

**January 20, 2026**

**DISSEMINATION BY THE LIVINGSTON GROUP, LLC**

**Fara Registration #6344**

The Livingston Group (TLG) represents Mr. Mustafa Cankat Aytek, a Turkish citizen and international businessman and entrepreneur, who was placed on the SDN list pursuant to Executive Order 14024 in December 2023.

Though identified as the sole President of the Executive Board of the Turkik Union, he was actually an Honorary Chairman with no involvement in the commercial activities conducted by the company. Immediately following the designation, in coordination with counsel, Mr. Aytek pursued clarification of the company's activities and commercial transactions. A limited review yielded no violation of local and international law or the sanctions implemented by the United States. Even so, Mr. Aytek resigned from his position as Honorary Chairman effective January 2024 and transferred his shares in the company in December 2024, officially terminating all relations with Turkik Union. See attached background.

Mr. Aytek is part of a well-established family in Turkey and a leader in the Circassian community, an ethnic minority group that was forced to migrate following the Circassian genocide and expulsion by Russia. See attached letter of support. He is also a successful businessman and is non-political. As such, Mr. Aytek does not hold the Old Russian Empire in high regard, nor does he sympathize with today's politics in Russia.

He maintains that he was not complicit in the supply of electronic components to Russia-based companies. To Mr. Aytek, being placed on the SDN list has been distressing personally and professionally, given his innocence, family history, and standing in society.

In advance of filing an official request for removal from the SDN list with the Department of the Treasury, TLG would appreciate the opportunity to speak with you or a representative regarding Mr. Aytek, his designation, and the review process. My colleagues (copied) and I are available via video conference or in person at your earliest convenience.

Enclosures



BAKIRKOY T.C. TR. NOTARY PUBLIC  
ATILLA AKINCI  
Cihangir Mah. E5 Yanyol Londra Astolu  
No: 267 Kat: 1 D: 6 Avcılar/İSTANBUL  
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Roll No

October 24, 2025

No 17781

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TURKISH TRADE REGISTRY GAZETTE

PAGE: 240

From Republic of Turkiye Istanbul Trade Registry Office

Announcement Registration No.: 271568

Central Registration System No.: 0871112408400001

Trade Registration/File No.: 314074-5

24 Ekim 2025

Commercial Title:

TURKIK UNION DİJİTAL TEKNOLOJİ DONUSUM OFİSİ ANONİM SİRKETİ

Address: Senlikkoy Mah. Catal Sk. Kocoglu Sitesi No.:18 Ic Kapi No.: 4 Bakirkoy/Istanbul

TERCÜMEDİR.

The following points regarding the company given above are announced as registered on 19.12.2024 in accordance with the Turkish commercial law and in accordance with the document submitted to our directorate.

Registered Matters: Board of Directors/Authorised Persons, Sole Partnership Information

Supporting Documents for Registration: Board of Directors Decision No. 2024/05 dated 10.12.2024, certified by the Uskudar 13<sup>th</sup> Notary Public on 11.12.2024, with the number 26089, Board of Directors Resolution No. 2024/03 dated 09.12.2024, certified by the Uskudar 13<sup>th</sup> Notary Public on 11.12.2024, with the number 26087, Board of Directors Resolution dated 10.12.2024, certified by the Uskudar 13<sup>th</sup> Notary Public on 11.12.2024, with the number 26090.

## SOLE SHAREHOLDER INFORMATION

The Company is a joint-stock company with a single shareholder. This shareholder is ADEM ARAS, a citizen of the Republic of Turkiye with ID number 391\*\*\*\*\*42, residing at Bakirkoy, Istanbul, Turkiye.

## BOARD OF DIRECTORS/AUTHORISED PERSONS

ADEM ARAS, a citizen of the Republic of Turkiye with ID number 391\*\*\*\*\*42, residing at İSTANBUL / BAKIRKOY, has been elected as a member of the Board of Directors until 10.12.2027.

Previous Member of the Board of Directors position of MUSTAFA CANKAT AYTEK; holder of the 513\*\*\*\*\*80 identification number resident at İSTANBUL / BAKIRKOY Citizen of Republic of Turkiye, is terminated.

ADEM ARAS, a citizen of the Republic of Turkiye with ID number 391\*\*\*\*\*42, residing at İSTANBUL / BAKIRKOY, has been elected as the Chairman of the Board of Directors until 10.12.2027.

## NEWLY APPOINTED REPRESENTATIVES

ADEM ARAS, a citizen of the Republic of Turkiye with ID number 391\*\*\*\*\*42, residing at İSTANBUL / BAKIRKOY, has been selected as AUTHORISED TO REPRESENT until 10.12.2027. Authorization Form: Authorized to Represent Solely.

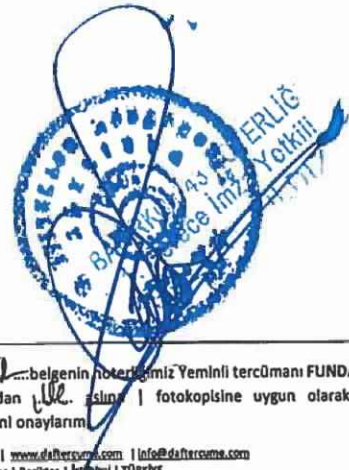
## CHANGES IN TASK DISTRIBUTION

Previous Chairman of the Board of Directors position of MUSTAFA CANKAT AYTEK; holder of the 513\*\*\*\*\*80 identification number resident at İSTANBUL/BAKIRKOY Citizen of Republic of Turkiye, is terminated.

Previous Deputy Chairman of the Board of Directors position of ADEM ARAS; holder of the 391\*\*\*\*\*42 identification number resident at İSTANBUL/BAKIRKOY Citizen of Republic of Turkiye, is terminated.

Previous (Chairman of the Board of Directors) Authorised to Represent position of MUSTAFA CANKAT AYTEK; holder of the 513\*\*\*\*\*80 identification number resident at İSTANBUL/BAKIRKOY Citizen of Republic of Turkiye, is terminated.

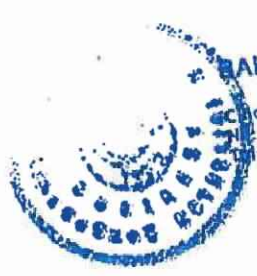
(19771635)



İşbu belgeyi...acime | fotokopisine uygun olarak tam ve doğru olarak tercüme ettiğimi beyan ederim.  
Yeminli Tercüman: FUNDA AYDIN

İşbu belgeyi...acime | fotokopisine uygun olarak tercüme ettiğimi onaylarım.

DAF Tercüme Eğitim ve Dil Hizmetleri Tic. Ltd. Şti. | (+90) 212 517 62 62 | www.daftercu.me.com | info@daftercu.me.com  
Etiler Mah. Nispetiye Cad. Etiler Apt. No.:104 D:2 Etiler | Beşiktaş | İstanbul | TÜRKİYE



T.C.  
BAKIRKÖY 43. NOTERLİĞİ  
ATILLA AKINCI  
Etiler Mah. E5 Yanyol Londra Asfaltı  
267 Kat: 1 D: 6 Avcılar/İSTANBUL  
T: 0212 422 24 21 - 0212 422 24 20

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№17785



24 Ekim 2025

TURKIK UNION DİJİTAL TEKNOLOJİ DONUSUM OFİSİ A.S.  
TO THE CHAIRMAN OF THE BOARD OF DIRECTORS

TERCÜMEDİR.

**Subject:** Request for Information Regarding the Company's Commercial Transactions and Compliance with International Law  
**Date:** 15.12.2023

Dear Sir/Madam,

My client, Mr. Mustafa Cankat AYTEK, whom I represent, holds the position of **Honorary President** of your company. Due to this position, it is essential that my client be informed about the company's activities and commercial transactions. As a result of your company's activities, your company and my client were included in the United States sanctions list on December 12, 2023.

In this context, we kindly request detailed information regarding the company's recent commercial transactions, contracts, partnerships, goods and services procurement processes, and international activities. In particular, we require clarification **as to whether these transactions have been conducted in accordance with international trade law, financial regulations, and relevant national regulations.**

This information is important both as a requirement of my client's right to be informed about the company's general activities in his capacity as honorary chairman, and in order to prevent any legal and financial risks that may arise in the future.

In this regard, I kindly request that the documents and explanations relating to the requested information be sent to me in writing **within 5 (five) days** at the latest.

**Appendix 1: Sample Power of Attorney**

Kind regards,

Attorney

Ahmet Alp KIZILCIK

[Signature]



Emniyettepe Mah. Ahikent Villaları Sadabad Sok. No.: 9  
Eyup/34060 İstanbul – Republic of Turkey  
Turkish Bar Association Reg. No.:57414/İstanbul Bar

P/F: +90 544 555 59 34

İşbu belgeyi ..... aslında | fotokopisine uygun olarak tam ve doğru olarak tercüme ettiğimi beyan ederim.  
Yeminli Tercüman: FUNDA AYDIN

İşbu belge nin noterliğimle yeminli tercümanı FUNDA AYDIN tarafından ..... | fotokopisine uygun olarak tercüme edildiğini onaylarım.

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THE LIVINGSTON GROUP PROVIDES REPRESENTATION FOR MUSTAFA CANKAT AYTEK, A TURKISH CITIZEN AND INTERNATIONAL BUSINESSMAN AND ENTREPRENEUR. ADDITIONAL INFORMATION IS AVAILABLE AT THE DEPARTMENT OF JUSTICE, WASHINGTON, DC.

T.C.  
BAKIRKÖY 49. NOTERLİĞİ  
ATILLA AKINCI  
Cihangir Mah. 53. Yönelim İşhanı Asfaltlı  
No: 267 Kat: 1 D: 6 Avcılar/İSTANBUL  
Tel: 0212 422 24 21 - 0212 422 24 20



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№ 17786  
TERCÜMEDİR.

24 Ekim 2025

18.12.2023

Dear Atty. Ahmet Alp KIZILCIK,

Your letter regarding the Request for Information on the Company's Commercial Transactions and Compliance with International Law was received by us on December 16, 2023. Our views and responses to your requests are as follows:

1. While Mr. Mustafa Cankat AYTEK holds the title of Honorary Chairman of our company, we are unable to comprehend the rationale for his inclusion on the sanctions list in a personal capacity, given that he has no involvement in the commercial activities conducted by our company.
2. We are also unable to understand the reason for our company's inclusion on the embargo list. Indeed, all of our commercial activities are conducted in full compliance with the law, and the products we trade consist solely of items not subject to any embargo.
3. The allegations and grounds leading to the imposition of sanctions on the company have also been examined by us, and it has been determined that they are unfounded, unjust, and were made entirely without investigation or consideration of our defense. Indeed, the transactions in question involved products freely traded and accessible in national and international markets, and under no circumstances were any prohibited products knowingly or indirectly sold to sanctioned countries or regions. Our commercial activities conducted within the borders of Türkiye were carried out purely on a commercial basis, with products simply purchased and sold through Turkish customs to international firms, without any ulterior motive or malintent.
4. As a medium-sized company, we have no ability to track the end user of the products and components we sell, which are not subject to any restrictions on sale, regarding the purpose and intent for which they will use the products and components after the sale, or to whom they may indirectly sell them. Furthermore, expecting such tracking to be carried out is contrary to the nature of trade. Furthermore, carrying out such monitoring is not a legal requirement.
5. Since the establishment, our company has conducted its activities in accordance with local and international legal standards.
6. While we cannot share the company's sensitive and confidential documents with you, we wish to inform you that, under the supervision of our company officials, you may review the documents on-site on Wednesday, December 20, 2023.

King regards;

Adem ARAS  
General Manager  
On behalf of  
Turkik Union Dijital Teknoloji Donusum Ofisi A.S.



Turkik Union Dijital Teknoloji Donusum Ofisi Anonim Sirketi  
Turkik Union Digital Technology Transformation Office Joint Stock Company  
İSTANBUL WORLD TRADE CENTER

Yesilkoy Mah. Atatürk Cad. Egs Business Park No.: 12 1c Kapı No.: 8 Bakirkoy / Istanbul - REPUBLIC OF TURKEY

Tel.: +90 (212) 662 07 93 | info@turkikunion.com  
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Yeminli Tercüman: FUNDA AYDIN

İşbu belgeyi... belgenin noteriğimi... aklamışım | fotokopisine uygun olarak tercüme edildiğini onaylıyorum.

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Etiler Mah. Nispetiye Cad. Etiler Apt. No.:104 D.:2 Etiler | Beşiktaş | İstanbul | TÜRKİYE

# TERCÜME



## KAFFED

Address: Beştepe Mah. Meriç Sk. No:44 Yenimahalle -  
ANKARA

Tel: 0 (312) 222 85 89 -223 51 59 -0 (506) 399 04 01

Email: info@kaffed.org

### FEDERATION OF CAUCASIAN ASSOCIATIONS

Reference No.: 2025/ 77

Date: 24/12/2025

Subject: Regarding the Removal of Mustafa Cankat Aytek from U.S. Sanctions Lists  
Attention: Relevant Authorities of the Government of the United States of America

On behalf of the Federation of Caucasian Associations (KAFFED), we respectfully submit this official petition concerning the sanctions currently imposed on Mr. Mustafa Cankat Aytek, and we hereby request that the said sanctions decision be comprehensively, objectively, and fairly re-evaluated.

The peoples of the Caucasus experienced profound humanitarian tragedies during the military expansion of the Russian Empire into the region in the 19th century. This historical period resulted in widespread violence, mass forced migrations, and the disintegration of local social structures, leaving permanent marks on the collective memory of the Caucasian peoples. As a result of these tragic developments, millions of people of Caucasian origin were forced to leave their ancestral homelands, leading to the formation of large diaspora communities, primarily in Turkey, as well as in the Middle East, North America, and Europe. Today, Caucasian civil society organizations operating in these countries continue their efforts to preserve cultural heritage, historical memory, and social solidarity.

The Aytek family is a well-established family in Turkey, recognized for its respectability and reputation, and has made long-standing contributions to the Republic of Türkiye and its institutions. Mr. Mustafa Cankat Aytek is an individual known for his sense of social responsibility and his work in the civil sphere, and is held in high esteem by the public. Considering both his personal background and the historical experiences of the communities to which he belongs, we believe that associating him with Russian state interests does not reflect the truth. Members of Caucasian communities living in the diaspora engage in numerous international meetings and contacts aimed at establishing communication channels with their ancestral homelands, fostering dialogue, and strengthening mutual understanding. These activities are carried out entirely within the framework of civil society diplomacy and do not constitute any political, interstate, or official state representation.

In this context, we respectfully request from the relevant authorities of the United States of America that Mr. Mustafa Cankat Aytek's status under the sanctions regime be re-evaluated in a transparent, objective, and evidence-based manner, and that, in order to remedy this injustice, Mr. Mustafa Cankat Aytek be removed from the U.S. sanctions lists.

The Federation of Caucasian Associations is committed to the principles of the rule of law, human rights, justice, and peaceful dialogue. We firmly believe that correcting this matter would also be consistent with the fundamental values upheld by the United States of America. We respectfully submit this petition for your consideration and state that we are ready to provide additional information and explanations if requested.

Respectfully yours,  
[signature]  
Unal ULUÇAY  
General President

Türkçe.....Lisanından İngilizceLisanına  
Datamız yeminli tercümanlarından  
Mehmet Sertac Ayhan.....  
tarafından tercüme edildiğini onaylarım.

Tercüme Aslına Uygun Olarak  
Tarafımdan Yapılmıştır  
Yeminli Tercüman



**KAFFED**

Adres: Beştepe Mah. Meriç Sk. No:44 Yenimahalle - ANKARA

Tel: 0 (312) 222 85 89 -223 51 59 -0 (506) 399 04 01

E posta : info@kaffed.org

**K A F K A S D E R N E K L E R İ F E D E R A S Y O N U**

Sayı 2025/77

Tarih: 24/12/2025

Konu : Mustafa Cankat Aytek'in ABD Yaptırım Listelerinden Çıkarılması Hk.

İlgi : Amerika Birleşik Devletleri Hükümeti'nin İlgili Makamlarının Dikkatine

Kafkas Dernekleri Federasyonu (KAFFED) adına, Sayın Mustafa Cankat Aytek hakkında uygulanmakta olan yaptırımlara ilişkin bu resmî dilekçeyi saygıyla sunuyor; söz konusu yaptırım kararının kapsamlı, objektif ve adil biçimde yeniden değerlendirilmesini talep ediyoruz.

Kafkasya halkları, 19. yüzyılda Rus İmparatorluğu'nun bölgeye yönelik askerî yayılması sürecinde derin insani trajediler yaşamıştır. Bu tarihsel dönem; yaygın şiddet, kitlesel zorunlu göçler ve yerel toplumsal yapıların dağılmasıyla sonuçlanmış, Kafkasya halklarının kolektif hafızasında kalıcı izler bırakmıştır. Bu trajik gelişmeler neticesinde, Kafkasya kökenli milyonlarca insan ata yurtlarını terk etmek zorunda kalmış; başta Türkiye olmak üzere Orta Doğu, Kuzey Amerika ve Avrupa'da geniş diaspora toplulukları oluşmuştur. Günümüzde bu ülkelerde faaliyet gösteren Kafkas sivil toplum kuruluşları, kültürel mirasın, tarihsel hafızanın ve toplumsal dayanışmanın korunması için çalışmalarını sürdürmektedir.

Aytek ailesi, Türkiye'de saygınlığı ve itibarıyla tanınan, Türkiye Cumhuriyeti Devleti'ne ve kurumlarına uzun yıllara dayanan katkılar sunmuş köklü bir ailedir. Sayın Mustafa Cankat Aytek, toplumsal sorumluluk bilinci ve sivil alandaki çalışmalarıyla tanınan, kamuoyunda saygı gören bir şahsiyettir. Kendisinin Rus devlet çıkarlarıyla ilişkilendirilmesinin gerek kişisel geçmişi gerekse mensubu olduğu toplulukların tarihsel deneyimleri dikkate alındığında gerçeği yansıtmadığı kanaatindeyiz. Diasporada yaşayan Kafkas halklarının mensupları anavatanları ile iletişim kanalları oluşturma, diyalog geliştirme ve karşılıklı anlayışı güçlendirme yönünde çok sayıda uluslararası görüşme ve temas gerçekleştirmektedir. Bu faaliyetler tamamen sivil toplum diplomasisi çerçevesinde yürütülmekte olup, herhangi bir siyasi, devletlerarası ya da resmî devlet temsili niteliği taşımamaktadır.

Bu çerçevede, Amerika Birleşik Devletleri'nin ilgili makamlarından; Sayın Mustafa Cankat Aytek'in yaptırım kapsamındaki durumunun şeffaf, objektif ve delile dayalı biçimde yeniden değerlendirilmesini ve ortaya çıkan bu haksızlığın giderilmesi amacıyla Sayın Mustafa Cankat Aytek'in ABD yaptırım listelerinden çıkarılmasını saygıyla talep ediyoruz.

Kafkas Dernekleri Federasyonu; hukukun üstünlüğü, insan hakları, adalet ve barışçıl diyalog ilkelerine bağlıdır. Bu meselenin düzeltilmesinin, Amerika Birleşik Devletleri'nin savunduğu temel değerlerle de uyumlu olacağına inancımız tamdır. Bu dilekçeyi saygıyla bilgilerinize sunar; talep edilmesi hâlinde ek bilgi ve açıklama sağlamaya hazır olduğumuzu bildiririz.

Saygılarımızla,

**Ünal ULUÇAY**  
Genel Başkan