

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108年10月17日
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主旨：轉知金融監督管理委員會檢送有關美國財政部108年9月4日發布「海外資產控制辦公室（OFAC）海上運輸油品指引」，並公告制裁名單增修16個實體及10名個人，及11艘受制裁人持有之船舶一案，如發現疑似洗錢或資恐交易，請向法務部調查局申報，並注意該等交易之風險，請查照。

說明：依金融監督管理委員會108年10月9日金管證券字第10803331561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

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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（代表
人：張錫先生）

發文日期：中華民國108年10月9日

發文字號：金管證券字第10803331561號

速別：普通件

密等及解密條件或保密期限：

附件：如文(附件1 108UJ01023_1_09152611106.pdf、附件2 108UJ01023_2_09152611106.pdf)

主旨：有關美國財政部108年9月4日發布「海外資產控制辦公室
（OFAC）海上運輸油品指引」，並公告制裁名單增修16
個實體及10名個人，及11艘受制裁人持有之船舶一案，
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，並注意該等交易之風險，請查照。

說明：檢附美國財政部發布旨揭指引及公告之制裁名單如附件。

正本：中華民國證券商業同業公會（代表人：賀鳴珩先生）、中華民國期貨業商業同
業公會（代表人：糜以雍先生）、中華民國證券投資信託暨顧問商業同業公會
（代表人：張錫先生）、中華民國會計師公會全國聯合會（代表人：黃奕睿先
生）

副本：臺灣證券交易所股份有限公司（代表人：許璋瑤先生）、財團法人中華民國證
券櫃檯買賣中心（代表人：陳永誠先生）、臺灣期貨交易所股份有限公司（代
表人：許虞哲先生）、臺灣集中保管結算所股份有限公司（代表人：林修銘先
生）、本會證券期貨局（證券發行組、投信投顧組、會計審計組、期貨管理
組）

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U.S. DEPARTMENT OF THE TREASURY

Resource Center

Counter Terrorism Designations; Iran-related Designations

9/4/2019

OFFICE OF FOREIGN ASSETS CONTROL
Specially Designated Nationals List Update

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

AKBARI, Mohammadreza Ali (a.k.a. ALIAKBARI, Mohammad Reza Abbas; a.k.a. ALI-AKBARI, Mohammadreza; a.k.a. "AKBARI, Ali"); DOB 31 Oct 1967; Passport 21795618 (individual) [SDGT] (Linked To: QASEMI, Rostam).

ASADI, Shamsollah; DOB 23 Aug 1971; POB Khorram Abad, Iran; nationality Iran; Gender Male; Passport Y46559184 (Iran) expires 11 Sep 2023 (individual) [SDGT] (Linked To: QASIR, Ali).

ASHTARI, Mahmud (a.k.a. ASHTARI, Mahmood; a.k.a. ASHTARI, Mahmoud); POB Tehran, Iran; National ID No. 0062502034 (Iran) (individual) [SDGT] (Linked To: QASIR, Ali).

BHARDWAJ, Auj; Passport Z4984865 expires 19 Jan 2029 (individual) [SDGT] (Linked To: MEHDI GROUP).

GHASEMI, Morteza (a.k.a. ALI, Ghasemi Morteza; a.k.a. GHAEEMI, Morteza; a.k.a. QASIMI, Murtadi); DOB 10 Apr 1991; alt. DOB 31 May 1988; alt. DOB 03 Mar 1983; alt. DOB 03 Jan 1983; POB Iran; Gender Male; Passport T14532563 (Iran); alt. Passport K30603656 (Iran) expires 07 Sep 2019 (individual) [SDGT] (Linked To: QASEMI, Rostam).

HUSSAIN, Zafar Anis Ishteyaq (a.k.a. ANIS, Zafar), United Arab Emirates; nationality India; Residency Number 784-1973-1617539-3 (United Arab Emirates) (individual) [SDGT] (Linked To: FOURTEEN STAR SHIPPING MANAGEMENT).

MEHDI, Ali Ghadeer (a.k.a. MEHDI, Alighadeer Mohammad); DOB 14 May 1984 (individual) [SDGT] (Linked To: KHADIJA SHIP MANAGEMENT PRIVATE LIMITED).

MEHDI, Alizaher Mohammad (a.k.a. MEHDI, Ali Zaheer); DOB 14 May 1973; alt. DOB 01 Jan 1973 to 31 Dec 1973; nationality India; Gender Male; Passport Z2423134 (India) expires 11 Dec 2023; alt. Passport Z3079423 (India) expires 01 Jan 2026 to 31 Dec 2026 (individual) [SDGT] (Linked To: QASEMI, Rostam).

QASIR, Ali (a.k.a. GHASIR, Ali; a.k.a. GHASSIR, Ali; a.k.a. KASSIR, Ali; a.k.a. QASIR, 'Ali); Iran; DOB 29 Jul 1992; POB Deir Kanoun El Nahr, Lebanon; nationality Lebanon; Gender Male; Passport RL 3367620 (Lebanon) expires 28 Aug 2020 (individual) [SDGT] (Linked To: QASEMI, Rostam).

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

AFRICO 1 OFF-SHORE SAL (a.k.a. AFRICO 1 OFFSHORE; a.k.a. AFRICO 1 OFF-SHORE S.A.L.), Al Azariah Building, Bechara el Khoury Street, Beirut, Lebanon; Registration Number 1804932 (Lebanon) [SDGT] (Linked To: VANIYA SHIP MANAGEMENT PRIVATE LIMITED).

ALUMINUM DRAWING AND DRAWING COMPANY SAL (a.k.a. DOGMOCH; a.k.a. DOMAL SAL; a.k.a. NATIONAL ALUMINUM DRAWING AND DRAWING COMPANY SAL; a.k.a. NATIONAL COMPANY FOR ALUMINUM EXTRUSION AND COLORING; a.k.a. "ALOMEX"), Calot Center, Sami El Solh Street, Badaro, Beirut, Lebanon; Commercial Registry Number 1010799 (Lebanon) [SDGT] (Linked To: AL-BAZZAL, Muhammad Qasim).

BUSHRA SHIP MANAGEMENT PRIVATE LIMITED (a.k.a. BUSHRA SHIP MANAGEMENT PVT LTD), 102, Mohid Height, Suresh Nagar, Mumbai City, Maharashtra 400053, India; 102, Mohid Height, Suresh Nagar Near Rto Office, Four Bungalows, Anderi (W), Mumbai, Maharashtra 400053, India; Mohid Height, 102, Lokhandwaia Complex Road, Suresh Nagar, Anderi (W), Mumbai 400053, India; Registration Number 233897 (India); alt. Registration Number U63090MH2012PTC233897 (India) [SDGT] (Linked To: MEHDI GROUP).

FIVE ENERGY OIL TRADING (a.k.a. "5 ENERGY"), United Arab Emirates [SDGT] (Linked To: MEHDI GROUP).

FOURTEEN STAR SHIPPING MANAGEMENT (a.k.a. 14 STAR SHIPPING MANAGEMENT; a.k.a. "FOURTEEN STARS"), United Arab Emirates [SDGT] (Linked To: MEHDI GROUP).

HAMRAHAN PISHRO TEJARAT TRADING COMPANY (a.k.a. BAZARGANI HAMRAHAN PISHRO TEJARAT; a.k.a. HAMRAHAN PISHRO TEJARAT; a.k.a. HAMRAHAN PISHRO TEJARAT COMMERCIAL TRADING COMPANY), No. 750, 10th Floor, Bahar Tower, Bahar Street, Tehran 1561636847, Iran; Website <http://pishro-tejarat.com/about/fa> [SDGT] (Linked To: ASHTARI, Mahmud).

HOKOUL SAL OFFSHORE, Beirut, Lebanon; Commercial Registry Number 1808620 (Lebanon) [SDGT] (Linked To: AL-BAZZAL, Muhammad Qasim).

KHADIJA SHIP MANAGEMENT PRIVATE LIMITED (a.k.a. KHADIJA SHIP MANAGEMENT PVT; a.k.a. KHADIJA SHIP MANAGEMENT PVT LTD), Shop 1/2, Adarsh Chawl, Anand Nagar, Jogeshwari (W), Mumbai 400102, India; Off No 512, B Wing, Mumbai City, Maharashtra 400053, India; Unit D-605, 6th Floor, Crystal Plaza Premises Chs Ltd, Opp. Infinity Mall, New Link Road, Anderi - W, Mumbai, Maharashtra 400053, India; 512, 5th Floor, Samarth Aishwarya, Off K.L. Walawalkar Road, Oshiwara, Andheri West, Mumbai, India; Website www.khadijasm.com; Registration Number 247118 (India); alt. Registration Number U74999MH2013PTC247118 (India) [SDGT] (Linked To: MEHDI GROUP).

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KISH P AND I CLUB (a.k.a. KISH PROTECTION AND INDEMNITY CLUB, a.k.a. "KPI"), Suite 6, 96 Maalek Ashtar Street Andishev Blvd. Kish Island 7941777844, Iran; No-82, 2nd Floor, Softani St., Nelson Mandela Blvd, Tehran 19677-13855, Iran; Website <http://www.kishpandi.com> [SDGT] (Linked To: MEHDI GROUP).

MEHDI GROUP (a.k.a. MEHDI BROS SHIP SERV. PVT. LTD.; a.k.a. MEHDI BROS SHIP SERVICES PVT LTD; a.k.a. MEHDI BROS. SHIP SERVICES PRIVATE LIMITED; a.k.a. MEHDI BROTHERS SHIP SERVICES PVT. LTD.; a.k.a. MEHDI SHIPPING LIMITED), 511, 5th Floor, Samarth Aishwarya Off K.L. Walawakar road, Oshiwara, Andheri [w], Mumbai 400053, India; 102, Mohid Height, Suresh Nagar, Four Bungalow RTO, Andheri (West), Mumbai, Maharashtra 400053, India; Off No 511, B Wing, Mumbai City 400053, India; Website www.mehdishipping.net; alt. Website <http://mehdishipping.com>; Registration Number U74999MH1999PTC119358 (India) [SDGT] (Linked To: QASEMI, Rostam).

MEHDI OFFSHORE AND SHIP MANAGEMENT PTE. LTD. (a.k.a. MEHDI GROUP OFFSHORE; a.k.a. MEHDI OFFSHORE AND SHIP MANAGEMENT), 17 Phillip Street, #05-01 Grand Building 048695, Singapore; Phillip Street 17 #05-01, City - Marina Area 048695, Singapore; Registration Number 201536806R (Singapore) [SDGT] (Linked To: MEHDI GROUP).

NAGHAM AL HAYAT LTD. (a.k.a. NAGHAM AL HAYAT), Building 25, al-Bahdaliyah, Damascus, Syria; Commercial Registry Number 10822 (Syria) issued 26 Jun 2016 [SDGT] (Linked To: AL-BAZZAL, Muhammad Qasim).

PENTA OCEAN SHIP MANAGEMENT AND OPERATION LLC (a.k.a. PENTA OCEAN SHIP MANAGEMENT; a.k.a. PENTA OCEAN SHIP MANAGEMENT & OPERATIONS LLC; a.k.a. PENTA OCEAN SHIP MANAGEMENT AND OPERATIONS LLC), 3303, Saeed, Tower 1, Sheikh Zayed Road, P.O. BOX - 9614, Dubai, United Arab Emirates; Sheikh Zayed Road, sahid tower # 1, office # 3303, Dubai International Financial Centre Area, Dubai, United Arab Emirates; Office 2905, 29th Floor, Al-Attar Tower, Sheikh Zayed Road, Al Barsha 1, Dubai, United Arab Emirates; Chamber of Commerce Number 196434 (United Arab Emirates); Registration Number 658572 (United Arab Emirates) [SDGT] (Linked To: MEHDI GROUP).

TALAQI GROUP (a.k.a. TALAQI GROUP FOR TRADE LLC; a.k.a. TALAQI GROUP LLC), Sheraton Building, Damascus, Syria; Dummar Project, al-Jazirah 7, real estate property 18/234, Western Dummar, Damascus, Syria; Dummar Project, al Jazirah 11, building 23 section number 1 of real estate property 2259, Damascus, Syria; Dummar Project, al-Jazirah 7, building 2340/33 and 4, Western Dummar, Damascus, Syria; Dummar Project, al-Jazirah 11, building 23, section 2 and 3, building 2259, Damascus, Syria [SDGT] (Linked To: AL-BAZZAL, Muhammad Qasim).

TAWAFUK LTD (a.k.a. TAWAFUK; a.k.a. TAWAFUK LLC), Building 507, Public Street, Dufa al-Shawk Yalda, Damascus, Syria; Commercial Registry Number 10821 (Syria) issued 26 Jun 2017 [SDGT] (Linked To: AL-BAZZAL, Muhammad Qasim).

VANIYA SHIP MANAGEMENT PRIVATE LIMITED (a.k.a. VANIYA SHIP MANAGEMENT; a.k.a. VANIYA SHIP MANAGEMENT LTD; a.k.a. VANIYA SHIP MANAGEMENT PVT LTD), 504, Crescent Tower C.S.No., Kismat Nagar Dheeraj Enclave, NL Road, Oshiwara, Andheri (W), Mumbai, Maharashtra 400053, India; No. 504, Crescent Tower C.S.No., Kismat Nagar, Mumbai City 400053, India; 5th Floor, Samarth Aishwarya, 5012, Off Kl. Walawalker Road, Andheri (W), Mumbai 400053, India; 504, 5th Floor, Crescent Tower, CST NO.500, Oshiwara off Link Road, Opp. Infinity Mall, Andheri (West), Mumbai, Maharashtra 400 053, India; Registration Number 244569 (India); alt. Registration Number U63090MH2013PTC244569 (India) [SDGT] (Linked To: MEHDI GROUP).

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

BONITA QUEEN (f.k.a. KAMILA) Crude Oil Tanker St. Kitts & Nevis flag; Vessel Registration Identification IMO 9105906 (vessel) [SDGT] (Linked To: KHADIJA SHIP MANAGEMENT PRIVATE LIMITED).

JASMINE (f.k.a. EMMA) Chemical/Products Tanker Iran flag; Vessel Registration Identification IMO 9105085 (vessel) [SDGT] (Linked To: AFRICO 1 OFF-SHORE SAL).

SARAK (f.k.a. RISE DESTINY) Crude Oil Tanker Iran flag; Vessel Registration Identification IMO 9226968 (vessel) [SDGT] (Linked To: MEHDI GROUP).

SOBAR (f.k.a. RISE DIGNITY) Crude Oil Tanker Iran flag; Vessel Registration Identification IMO 9221970 (vessel) [SDGT] (Linked To: MEHDI GROUP).

SOLAN (f.k.a. RISE GLORY) Crude Oil Tanker Iran flag; Vessel Registration Identification IMO 9155808 (vessel) [SDGT] (Linked To: MEHDI GROUP).

TOUR 2 Crude Oil Tanker Panama flag; Vessel Registration Identification IMO 9364112 (vessel) [SDGT] (Linked To: KHADIJA SHIP MANAGEMENT PRIVATE LIMITED).

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

DELICE Chemical/Products Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9125138 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES). -to- DELICE Chemical/Products Tanker Iran flag; Former Vessel Flag Panama; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9125138 (vessel) [IRAN] [SDGT] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES; Linked To: HOKOUL SAL OFFSHORE).

DESTINY (f.k.a. ULYSSES 1) Crude Oil Tanker Panama flag; Former Vessel Flag Liberia; alt. Former Vessel Flag Mongolia; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9177155 (vessel) [IRAN]. -to- DESTINY (f.k.a. ULYSSES 1) Crude Oil Tanker Iran flag; Former Vessel Flag Liberia; alt. Former Vessel Flag Mongolia; alt. Former Vessel Flag Panama; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9177155 (vessel) [IRAN] [SDGT] (Linked To: NATIONAL IRANIAN TANKER COMPANY; Linked To: HOKOUL SAL OFFSHORE).

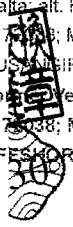
DEVREZ Chemical/Products Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9120994 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES). -to- DEVREZ Chemical/Products Tanker Iran flag; Former Vessel Flag Panama; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9120994 (vessel) [IRAN] [SDGT] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES; Linked To: KHADIJA SHIP MANAGEMENT PRIVATE LIMITED).

HAPPINESS I (f.k.a. HAPPINESS; f.k.a. HENGAM; f.k.a. LOYAL; f.k.a. TULAR) (T2ER4) Crude Oil Tanker 299,214DWT 160,930GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9212905; MMSI 256875000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY). -to- HAPPINESS I (f.k.a. HAPPINESS; f.k.a. HENGAM; f.k.a. LOYAL; f.k.a. TULAR) (T2ER4) Crude Oil Tanker 299,214DWT 160,930GRT Iran flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; alt. Former Vessel Flag Panama; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9212905; MMSI 256875000 (vessel) [IRAN] [SDGT] (Linked To: NATIONAL IRANIAN TANKER COMPANY; Linked To: HOKOUL SAL OFFSHORE).

KUMAR, Akhilesh; DOB 15 Jun 1976; POB Patna, India; nationality India; Gender Male; Seafarer's Identification Document MUM 85917 (India) issued 11 Nov 2023 (individual) [SDGT]. -to- KUMAR, Akhilesh; DOB 15 Jun 1976; POB Patna, India; nationality India; Gender Male; Seafarer's Identification Document MUM 85917 (India) expires 11 Nov 2023 (individual) [SDGT] (Linked To: MEHDI GROUP).

QASEMI, Rostam (a.k.a. GHASEMI MOHAMMADALI, ROSTAM), Iran; nationality Iran; citizen Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Passport A2463775 (Iran) (individual) [SDGT] [NPWMD] [IRGC] [IFSR]. -to- QASEMI, Rostam (a.k.a. GHASEMI MOHAMMADALI, ROSTAM; a.k.a. GHASEMI, Rostam), Iran; DOB 22 May 1964; POB Lamerd, Iran; nationality Iran; citizen Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport A2463775 (Iran); National ID No. 6579726970 (Iran) (individual) [SDGT] [NPWMD] [IRGC] [IFSR] (Linked To: SOLEIMANI, Qasem; Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)-QODS FORCE).

SINOPA (f.k.a. DAISY; f.k.a. SUPERIOR; f.k.a. SUSANGIRD) (5IM584) Crude Oil Tanker 159,681DWT 81,479GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9172130; MMSI 677048400 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY). -to- SINOPA (f.k.a. DAISY; f.k.a. SUPERIOR; f.k.a. SUSANGIRD) (5IM584) Crude Oil Tanker 159,681DWT 81,479GRT Iran flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; alt. Former Vessel Flag Panama; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9172130; MMSI 677048400 (vessel) [IRAN] [SDGT] (Linked To: NATIONAL IRANIAN TANKER COMPANY; Linked To: HOKOUL SAL OFFSHORE).





DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFAC Advisory to the Maritime Petroleum Shipping Community



Issued: September 4, 2019
Subject: Sanctions Risks Related to Shipping Petroleum and Petroleum Products from Iran

The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is issuing this advisory to alert persons globally to the significant U.S. sanctions risks for parties involved in shipping petroleum or petroleum products from Iran after the expiration of any applicable significant reduction exceptions on May 2, 2019. These shipments create significant sanctions risk for entities and individuals in the shipping industry, including shipping companies, vessel owners, managers, operators, insurers, and financial institutions. Those who knowingly engage in significant transactions for the purchase, acquisition, sale, transport, or marketing of petroleum or petroleum products from Iran — or knowingly provide significant support to an Iranian person on OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List), such as the National Iranian Oil Company (NIOC), the National Iranian Tanker Company (NITC), and the Islamic Republic of Iran Shipping Lines (IRISL) — are at serious risk of being targeted by the United States for sanctions, regardless of the location or nationality of those engaging in such activities. Further, persons providing bunkering services to vessels transporting petroleum or petroleum products from Iran risk being subject to sanctions unless an applicable waiver or exception applies. The United States continues to take strong action to deny the Government of Iran funds derived from the illicit exportation of petroleum or petroleum products from Iran.

The United States is committed to aggressively enforcing our sanctions against the Iranian regime, denying it the financial means to sponsor terrorism and advance its ballistic missile program while permitting humanitarian trade benefitting the Iranian people. Targeting shipments of petroleum and petroleum products from Iran is a critical element of denying the Iranian regime access to financial resources to support its malign activities.

In connection with these activities, the United States is targeting private and public sector entities around the world that engage in sanctionable conduct, including those involved in procuring petroleum and petroleum products from Iran to Syria, China, and elsewhere. For example, in November 2018, August 2019, and September 2019, OFAC sanctioned individuals and entities in a number of countries involved in schemes in which the sale and shipment of Iranian oil to Syria provided hundreds of millions of dollars to Iran's terror proxy groups, including the Islamic Revolutionary Guard Corps Qods Force (IRGC-QF), Hizballah, and Hamas.

This advisory contains an annex providing a list of vessels that were identified on OFAC's

SDN List as property in which persons blocked pursuant to E.O. 13224 have an interest on September 4, 2019.¹ These blocked persons are part of an IRGC-QF-led network that shipped Iranian crude oil and condensate to Syria.

Sanctions Risks and OFAC's Iran-related Authorities

Individuals and entities knowingly engaged in certain transactions relating to the purchase, acquisition, sale, transport, or marketing of petroleum and petroleum products from Iran or providing material support to certain Iran-related persons on the SDN List risk being sanctioned under U.S. sanctions authorities relating to Iran, unless an exception applies.

Below is a high-level overview of OFAC's Iran-related sanctions authorities; however, this overview is not intended to be a comprehensive summary of all U.S. sanctions authorities related to Iran. 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.

OFAC administers and enforces a comprehensive trade embargo against Iran, as set forth in the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560 (ITSR), issued under the authority of the International Emergency Economic Powers Act, 50 U.S.C. §§ 1701-06, among other authorities. The ITSR prohibits most direct and indirect transactions with Iran by U.S. persons or within the United States, unless authorized by OFAC or exempted by statute.² Further, absent an applicable 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 of those services is otherwise received in Iran.

In addition, non-U.S. persons — including foreign financial institutions — may be subject to U.S. sanctions for knowingly conducting significant transactions for, or knowingly providing significant support to, certain Iran-related persons on OFAC's SDN List, including NIOC, NITC, and IRISL, unless an exception applies. Further, non-U.S. persons that knowingly own, operate, control, or insure a vessel that transports crude oil exported from Iran after the expiration of any applicable significant reduction exception could be subject to secondary sanctions under the Iran Sanctions Act. Even if an exception applies, the involvement of the IRGC or any other person designated in connection with Iran's support for international terrorism or its proliferation of weapons of mass destruction or their means of delivery is nonetheless subject to U.S. sanctions. The IRGC is identified by the United States as

¹ NOTE: Blocked persons subject to sanctions and additional vessels identified as property in which a blocked person has an interest can be found on the SDN List, which can be searched [here](#). Please note that the transport of petroleum and petroleum products exported from Iran before May 2, 2019 to a country that received a significant reduction exception pursuant to section 1245 of the National Defense Authorization Act for Fiscal Year 2012 could be subject to a sanctions exception.

² The ITSR also prohibits entities owned or controlled by a United States person and established or maintained outside the United States ("U.S.-owned or -controlled foreign entities") from knowingly engaging in any transaction directly or indirectly with the Government of Iran or any person subject to the jurisdiction of the Government of Iran that would be prohibited by the ITSR if the transaction were engaged in by a United States person or in the United States.

a Foreign Terrorist Organization.

Deceptive Shipping Practices

As the global community increases its pressure on the Iranian regime, persons associated with the petroleum shipping industry continue to deploy deceptive practices to facilitate Iranian transactions. Actors such as Iran's IRGC-QF attempt to evade U.S. and European sanctions by obfuscating the origin, destination, and recipient of oil shipments, including those in the Mediterranean Sea ultimately destined for Syria.

The following list provides examples of the types of tactics used to obfuscate the origin and destination of petroleum and petroleum products from Iran.

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 AIS at all times, consistent with applicable requirements; however, vessels carrying petroleum from Iran have been known to intentionally disable their AIS transponders or modify transponder data to mask their movements. This tactic can conceal the cargo's Iranian origin, or create uncertainty regarding the location of Iranian vessels and obfuscate STS transfers of Iranian cargo.

Vessel Name Changes: The owners of vessels that have engaged in illicit activities are known to change the name of a vessel in an attempt to obfuscate its prior illicit activities. For this reason, it is essential to research a vessel not only by name, but also by its International Maritime Organization (IMO) number.

Risk Mitigation Measures

The risk of engaging in sanctionable activity or processing prohibited transactions can be potentially mitigated by implementing the following types of measures, many of which were

outlined in previous OFAC publications:

Insurance: There is sanctions risk related to the provision of underwriting services or insurance or reinsurance to certain Iranian energy- or maritime-related persons or activity. In particular, persons who knowingly provide underwriting services or insurance or reinsurance to any Iranian person on the SDN List — such as NIOC, NITC, or IRISL — are exposed to sanctions. Additionally, transactions involving the designated entity Kish Protection & Indemnity Club (aka Kish P&I), a major Iranian insurance provider, are considered sanctionable activity. The United States is not alone in its concerns with Kish P&I. Many countries' flagging registries do not accept vessels insured by Kish P&I to their registries.

Verify Cargo Origin: Individuals and entities receiving petroleum or petroleum products shipments should conduct appropriate due diligence to corroborate the origin of such goods when transported or delivered by vessels exhibiting deceptive behaviors or where connections to sanctioned persons or locations are suspected. Testing samples of the cargo's composition can reveal chemical signatures unique to Iranian oil fields. Publicizing cases where certificates of origin are known to be falsified can deter efforts to resell the goods to alternative customers.

Strengthen Anti-Money Laundering/Countering the Financing of Terrorism

(AML/CFT) Compliance: Financial institutions and companies are strongly encouraged to employ risk mitigation measures consistent with Financial Action Task Force standards designed to combat money laundering, and terrorist and proliferation financing. This includes the adoption of appropriate due diligence policies and procedures by financial institutions and non-financial gatekeepers and promoting beneficial ownership transparency for legal entities, particularly as related to the scenarios outlined above.

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 and near China. 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 or petroleum products from Iran 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.

Know Your Customer (KYC): As a standard practice, those involved in the maritime petroleum shipping community, including vessel owners and operators, are advised to conduct

KYC due diligence. KYC due diligence helps to ensure that those in the maritime petroleum shipping community are aware of the activities and transactions they engage in, as well as the parties, geographies, and country-of-origin and destination of the goods involved in any underlying shipments. This includes not only researching companies and individuals, but also the vessels, vessel owners, and operators involved in any contracts, shipments, or related maritime commerce. Best practices for conducting KYC on a vessel include researching its IMO number, which may provide a more comprehensive picture of the vessel's history, travel patterns, ties to illicit activities, actors, or regimes, and potential sanctions risks associated with the vessel or its owners or operators.

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 best practices, along with available information from OFAC as outlined below in the "Sanctions Resources" section of this advisory.

Consequences of Violating U.S. Sanctions or Engaging in Sanctionable Conduct

Individuals and entities engaged in certain transactions involving petroleum or petroleum products from Iran or certain Iran-related persons on the SDN List should be aware that engaging in such conduct may result in designation or other sanctions under U.S. sanctions authorities unless an exception applies.

In addition, violations of the ITSR could result in civil enforcement actions or criminal penalties for persons or transactions subject to U.S. jurisdiction.

Persons that violate the ITSR can be subject to significant civil monetary penalties.³ OFAC investigates and enforces violations of its regulations as outlined in its Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, Appendix A. For more information regarding civil monetary penalties and other administrative actions taken by OFAC, see the Civil Penalties and Enforcement Information portion of OFAC's web site.

³ 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.

Sanctions Resources

For additional guidance regarding the U.S. sanctions programs on Iran, please consult OFAC's 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.



ANNEX

The following vessels were identified on OFAC's SDN List on September 4, 2019 as property in which persons blocked pursuant to E. O. 13224 have an interest. This list is in addition to the nearly 200 vessels identified as blocked property pursuant to Executive Order 13599 on November 5, 2018. Please see OFAC's March 25, 2019 Advisory to the Maritime Petroleum Shipping Community for additional information on sanctions risks related to petroleum shipments involving Iran and Syria.



Non-Exhaustive List of Vessels in Which Persons Blocked Pursuant to E.O. 13224 Have an Interest

Vessel Name	IMO
ADRIAN DARYA 1 ⁴	9116412
BONITA QUEEN ⁵	9105906
DELICE ⁶	9125138
DESTINY ⁷	9177155
DEVREZ	9120994
HAPPINESS I	9212905
JASMINE ⁸	9105085
SARAK ⁹	9226968
SINOPA	9172038
SOBAR ¹⁰	9221970
SOLAN ¹¹	9155808
TOUR 2	9364112

⁴ Formerly GRACE 1

⁵ Formerly KAMILA

⁶ The DELICE and the DEVREZ also are identified pursuant to E.O. 13599 as property in which IRISL has an interest.

⁷ The DELICE, DESTINY, DEVREZ, HAPPINESS I, and SINOPA also are identified pursuant to E.O. 13599 as property in which NITC has an interest.

⁸ Formerly EMMA

⁹ Formerly RISE DESTINY

¹⁰ Formerly RISE DIGNITY

¹¹ Formerly RISE GLORY