

## 中華民國證券投資信託暨顧問商業同業公會 函

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受文者：

發文日期：中華民國107年12月4日  
發文字號：中信顧字第1070053037號  
速別：普通件  
密等及解密條件或保密期限：  
附件：如文

主旨：函轉金融監督管理委員會檢送有關美國財政部107年11月20日公告新增6位個人及3個實體於制裁名單（SDN list）一案，如發現疑似洗錢或資恐交易，請向法務部調查局申報，並注意該等交易風險，請查照。

說明：依金融監督管理委員會107年11月30日金管證券字第10703450931號函辦理。

正本：本公會各投信會員公司、本公會各投顧會員公司  
副本：

理事長 張錫

裝

訂

線

檔 號：

保存年限：

# 金融監督管理委員會 函

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受文者：中華民國證券投資信託暨顧問商業同業公會

發文日期：中華民國107年11月30日

發文字號：金管證券字第10703450931號

速別：普通件

密等及解密條件或保密期限：

附件：如主旨(第一件 A45020000DORGUNIT107113003450931A2B345093.PDF)

主旨：有關美國財政部107年11月20日公告新增6位個人及3個實體於制裁名單 (SDN list) 一案，請轉知所屬會員，如發現疑似洗錢或資恐交易，請向法務部調查局申報，並注意該等交易風險，請查照。

說明：

- 一、依據駐美國代表處經濟組107年11月20日經美字第1070001407號函副本辦理。
- 二、檢附駐美國代表處經濟組函文及美國財政部107年11月20日公告影本各一份。

正本：中華民國證券商業同業公會、中華民國期貨業商業同業公會、中華民國證券投資信託暨顧問商業同業公會、中華民國會計師公會全國聯合會 (均含附件)

副本：臺灣證券交易所股份有限公司、財團法人中華民國證券櫃檯買賣中心、臺灣期貨交易所股份有限公司、臺灣集中保管結算所股份有限公司、金融監督管理委員會證券期貨局 (證券發行組、投信投顧組、會計審計組、期貨管理組)



授權單位主管決行並鈐印



檔 號：

保存年限：

## 駐美國代表處經濟組 函

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受文者：金融監督管理委員會

發文日期：中華民國107年11月20日

發文字號：經美字第1070001407號

速別：普通件

密等及解密條件或保密期限：

附件：如文(1070001407\_Attach1.pdf、1070001407\_Attach2.docx、1070001407\_Attach3.pdf、1070001407\_Attach4.pdf、1070001407\_Attach5.pdf)

主旨：陳報美國增列6位個人與3個實體為受制裁對象事，敬請查照。

說明：

- 一、美國務院與財政部於本(2018)年11月20日發布新聞稿略以，認定ISIS幹部Hajji Abd al-Nasir從事恐怖活動，爰將其分別列於所屬之制裁名單。
- 二、美財政部外國資產管制局(OFAC)另以敘利亞籍Mohammad Amer Alchwiki透過其依俄羅斯法設立之Global Vision Group公司，將伊朗石油出口至敘利亞，並以人道相關貿易為掩護，提供資金予伊朗革命衛隊聖城旅(IRGC-QF)、哈瑪斯(HAMAS)及真主黨(Hizballah)等恐怖組織為由，以及將涉入前述伊朗石油出口網路之俄國能源部所屬Promsyrioi mport公司及主管Andrey Dogaev、伊朗央行官員Rasul Sajjad、Hossein Yaghoobi、伊朗Tadbir Kish Medical and Pharmaceutical Company及真主黨黨員Mhuammad Qasim

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al-Bazzal等，共計6位個人與3個實體增列於該部制裁名單(SDN list)，凍結渠於美國境內之資產與交易。

三、鑑於前揭受制裁對象係採用相關措施，企圖規避美國之制裁，OFAC並與國務院、海岸防衛隊等共同就出口石油至敘利亞之規避行為態樣與涉及之制裁風險，提出諮詢意見略以：

- (一)規避行為態樣包括偽變造貨物與船運文件、海上駁船交易、關閉船舶自動辨識系統(AIS)等。
- (二)為避免被美國認定涉及規避制裁之違反行為，企業或個人宜採取可降低參與資恐或曝險之作為，包括強化洗錢防制或反資恐作為、監控AIS操縱、檢視所有船運文件、與夥伴國家溝通，善用各可得資訊等。
- (三)針對位於美國境內之違反者，可按每一違反行為，處以兩倍違法所得或29萬5,141美元之民事罰鍰(擇較高者)。
- (四)OFAC另就於2016年至2018年間載運石油至敘利亞之船舶，提出乙份船舶清單(non-exhaustive list of vessels)。

四、檢附上述國務院與財政部新聞稿及諮詢意見等如附件，併請卓參。

正本：經濟部國際貿易局

副本：金融監督管理委員會、交通部

2018/12/21  
交 09.09 章

# U.S. Department of State

## Diplomacy in Action

### State Department Terrorist Designation of Hajji 'Abd al-Nasir

Media Note

Office of the Spokesperson

Washington, DC

November 20, 2018



The Department of State has designated Hajji 'Abd al-Nasir as a Specially Designated Global Terrorist (SDGT) under Section 1(b) of Executive Order 13224, which imposes sanctions on foreign persons who have committed, or pose a significant risk of committing, acts of terrorism. Today's designation seeks to deny al-Nasir the resources to plan and carry out terrorist attacks. Among other consequences, all of his property and interests subject to U.S. jurisdiction are blocked, and U.S. persons are generally prohibited from engaging in any transactions with him.

Hajji 'Abd al-Nasir has held several leadership positions in the Islamic State of Iraq and Syria (ISIS), a U.S.-designated Foreign Terrorist Organization (FTO) and SDGT. Within the past five years, al-Nasir has served as an ISIS Military Amir in Syria as well as chair of the ISIS Delegated Committee, the council that reports to ISIS leader Abu Bakr al-Baghdadi and exercises administrative control of the terrorist organization's affairs. The Delegated Committee is responsible for planning and issuing orders related to ISIS's military operations, tax collections, religious police, and commercial and security operations.

"ISIS is down but not out," said Ambassador Nathan A. Sales, Coordinator for Counterterrorism at the Department of State. "As ISIS continues to lose ground on the battlefield, we must starve it of the resources it uses to commit terrorism around the world. Today's designation is another step towards ensuring the enduring defeat of ISIS."

Today's action notifies the U.S. public and the international community that Hajji 'Abd al-Nasir has committed, or poses a significant risk of committing, acts of terrorism. Designations of terrorist individuals and groups expose and isolate them, and deny them access to the U.S. financial system. Moreover, designations can assist the law enforcement actions of other U.S. agencies and governments. Additionally, in a coordinated global action taken yesterday, the United Nations Security Council's 1267 ISIL and al-Qa'ida Sanction Committee added al-Nasir to its Sanctions List, subjecting al-Nasir to an international asset freeze, travel ban, and arms embargo.

A list of State Department-designated FTOs and SDGTs is available here: <http://www.state.gov/j/ct/list/index.htm> (<https://www.state.gov/j/ct/list/index.htm>).

The Office of Website Management, Bureau of Public Affairs, manages this site as a portal for information from the U.S. State Department.

External links to other Internet sites should not be construed as an endorsement of the views or privacy policies contained therein.

Note: documents in Portable Document Format (PDF) require Adobe Acrobat Reader 5.0 or higher to view, [download Adobe Acrobat Reader \(http://get.adobe.com/reader/\)](http://get.adobe.com/reader/).



## PRESS RELEASES

# Treasury Designates Illicit Russia-Iran Oil Network Supporting the Assad Regime, Hizballah, and HAMAS

November 20, 2018

WASHINGTON – Today, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) is designating nine targets in an international network through which the Iranian regime, working with Russian companies, provides millions of barrels of oil to the Syrian government. The Assad regime, in turn, facilitates the movement of hundreds of millions of U.S. dollars (USD) to the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) for onward transfer to HAMAS and Hizballah. U.S. sanctions prohibit material support to the Government of Syria, including shipments of oil to Syrian government-controlled ports, as well as material support to designated terrorist groups.

“Today we are acting against a complex scheme Iran and Russia have used to bolster the Assad regime and generate funds for Iranian malign activity,” said Treasury Secretary Steven Mnuchin. “Central Bank of Iran officials continue to exploit the international financial system, and in this case even used a company whose name suggests a trade in humanitarian goods as a tool to facilitate financial transfers supporting this oil scheme. We are issuing an Advisory today identifying the grave risks to the maritime community if they participate in shipping oil to the Government of Syria. The United States is committed to imposing a financial toll on Iran, Russia, and others for their efforts to solidify Assad’s authoritarian rule, as well as disrupt the Iranian regime’s funding of terrorist organizations.”

Today’s designations target critical actors in this scheme, including Syrian national Mohammad Amer Alchwiki (Alchwiki) and his Russia-based company, Global Vision Group. Alchwiki and his company are central to (1) the delivery of oil from Iran to Syria, and (2) the transfer of funds to the IRGC-QF’s lethal proxies. Today’s designations also highlight the important role that Central Bank of Iran (CBI) officials play in facilitating this scheme.

Throughout the Syrian Civil War, the Iranian regime has continued to provide military and financial support to the Assad regime, enabling it to commit mass atrocities against the Syrian people. The Iranian regime also continues to fund terrorism, providing hundreds of millions of

dollars to its regional proxies and U.S.-designated terrorist organizations, HAMAS, and Lebanese Hizballah (Hizballah), further destabilizing the region. All the while, Iranian citizens suffer from their government's neglect and corruption, including through a lack of stable food and water supplies, electricity, and other essential needs.

"The Iranian regime continues to prioritize spending money on fomenting terror over supporting its own people," said Undersecretary for Terrorism and Financial Intelligence, Sigal Mandelker. "This is yet another example of the regime using the proceeds of millions of barrels of its oil to fund terrorists and the murderous Assad regime to the detriment of its own people. The United States will aggressively seek to impose sanctions against any party involved in shipping oil to Syria, or seeking to evade our sanctions on Iranian oil. Shipping companies, insurers, vessel owners, managers, and operators should all be aware of the grave consequences of engaging in sanctionable conduct involving Iranian oil shipments."

U.S. sanctions prohibit material support to the Assad regime and U.S.-designated terrorist groups, including the IRGC-QF, HAMAS, and Hizballah. All assets subject to U.S. jurisdiction of the individuals and entities added to the Specially Designated Nationals List (SDN List), and of any other entities blocked by operation of law as a result of their ownership by a sanctioned party, are frozen, and U.S. persons are generally prohibited from dealings with them.

## **RUSSIAN AND IRANIAN GOVERNMENTS FACILITATION OF OIL SHIPMENTS TO ASSAD**

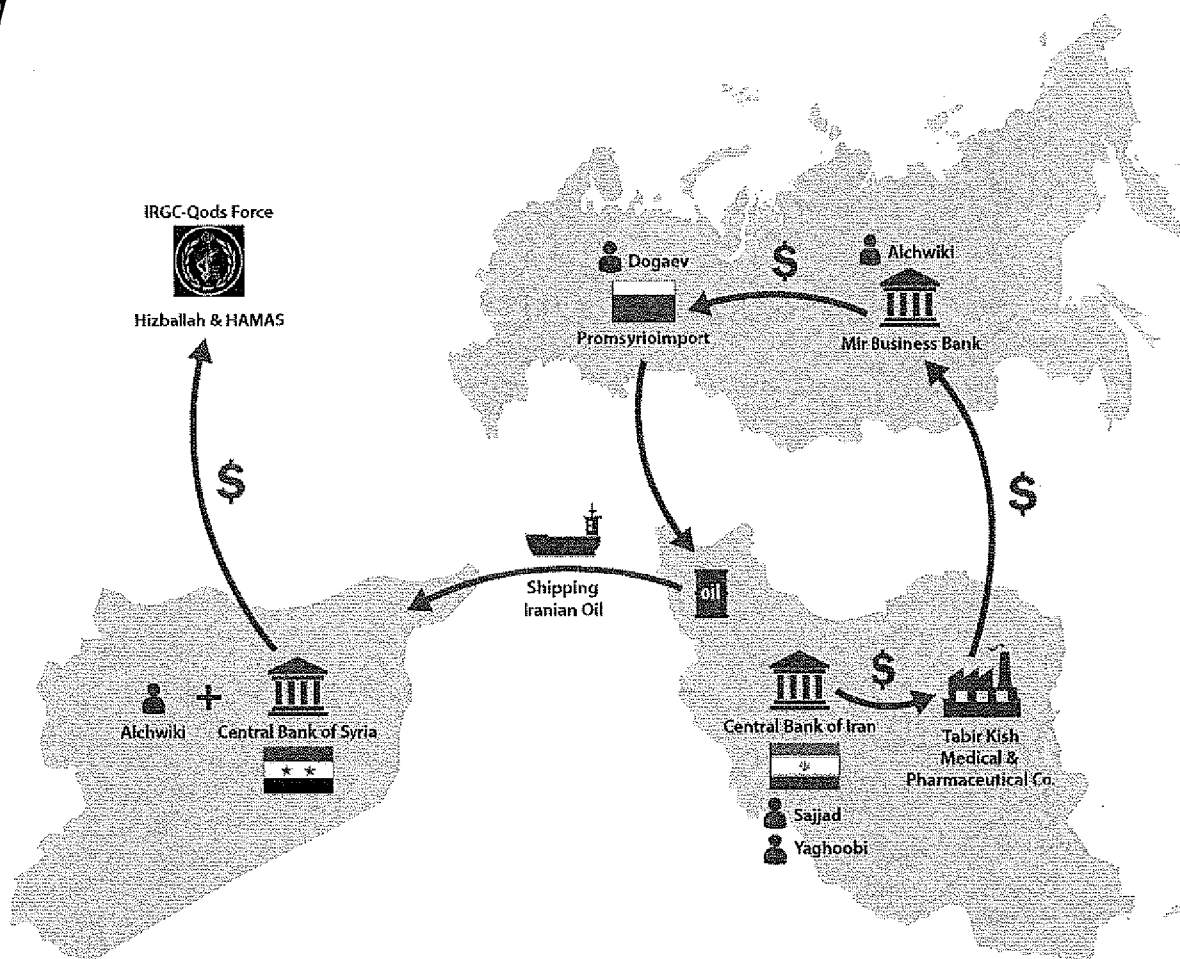
Using an array of mechanisms designed to obfuscate their activities, Alchwiki's Russia-based Global Vision Group coordinates with the National Iranian Oil Company (NIOC) to remit payment for oil being shipped to Syria.

Global Vision Group does this by working with state-owned Russian company Promsyrioimport, a subsidiary of the Russian Ministry of Energy (Minenergo), to facilitate shipments of Iranian oil from NIOC to Syria. To deliver the oil from Iran to the Syrian regime, Global Vision Group uses a number of vessels, many of which have been insured by European companies. Since at least 2014, vessels carrying Iranian oil have switched off the Automatic Identification System (AIS) onboard before delivering oil to Syria, as a means of concealing the true destination and recipient of this Iranian oil.

Today, OFAC is issuing an Advisory to the maritime community regarding the sanctions risks of shipping oil to the Government of Syria, including a non-exhaustive list of vessels that have delivered oil to Syria since 2016.

To assist Syria in paying Russia for this oil, Iran sends funds to Russia through Alchwiki and Global Vision Group. To conceal its involvement in these transactions, the CBI makes these

payments to Mir Business Bank using Iran-based Tadbir Kish Medical and Pharmaceutical Company (Tadbir Kish). Despite the reference to humanitarian goods in Tadbir Kish’s name, the company has repeatedly been used to facilitate illicit transfers in support of this oil scheme. Following the CBI’s transfer of funds from Tadbir Kish to Global Vision Group in Russia, Global Vision Group transfers payment to Russia state-owned Promsyrioimport to pay for the oil. Mir Business Bank was designated on November 5, 2018, pursuant to Executive Order (E.O.) 13224, and is a wholly-owned subsidiary of Iran’s Bank Melli, which was designated for acting as conduit for payments to IRGC-QF.



*Visual Depiction of the Alchwiki Network*

CBI senior officials play a critical role in this arrangement. Rasul Sajjad, CBI’s International Department Director, and Hossein Yaghoobi, CBI’s Vice Governor for International Affairs, have both assisted in facilitating Alchwiki’s transfers. Andrey Dogaev, First Deputy Director of Promsyrioimport, has worked closely with Yaghoobi to coordinate the sale of Iranian crude to the Government of Syria.



*Photo of Mohammad Amer Alchwiki and Andrey Dogaev*

Through this scheme, Promsyrimport, working with Global Vision Group, has exported millions of barrels of Iranian oil into Syria. This scheme has also funneled millions of dollars between the CBI and Alchwiki's Mir Business Bank account in Russia.



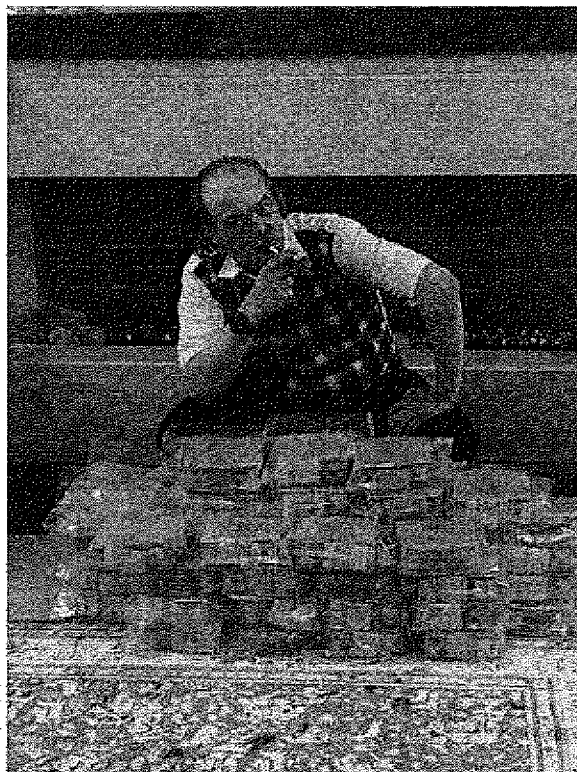
*Alchwiki posing in Moscow*

## **ALCHWIKI WORKING IN TANDEM WITH IRGC-OF TO PROVIDE FUNDS TO HIZBALLAH AND HAMAS**

In addition to the scheme above, Alchwiki also acts as a critical conduit for the transfer of hundreds of millions of USD banknotes to Iranian proxies in the Levant, including U.S. designated foreign terrorist organizations and specially designated global terrorist groups Hizballah and HAMAS. Using the Central Bank of Syria, Alchwiki coordinates the transfers with Hizballah official Muhammad Qasir, who heads the Hizballah unit responsible for facilitating the transfer of weapons, technology, and other support from Syria to Lebanon. OFAC designated Qasir on May 15, 2018, for acting for or on behalf of Hizballah.

To: Mr. Rasoul Sajjad  
 Director International Dept.  
 Regarding your crediting the  
 Account of the CBS number: 83  
 in the CBI, I am Mr. Fadi and  
 Mr. HMD Amer Alchwiki we  
 confirming that the amount of  
 (63) H. sixty three million USD  
 has been counted and Received by  
 us on 17/04/2018

Mr. Fadi  
 Mr. HMD Amer  
 Alchwiki



*A letter from Alchwiki and Muhammad Qasir, a.k.a. Mr. Fadi, to Rasoul Sajjad of CBI confirming receipt of U.S. \$63 million (left), and Alchwiki posing with stacks of USD (right)*

Senior CBI officials played a key role in this scheme, working with their counterparts in Syria and Alchwiki to facilitate transfer of foreign currency to Hizballah, and together have coordinated the transfer of millions of dollars through this network. Specifically, CBI Official, Hossein Yaghoobi, who also has a history of working with Hizballah in Lebanon, has coordinated financial transfers intended for Hizballah with the IRGC-QF and Hizballah personnel. Muhammad Qasim al-Bazzal, a Hizballah member and associate of Qasir, is being designated for his support to Hizballah.

## DESIGNATION BASES AND AUTHORITIES

Mohamed Amer Alchwiki is being designated pursuant to E.O. 13582 for (1) having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of the Central Bank of Syria, an entity identified as meeting the definition of the Government of Syria, which is blocked under E.O. 13582 and (2) having acted or purported to act for or on behalf of Global Vision Group. Alchwiki is also being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of Hizballah and IRGC-QF.

Global Vision Group is being designated pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, Syria's Baniyas Refinery Company and the Central Bank of Syria, entities identified as meeting the definition of the Government of Syria. Global Vision Group is also being designated pursuant to E.O. 13224.

Promsyrioimport is being designated pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of the Syrian Company for Oil Transport (SCOT), an entity identified as meeting the definition of the Government of Syria, which is blocked under E.O. 13582.

Andrey Dogaev is being designated pursuant to E.O. 13582 for having acted or purported to act, for or on behalf of directly or indirectly, Promsyrioimport.

Mir Business Bank is being designated pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of Global Vision Group.

Tadbir Kish Medical and Pharmaceutical Company is being designated pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of Global Vision Group.

Rasul Sajjad and Hossein Yaghoobi are being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of the IRGC-QF.

Muhammad Qasim al-Bazzal is being designated pursuant to E.O. 13224 for acting for or on behalf of Hizballah.

Identifying information on the individuals and entities designated today.



2018/11/20

Counter Terrorism Designations and Designation Update; Syria Designations; Publication of Syria Shipping Advisory

## U.S. DEPARTMENT OF THE TREASURY

## Resource Center

## Counter Terrorism Designations and Designation Update; Syria Designations; Publication of Syria Shipping Advisory

11/20/2018

The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), with the U.S. Department of State and the U.S. Coast Guard, is issuing this advisory to alert persons globally to the significant U.S. sanctions risks for parties involved in petroleum shipments to Syria. These shipments create significant sanctions risk for entities and individuals in the shipping industry, including insurers, shipping companies, financial institutions, and vessel owners, managers, and operators.

In addition, the following changes to the Specially Designated Nationals List occurred today:

## The following individuals have been added to OFAC's SDN List:

'ABD AL-NASIR, Hajji (a.k.a. "ABD AL-NASR, Hajji"; a.k.a. "ABDELNASSER, Hajji"; a.k.a. "AL-KHUWAYT, Taha"), Syria; DOB 1967; alt. DOB 1966; alt. DOB 1968; POB Tall 'Afar, Iraq; nationality Iraq (individual) [SDGT].

AL-BAZZAL, Muhammad Qasim (a.k.a. BAZZAL, Mohamad; a.k.a. "MUPIN"); DOB 26 Aug 1984; POB Ba'albakk, Lebanon; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; Gender Male; Passport LR0510789; Identification Number 18349929 (Lebanon) (individual) [SDGT] (Linked To: HIZBALLAH).

ALCHWIKI, Mhd Amer (a.k.a. AL CHWIKI, Mohamad Amer Mohamad Akram; a.k.a. ALCHWIKI, Amer; a.k.a. ALCHWIKI, Amer Mhd; a.k.a. ALCHWIKI, Mohamad Amer; a.k.a. AL-SHUWAYKI, Muhammad 'Amir Muhammad Akram; a.k.a. AL-SHWEIKI, Mohamad Amer; a.k.a. AL-SHWEIKI, Muhammad Omar; a.k.a. ALSHWIKI, Mhd Amer (Cyrillic: АЛЬШВИКИ, Мхд Амер); a.k.a. CHWIKI, Mohammad Amer; a.k.a. SHUWAYKI, Mohamad Amer; a.k.a. SHWEIKI, Mohammad Amer), 71 Linton Road, Acton, London W3 9HL, United Kingdom; Syria; DOB 04 Sep 1972; POB Damascus, Syria; nationality Syria; citizen Syria; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; alt. Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport N012430661; alt. Passport N010794545; alt. Passport N007024509; alt. Passport N005668098 (individual) [SDGT] [SYRIA] [IRGC] [IFSR] (Linked To: GLOBAL VISION GROUP; Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)-QODS FORCE; Linked To: HIZBALLAH).

DOGAEV, Andrey (a.k.a. DOGAYEV, Andrey; a.k.a. DOGAYEV, Andrey Yuryevich (Cyrillic: ДОГАЕВ, Андрей Юрьевич)); DOB 19 Dec 1955; POB Russia; Gender Male; Passport 72 9279533 (Russia) issued 27 Aug 2014 expires 27 Aug 2024; First Deputy Director of Promsyrimport (individual) [SYRIA] (Linked To: PROMSYRIOIMPORT).

SAJJAD, Rasoul (a.k.a. SAJJAD, Rassouf; a.k.a. SAJJAD, Rasul), Iran; DOB 09 Aug 1970; POB Esfahan, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport G9333110 (Iran) issued 03 Mar 2014 expires 03 Mar 2019; Dr (individual) [SDGT] [IRGC] [IFSR] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)-QODS FORCE).

YAGHOUBI MAYAB, Hossein (a.k.a. YAGHOUBI MAYAB, Hossein; a.k.a. YAGHOUBI, Hossein; a.k.a. YAGHUBI MAYAB, Hosein; a.k.a. YAQUBI, Hosein), Iran; DOB 23 Jul 1961; POB Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport G9342868 (Iran) issued 16 Mar 2016 expires 16 Mar 2021 (individual) [SDGT] [IRGC] [IFSR] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)-QODS FORCE).

## The following entities have been added to OFAC's SDN List:

GLOBAL VISION GROUP (a.k.a. LIMITED LIABILITY COMPANY GLOBAL CONCEPTS GROUP (Cyrillic: ОБЩЕСТВО С ОГРАНИЧЕННОЙ ОТВЕТСТВЕННОСТЬЮ ГЛОБАЛЬНЫЕ КОНЦЕПЦИИ ГРУПП); a.k.a. "LLC GKG" (Cyrillic: "ООО ГКГ")), Office 1 Room 7, Building 3, House 22, Staromonetny Lane, Moscow 119180, Russia; Russia; Staromonetne STR 22/3, Moscow, Russia; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; alt. Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [SYRIA] [IRGC] [IFSR] (Linked To: BANIAS REFINERY COMPANY; Linked To: ALCHWIKI, Mhd Amer).

PROMSYRIOIMPORT (a.k.a. FEDERAL STATE UNITARY ENTERPRISE FOREIGN ECONOMIC ASSOCIATION PROMSYRIOIMPORT; a.k.a. PROMSYRIOIMPORT FOREIGN ECONOMIC ASSOCIATION S.O.C.; a.k.a. VO PROMSYRIOIMPORT (Cyrillic: ВО ПРОМСЫРЬЕИМПОРТ); a.k.a. VO PROMSYRIOIMPORT FGUP; a.k.a. VO PROMSYRIOIMPORT), d. 13 str. 4, bulvar Novinski, Moscow 121099, Russia; 13 Novinski Boulevard, Moscow 121834, Russia; Novinsky Boulevard 13, Building 4, Moscow 123995, Russia; Novinsky bld. 13, build 4, Moscow 121099, Russia; Tax ID No. 7704140399 (Russia); Government Gazette Number 01860331; Registration Number 1027700499903 (Russia) [SYRIA] (Linked To: SYRIAN COMPANY FOR OIL TRANSPORT).

TADBIR KISH MEDICAL AND PHARMACEUTICAL COMPANY (a.k.a. TADBIR KISH MEDICAL AND PHARMACEUTICAL CO.; a.k.a. TADBIR TED VA DAROYE KISH), Iran; Unit A103, 1st Floor, Padena Complex, Iran Blvd, Kish, Iran; Unit A301, 1st Floor, Padena Complex, Iran Blvd, Kish, Iran; Unit 301, 3rd Floor, Sadaf Tower, Kish, Iran [SYRIA] (Linked To: GLOBAL VISION GROUP).

## The following changes have been made to OFAC's SDN List:

<https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20181120.aspx>

2018/11/20

Counter Terrorism Designations and Designation Update; Syria Designations; Publication of Syria Shipping Advisory

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DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

**OFAC Advisory to the Maritime Petroleum Shipping Community**

**Issued:** November 20, 2018  
**Subject:** Sanctions Risks Related to Shipping Petroleum to Syria

The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), with the U.S. Department of State and the U.S. Coast Guard, is issuing this advisory to alert persons globally to the significant U.S. sanctions risks for parties involved in petroleum shipments to Syria. These shipments create significant sanctions risk for entities and individuals in the shipping industry, including insurers, shipping companies, financial institutions, and vessel owners, managers, and operators.


The United States is committed to disrupting illicit financial and other support to the Syrian Government, to include transporting petroleum to its state-owned and -operated ports, regardless of the location or nationality of those facilitating such support. Countries such as Iran and Russia have been involved in providing Syria with petroleum. Those who facilitate the financial transfers, logistics, or insurance associated with these or other petroleum shipments are at risk of being targeted by the United States for sanctions.

The United States and its international partners continue to demonstrate resolve to disrupt support for the Assad regime by preventing the normalization of economic and diplomatic relations and reconstruction funding and permanently denying the regime the use of chemical weapons. The United States is committed to isolating the Assad regime and its supporters from the global financial and trade system in response to the continued atrocities committed by the regime against the Syrian people. The United States, European Union (EU), and United Nations (UN) maintain sanctions programs against Syria, and the United States will continue to maximize pressure on the Assad regime and impose additional financial costs on the regime and its financial facilitators. The United States prohibits virtually all trade and other transactions directly or indirectly by U.S. persons with the Government of Syria, and has the authority to sanction entities or individuals who provide support to the Government of Syria — including those who deliver or finance petroleum shipments to the Syrian government or government-owned entities, such as the U.S.-designated Syrian Company for Oil Transport or Baniyas Refinery Company.

This advisory contains an annex providing a non-exhaustive list of vessels that have delivered petroleum to Syria since 2016.<sup>1</sup>

<sup>1</sup> NOTE: This annex is not a sanctions list or a comprehensive list of vessels in which blocked persons may have an interest. While some vessels on this list may be property in which a blocked person has an interest, the inclusion of

## Sanctions Risks and OFAC Authorities



Insurers, shipping companies, financial institutions, and others involved in petroleum-related shipping transactions with the Government of Syria may be subject to designation under one or more sanctions authorities. Similarly, individuals and entities knowingly engaged in certain transactions relating to petroleum and petroleum products from Iran or material support to the Central Bank of Iran or to certain other sanctioned Iran-related persons on OFAC's list of Specially Designated Nationals and Blocked Persons (SDN List) risk exposure to designation or other sanctions under one or more Iran sanctions authorities. A high-level overview of these sanctions authorities follows. However, more information on the Syria and Iran sanctions programs can be found on Treasury's website. Please note this section is current as of the date of this advisory. The most up-to-date information can be found on Treasury's website and the hyperlinks listed in the footnotes below.

### *Syria*

The U.S. government will aggressively target for designation any person who provides support to the regime, for example by facilitating exports to or imports from the Government of Syria, including government-owned entities, unless such exportation or importation is otherwise exempt or authorized.<sup>2</sup>

The United States also prohibits, among other things, any U.S. person from engaging in any transactions with or dealings with the Government of Syria, or entities sanctioned under the Syria Sanctions Program (see, e.g., Executive Order 13582, "Blocking Property of the Government of Syria and Prohibiting Certain Transactions With Respect to Syria" and 31 C.F.R. Part 542).

### *Iran*

The United States is committed to targeting those who provide support to the Iranian regime and its malign activities, and those subject to U.S. jurisdiction who engage in prohibited transactions involving the Government of Iran may be subject to penalties under the Iranian Transactions and Sanctions Regulations, 31 C.F.R. Part 560 (ITSR). Furthermore, any property or interests in property of the Government of Iran that is subject to U.S. jurisdiction

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a vessel in this annex does not constitute a determination by OFAC that the vessel has been identified as property in which a blocked person has an interest. Persons subject to sanctions can be found on OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List) and other sanctions lists, which can be searched [here](#). For more information, please see OFAC's [Iran](#) and [Syria](#) Sanctions webpages.

<sup>2</sup> The term Government of Syria includes: (a) The state and the Government of the Syrian Arab Republic, as well as any political subdivision, agency, or instrumentality thereof, including the Central Bank of Syria; (b) Any entity owned or controlled, directly or indirectly, by the foregoing, including any corporation, partnership, association, or other entity in which the Government of Syria owns a 50 percent or greater interest or a controlling interest, and any entity which is otherwise controlled by that government; (c) Any person that is, or has been, acting or purporting to act, directly or indirectly, for or on behalf of any of the foregoing; and (d) Any other person determined by OFAC to be included within (a) through (c).

must be blocked (*see* Executive Order 13599, “Blocking Property of the Government of Iran and Iranian Financial Institutions” and the ITSR). In addition, pursuant to multiple statutory and executive authorities, non-U.S. persons—including foreign financial institutions—may be subject to sanctions for knowingly conducting significant transactions for, or providing material support to, certain Iran-related sanctioned persons on OFAC’s SDN List. Non-U.S. persons that knowingly own, operate, control, or insure a vessel that transports crude oil from Iran to Syria or other countries that have not received a significant reduction exception could be subject to secondary sanctions under the Iran Sanctions Act.

OFAC sanctions on Iran broadly prohibit U.S. persons and U.S.-owned or -controlled foreign entities from engaging in virtually all transactions or dealings with or involving Iran, the Government of Iran, or Iranian financial institutions, unless the transactions are exempt from regulation or expressly authorized by the U.S. Government. Absent an exemption or OFAC authorization, foreign persons, including foreign financial institutions, are prohibited from processing transactions to or through the United States in violation of these prohibitions, including transactions through U.S. correspondent accounts for or on behalf of Iranian financial institutions, other persons located in Iran, or where the benefit is otherwise received in Iran.

#### Deceptive Shipping Practices Used to Ship Petroleum to Syria

As the global community increases its pressure on the Syrian regime, persons in the petroleum shipping industry continue to deploy deceptive practices by obfuscating the destination and recipient of oil shipments in the Mediterranean Sea ultimately destined for Syria.

The following list provides examples of the types of tactics used to obfuscate the destination of petroleum bound for Syria.

**Falsifying Cargo and Vessel Documents:** Complete and accurate shipping documentation is critical to ensuring all parties to a transaction understand the parties, goods, and vessels involved in a given shipment. Bills of lading, certificates of origin, invoices, packing lists, proof of insurance, and lists of last ports of call are examples of documentation that typically accompanies a shipping transaction. Shipping companies have been known to falsify vessel and cargo documents to obscure the destination of petroleum shipments.

**Ship to Ship (STS) Transfers:** STS transfers are a method of transferring cargo from one ship to another while at sea rather than while located in port. STS transfers can conceal the origin or destination of cargo.

**Disabling Automatic Identification System (AIS):** AIS is a collision avoidance system, which transmits, at a minimum, a vessel’s identification and select navigational and positional data via very high frequency (VHF) radio waves. While AIS was not specifically designed for vessel tracking, it is often used for this purpose via terrestrial and satellite receivers feeding this information to commercial ship tracking services. Ships meeting

certain tonnage thresholds and engaged in international voyages are required to carry and operate AIS; however, vessels carrying petroleum to Syria have been known to intentionally disable their AIS transponders to mask their movements. This tactic can conceal the destination of cargo destined for Syria.

### **Risk Mitigation Measures**

The risk of engaging in prohibited activity or processing prohibited transactions can be potentially mitigated by implementing the following types of measures:

#### **Strengthen Anti-Money Laundering/Countering the Financing of Terrorism**

**(AML/CFT) Compliance:** Financial institutions and companies alike should ensure compliance consistent with Financial Action Task Force AML/CFT standards and conduct enhanced due diligence to defend against abuse by the Assad regime and enablers such as the Iran regime.

**Monitor for AIS Manipulation:** Ship registries, insurers, charterers, vessel owners, or port operators should consider investigating vessels that appear to have turned off their AIS while operating in the Mediterranean and Red Seas. Any other signs of manipulating AIS transponders should be considered red flags for potential illicit activity and should be investigated fully prior to continuing to provide services to, processing transactions involving, or engaging in other activities with such vessels.


**Review All Applicable Shipping Documentation:** Individuals and entities processing transactions pertaining to shipments potentially involving petroleum shipments to Syria and/or involving Iranian oil should ensure that they request and review complete and accurate shipping documentation. Such shipping documentation should reflect the details of the underlying voyage and reflect the relevant vessel(s), flagging, cargo, origin, and destination. Any indication that shipping documentation has been manipulated should be considered a red flag for potential illicit activity and should be investigated fully prior to continuing with the transaction. In addition, documents related to STS transfers should demonstrate that the underlying goods were delivered to the port listed on the shipping documentation.

**Clear Communication with International Partners:** Parties to a shipping transaction may be subject to different sanctions regimes depending on the parties and jurisdictions involved, so clear communication is a critical step for international transactions. Discussing applicable sanctions frameworks with parties to a transaction can ensure more effective compliance.

**Leverage Available Resources:** There are several organizations that provide commercial shipping data, such as ship location, ship registry information, and ship flagging information. This data should be incorporated into due diligence practices, along with available information from OFAC as outlined below in the "Syria Sanctions Resources"

section of this advisory.


### Penalties for Violations of U.S. Sanctions



Individuals and entities engaged in shipping-related transactions or transfers destined for the Government of Syria or its subsidiaries/instrumentalities, or certain transactions involving Iranian petroleum or certain Iran-related sanctioned persons on the SDN List, should be aware that engaging in sanctionable conduct may result in designation or other sanction under U.S. sanctions authorities and that prohibited conduct could result in civil enforcement actions or criminal penalties for persons or transactions subject to U.S. jurisdiction.

Persons subject to U.S. jurisdiction that violate U.S. sanctions with respect to Syria can be subject to civil monetary penalties equal to the greater of twice the value of the underlying transaction, or \$295,141, per each violation.<sup>3</sup> OFAC investigates apparent violations of its regulations and maintains enforcement authority as outlined in its Economic Sanctions Enforcement Guidelines. See Treasury's Guidance on OFAC Enforcement Policy for additional information regarding OFAC's enforcement authorities, Economic Sanctions Enforcement Guidelines, and recent civil penalties and enforcement actions.

### Sanctions Resources



For additional guidance regarding the U.S. sanctions programs on Syria and Iran, please consult OFAC's Syria Sanctions FAQs and Iran Sanctions FAQs pages. For questions or concerns related to OFAC sanctions regulations and requirements, including to disclose a potential violation of U.S. sanctions regulations, please contact OFAC's Compliance Hotline at 1-800-540-6322 or via OFAC Feedback@treasury.gov. To submit a request for a specific OFAC license, see OFAC Licensing.

IHS Maritime is the manager of the International Maritime Organization (IMO) ship numbering scheme. For verification of IMO numbers for individual ships, you can research existing IMO numbers or contact IHS Maritime directly via email at ship.imp@ihs.com.

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<sup>3</sup> Pursuant to Section 4 of the Federal Civil Penalties Inflation Adjustment Act (1990 Pub. L. 101-410, 104 Stat. 890; 28 U.S.C. 2461 note), as amended by the Debt Collection Improvement Act of 1996 (Pub. L. 104-134, 110 Stat. 1321-373) and the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015 (Pub. L. 114-74, 129 Stat. 599, 28 U.S.C. 2461 note) (collectively, the FCPIA Act), requires each federal agency with statutory authority to assess civil monetary penalties (CMPs) to adjust CMPs annually for inflation according to a formula described in section 5 of the FCPIA Act.

## ANNEX

## Non-Exhaustive List of Vessels That Delivered Oil to Syria 2016-2018

Ship Name	IMO
ALMETYEVS	9621558
ARAMIS	9354521
ARSOS M	9313761
AZIZ TORLAK	9558763
BASILIA	9012305
DISTYA PUSHTI	9179127
ENERGY GAS	9034690
GITTA GAS	8817693
GOEAST	7526924
GOLDEN SEA	8800298
HELEN M	9308223
IRIS GAS	9134359
KADER	9080493
KORSARO	9373137
LEVANTE	9391139
MAESTRO	8810700
MIURA	9390903
MOTIVATOR	9340386
MR NAUTILUS	9150767
OASIS 1	9465629
OCEAN 61	8870865
PATRIOTIC	9361469
RAMA 1	8306711
RAWAN	8697304
RISE DIGNITY	9221970
RISE GLORY	9155808
SEA SHARK	8919154
SENNA 8 <sup>4</sup>	9128673
SIENNA	9147447
TRUE OCEAN	9169421
TRUVOR <sup>5</sup>	9676230
VALE	9391153
VENICE	9005479
VOLGA <sup>6</sup>	9104770
YAZ	9735323

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<sup>4</sup> Formerly ODYN GAS

<sup>5</sup> Formerly MUKHALATKA

<sup>6</sup> Formerly MARSHAL ZHUKOV