

## Report on Supply Chain Compliance Volume 3, Number 10. May 14, 2020

### US charges two Iranian nationals with sanctions violations

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The U.S. government charged two men<sup>[1]</sup> with conspiring to launder money into the United States in order to purchase a Greek-owned ship to transport petroleum out of Iran. The scheme allegedly involved several designated entities, including the National Iranian Oil Company, the National Iranian Tanker Company and the IRGC-Quds Force.

The scheme unraveled after the compliance team at the U.S. corresponding bank, Wells Fargo Bank NA, blocked the transfer<sup>[2]</sup> due to sanctions and money laundering concerns. The Greek owners of the ship filed suit to regain the ship, and U.S. authorities also filed a civil forfeiture complaint for more than USD 12 million.

The men are being charged under the International Emergency Economic Powers Act and the Iranian Transactions and Sanctions Regulations, which “prohibit the exportation, re-exportation, sale, or supply, directly or indirectly, to Iran of any goods, technology, or services from the United States or by a United States person without prior authorization or license from the U.S. Department of the Treasury.”<sup>[3]</sup>

**1** U.S. Department of Justice, “Criminal Charges Filed Against Two Iranian Nationals for Violating Money Laundering & Sanctions Laws by Procuring Petroleum Tanker,” news release, May 1, 2020, <https://bit.ly/3djI2qh>.

**2** Mengqi Sun and Dylan Tokar, “U.S. Charges Two Iranians Over Oil Tanker Purchase, Seeking \$12 Million Forfeiture,” *The Wall Street Journal*, May 2, 2020, <https://on.wsj.com/2ypo7nc>.

**3** U.S. Department of Justice, “Criminal Charges Filed.”

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