

November 25, 2025

Captain Ashraf Husseini  
Qatrat Alnada Almasi Ship Management LLC  
Riggat Al Buteen  
Green Tower, Office No. 604  
Dubai  
United Arab Emirates  
Via email: [operation@almasimanagement.com](mailto:operation@almasimanagement.com) cc: [ops@almasimanagement.com](mailto:ops@almasimanagement.com)

**Re: Almasi Ship Management and Vessels Listed on UANI's Ghost Armada**

Dear Capt. Husseini:

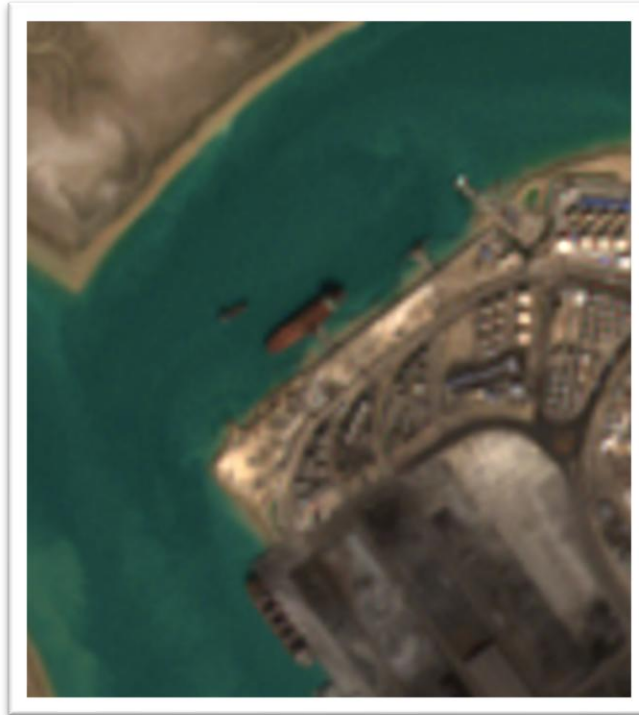
United Against Nuclear Iran (“UANI”)<sup>1</sup> is writing in response to your recent request concerning the removal of three oil tankers from UANI’s *Ghost Armada*: **SEAMULL (IMO 9204776)**, **SEA WISE (IMO 9224570)**, and **SEA ROCK (IMO 9140451)**.

Our comprehensive review of satellite imagery and shipping records strongly indicates that each vessel continues to exhibit or has exhibited within the past 24 months hallmarks of sanctionable and covert activity associated with the transportation of Iranian oil. We note that each vessel is also over 20 years old, raising serious environmental and operational safety concerns. Please note the following:

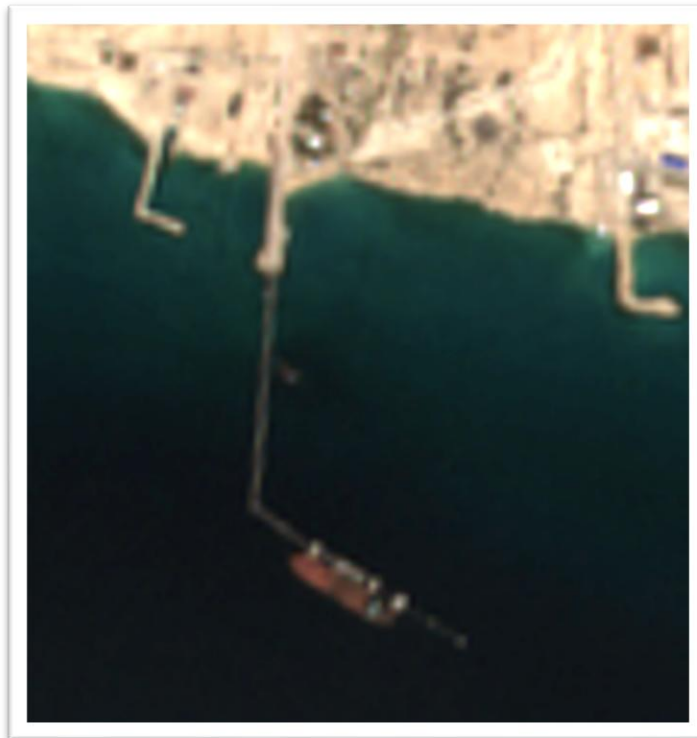
- **SEA WISE (IMO 9224570)**: Loaded Iranian crude oil from Lavan Island on November 3, 2023, and again from Bandar Imam Khomeini (BIK) on November 11, 2024 (see following page).

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<sup>1</sup> UANI is a leading not-for-profit, non-partisan, advocacy organization whose mission is to promote the cessation of economic and financial support of the Islamic Republic of Iran by corporations and business until the Iranian regime verifiably abandons its drive for nuclear weapons and support for terrorism and human rights violations. (<http://www.unitedagainstnucleariran.com>).

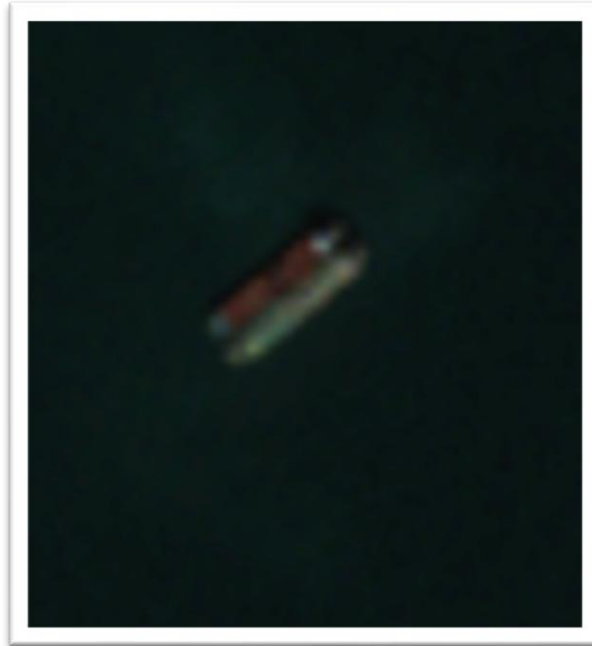


*Satellite imagery capturing SEAWISE docking at Bandar Imam Khomeini (BIK) on November 11, 2024.*



*Satellite imagery capturing SEAWISE docking at Lavan Island, Iran on November 3, 2023.*

- **SEAMULL (IMO 9204776):** Engaged in illicit practices including AIS spoofing and ship-to-ship (“STS”) transfers. Notably, it conducted an STS operation offshore Sharjah, UAE on December 23, 2023, and has operated between Yemen and the UAE.



*Satellite imagery capturing SEAMULL conducting an STS with RED RUBY (9284790).*

- **SEA ROCK (IMO 9140451):** Flagging information remains unknown, which raises significant compliance and transparency concerns, as the absence of a recognized flag prevents effective oversight, inspection, and enforcement of international maritime regulations. Nonetheless, analysis links the vessel’s operations to the same network of dark fleet activity.

Moreover, it appears that none of these vessels has undergone port state control inspection for more than five years—a key indicator of their continued participation in non-transparent and potentially sanctionable trade. They therefore remain categorized as “dark fleet” ships by every relevant measure.

As part of U.S. President Donald Trump’s National Security Presidential Memorandum (“NSPM”) to restore maximum pressure on the Islamic Republic of Iran, the current U.S. administration is committed to driving Iran’s export of oil to zero.<sup>2</sup> In light of this policy and recent

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<sup>2</sup> The White House, “[National Security Presidential Memorandum/NSPM-2 – The White House](#),” February 4, 2025.

U.S. sanctions targeting entities involved in Iran's energy exports,<sup>3</sup> it is clear that companies managing vessels implicated in the Iranian oil trade face significant legal, financial, and reputational exposure. Even for companies either outside the legal jurisdiction of the United States or without direct or indirect U.S. business ties, reputational consequences of U.S. sanctions can be extremely wide and prolonged, and can preclude future lucrative business opportunities and investment with not only U.S. entities but those in many other regions of the world.

Accordingly, the vessels **SEAMULL**, **SEA WISE**, and **SEA ROCK** will remain on UANI's list until further notice. Please be assured that UANI is prepared to carefully review any further countervailing evidence you may wish to provide. Thank you for your attention.

Very truly yours,



Ambassador Mark D. Wallace

UANI is a not-for-profit, bi-partisan, advocacy group that seeks to prevent Iran from fulfilling its ambition to obtain nuclear weapons. UANI was founded in 2008 by Ambassador Mark D. Wallace, the late Ambassador Richard Holbrooke, and Middle East expert Dennis Ross. UANI's private sanctions campaigns and state and federal legislative initiatives focus on ending the economic and financial support of the Iranian regime by corporations until Iran verifiably abandons its drive for nuclear weapons, support for terrorism and gross human rights violations. Governor Jeb Bush is UANI's Chairman. UANI's Advisory Board consists of distinguished leaders in government, academia and business. See [www.unitedagainstnucleariran.com/about/leadership](http://www.unitedagainstnucleariran.com/about/leadership).

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## I. IRAN BUSINESS RISKS

*Any desire from foreign firms to maintain or ramp up Iran business is short-sighted, ill-advised, and fraught with risk to its shareholders, employees, agents, and contractors. The risks inherent in doing business in Iran are serious and fall into at least ten distinct categories:*

**Revocation of the JCPOA and Reimposition of U.S. Secondary Sanctions.** On May 8, 2018, the United States Administration announced it would withdraw from the JCPOA, and secondary sanctions were reimposed which affect companies even outside U.S. jurisdiction with respect to every major industry in Iran. Due to Iran's military support of the Russian invasion of Ukraine in 2022, there are increasing calls for E-3 signatories to the JCPOA, France, Germany, and the United Kingdom, to follow the example of the U.S. and reimpose sanctions snapback.

**Impairment of Corporate Reputation.** A company that seeks opportunities in a country notorious for sponsoring terrorism and violating fundamental human rights, including state sponsored torture and killing of its own citizens, like Mahsa Amini in late 2022, will inevitably corrode its reputation with consumers, trading partners, and the general public, as recent polling strongly indicates.

**Banking Risk.** U.S. and European banks are unwilling, largely as a result of Iran's own actions, to finance new business ventures in Iran. Along with the serious money laundering issues in Iran, banking-related Iran risks continue to be severe, as strong penalties remain for those institutions that directly or indirectly facilitate prohibited transactions. Iran remains on the Financial Action Task Force (FATF) blacklist.

**Doing Business with the Islamic Revolutionary Guard Corps.** Doing business in Iran means doing business with the IRGC. It is flatly illegal for American and international companies to do business with the IRGC, but corporate compliance officers and country managers will be unable to discern if their companies are doing business with a reputable Iranian company or one that is secretly operated, managed, and even owned by the IRGC.

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<sup>3</sup> U.S. Department of Treasury OFAC, "[Treasury Dismantles Key Elements of Iran's Energy Export Machine.](#)" October 9, 2025.

**Economic Sanctions Independent of the JCPOA.** Notwithstanding the JCPOA, significant economic sanctions unrelated to Iran's illegal nuclear proliferation program remain in effect which bar companies and their affiliates from doing business in multiple sectors of Iran's economy. The passage of the JCPOA does not eliminate or ease those sanctions.

**Unavailability and Deficiency of Insurance Coverage.** Companies will find that their business operations and assets in Iran are either uninsurable or subject to inadequate coverage and/or extraordinary insurance premiums because of the highly unstable and risk-laden political, legal, and business environment. Germany no longer allows export credit insurance from 2023.

**Impairment of Shareholder Value.** Influential shareholders and the investing public will not look charitably upon any company whose drive for short term profits in Iran will inexorably finance that regime's policies of sponsoring terrorism, nuclear proliferation, subjugation of women, violent repression of LGBT individuals, and the arbitrary incarceration and execution of its citizens. It is difficult to see how share value will not suffer.

**Impairment of Future Business Opportunities.** A company that shortsightedly embraces business opportunities in Iran will likely be cut off from more lucrative business opportunities in countries that oppose Iran's hegemonic policies, especially among Gulf Arab states. Even worse, companies may be barred altogether from doing any business within the borders of these neighboring countries because they will be viewed as providing financial support to a lawless regime that is antithetical to their very existence.

**Arrest, Imprisonment, Kidnapping, Torture, and Execution.** A company that does business in Iran exposes its officers, employees, and contractors to a high risk of harassment, arrest, prosecution, and incarceration without due process of law, without the right to legal counsel, and without an effective and independent judicial system to protect basic legal rights. Even individuals with dual citizenship, such as British-Iranian Alireza Akbari, executed by the regime in January 2023, are not safe from the regime's clutches.

**Hacking, Cyber Insecurity, and IP theft.** Doing business in Iran will inevitably lead to the hacking and theft by Iranian operatives and security agents of a company's proprietary information, trade secrets, confidential employee and corporate information, personal information, and customer information. Moreover, Iranian firms systematically use the slightest association with foreign firms as a pretext to continue advertising purported partnerships, and misappropriate corporate trademarks often many years after ties may have been excised.