching its destination. It was loaded with large quantities of drugs. Detailed in the Libyan sentencing document was that al-Tayr International Trading, a company owned by al-Dj headquartered in Latakia, had rented a warehouse to receive the cargo and store the narcotics.

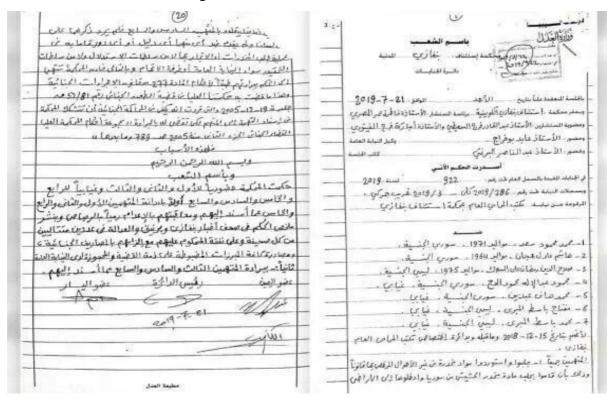


Photo (8): <u>A copy of the Benghazi court decision</u>
Source: <u>Article</u> from *The New Arab*, (in Arabic, Google Translate
"Syrian drugs...smuggled to Libya through the "al-Tayr network") published 28 June 2021

The court document details the operations of a gang allegedly led by "Mahmud Abdulilah Dajj," a Syrian Libyan. On 21 July 2019, the Benghazi Court of Appeals handed down a verdict accusing al-Dj and his aides of involvement in the Noka shipment, as well as three other shipments seized in Libya: one in the Al Khums port near Tripoli in western Libya, one in Benghazi, and another in Tobruk in eastern Libya. The Benghazi court sentenced al-Dj, in absentia, to death by firing squad. Should al-Dj ever be caught on Libyan soil again, that sentence will be carried out.

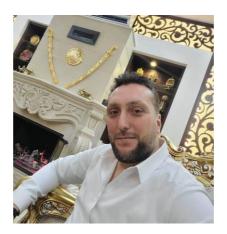


Photo (9): Mahmoud al-Dj. Source: "محمود عبد الآله الدح" (Google Translate: "Mahmoud Abdel-Ilah Al-Daj") Facebook page profile picture post 21 February 2022

In addition to his Syrian passport, Mahmoud al-Dj holds another <u>passport</u>, <u>issued by Libyan</u> <u>authorities in the city of Misrata</u>, which makes his Libya-Syria operations easier.

Also of note, **Abdulfattah al-Dj** works with his brother Mahmoud al-Dj at the FreeBird Company in Damascus (according to his <u>Facebook profile</u>).



Photo (10): Abdulfattah al-Dj Source: Facebook profile <u>photo</u> from "عبد الفتاح دج" (Google Translate "Abdel Fattah Dj") posted 30 March 2021

# **SECTION 3: Air Mediterranean: Background and Operations**

On its face, AirMed is owned by non-Syrian businessmen, but this report highlights its strong connections to al-Dj and perhaps to the Assad regime.

# 3.1 Background

Air Mediterranean is a small carrier operating from Eleftherios Venizelos International Airport in Athens, Greece (IATA: ATH). Incorporated in 2015, it <u>began commercial flights</u> in November 2017 to six destinations: London, Stockholm, Khartoum (Sudan), Jeddah (Saudi Arabia), Casablanca (Morocco), and Baghdad (Iraq). But less than three months later it suspended all flights, <u>due to a disagreement</u> between two of the shareholders. (5) Grounded on

<sup>(5)</sup> NOTE: Linked article is in Greek.

18 January 2018, AirMed then <u>announced</u> in February of the same year that it would cease all commercial flights and instead focus on charter operations.<sup>(6)</sup>

AirMed's various social media accounts went silent shortly thereafter. Its last <u>Twitter/X post</u> was on 6 November 2018 (though there was a like on a <u>post</u> from 4 Feb 2019), its last <u>Instagram</u> post was on 9 January 2019, and its last <u>Facebook</u> post on 25 December 2020. Given the internal dispute and then the decision to switch to charter operations alone, the lack of online presence is not surprising.

The reappearance of AirMed came in March 2023, when the *Greek City Times* reported that "Greece's Air Mediterranean will inaugurate the first flight from Europe to Syria in 11 years when one of their vessels lands at Damascus International Airport from Athens on March 9."

In June 2023, *The New Arab\_reported* the first flights to Damascus from Düsseldorf and then from Stockholm, both via Athens. AirMed's first flight between Düsseldorf Airport and Damascus International Airport (via Athens) took place on <u>24 June 2023</u>. Its first flight between Damascus and Stockholm's Arlanda Airport (via Athens) was on <u>29 June 2023</u>.

The company's ownership has changed over time, but it has always included Andreas and Fanti Ilias Hallaq.<sup>(7)</sup> More recently they have included their mother, Nanta, in the company. As of 28 August 2023, the listed administration on the company's <u>page</u> at the Union of Hellenic Chambers of Commerce website (in Greek, English button available at the top right) are:

#### O All Active Inactive Board Members/Other Category Capacity Members (Title from 04/04/2022 Management CHALLAK NANTA President Board To 30/03/2026) (Title from 04/04/2022 Member of the Board of Directors. Management SAMPRAKOS MARIOS Board **Board of Directors** To 30/03/2026) (Title from 04/04/2022 Member of the Board of Directors. Management CHALLAK FANTI ILIAS Board Board of Directors To 30/03/2026) (Title from 04/04/2022 Member of the Board of Directors, Management CHALLAK ANDREAS Board of Directors To 30/03/2026)

Photo (11): Screenshot of AirMed Administrative officers. Source: <a href="https://bit.ly/480wVf9">https://bit.ly/480wVf9</a>, accessed 28 August 2023

Administration

<sup>(6)</sup> NOTE: Linked article is in German.

<sup>(7)</sup> The family surname has also been spelled "Hallak" and "Challak." Fanti appears in other documents as Fadi.

There are two reasons we make the assumption that at least the Hallaq brothers know what they're doing and who they're dealing with:

- ALDJ Group publicly introduces AirMed as an official part of their holdings.
- There is evidence that the Hallaq family has at least some access to the Assad regime (from the photo of George Hallaq, Andreas and Fanti's father, with Syria's Foreign Affairs and Expatriates Minister Faisal al-Mikdad, shown at the end of Section 4).

AirMed's website currently indicates it <u>offers commercial</u>, <u>cargo</u>, <u>and charter services</u>. However, individual bookings for AirMed commercial flights can be booked only through FreeBird, further highlighting that al-Dj's claim to be the exclusive agent of AirMed everywhere is correct. AirMed's own website is outdated and has no direct booking option.

AirMed also appears to have done a number of "wet leases" to other airlines in the very few months it has been operating commercially, <u>most recently</u> for TunisAir (IATA: TU, national carrier of Tunisia) and AirSerbia (IATA: JU, national carrier).

#### **3.2 Current Operations**

An open-source history search on aviation tracking sites <u>FlightAware</u> and <u>FlightRadar24</u> revealed that AirMed is currently operating flights to and from Athens, Benghazi, Damascus, Düsseldorf, and Stockholm, in addition to Prague in the Czech Republic, Craiova in Romania, Forli in Italy, and Zakynthos and Kefalonia in Greece.

Even though commercial flights have been announced and have taken place, AirMed's website is still outdated and vague. Under the <u>Destinations</u> page, only Greece and Cyprus are listed as active airports, with "Coming Soon" marked for Israel, Denmark, Germany, and France. There is no mention of Damascus being or becoming a destination, nor are Libya or Sweden mentioned.

As AirMed, their one active plane (registered SX-MAT, See Appendix 1) has flown directly from Damascus (IATA: DAM) 52 times from 30 April 2023 to 28 August 2023, to just three cities:

- Athens (IATA: ATH) 31
- Benghazi (IATA: BEN) 16 (none since 28 July)
- Dubai (IATA: DWC) 5 (none since 28 July)

<sup>(8) &</sup>quot;A wet-lease airline provides all the required assets to fly the aircraft. This includes crew, maintenance, airline certificates and, importantly, third party liability insurance. All direct operating costs such as fuel, catering, airport fees, handling and navigation fees are paid for directly by the client to the service providers (i.e. Airports)." Source: <a href="https://simpleflying.com/what-is-aircraft-wet-leasing/">https://simpleflying.com/what-is-aircraft-wet-leasing/</a>, accessed 28 August 2023.

# **SECTION 4: Should AirMed and FreeBird operations be halted?**

The following facts suggest that the relationship between AirMed and al-Dj's FreeBird is exclusive; they also suggest the two companies might be, in effect, one entity with al-Dj being the ultimate beneficiary.

- A. AirMed's commercial flights cannot be booked on any other site, including their own—only FreeBird's.
- B. FreeBird's launch party introduced it as an airline, not a travel agency.
- C. AirMed is listed along with FreeBird on ALDJ's holdings promotion.
- D. Mahmoud al-Dj introduces himself on his Facebook page as the exclusive agent for AirMed—not as the exclusive agent for Syria, as he did "for Libya" in his Cham Wings listing.

Given Mahmoud al-Dj's background, running commercial flights into Europe and Libya poses multiple risks. Destination countries face a new potential narcotics supply route. Furthermore, pilots and flight attendants could face arrest if authorities discover contraband on flights—items the employees knew nothing about. Passengers as well could face security scrutiny.

The operation of a new airline between Damascus and eastern Libya is particularly risky. AirMed might engage in activities similar to Cham Wings, which the US Treasury accuses of providing material assistance to the Syrian regime and transporting weapons and fighters between the two destinations. The fact that al-Dj is the exclusive agent of Cham Wings in Libya increases the likelihood that his new partnership with AirMed may engage in similar activities.

Tracking the flights between Syria and Libya has also highlighted some safety concerns. On 31 May 2023, SX-MAT, one of AirMed's planes, took off from Damascus at 9:16 am local time and landed in Benghazi at 11:20 am local time. It then took off from El Beida International Airport (also spelled Al-Bayda, IATA: LAQ) at 3:22 pm local time and landed in Damascus at 4:22 pm local time. However, there is no flight listed between Benghazi and El Beida, which lie 120 miles apart and in the same time zone. How did SX-MAT get to El Beida without showing up on radar?

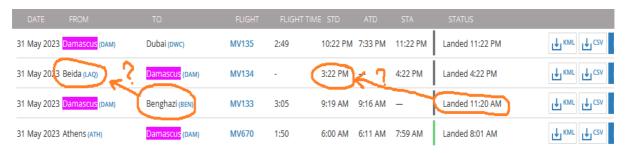


Photo (12): The odd flight between Damascus and El Beida, Libya on 31 May 2023.

[Source: Screenshot from FlightRadar24 (seeing it from the link above will require a Gold subscription, as it's more than 90 days back from the publishing of this report) showing the gap between landing at Benghazi and taking off at El Beida. In the column headers: STD=the stated time of departure, ATD=the actual time of departure, STA=the stated time of arrival.]

The airplane might have flown from Benghazi to El Beida with its transponder off. Flying with the transponder off can pose safety risks as it makes the aircraft less visible to air traffic control and other aircraft equipped with collision avoidance systems. The transponder provides vital information about the aircraft, such as its position, airspeed, and altitude, which is crucial for air traffic controllers to ensure safe separation between aircraft. However, this research could not preclude the possibility that the tracking site failed to capture the flight due to <u>a technical</u> error.

It is not clear whether the official owners of AirMed have a direct connection to the Syrian regime. Andreas and Fanti Hallaq's father, George, has no public-facing connection to AirMed, though he has been seen and identified in <u>photos with his sons for AirMed promotions</u>. George is known in Greek press circles as a <u>representative of the Lebanese investment</u> in the company (the linked article actually describes George Hallaq as the shareholder in dispute with another shareholder who later sold out to the Hallaqs).

However, he does have access to the Assad regime through another channel. On 11 June 2021, the Syrian official news agency <u>SANA</u> reported George Hallaq's visit to Syria in his capacity as Assistant to the President of the <u>Cooperative Republic of Guyana</u>, as Guyana's Minister of Southern Europe (other news articles specify Greece), the Middle East and Africa, and as Special Envoy of the President. Hallaq met with Faisal Al-Miqdad, Syrian Minister of Foreign Affairs and Expatriates. The two sides agreed to coordinate and consult on various issues of bilateral cooperation between the two countries and in international forums.

The earliest activity of George Hallaq as an official envoy of the President of Guyana dates back to 2006, according to what's available from open sources. We could not find information on how Mr. Hallaq came to this position nor if he holds Guyanian citizenship.



Photo (13): George Hallaq with Faisal Al-Miqdad.

Source: Syrian Arab News Agency article (in Arabic–Google Translate "Mekdad is discussing with the Special Envoy of the President of Guyana bilateral relations and means of enhancing them," published 11 June 2021, accessed 28 August 2023

# **Appendix 1: Air Mediterranean's Fleet**

Air Med is recorded as having three planes in its fleet, tail registrations SX-MAH, SX-MAM, and SX-MAT (Its <u>initial registration</u> with the Hellenic Chambers of Commerce indicates only two planes; SX-MAH appears to have been acquired later).

#### **SX-MAH**

According to <u>FlightRadar24</u>, SX-MAH is a Boeing 737-405 operated by Air Med, Type Code B734, Mode S 46B428, Serial No. (MSN) 24643, Age (May 1990) 33 years. It has no flight history for the past five months (from 30 April 2023).

#### **SX-MAM**

According to <u>FlightRadar24</u>, SX-MAM is a Boeing 737-405 operated by Air Med, Type Code B734, Mode S 46B42D, Serial No. (MSN) 28097, Age (Jul 1997) 26 years. It has made only <u>one flight in the past</u> five months, from Barcelona to Tel Aviv as <u>Bluebird Airways</u> (Greece). SX-MAM was also subleased at least once during January 2020–October 2021 to <u>Felix Airways</u> (Yemen).

<u>Planespotters.net</u> corrects the aircraft type to a Boeing 737-446, and adds that SX-MAM was leased <u>from</u> Air Med from June to October 2021 by <u>Felix Airways</u>, headquartered in Yemen. Felix Airways had also leased the plane once before from Air Med, from 12 October 2020 to 12 April 2021. But their website is dark now—they appear to have gone out of business.

#### **SX-MAT**

From FlightRadar24: SX-MAT is a Boeing 737-446 operated by Air Med, Type Code B734, Mode S 46B434, Serial Number (MSN) 28831, Age (Jul 1997) 26 years. Planespotters.net adds that it was delivered to Air Med on 1 November 2022 after being "not taken up" by Greece's Aeolian Airlines.

Of AirMed's fleet, only SX-MAT has any <u>flight history</u> at all since 30 April 2023 (SX-MAM had active flights until 14 April 2023, but none since), and in that time the plane has operated, probably under wet lease conditions, for other carriers as well as for Air Med:

- Air Mediterranean
- LEAV Aviation (a German regional airline)
- Sunclass Airlines (a Danish <u>charter service</u>)
- Smartwings (the largest carrier in the Czech Republic)
- AirSerbia (Serbia's national carrier)
- <u>TunisAir</u> (Tunisia's national carrier)

# **Appendix 2: Air Mediterranean Current Administration**

Andreas "Andrew" Hallaq (XAAAAK ANAPEA $\Sigma$  | أندرياس حلاق) was listed as Director of Air Mediterranean on the carrier's website in a Press Release dated 17 January 2017; he was also defined as the Director in an article by Times Aerospace around the same time. Per an announcement filed 4 July 2022 with the Hellenic Chambers of Commerce, he is now listed as a member of the Board of Directors, continuing as of 28 August 2023.

He is the son of Georgios (George) and Nada (Nadia, Nanta) Hallaq, born 1984 in Philadelphia, Pennsylvania. He is self-employed and a resident of Kuwait and temporary resident of Greece. The Hellenic Chambers of Commerce site lists him as "a foreign resident of Greek citizenship."

Fanti Ilias Hallaq (XAAAAK ΦANTI HAIAΣ | فادي الياس حلاق) was listed as CEO of Air Mediterranean on the carrier's website—Press Release dated 6 December 2016. Per an announcement filed 4 July 2022 with the Hellenic Chambers of Commerce, he is now listed as a member of the Board of Directors, continuing as of 28 August 2023.

He is the son of Georgios and Nadia, born 1980 in Beirut, Lebanon. He is a "businessman" of Greek citizenship residing in Smyrni, Greece (an Athens suburb).

**Nada** (**Nadia**, **Nanta**) **Hallaq** (XAΛΛAK NANTA), mother of Andreas and Fanti, born 1958 in Lebanon and residing in Athens, holds the position of <u>Chairman of the Board of Directors</u> of the company, according to the Greek General Commercial Register as of 04 April 2022. Per an <u>announcement</u> filed 4 July 2022 with the Hellenic Chambers of Commerce, she is still listed as Chairman of the Board, but on the Hellenic Chambers page for Air Med she is listed as the president of the company.

**Marios Sambrakos** ( $\Sigma$ AMΠΡΑΚΟΣ ΜΑΡΙΟΣ), a Greek national, was born 1962 in Athens and resides there. Per an <u>announcement</u> filed 4 July 2022 with the Hellenic Chambers of Commerce, he is listed as a member of the Board of Directors.

