

February 1, 2013

The Honorable Barack Obama
President of the United States
1600 Pennsylvania Avenue
Washington, DC 20500

His Highness Sheikh Hamad bin Mohammed al Sharqi
Ruler of Fujairah, United Arab Emirates
P.O. Box 4400, Emri Court, Fujairah, UAE

His Highness Sheikh Mohammed bin Rashid Al Maktoum
Ruler of Dubai, United Arab Emirates
P. O. Box 46616, Abu Dhabi, UAE

His Excellency Benigno Aquino III
President of the Philippines
Malacañang Palace Compound
J. P. Laurel St., San Miguel, Manila 1005

His Excellency Jakaya Kikwete
President of the United Republic of Tanzania
P.O. Box 9120, Dar es Salaam, Tanzania

**Re: Iran Sanctions Fraud: The United States, the Emirates of Dubai and Fujairah,
Tanzania and the Philippines**

Dear President Obama, Your Highness Sheikh Hamad bin Mohammed al Sharqi, Your Highness Sheikh Mohammed bin Rashid Al Maktoum, Your Excellency President Benigno Aquino III and Your Excellency President Jakaya Kikwete:

United Against Nuclear Iran (“UANI”) has completed its investigation into Iran’s systemic effort to evade international oil sanctions. The findings of UANI’s investigation are included in this letter. UANI’s investigation focused on the Iranian regime’s elaborate and ongoing attempts to smuggle Iranian crude to recipient countries in contravention of the international sanctions regime imposed on Iran. UANI’s investigation is based on shipping information, news reports, whistleblowers, and interviews of persons with knowledge of the scheme.

The purpose of this letter is to inform you of this Iranian-sponsored fraud, which is designed to avoid the full impact of oil sanctions against Iran (the “Sanctions Fraud”) and to seek your assistance in stopping the elements of the schemes that operate within your jurisdiction. Unfortunately, this Sanctions Fraud is perpetrated, at least in part, within the jurisdiction of the Emirate of Fujairah and its important

port/bunkering hub, and with the assistance of a Dubai/United States-based criminal enterprise, Philtex Corporation (“Philtex”), and its affiliate the American Register of Shipping (“ARS”) that appears to predominantly operate in the Philippines. The Sanctions Fraud enables Iran to avoid the impact of international sanctions and to sell and trade far more oil than would be permitted under international law.

By this letter, we respectfully request that you take immediate action to end this fraud and/or the parts of the fraud that occur within your jurisdiction and specifically in Dubai, Fujairah, the Philippines and the United States.

Iran Sanctions

On December 31, 2011, President Obama signed into law the *National Defense Authorization Act* (“NDAA”) for the Fiscal Year 2012. Section 1245 of the NDAA sanctions any foreign bank that carries out financial transactions “for the purchase of petroleum or petroleum products from Iran.” Under the terms of the NDAA, the President has authority to waive sanctions if a determination is made that the country with primary jurisdiction over the bank has “significantly reduced” its volume of crude oil purchases. The President may waive sanctions for up to 120 days, and every 120 days thereafter, if there is a determination that it “is in the national security interest of the United States.”

As you know on December 7, 2012, President Obama granted the second series of such waivers to China, India, South Korea, Malaysia, Singapore, South Africa, Sri Lanka, Turkey and Taiwan.

The Iranian regime’s oil production and exports have fallen precipitously as a result of these sanctions. Iran has found it increasingly difficult to transact and ship what oil it is able to produce and sell. As a result, Iran has resorted to fraudulent and increasingly complex schemes to overcome the limitations on transacting and shipping its oil imposed by sanctions. Those schemes are typically played out in international shipping lanes and the vessels that carry Iranian crude.¹

Shipping Iranian Oil

The Iranian regime and its illegal nuclear weapons program are dependent on international shipping for the import of sensitive technology and industrial goods as well as for its crucial export of oil, the proceeds from which are used to fund Iran’s illicit activities. Iran also utilizes shipping to provide crucial support to the Syrian regime in the form of oil purchases, weapons and other material as it carries out its campaign of repression against the Syrian people.

In response to this illicit action, UANI launched its Shipping Campaign in early 2012. As you know, in order to successfully ship its oil, Iran’s tankers must be legally classified, documented, insured and flagged. UANI’s Shipping Campaign therefore sought to compel classification societies, document service providers, insurers and governments worldwide to cease their business with the Islamic Republic of Iran Shipping Lines (“IRISL”), the National Iranian Tanker Company (“NITC”) and the Iranian regime. In response to UANI’s campaign, all thirteen members of the International Association of Classification Societies (“IACS”), including the China Classification Society, ClassNK, Bureau Veritas,

¹ *Hellenic Shipping News*, “[Iran Bypasses sanctions by selling fuel oil through UAE entity: sources](#),” 11/02/12; *ICIS*, “[Iran bitumen exports hit hard by EU insurance ban](#),” 7/16/12

Germanischer Lloyd, Russian Maritime Register of Shipping and Korean Register of Shipping have ceased their maritime activities related to Iran.²

Governments worldwide have also taken action to cease their work with the Iranian regime related to the sales and shipping of oil. For example, in addition to banning the import of Iranian oil, the EU declared it illegal for the dominant European insurance industry to provide insurance for Iranian tankers. The EU has further banned activities carried out in support of Iran's construction of new tankers.³ In October 2012, the EU passed Council Decision 2012/635/CFSP, officially sanctioning the NITC and prohibiting "the construction or the participation in the construction of new oil tankers for Iran..." in addition to prohibiting the provision of "...technical assistance or financing or financial assistance to the construction of new oil tankers for Iran..."⁴ UANI has called on key materials providers such as MAN SE and Wärtsilä to cease their provision of such materials for new tankers under construction for Iran. UANI is still corresponding with such companies but remains dissatisfied with the response of both MAN SE and Wärtsilä.⁵

Now, no reputable insurer will insure Iranian tankers,⁶ and no reputable country will flag Iranian tankers. Countries such as Barbados, Hong Kong, Moldova and Mongolia have recently ended their reflagging of Iranian vessels following UANI campaigns.⁷ Because of these laws and market conditions, Iran can only lawfully ship such oil as permitted under sanctions waiver.⁸

The Iranian regime has sought to evade these sanctions and ship illicit oil. In order to do so it has created an elaborate scheme to falsely classify, document and flag Iranian oil tankers.

1. Iran uses an illegitimate front company, Philtex, (based in Dubai and the United States) to provide key shipping documentation;
2. Iran uses an illegitimate front company that purports to be a classification society, ARS (controlled by Philtex and based in the Philippines), to provide "classification" for its illicit oil carrying vessels;
3. Iran uses a front P&I club created and controlled by Iran's Islamic Revolutionary Guard Corps, Kish P&I Club, to fraudulently satisfy international shipping requirements;⁹ and
4. With the assistance of Philtex and ARS, Iran has employed illicitly acquired "flags of convenience" by misusing the ship registries of Zanzibar and Tanzania, among others.

² Reuters, "[China ship firm ends Iran work as Tehran feel more heat](#)," 11/21/12; Reuters, "[Japanese ship certifier to end Iran ties](#)," 7/17/12; Reuters, "[UPDATE 1-Ship classifier Bureau Veritas halts Iran marine work](#)," 6/7/12; Reuters, "[Exclusive: Russian firm to halt Iran ship work as pressure grows](#)," 9/5/12; Reuters, "[Iran faces new blow as South Korea firm ends ship work](#)," 9/28/12

³ See [EU Council Decision 2012/635/CFSP](#) of 15 October 2012 amending Decision 2010/413/CFSP concerning restrictive measures against Iran

⁴ See [EU Council Decision 2012/635/CFSP](#) of 15 October 2012 amending Decision 2010/413/CFSP concerning restrictive measures against Iran

⁵ See UANI Press Release: [UANI Letter to Wärtsilä Corporation, January 24, 2013](#); see UANI Press Release: [UANI Letter to MAN SE, January 7, 2013](#).

⁶ Reuters, "[Iran oil liability fears grow as insurance ban bites](#)," 11/14/12

⁷ Reuters, "[Hong Kong to cut Iranian ships from register: letter](#)," 11/12/12; Wall Street Journal, "[Iran Shippers Face Difficulty Dodging Sanctions](#)," 9/28/12; The Motorship, "[Moldova ends its reflagging of Iranian vessels](#)," 10/8/12; Barbados Free Press, "[Barbados ends reflagging of Iranian vessels](#)," 12/1/12

⁸ Associated Press, "[US Extends Waivers on Iran Oil Sanctions](#)," 12/7/12

⁹ Reuters, "[Iran oil liability fears grow as insurance ban bites](#)," 11/14/12

This Sanctions Fraud has enabled Iran to engage in an oil smuggling operation primarily based out of the port of Fujairah, wherein sanctions waiver recipient countries are duped into buying additional Iranian oil mislabeled including among other misrepresentations as Iraqi Special Blend.¹⁰

Philtex and ARS – False Shipping Documents and Bogus Classification

Iran has sought to deceptively avoid the growing impediment to shipping its crude by the use of fraudulent shell companies that purport to act as legitimate classification societies and provide legal documentary services essential to the lawful transportation of oil. One such key front company is the Dubai and United States-headquartered Philtex and its controlled affiliate ARS located in the Philippines. Philtex and ARS list its corporate locations and officers as follows:

Chris E. Warren
Director and President
Philtex Corporation
Entrance 4, Level 1, Hamarain Center
P.O. Box 14069
Dubai, UAE

Philtex Marine Services
3616 Roller Crossing
Austin, TX 78728, USA

Captain Khaldoon Kalla
Surveyor
American Register of Shipping
201 VM Condo, 146 Amorsolo St.
Makati, Philippines

On November 30, 2012, UANI wrote to Messrs. Warren and Kalla requesting that they immediately cease and desist from their illicit activity.¹¹ Specifically, Philtex's Philippines-based ARS classification service claims to provide certification services for at least seven (7) vessels listed by the U.S. Treasury as linked to NITC or the National Iranian Oil Company ("NIOC") (Vessels: "Panda" IMO 9569205; "Clove" IMO 9171450; "Rainbow" IMO 9569619; "Azalea" IMO 9357365; "Majestic" IMO 9357183; "Midsea" IMO 9079092; "Zeus" IMO 9362073).¹² Particularly disturbing is that two of the vessels, the "Rainbow" (IMO: 9569619) and "Panda" (IMO: 9569205) are recently-built VLCCs delivered to Iran by Chinese shipyards.¹³ However, ARS does not provide legitimate classification services.

UANI received a "response" purportedly from Philtex. Its offensive tone is only exceeded by its irrational content. The response, written by Philtex Director of Operations Jocelyn Acosta and copied to the "American Law Corporation-USA" purported to be in response to UANI's "illegal exploitation of

¹⁰ *Hellenic Shipping News*, "[Iran bypasses sanctions by selling fuel oil through UAE entity: sources](#)," 11/02/12

¹¹ See attached Exhibit "A": UANI Letter to Philtex Corporation, November 30, 2012

¹² Office of Foreign Assets Control ("OFAC"): [Special Designated Nationals \("SDN"\) List](#)

¹³ *Trend News Agency*, "[Additional tanker deliveries increases Iran's export capacity](#)," 11/27/12; Office of Foreign Assets Control ("OFAC"): [Special Designated Nationals \("SDN"\) List](#)

our company's name and its copyright logo under the name of 'Philtex' that you have so blatantly abused in a scam that your self-appointed illegal body of special interest group of thugs are running... Your bluff have been bought off by many law abiding self-respecting simple minded people who did not question your self-appointed special interest Israeli-American Zionists Neocon private organization pushing a special Israeli agenda by exploiting United States name, its people and locations. We are fully cognizant to the real facts!" Furthermore, the letter threatened "If you do not remove Philtex logo [*sic*] from your website within 5 days from the date of receipt of this electronic Notice, we will be compelled to seek any an [*sic*] all legal remedies in the United States and in all other jurisdictions of the world where our business are [*sic*] being operated directly by us or through any affiliations who have been in the past [*sic*] and continue to suffer at present in [*sic*] financial losses not to mention billions of dollars revenue losses [*sic*] to our clients through illegal arm twisting tactics that UANI has so blatantly adopted in violations [*sic*] of all the international and American laws as well."

Continued Philtex: "I hope we don't have to resort to unnecessary legal actions if you cooperate with us [*sic*] and respect our rights of commercial business granted and preserved by the international laws of free commerce and trade by immediately removing the name of Philtex along with our trademark logo. We are fully certified, registered, properly endorsed by the related agencies of the government of the United Arab Emirates and all those agencies who have granted us the charters and relevant authorities to engage on [*sic*] fully bona fide legal, ethical, and moral norms of private business worldwide including the United States and Europe."¹⁴

Recently, UANI has come into possession of copies of fraudulent documents associated with Philtex and ARS specifically as related to the U.S.-blacklisted NITC vessel currently known as the "Midsea" (IMO 9079092) among other vessels.¹⁵ The Midsea is a dramatic case study for the fraudulent activity of Philtex and ARS on behalf of Iran.

The Midsea was sold to the NITC in 1996 for \$98 million by its builder, Daewoo Heavy Industries. Rated to a deadweight tonnage of 298,809, since 1996 the "Midsea" ("vessel 9079092") has plied the seas as an NITC supertanker.¹⁶ With the advent of sanctions, Iran has sought to conceal the true nature of this vessel, although the unique International Maritime Organization ("IMO") number assigned to the vessel cannot be altered or concealed. In an effort to disguise the ownership and operations of vessel 9079092, in March 2007 the NITC created the single-vessel front company Motion Shipping Co. Ltd., which operated vessel 9079092 under its new identity as the Malta-flagged "Motion." In a similar effort, vessel 9079092 was granted the Tanzanian flag by Philtex and renamed "Midsea" in September and October 2012, respectively.¹⁷

Before the advent of sanctions and the end of IACS classification societies' work with Iran, vessel 9079092 was legitimately classified by Det Norske Veritas ("DNV") and Bureau Veritas. However, after IACS members ended their Iran business, vessel 9079092 has been unable to obtain legitimate classification services from a legitimate classification society. For example, vessel 9079092 was disclassified by DNV in April 2012 and disclassified by Bureau Veritas in December 2012.¹⁸

¹⁴ See Exhibit "B": Philtex Corporation Letter to UANI, December 18, 2012

¹⁵ Office of Foreign Assets Control ("OFAC"): [Special Designated Nationals \("SDN"\) List](#)

¹⁶ IHS: Sea-web; see attached Exhibit "C": Intertanko's Standard Tanker Chartering Questionnaire 88 (Q88)

¹⁷ IHS: Sea-web; see attached Exhibit "C": Intertanko's Standard Tanker Chartering Questionnaire 88 (Q88)

¹⁸ IHS: Sea-web

Iran has resorted to the elaborate scheme described herein in order to conceal the true nature of vessel 9079092 and to facilitate its oil smuggling. For example, through the work of Philtex and ARS, vessel 9079092 was granted a false Interim Certificate of Class.¹⁹ In reality ARS is a fraudulent company and no legitimate classification of vessel 9079092 ever took place.

Philtex and ARS also worked to provide the various shipping documentation that would permit vessel 9079092 to appear to obtain insurance and to lawfully enter international ports.²⁰ These documents are false, have no value and represent no legitimate ship documentary assurances.

Philtex and ARS have further assisted Iran in concealing the true ownership of vessel 9079092 to mask its true Iranian ownership. Philtex and ARS worked with a small law firm in the Seychelles to create a front company that is purportedly the “new” owner of vessel 9079092. The company now purported to own vessel 9079092 is Artemis Shipping Company Ltd., (IMO [5690781](#)) which is listed as based in both the Seychelles and Dubai. UANI’s investigation has revealed Artemis Shipping Company Ltd. to be nothing more than a front company. The address of the company is a small law firm, Trust and Fiduciary Services Limited, which is employed by Philtex and ARS to create such a front. Trust and Fiduciary Services Limited advertises its business as supplying “shelf companies” and creating offshore corporations.²¹ Yet, even with the Seychelles-based effort at fraud, in other documents fraudulently prepared by ARS, the “owner” of vessel 9079092 is described as Success Shipping Co. Ltd., based supposedly on the Island of Nevis.²²

Viewed collectively, all documentation necessary for the legitimate operation of a vessel like the supertanker 9079092 was falsely and illegitimately prepared by the shadowy Philtex and ARS.

Kish P&I Club – Bogus Shipping Insurance

As reported by various media outlets, Iran is no longer able to procure legitimate shipping insurance for its vessels. In the absence of real insurance, Iran has created a bogus and untested insurance company called Kish P&I. Kish P&I is an Iranian regime front that is controlled by the IRGC. Certainly, the fears expressed about the ability of a cobbled together maritime insurer like Kish P&I to compensate for any seaborne accident are real. For instance, Marshall Islands Registry managing partner Clay Maitland stated, “The problem is going to be collecting money if there is a big spill...It might very well take 20 or 30 years of lawsuits or more to collect this money.”²³ In fact, Kish P&I only “insures”

¹⁹ See attached Exhibit “D”: ARS Interim Certificate of Class, issued September 28th 2012

²⁰ See attached Exhibit “E”: ARS Cargo Ship Safety Construction Certificate, issued September 28, 2012; see attached Exhibit “F”: ARS International Sewage Pollution Prevention Certificate, issued September 28, 2012; see attached Exhibit “G”: ARS Interim International Ship Security Certificate, issued September 28, 2012; see attached Exhibit “H”: ARS Statement of Compliance With International Air Pollution Prevention Certificate, issued September 28, 2012; see attached Exhibit “I”: ARS Interim Document of Compliance, issued September 22, 2012; see attached Exhibit “J”: ARS International Load Line Certificate, issued September 28, 2012; see attached Exhibit “K”: ARS Cargo Ship Safety Equipment Certificate, issued September 28, 2012; see attached Exhibit “L”: ARS Interim Safety Management Certificate, issued September 28, 2012; see attached Exhibit “M”: ARS Cargo Ship Safety Radio Certificate, issued September 28, 2012

²¹ Trust and Fiduciary Services Limited: [Company Request Form](#); see attached Exhibit “L”: Interim Safety Management Certificate, issued September 28, 2012

²² See attached Exhibit “N”: TZIRS Certificate of Insurance or Other Financials Security in Respect of Civil Liability for Oil Pollution Damage; Exhibit “O”: see attached TZIRS Certificate of Insurance or Other Financial Security in Respect of Civil Liability for Bunker Oil Pollution Damage

²³ Reuters, “[Iran oil liability fears grow as insurance ban bites](#),” 11/14/12

Iranian oil tankers. Kish P&I is listed on the Certificates of Insurance for vessel 9079092.²⁴ No legitimate port authority should accept such claims of insurance from Kish P&I and indeed it is an essential part of Iran's scheme to smuggle oil as detailed herein.

Illicit Flagging

Over the course of the last year, various countries have declined to flag Iranian vessels. In 2012, for example, UANI successfully contacted Barbados, Hong Kong, Moldova and Mongolia, all of whom committed to refuse to flag Iranian oil tankers.²⁵ The government of Tanzania has stated that "We are de-registering the Iran ships first, then we will move to terminate our contract with Philtex..."²⁶ Yet Philtex and ARS continue to use the Tanzania Zanzibar International Register of Shipping ("TZIRS") as the authority by which it classifies and documents vessels like vessel 9079092. ARS utilized the letterhead of the TZIRS to purportedly attest to the legitimacy of the Kish P&I insurance for vessel 9079092.²⁷ Without such falsified flags of convenience, Iran would be unable to ship its smuggled oil.

The Smuggling Route and Method

To demonstrate Iran's smuggling routes and method the "Midsea," vessel 9079092 provides an excellent example. On October 23, 2012, the NITC filed a Loading Stowage Plan for 1,900,900 barrels of Iranian Light Crude Oil ("ILCO") for vessel 9079092. The Questionnaire for Delivery states that vessel 9079092 was scheduled to deliver such oil to China International United Petroleum & Chemicals Company ("UNIPEC").²⁸ Vessel 9079092 did not just deliver its ILCO cargo to UNIPEC. Following the filing of the Stowage Loading Plan, vessel 9079092 spent two days at the Kharg Island oil terminal, a NIOC loading facility that handles 98% of Iran's crude oil exports.²⁹

After leaving Kharg on October 26, 2012, vessel 9079092 transmitted location data that showed it steaming east out of the Strait of Hormuz on October 28, 2012. After failing to transmit location data for six days, vessel 9079092 reentered the Strait of Hormuz on November 4, 2012, and returned to the Kharg loading terminal.³⁰ A round-trip voyage to the UNIPEC discharge port (Shuidong, China) cited by vessel 9079092 in the Questionnaire for Delivery could not have been completed during this six-day period. Clearly, vessel 9079092 did not fulfill its claimed delivery of 1,900,900 barrels of ILCO to the declared discharge point. Based on the previous actions of vessel 9079092 and the tactics regularly employed by Iranian vessels in facilitating this Sanctions Fraud, and first-hand accounts relayed to UANI, vessel 9079092 offloaded its cargo of ILCO to a third party at a ship-to-ship transfer location close to its known route, at the Fujairah (UNLOCODE: AEFJR) anchorage.

²⁴ See attached Exhibit "N": TZIRS Certificate of Insurance or Other Financials Security in Respect of Civil Liability for Oil Pollution Damage; see attached Exhibit "O": TZIRS Certificate of Insurance or Other Financial Security in Respect of Civil Liability for Bunker Oil Pollution Damage

²⁵ Reuters, "[Hong Kong to cut Iranian ships from register: letter](#)," 11/12/12; *Wall Street Journal*, "[Iran Shippers Face Difficulty Dodging Sanctions](#)," 9/28/12; *The Motorship*, "[Moldova ends it reflagging of Iranian vessels](#)," 10/8/12; *Barbados Free Press*, "[Barbados ends reflagging of Iranian vessels](#)," 12/1/12

²⁶ Reuters, "[Tanzania to drop agent over Iran ship reflagging](#)," 8/17/12

²⁷ See attached Exhibit "N": TZIRS Certificate of Insurance or Other Financials Security in Respect of Civil Liability for Oil Pollution Damage; Exhibit "O": see attached TZIRS Certificate of Insurance or Other Financial Security in Respect of Civil Liability for Bunker Oil Pollution Damage

²⁸ See attached Exhibit "P": NITC Loading Stowage Plan; see attached Exhibit "Q": Questionnaire for Delivery Contract

²⁹ IHS: Sea-web; *PressTV*, "[Iran increases oil storage capacity to foil EU sanctions](#)," 3/19/12

³⁰ IHS: Sea-web

Vessel 9079092 has been known to engage in such clandestine oil transfer schemes in the past. Specifically, in September 2012 vessel 9079092 (then known as the “Motion”) illegally offloaded oil to storage vessels near the Malaysian port of Labuan as part of a transshipment scheme to circumvent sanctions. Specifically, vessel 9079092 and the NITC tanker “Lantana” (IMO 9110444) transferred three million barrels of oil into waiting storage vessels during an operation that “took place literally in the dark of night,” without notice to authorities and without the supervision of a qualified operator.³¹ Similarly, vessel 9079092 has made periodic port of calls to the Fujairah Anchorage B, a designated ship-to-ship transfer location that has become the destination of choice for Iranian vessels to manipulate its oil cargo and to offload it to other tankers and mix it with other blends of oil to mask its Iranian origin.³²

UANI has obtained additional satellite tracking images for NITC vessels that operate in a similar manner to the Midsea and illustrate the methods used in the Sanctions Fraud. The NITC vessels “Azalea” (IMO 9357365), “Clove” (IMO 917450), “Seahorse” (IMO 9356608), “Valor” (IMO 9212917), “Magnolia” (IMO 9172052), and “Millionaire” (IMO 9357391) can be observed disabling their AIS transponders to disguise unscheduled stops in Iranian ports and Fujairah ship-to-ship transfer anchorages. Iran has used “ship-to-ship transfers, discharging and loading at remote ports and “blending” of Iranian oil with others,” to circumvent sanctions and sell its fuel oil to Asia. According to press reports that UANI has independently confirmed:

[O]ne common tactic to skirt them has been to cooperate with small Gulf-based oil traders who act as middlemen for buyers who might be unaware that the cargo is of Iranian origin. Several Middle Eastern traders said they had been approached by small UAE-based companies offering a type of fuel oil dubbed in the market as “Iraqi special blend” that included a combination of different fuel oil blends from the Middle East, or with an origin described as Iraqi. The specification indicates this is a cocktail of products blended in storage tanks and usually offered from the quiet Gulf port of Hamriyah and bunkering hub of Fujairah mostly via ship-to-ship transfers (STS), trading sources said.³³

UANI satellite data is confirmed by news accounts that show that:

AIS Live shiptracking data on Reuters showed that tankers were regularly shuttling towards Iran's main fuel oil export terminals of Bandar Abbas and Bandar Imam Khomeini, then turning off their satellite signals before reappearing soon afterwards next to the UAE storage hub Fujairah. In another tactic, small barges have left the port of Bandar Imam Khomeini, near Iran's largest refinery Abadan, and then transferred their cargo onto bigger tankers destined for Fujairah, two industry sources said. Separately, Chinese e-commerce website Alibaba showed an Iranian seller offering volumes of at least 100,000 barrels of Iraqi fuel oil for sale.³⁴

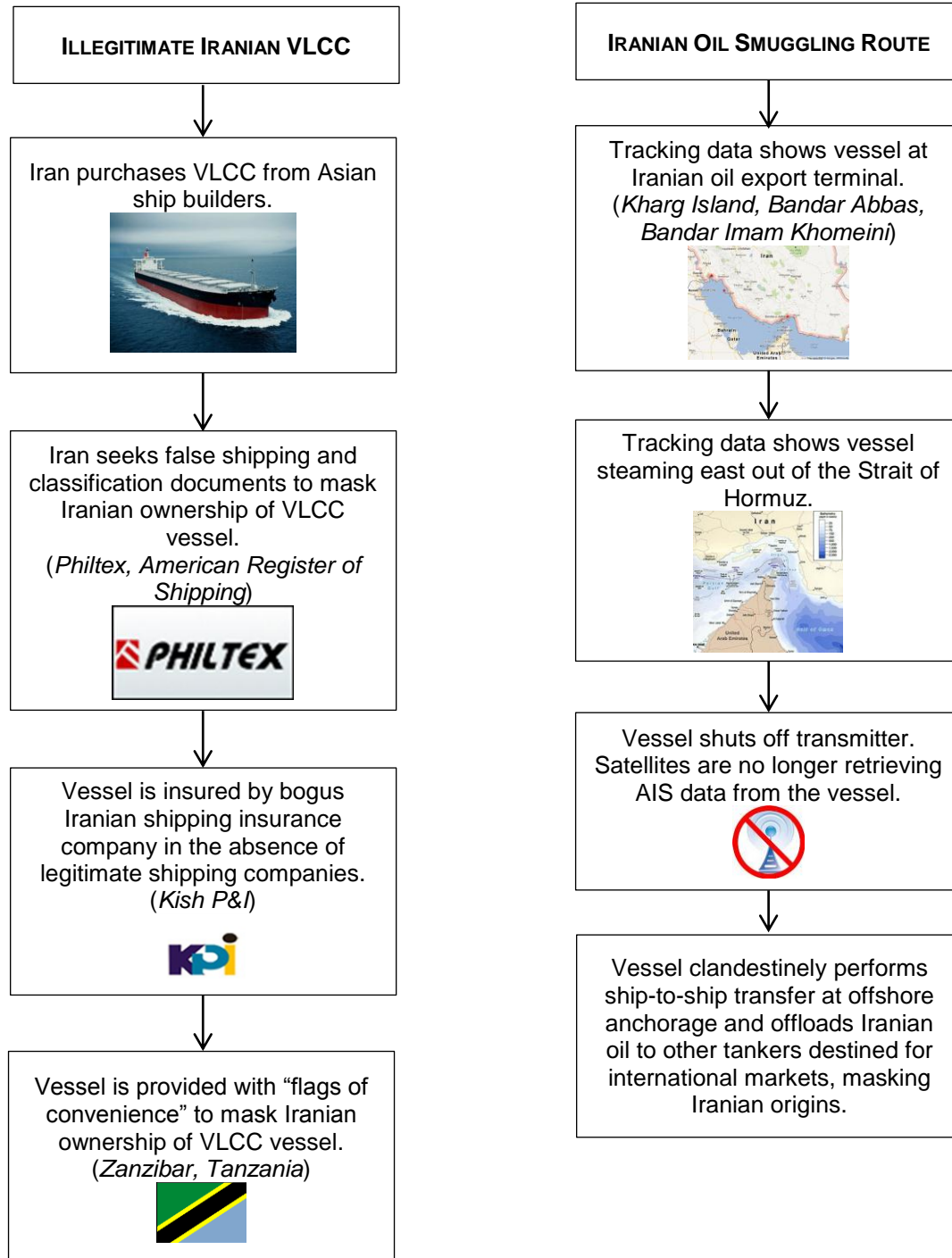
³¹ *The Telegraph*, “[Iran ‘trying to evade sanctions on oil exports’ with night transfers near Malaysia](#),” 9/13/12

³² IHS: Sea-web; Port of Fujairah: [Notice to Mariners No. 53](#); *Hellenic Shipping News*, “[Iran bypasses sanctions by selling fuel oil through UAE entity: sources](#),” 11/02/12

³³ *Reuters*, “[Iran sidesteps sanctions to export its fuel oil](#),” 12/20/12

³⁴ *Reuters*, “[Iran sidesteps sanctions to export its fuel oil](#),” 12/20/12

The satellite data and loading information for NITC vessels, including vessel 9079092, confirms this exact scheme.



Petroleum is the lifeblood of the Iranian regime. Absent the revenue it receives from oil exports, the Iranian regime would be unable to continue its illicit nuclear program or fund its terror proxies around the world. The ongoing Sanctions Fraud described in this letter undermines the progress made by the international community in the last few years to isolate the Iranian regime and limit its ability to transact its oil shipments.

It is therefore imperative that all responsible actors take immediate action to end this fraud and/or the parts of the fraud that occur within their jurisdictions. We respectfully request that you and your governments take immediate action to end the portions of this scheme that occur on or off your shores but in your territorial waters. We appreciate your urgent attention to this matter.

By separate correspondence we ask that the oil waiver countries, China, India, South Korea, Malaysia, Singapore, South Africa, Sri Lanka, Turkey and Taiwan, refuse entry to their territorial waters of any vessel associated with, classified, and/or documented by Philtex, ARS and the TZIRS and to disavow Kish P&I as a legitimate insurance club. Moreover, we ask the waiver countries to refuse to accept any oil from any vessel that had received ship-to-ship transfers in either Fujairah and/or Malaysia until such time as Iran ends its illicit smuggling. Finally we ask that the waiver countries and all responsible countries confirm the true nature of the oil that it purchases by conducting an analysis of its viscosity and to ensure that Iranian oil is not deceptively labeled as, among others, "Iraqi Special Blend."

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Mark Wallace", written in a cursive style.

Ambassador Mark D. Wallace

cc: Chris E. Warren
Director and President, Philtex Corporation

Captain Khaldoon Kalla
Surveyor, American Register of Shipping

Jocelyn S. Acosta
Director of Operations, Philtex Corporation

Adam Szubin
Director of the Office of Foreign Assets Control, United States Department of the Treasury

Daniel L. Glaser
Assistant Secretary for Terrorist Financing, United States Department of the Treasury

The Honorable Ed Royce
Chairman, United States House Committee on Foreign Affairs

The Honorable Eliot Engel
Ranking Member, United States House Committee on Foreign Affairs

The Honorable Tim Johnson
Chairman, United States Senate Committee on Banking, Housing, and Urban Affairs

The Honorable Michael Crapo
Ranking Member, United States Senate Committee on Banking, Housing, and Urban Affairs

The Honorable Jeb Hensarling
Chairman, United States House Committee on Financial Services

The Honorable Maxine Waters
Ranking Member, United States House Committee on Financial Services

The Honorable Ileana Ros-Lehtinen
United States House of Representatives

The Honorable Steve Israel
United States House of Representatives

The Honorable David S. Cohen
Under Secretary for Terrorism and Financial Intelligence, United States Department of the Treasury

His Excellency Hu Jintao
President, People's Republic of China

The Honorable Pranab Mukherjee
President, Republic of India

The Honorable Lee Myung-bak
President, Republic of Korea

Mohd Najib Abdul Razak
Prime Minister, Federation of Malaysia

Dr. Tony Tan Keng Yam
President, Republic of Singapore

Jacob Zuma
President, Republic of South Africa

His Excellency Mahinda Rajapaska
President, Democratic Socialist Republic of Sri Lanka

Abdullah Gül
President, Republic of Turkey

Ma Ying-jeou
President, Republic of China (Taiwan)

Ambassador Zhang Yesui
Ambassador of the People's Republic of China to the United States

Ambassador Gary F. Locke
Ambassador of the United States to the People's Republic of China

Ambassador Nirupama Rao
Ambassador of the Republic of India to the United States

Ambassador Nancy J. Powell
Ambassador of the United States to the Republic of India

Ambassador Y. J. Choi
Ambassador of Republic of Korea to the United States

Ambassador Sung Kim
Ambassador of the United States to the Republic of Korea

Ambassador Datuk Othman Hashim
Ambassador of the Federation of Malaysia to the United States

Ambassador Paul W. Jones
Ambassador of the United States to the Federation of Malaysia

Ambassador Ashok Kumar Mirpuri
Ambassador of the Republic of Singapore to the United States

Ambassador David I. Adelman
Ambassador of the United States to the Republic of Singapore

Ambassador Ebrahim Rasool
Ambassador of the Republic of South Africa to the United States

Virginia Palmer
Chargé d’Affaires of the United States to the Republic of South Africa

Ambassador Jaliya Wickramasuriya
Ambassador of the Democratic Socialist Republic of Sri Lanka to the United States

Ambassador Michele J. Sison
Ambassador of the United States to the Democratic Socialist Republic of Sri Lanka

Ambassador Namık Tan
Ambassador of the Republic of Turkey to the United States

Ambassador Francis J. Ricciardone, Jr.
Ambassador of the United States to the Republic of Turkey

Representative Pu-tsung King
Chief Representative of the Republic of China (Taiwan) to the United States

Christopher J. Marut
Director, American Institute in Taiwan

Ambassador Mwanaidi S. Maajar
Ambassador of the United Republic of Tanzania to the United States

Ambassador Alfonso E. Lenhardt
Ambassador of the United States to the United Republic of Tanzania

Exhibit A

UNITED AGAINST NUCLEAR IRAN

P.O. Box 1028 | New York, NY 10185-1028 | (212) 554-3296

November 30, 2012

Chris E. Warren
Director and President
Philtex Corporation
Entrance 4, Level 1, Hamarain Center
P.O. Box 14069
Dubai, UAE

Philtex Marine Services
3616 Roller Crossing
Austin, TX 78728, USA

Captain Khaldoon Kalla
Surveyor
American Register of Shipping
201 VM Condo, 146 Amorsolo St.
Makati, Philippines

Re: Philtex and Iran

Dear Mr. Warren and Capt. Kalla:

United Against Nuclear Iran (“UANI”) is writing to express its concern with Philtex Corporation’s (“Philtex”) extensive support for Iran’s illicit shipping activities in violation of international sanctions. Specifically, UANI understands that Philtex recently established the American Register of Shipping (“ARS”) in order to provide classification services to at least seven (7) vessels owned by the National Iranian Tanker Company (“NITC”), including two new Chinese-built Very Large Crude Carriers (“VLCCs”) that are vital to Iran’s oil shipping industry. Philtex is also reported to have fraudulently granted Tanzanian flagging rights to NITC vessels. (*Reuters*, “[Tanzania to drop agent over Iran ship reflagging](#),” 8/17/12) By providing these key services to Iran’s shipping industry, Philtex undermines international sanctions and enables the Iranian regime to continue its illicit nuclear proliferation activities as well as arms shipments to its terrorist proxies and regional allies including the brutal Syrian regime. UANI calls on Philtex to clarify its involvement with Iran’s shipping sector and to immediately cease its provision of maritime services until Philtex can confirm that no Iranian vessels are beneficiaries of such services.

Earlier this year, UANI launched its Shipping Campaign to compel international shippers, classification societies, P&I clubs and governments worldwide to cease their business with the Islamic Republic of Iran Shipping Lines (“IRISL”), the NITC and the Iranian regime. The

Ambassador Mark D. Wallace | Chief Executive Officer | MWallace@uani.com

Iranian regime and its illegal nuclear weapons program are dependent on the international shipping industry for imports of sensitive technology and industrial goods as well as for the exports of oil needed to fund its illicit activities. Iran is also providing crucial support to the Syrian regime in the form of oil purchases, weapons and other material as it carries out its reprehensible campaign of repression against the Syrian people.

In response to UANI's campaign, all members of the International Association of Classification Societies ("IACS"), including the China Classification Society, ClassNK, Bureau Veritas, Germanischer Lloyd, Russian Maritime Register of Shipping and Korean Register of Shipping, have ceased their maritime activities related to Iran. Furthermore, Barbados, Hong Kong, Moldova and Mongolia have recently ended their reflagging of Iranian vessels.

As a result, Iran's NITC vessels have resorted to utilizing a variety of fraudulent measures to clandestinely export Iranian oil. For instance, UANI understands that Philtex's Philippines-based ARS classification service provides certification services for at least seven (7) vessels listed by the U.S. Treasury as linked to NITC or the National Iranian Oil Company ("NIOC"). (Office of Foreign Assets Control ("OFAC"): [Special Designated Nationals \("SDN"\) List](#)) (Vessels: "Panda" IMO 9569205; "Clove" IMO 9171450; "Rainbow" IMO 9569619; "Azalea" IMO 9357365; "Majestic" IMO 9357183; "Midsea" IMO 9079092; "Zeus" IMO 9362073) Particularly disturbing is that two of the vessels, the "Rainbow/Souvenir" (IMO: 9569619) and "Carnation/Safe" (IMO: 9569205) are recently-built VLCCs delivered to Iran by Chinese shipyards. (*Trend News Agency*, "[Additional tanker deliveries increases Iran's export capacity](#)," 11/27/12, and OFAC: [SDN](#))

UANI is particularly concerned that neither Philtex nor ARS maintain public lists of the vessels or entities they provide services for, a practice that is standard among responsible and reputable members of the international shipping industry. Accordingly, UANI calls on Philtex and ARS to make public the identities of all business partners and serviced vessels, including a list of all vessels and entities receiving classification, flagging or other maritime services arising out of or relating in any way to Iran – particularly those entities and vessels that fraudulently conceal their true Iranian identity.

Additionally, despite recent media attention, Philtex has yet to provide a satisfactory explanation of its involvement in Tanzania's reflagging of NITC vessels in its capacity as manager of the Tanzania Zanzibar International Register of Shipping ("TZIRS"). Surely Philtex understands the disconnect whereby it self-identifies a member of its leadership as the "deputy registrar of the Tanzanian shipping registry" but is unable to provide an explanation of the continued and renewed presence of NITC tankers flying Tanzania's flag. (*Forbes*, "[Iranian Tankers in a Tanzanian Twilight Zone](#)," 10/18/12)

Furthermore, UANI understands that Philtex facilitates the NITC's deceptive practice of obscuring the ownership of its vessels by registering them through front companies. The Iranian regime is known to have registered front companies in Belize and the British Virgin Islands ("BVI") in order to evade international sanctions that affected its previous safe havens of Malta and Cyprus. (*Wall Street Journal*, "[Iran Hides Behind Exotic Flags to Help Syria](#)," 11/1/12) Philtex conveniently advertises its marine consultancy services, including the "Formation of

International Business Company,” in both Belize and the BVI. (Philtex Corporation: [Marine Consultancy](#))

Philtex and U.S.-based Philtex Marine Services should also be aware of recent sanctions legislation that could seriously affect Philtex’s U.S. and international operations. As you know, on August 10, 2012, President Barack Obama signed into law the *Iran Threat Reduction and Syria Human Rights Act of 2012*, which imposes sanctions on entities that assist Iran in evading existing sanctions. Specifically, Section 202 calls for the sanctioning of any person, including any government, that “owns, operates, or controls the vessel, in a manner that conceals the Iranian origin of crude oil or refined petroleum products transported on the vessel, including by—(i) permitting the operator of the vessel to suspend the operation of the vessel’s satellite tracking device; or (ii) obscuring or concealing the ownership, operation, or control of the vessel by—(I) the Government of Iran; (II) the National Iranian Tanker Company or the Islamic Republic of Iran Shipping Lines; or (III) any other entity determined by the President to be owned or controlled by the Government of Iran or an entity specified in subclause (II).” Moreover, Section 211 calls for the sanctioning of any person, including any government, that “knowingly sells, leases, or provides a vessel or provides insurance or reinsurance or any other shipping service for the transportation to or from Iran of goods that could materially contribute to the activities of the Government of Iran with respect to the proliferation of weapons of mass destruction or support for acts of international terrorism.” (U.S. Federal Register: [Iran Threat Reduction and Syria Human Rights Act of 2012](#))

The European Union has taken similar steps. In July 2012, the EU enacted Council Regulation No. 267/2012 and imposed on a ban on insurance and reinsurance for tankers carrying Iranian oil, prohibiting EU companies from providing such services. (EU Council Regulation No. 267/2012 of 23 March 2012 [concerning restrictive measures against Iran and repealing Regulation \(EU\) No. 961/2010](#)) Most recently in October, the EU also passed Regulation No. 945/2012 and officially designated the NITC. (EU Council Decision 2012/635/CFSP of 15 October 2012 [amending Decision 2010/413/CFSP concerning restrictive measures against Iran](#))

Please also be advised that any U.S. persons, wherever they operate, who violate U.S. regulations on trade with Iran may be subject to severe civil or criminal penalties. Specifically, the *Iranian Transactions Regulations* ([31 Code of Federal Regulations Part 560](#), 2011) state that “a person who willfully commits, willfully attempts to commit, or willfully conspires to commit, or aids and abets in the commission of a violation of any license, order, regulation, or prohibition shall, upon conviction, be fined no more than \$1,000,000, or, if a natural person, may be imprisoned for not more than 20 years, or both.” (*Iranian Transactions Regulations*, [31 CFR §560.701\(a\)\(2\)](#), 2011) These grave consequences should be of particular concern to Mr. Warren as he is both president of the company and a U.S. citizen.

The international community has taken unprecedented steps to counter the grave threat posed by Iran’s illicit nuclear weapons program. Concentrated international pressure is having a profound impact in driving Iran to the negotiating table. In the past year, Iranian oil exports have been reduced by more than half and Iran’s economy faces rampant inflation. Now is the time to exert maximum pressure on Iran if we are to avoid a potentially disastrous conflict in the world’s most volatile region.

Philtex's apparent deceptive business practices and seeming support for Iran's oil shipments and the regime-controlled shipping industry is unconscionable. By facilitating NITC's access to the international shipping market and supporting the Iranian regime's primary source of revenue, Philtex is undermining international sanctions and the actions taken by responsible members of the international shipping industry. It is time for Philtex to end its relationship with Iran and the NITC.

It is incumbent on all of us – private citizens, governments and corporations alike – to take concrete steps to oppose this ongoing and dangerous threat. UANI and its supporters will work to ensure that Iranian vessels, particularly those of the NITC, do not have access to international ports.

Please let us hear from you by December 7, 2012 regarding Philtex's intentions concerning its Iran business.

Thank you for your immediate attention to this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Mark D. Wallace". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ambassador Mark D. Wallace

cc: The Honorable Ileana Ros-Lehtinen
Chairman, United States House Committee on Foreign Affairs

The Honorable Howard L. Berman
Ranking Member, United States House Committee on Foreign Affairs

The Honorable Tim Johnson
Chairman, United States Senate Committee on Banking, Housing, and Urban Affairs

The Honorable Richard C. Shelby
Ranking Member, United States Senate Committee on Banking, Housing, and Urban Affairs

The Honorable Spencer Bachus
Chairman, United States House Committee on Financial Services

The Honorable Barney Frank
Ranking Member, United States House Committee on Financial Services

The Honorable David S. Cohen
Under Secretary for Terrorism and Financial Intelligence, United States
Department of the Treasury

Jocelyn S. Acosta
Director of Operations, Philtex Corporation

Ambassador Vinai Thummalapally
United States Ambassador to Belize

H.E. Nestor Mendez
Ambassador of Belize to the United States

Ambassador Mwanaidi S. Maajar
Ambassador of the United Republic of Tanzania to the United States

Ambassador Alfonso E. Lenhardt
Ambassador of the United States to the United Republic of Tanzania

Ambassador Larry L. Palmer
Consul General of the United States to Barbados and E. Caribbean

Exhibit B

Date: 18TH December, 2012

To: Ambassador Mark D. Wallace
Chief Executive Officer
United Against Nuclear Iran
P.O. Box 1028, New York, USA

NOTICE TO CEASE AND DESIST

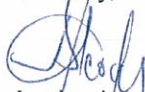
This is in reference to your illegal exploitation of our company's name and its copyright logo under the name of "Philtex" that you have so blatantly abused in a scam that your self-appointed illegal body of special interest group of thugs are running by giving impressions to the world as though you are affiliated with the United Nations or the United States government. It is farthest from the truth. Your bluff have been bought off by many law abiding self respecting simple minded people who did not question your self-appointed special interest Israeli-American Zionists Neocon private organization pushing a special Israeli agenda by exploiting United States' name, its people and locations. We are fully cognizant to the real facts!

Our organization has been subject to your illegalities whereby your sympathetic prestitute media has tried to intimidate Philtex Corporation to illegally force us to stop doing legally permissible business with Iran. Although we are not directly engaged in doing business with Iranian government or any of its agencies but we have been subjected to your illicit campaign resulting in barrage of communications from all sorts of equally dubious nature of advocacy groups of suspicious nature and origins. We have carefully researched your organization projecting as though you are some form of a government agency, which you are not. So this is the first and the last warning in the strongest possible terms to you and your henchmen worldwide, to immediately cease and desist from your illegal extortion and blackmail tactics. We are operating within the framework of laws, Rules and Regulations of our jurisdictional government. We have taken all the legal measure to ascertain that Philtex operation is fully in conformance to the Sanctions imposed by the United Nations Security Council Resolutions. We do not challenge nor seek to challenge any other sanctions unilaterally imposed by the United States, EU countries, Israel and other non-EU countries. As we are not a political body but a private ship registry office facilitating shipping companies from around the globe to enable their legal registry of their ships within all the prescribed laws, Rules and Regulations applicable in each flagging jurisdictions including the United States, Europe and rest of the world.

This is the **ONLY WARNING** that you will receive. If you do not remove Philtex logo from your website within 5 days from the date of receipt of this electronic Notice, we will be compelled to seek any an all legal remedies in the United States and in all other jurisdictions of the world where our business are being operated directly by us or through any affiliations who have been in the past and continue to suffer at present in financial losses not to mention billions of dollars revenue losses to our clients through illegal arm twisting tactics that UANI has so blatantly adopted in violations of all the international and American laws as well.

I hope we don't have to resort to unnecessary legal actions if you cooperate with us and respect our rights of commercial business granted and preserved by the international laws of free commerce and trade by immediately removing the name of Philtex along with our trademark logo. We are fully certified, registered, properly endorsed by the related agencies of the government of the United Arab Emirates and all those agencies who have granted us the charters and relevant authorities to engage on fully bona fide legal, ethical, and moral norms of private business worldwide including the United States and Europe.

Sincerely,


Jocelyn Acosta
Director Of Operations

cc: American Law Corporation - USA

Exhibit C

INTERTANKO'S STANDARD TANKER CHARTERING QUESTIONNAIRE 88 (Q88)
Version 3

1.	VESSEL DESCRIPTION		
1.1	Date updated:	13.10.2012	
1.2	Vessel's name:	MIDSEA	
1.3	IMO number:	9079092	
1.4	Vessel's previous name(s) and date(s) of change:	NAJM (13.06.2012)MOTION(27.09.12)	
1.5	Date delivered:	04.08.1996	
1.6	Builder (where built):	DAEWOO SHIPYARD, S.Korea	
1.7	Flag:	TANZANIA	
1.8	Port of Registry:	ZANZIBAR	
1.9	Call sign:	5IM628	
1.10	Vessel's satcom phone number:	Mini M 761131571 / F77 761128970	
	Vessel's fax number:	600892933	
	Vessel's telex number:		
	Vessel's email address:	motion@tankersmail.com	
1.11	Type of vessel:	OIL TANKER	
1.12	Type of hull:	DOUBLE HULL	
Classification			
1.13	Classification society:	ARS	
1.14	Class notation:	OIL TANKER ESP, AUT-UMS, SYSNEQ, MON-HULL, unrestricted navigation	
1.15	If Classification society changed, name of previous society:	DNV,BV	
1.16	If Classification society changed, date of change:	23.03.2012 ,28.09.12	
1.17	IMO type, if applicable:	N/A	
1.18	Does the vessel have ice class? If yes, state what level:	No	
1.19	Date / place of last dry-dock:	18.10.2011	CHINA
1.20	Date next dry dock due	08.04.2014	
1.21	Date of last special survey / next survey due:	24.10.2011	24.10.2016
1.22	Date of last annual survey:	24.10.2011	
1.23	If ship has Condition Assessment Program (CAP), what is the latest overall rating:	HULL-1,	
1.24	Does the vessel have a statement of compliance issued under the provisions of the Condition Assessment Scheme (CAS): If yes, what is the expiry date?	N/A	
Dimensions			
1.25	Length Over All (LOA):	332.00 Meters	
1.26	Length Between Perpendiculars (LBP):	320.00 Meters	
1.27	Extreme breadth (Beam):	58.000 Meters	
1.28	Moulded depth:	31.00 Meters	
1.29	Keel to Masthead (KTM) / KTM in collapsed condition (if applicable):	62.8 Meters	N/A Meters
1.30	Bow to Center Manifold (BCM) / Stern to Center Manifold (SCM):	163.50 Meters	168.50 Meters
1.31	Distance bridge front to center of manifold:	113.58 Meters	
1.32	Parallel body distances:	Lightship	Normal Ballast Summer Dwt
	Forward to mid-point manifold:	56.0 Meters	81.29 Meters 81.29 Meters
	Aft to mid-point manifold:	39.5 Meters	55.51 Meters 78.91 Meters
	Parallel body length:	95.5 Meters	136.8 Meters 160.200 Meters
1.33	FWA at summer draft / TPC immersion at summer draft:	498 Millimeters	171.2 Metric Tons
1.34	What is the max height of mast above waterline (air draft)	Full Mast	Collapsed Mast
	Lightship:	59.60 Meters	N/A Meters
	Normal ballast:	52.78 Meters	N/A Meters
	At loaded summer deadweight:	40.76 Meters	N/A Meters
Tonnages			
1.35	Net Tonnage:	108127	
1.36	Gross Tonnage / Reduced Gross Tonnage (if applicable):	156809	124299
1.37	Suez Canal Tonnage - Gross (SCGT) / Net (SCNT):	157753.48	149303.59

Exhibit D



AMERICAN REGISTER OF SHIPPING

INTERIM CERTIFICATE OF CLASS

ARS Register No.: 001

Certificate No.: DXB - 200

This certificate is issued to the **MIDSEA**
IMO Number **9079092**
Date of Build **23/04/1996**
Port of Registry **ZANZIBAR**
Gross tons **156809**

to confirm that having been surveyed by American Register Of Shipping and having been found in compliance with the Rules and Regulations for the Classification of Ships, the aforesaid ship has been assigned the class

⚡ HULL ⚡ MACHINERY
OIL TANKER ESP
UNRESTRICTED NAVIGATION
⚡ AUT-UMS ⚡ SYS-NEQ, MON-HULL

This Certificate is valid until 27TH December 2012

Issued at Singapore on 28TH September 2012



For American Register of Shipping

Exhibit E



AMERICAN REGISTER OF SHIPPING

No: DXB-200

CARGO SHIP SAFETY CONSTRUCTION CERTIFICATE

Issued under the Provisions of the
INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974,
as modified by the Protocol of 1988 relating thereto

Under the authority of

TANZANIA ZANZIBAR INTERNATIONAL REGISTER OF SHIPPING

By: American Register of Shipping

Name of Ship	Distinctive Number or Letters	Port of Registry	Gross Tonnage	IMO Number ¹
MIDSEA	SIM 628	ZANZIBAR	156809	9079092

Deadweight of ship² 298731 Metric tons

Type of ship³

~~Bulk Carrier~~
Oil Tanker
~~Chemical Tanker~~
~~Gas Carrier~~
Cargo ship other than any of the above

Date of build:

Date of building contract: 18/06/1993

Date on which keel was laid ship was at a similar stage of construction: 23/04/1996

Date of delivery: 02 OCT 1996

Date on which work for a conversion or an alteration or modification of a major character was commenced (where applicable) --

All applicable dates shall be completed

THIS IS TO CERTIFY:

1. That the ship has been surveyed in accordance with the requirements of regulation 1/10 of the Convention.
2. That the survey showed that the condition of the structure, machinery and equipment as defined in the above regulation was satisfactory and the ship complied with the relevant requirements of chapters II-1 and II-2 of the Convention (other than those relating to fire safety systems and appliances and fire control plans).
3. That the last two inspections of the outside of the ship's bottom took place
on 24.10.2011 and 02.08.2009
4. That an Exemption Certificate ~~has~~ has not⁴ been issued.

This certificate is valid until⁵ 27TH DAY OF DECEMBER 2012 subject to annual and intermediate surveys and inspections of the outside of the ship's bottom in accordance with regulation 1/10 of the Convention.

Completion date of survey on which this certificate is based 27/09/2012 dd/mm/yyyy

Issued at SINGAPORE the 28TH day of SEPTEMBER 2012

On behalf of American Register of Shipping
Surveyor: _____



¹ In accordance with IMO ship identification number scheme adopted by the Organization by resolution A.800 (15)

² For oil tankers, chemical tankers and gas carriers only

³ Delete as appropriate

⁴ Insert the date of expiry as specified by the Administration, in accordance with regulation 1/10 of the Convention. The day and month of this date correspond to the anniversary date, as defined in article 12 of the Convention, unless approved in accordance with regulation 1/10/1

Exhibit F



AMERICAN REGISTER OF SHIPPING

No: DXB-260

INTERNATIONAL SEWAGE POLLUTION PREVENTION CERTIFICATE

Issued under the provisions of the
International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating
thereto, and as amended (hereinafter referred to as "the convention")

Under the authority of the Government of

TANZANIA ZANZIBAR INTERNATIONAL REGISTER OF SHIPPING

By American Register of Shipping

Name of Ship	Distinctive Number or Letter	Port of Registry	Gross Tonnage	Number of persons which the ship is certified to carry	IMO Number
MIDSEA	SIM 628	ZANZIBAR	156809	43	9079092

New/ Existing ship?

Date on which keel was laid or ship was at a similar stage of construction or, where applicable, date on which work for a
conversion or an alteration or modification of a major character was commenced

23/04/1996

THIS IS TO CERTIFY:

1. The ship is equipped with sewage treatment plant/comminuter/holding tank² and a discharge pipeline in compliance with regulation 9 and 10 of ANNEX IV of the Convention as follows:

1.1 ²Description of the sewage treatment plant:

Type of the sewage treatment plant ORCA II-A 36, 4088LMD(3 phase), Marine Sanitation Device

Name of manufacturers Envirovac Inc

The sewage treatment plant is certified by the Administration to meet the following effluent standards as
Provided for in resolution ME-PC.2(VI).

1.2 ²Description of comminuter:

N/A

Type of the comminuter --

Name of manufacturer --

Standard of sewage after disinfection --

1.3 ²Description of holding tank equipment:

Total capacity of the holding tank 6.8 cbm

Location 1/R FIRST DECK

- 1.4 A pipeline for the discharge of sewage to a reception facility, fitted with standard shore connection - YES

2. That the ship has been surveyed in accordance with regulation 4 of Annex IV of the Convention.

3. That the survey shows that the structure, equipment, systems, fittings, arrangement and materials of the ship and the condition thereof are in all respects satisfactory and that the ship complies with the applicable requirements of Annex IV of the Convention.

This certificate is valid until 27TH DAY OF DECEMBER 2012 ³subject to surveys in accordance with
regulation 4 of Annex IV of the Convention.

Completion date of survey on which this certificate is based

27/09/2012

Dd/mm/yyyy

Issued at SINGAPORE The 28TH day of

SEPTEMBER

20

12

On behalf of American Register of Shipping
Surveyor:

¹ In accordance with IMO ship identification number scheme, adopted by the Organization by resolution A 500 (15).

² Delete as appropriate.

³ Insert the date of expiry as specified by the Administration in accordance with regulation 11 of Annex IV of the Convention. The day and month of this date correspond to the anniversary date, as defined in regulation 1.27 of Annex 1 of the Convention, unless amended in accordance with regulation 10.8 of the Convention.

Exhibit G



AMERICAN REGISTER OF SHIPPING

No: DXB-200

INTERIM INTERNATIONAL SHIP SECURITY CERTIFICATE

Issued under the Provisions of the
INTERNATIONAL CODE FOR THE SECURITY OF SHIP AND PORT FACILITIES
(ISPS CODE)

By: American Register of Shipping

Name of Ship	Distinctive Number or Letters	Port of Registry	Gross Tonnage	IMO Number	Type of Ship
MIRSEA	SIM 628	ZANZIBAR	156809	9079092	OIL TANKER

Name and address of the Company:

ARTEMIS SHIPPING COMPANY LTD.

SUITE NO. 3 - 11, 3RD FLOOR, CAPITAL CITY BUILDING

INDEPENDENCE AVENUE, VICTORIA, MAHE, SEYCHELLES

IMO NUMBER: 5690781

Is this subsequent, consecutive Interim Certificate? Yes/No

If Yes, date of issue of initial Interim Certificate

THIS IS TO CERTIFY that the requirements of section A/19.4.2 of the ISPS Code have been complied with

This Certificate is issued pursuant to section A/19.4 of the ISPS Code.

This Interim Document of Compliance is valid until

27TH DECEMBER 2012

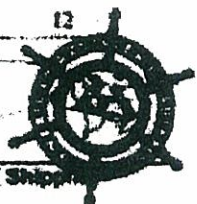
Issued at SINGAPORE the 28TH day of

SEPTEMBER

20

12

For the American Register of Shipping



Delete as appropriate.

Exhibit H



AMERICAN REGISTER OF SHIPPING

No: DXB-200

STATEMENT OF COMPLIANCE WITH INTERNATIONAL AIR POLLUTION PREVENTION CERTIFICATE

Issued under the provision of the Protocol of 1997 to amend the International Convention for the Prevention of Pollution from Ships, 1973 as modified by the protocol of 1978 relating thereto, and as amended by resolution MEPC.132 (53), (Hereinafter referred to as "The Convention")

(Note: This certificate shall be supplemented by a Record of Construction and Equipment)

Issued under the Tanzania Zanzibar International Register of Shipping

By: American Register of Shipping

Name of Ship	Distinctive Number or Letters	Port of Registry	Gross Tonnage	IMO Number
MIDSEA	SIM 628	ZANZIBAR	156809	9079092

Type of ship

Tanker
Ship other than a tanker

THIS IS TO CERTIFY:

1. That the ship has been surveyed in accordance with regulation 5 of Annex VI of the Convention; and
2. That the survey shows that the equipment, systems, fittings, arrangements and materials fully comply with the applicable requirements of Annex VI of the Convention.

This certificate is valid until 27th DAY OF DECEMBER 2012 subject to surveys in accordance with regulation of Annex VI of the Convention.

Issued at SINGAPORE The 28th day of SEPTEMBER 20 12



For the American Register of Shipping
Surveyor: _____

Exhibit I



AMERICAN REGISTER OF SHIPPING

INTERIM DOCUMENT OF COMPLIANCE

Issued under the Provisions of the
INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974, as amended.

By: American Register of Shipping

Name and address of the Company: **ARTEMIS SHIPPING COMPANY LTD.**
SUITE NO. 3 - 11, 3RD FLOOR, CAPITAL CITY BUILDING
INDEPENDENCE AVENUE, VICTORIA, MAHE, SEYCHELLES
IMO NUMBER: 5690781

THIS IS TO CERTIFY THAT safety management system of the Company has been recognized as meeting the objectives of paragraph 1.2.3 of the International Management Code of the Safe Operation of Ships and for Pollution Prevention (ISM Code for the type of ships listed (delete as appropriate):

Passenger ship	Gas carrier
Passenger high speed craft	
LPG Carrier	Bulk carrier
Oil tanker	Other cargo ship
Chemical tanker	Mobile offshore drilling unit

This Interim Document of Compliance is valid until 21ST DECEMBER 2012

Issued at ZANZIBAR the 22ND day of SEPTEMBER 20 12

For: American Register of Shipping



Exhibit J



AMERICAN REGISTER OF SHIPPING

No: DXB - 200

INTERNATIONAL LOAD LINE CERTIFICATE (1966)

Issued under the Provisions of the
INTERNATIONAL CONVENTION ON LOAD LINE, 1966,
as modified by the protocol of 1988 relating thereto
Under the authority of

TANZANIA ZANZIBAR INTERNATIONAL REGISTER OF SHIPPING

By: American Register of Shipping

Name of Ship	Distinctive Number or Letters	Port of Registry	Length (L) as defined in art 2(8) (in meters)	IMO Number ¹
MIDSEA	SIM 628	ZANZIBAR	320.276	9079092

Freeboard assigned as²:

A new ship
An existing ship

Type of Ship³:

Type A
Type-B
Type-B with reduced freeboard⁴

Freeboard

Freeboard from Deck Line⁵

Tropical	6561	mm(T)
Summer	7019	mm(S)
Winter	7477	mm(W)
Winter North Atlantic	--	mm(WNA)
Timber Tropical	--	mm(L.T)
Timber Summer	--	mm(L.S)
Timber Winter	--	mm(L.W)
Timber Winter North Atlantic	--	mm(L.WNA)

Load Line

458	mm above (S)
Upper edge of line through center of ring	
458	mm below (S)
--	mm below (S)
--	mm above (LS)
--	mm above (S)
--	mm below (LS)
--	mm above (LS)

Allowance for fresh water for all freeboards other than timber 498 mm. For timber freeboards -- mm.
The upper edge of the deck line from which these freeboards are measured is 2000 mm Below the top of steel upper deck at side



THIS IS TO CERTIFY:

- That the ship has been surveyed in accordance with the requirements of article 14 of the Convention.
- That the survey showed that the freeboard have been assigned and load lines shown above have been marked in accordance with the Convention.

This certificate is valid until⁶ 27TH DAY OF DECEMBER 2012 subject to annual survey in accordance with Art. 14(1)(c) of the Convention.

Completion date of survey on which this certificate is based

27/09/2012

dd/mm/yyyy

Issued at SINGAPORE The 28TH day of

SEPTEMBER

20

12

On behalf of American Register of Shipping
Surveyor: 

¹ In accordance with regulation A.606(15) - IMO Ship Identification Number Scheme, this information may be included voluntarily.

² Delete as appropriate.

³ Freeboards and load lines which are not applicable need not be entered on the certificate. Subdivision may be entered on the certificate on a voluntary basis.

⁴ Insert the date of expiry as specified by the Administration in accordance with regulation 19(1) of the Convention. The day and month of this date correspond to the anniversary date, as defined in article 2(9) of the Convention, unless amended in accordance with article 19(8) of the Convention.

Exhibit K



AMERICAN REGISTER OF SHIPPING

No: DXB - 200

CARGO SHIP SAFETY EQUIPMENT CERTIFICATE

This Certificate shall be supplemented by Record of Equipment (Form E-1)
Issued under the Provisions of the
INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974,
as modified by the Protocol of 1988 relating thereto

Under the authority of

TANZANIA ZANZIBAR INTERNATIONAL REGISTER OF SHIPPING

By: American Register of Shipping

Name of Ship	Distinctive Number or Letters	Port of Registry	Gross Tonnage	IMO Number ¹
MIDSEA	SIM 628	ZANZIBAR	156809	9079092

Deadweight of ship² 298731 Metric tons Length of ship (Regulation III/3.12) 320.276 m

Type of ship³

~~Bulk Carrier~~
~~Oil Tanker~~
~~Chemical Tanker~~
~~Gas Carrier~~
Cargo ship other than any of the above

Date on which keel was laid or ship was at a similar stage of construction or, where applicable, date on which work for a conversion or an alteration or modification of a major character was commenced 23/04/1996

THIS IS TO CERTIFY:

- That the ship has been surveyed in accordance with the requirements of regulation 1/8 of the Convention.
- That the survey showed that:
 - 2.1 The ship complied with the requirements of the Convention as regards fire safety systems and appliances and fire control plans;
 - 2.2 The life saving appliances and the equipment of the lifeboats, liferafts and rescue boats were provided in accordance with the requirements of the Convention;
 - 2.3 The ship was provided with a line-throwing appliance and radio installations used in life-saving appliances in accordance with the requirements of the Convention.
 - 2.4 The ship complied with the requirements of the Convention as regards shipborne navigational equipment, means of embarkation for pilots and nautical publications;
 - 2.5 The ship was provided with lights, shapes and means of making sound and distress signals, in accordance with the requirements of the Convention and the International Regulations for Preventing Collisions at Sea in force;
 - 2.6 In all other respects the ship complied with the relevant requirements of the Convention.
- That an Exemption Certificate has/has not⁴ been issued.

This certificate is valid until⁵ 27TH DAY OF DECEMBER 2012 subject to annual and periodical surveys in accordance with regulation 1/8 of the Convention.

Completion date of survey on which this certificate is based 27/09/2012 dd/mm/yyyy
Issued at SINGAPORE The 28TH day of SEPTEMBER 2012

On behalf of American Register of Shipping
Surveyor:

¹ In accordance with IMO ship identification number scheme, adopted by the Organization by resolution A 600 (12)

² For oil tankers, chemical tankers and gas carriers only

³ Delete as appropriate

⁴ Insert the date of expiry as specified by the Administration in accordance with regulation I/10.4 of the Convention. The day and month of this date correspond to the anniversary date, as defined in article I/2 of the Convention, unless amended in accordance with regulation I/10.6.

Exhibit L



AMERICAN REGISTER OF SHIPPING

No: DXB-200

INTERIM SAFETY MANAGEMENT CERTIFICATE

Issued under the provisions of the
INTERNATIONAL CONVENTION FOR THE SAFETY OF AT SEA, 1974, as amended,

by: American Register of Shipping

Name of Ship	Distinctive Number or Letters	Port of Registry	Gross Tonnage	IMO Number	Type of Ship
MIDSEA	SIM 628	ZANZIBAR	156809	9079092	OIL TANKER

Name and address of the Company: **ARTEMIS SHIPPING COMPANY LTD.**
SUITE NO. 3 - 11, 3RD FLOOR, CAPITAL CITY BUILDING
INDEPENDENCE AVENUE, VICTORIA, MAHE, SEYCHELLES
IMO NUMBER: 5690781

THIS IS TO CERTIFY THAT:

That the requirements of paragraph 14.4 of the ISM Code have been met and that the Document of Compliance/Interim Document of Compliance¹ of the Company is relevant to this ship.

This Interim Safety Management Certificate is valid until² 27TH DECEMBER 2012
Subject to the ~~Document of Compliance~~/Interim Document of Compliance³ remaining valid.

Issued at SINGAPORE the 28TH day of SEPTEMBER 20 12



For: AMERICAN REGISTER OF SHIPPING

1. In accordance with the IMO Ship Identification Number Scheme, adopted by the Organization by resolution A.600 (15)
2. In every type of ship from any class: passenger high speed craft; cargo high speed craft; Bulk Carrier, Oil Tanker, Chemical Tanker, Gas Carrier, Mobile Offshore Drilling Unit; other Cargo Ship
3. Delete as appropriate

Exhibit M



AMERICAN REGISTER OF SHIPPING

No: DXB-200

CARGO SHIP SAFETY RADIO CERTIFICATE

This Certificate shall be supplemented by Record of Equipment of Radio Facilities (Form R)
Issued under the Provisions of the
INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974,
as modified by the Protocol of 1988 relating thereto

Under the authority of

TANZANIA ZANZIBAR REGISTER OF SHIPPING

By: American Register of Shipping

Name of Ship	Distinctive Number or Letters	Port of Registry	Gross Tonnage	IMO Number ¹
MIDSEA	SIM 628	ZANZIBAR	156809	9079092

Sea areas in which ship is certified to operate (Regulation IV/2) A1+A2+A3

Date on which keel was laid or ship was at a similar stage of construction or, where applicable, date on which work for a conversion or an alteration or modification of a major character was commenced 23/04/1996

THIS IS TO CERTIFY:

1. That the ship has been surveyed in accordance with the requirements of regulation 1/9 of the Convention.
2. That the survey showed that:
 - 2.1 The ship complied with the requirements of the Convention as regards radio installations;
 - 2.2 The functioning of the radio installations used in life-saving appliances complied with the requirements of the convention.
3. That an Exemption Certificate ~~has~~ has not² been issued.

This certificate is valid until³ 27th DAY OF DECEMBER 2012 subject to annual and periodical surveys in accordance with regulation 1/9 of the Convention.

Completion date of survey on which this certificate is based 27/09/2012 dd/mm/yyyy
Issued at SINGAPORE the 28th Day of SEPTEMBER 20 12

On behalf of American Register of Shipping

¹ In accordance with IMO ship identification number scheme, adopted by the Organization by resolution A.600 (15)

² Delete as appropriate

³ Insert the date of expiry as specified by the Administration in accordance with regulation 1/14(4) of the Convention. The day and month of this date correspond to the anniversary date, as defined in article 1/2 of the Convention, unless amended in accordance with regulation 1/9(k)

Exhibit N

THE UNITED REPUBLIC OF
TANZANIA



THE REVOLUTIONARY GOVERNMENT OF ZANZIBAR
TANZANIA ZANZIBAR INTERNATIONAL REGISTER OF SHIPPING

The Maritime Transport Act, 2006
Maritime Transport (Registration and Licensing of Vessels) Regulations, 2007
Made under Regulation 28(2)(b)

CERTIFICATE OF INSURANCE OR OTHER FINANCIAL SECURITY
IN RESPECT OF CIVIL LIABILITY FOR OIL POLLUTION DAMAGE

Issued in accordance with provisions of Articles VII of the International Convention on
Civil Liability for Oil Pollution Damage, 1992

NAME OF SHIP	CALL SIGN	PORT OF REGISTRY	NAME & ADDRESS OF OWNER
MILDSIA	5IM 628	ZANZIBAR	SUCCESS SHIPPING CO. LTD. / ISLAND OF NEVIS, NEVIS

THIS IS TO CERTIFY:

That there is in force, in respect of the above-named ship, a policy of insurance or other financial security satisfying the requirements of Article VII of the International Convention on Civil Liability for Oil Pollution Damage, 1992.

TYPE OF SECURITY:	INSURANCE SATISFYING THE REQUIREMENTS OF ARTICLE VII OF THE INTERNATIONAL CONVENTION ON CIVIL LIABILITY FOR OIL POLLUTION DAMAGE, 1992 WHERE AND WHEN APPLICABLE.
DURATION OF SECURITY:	NOON (GMT) 27 TH 2012 TO NOON (GMT) 26 TH FEBRUARY 2013

NAME & ADDRESS OF THE INSURER (S) AND / OR GUARANTOR (S):

NAME:	KISH P&I CLUB
ADDRESS:	SUITE 6, 96 MAALEK ASHTAR ST., ANDSITEH BLVD., POSTAL CODE 794177841, KISH ISLAND, I.R. IRAN

This Certificate is valid until	20 FEBRUARY 2013
Issued or Certified by the Government of	ZANZIBAR, TANZANIA

Place of Issue:	ZANZIBAR, TANZANIA
Date of Issue:	08 OCTOBER 2012



Notes:

1. If issued, the designation of the ship may contain a reference to the complete public authority of the country where the certificate is issued.
2. If the total amount of the security has been furnished by more than one insurer, the amount of each of them should be indicated.
3. If security is provided in several forms, they should be enumerated.
4. The entry "Date of Expiry" means the date on which such security falls due.

Certificate No. TZIRS/CLC-036

Exhibit O

THE UNITED REPUBLIC OF
TANZANIA



THE REVOLUTIONARY GOVERNMENT OF ZANZIBAR
TANZANIA ZANZIBAR INTERNATIONAL REGISTER OF SHIPPING

The Maritime Transport Act, 2006
Maritime Transport (Registration and Licensing of Vessels) Regulations, 2007
Made under Regulation 28(2)(b)

CERTIFICATE OF INSURANCE OR OTHER FINANCIAL SECURITY
IN RESPECT OF CIVIL LIABILITY FOR BUNKER OIL POLLUTION DAMAGE

Issued in accordance with provisions of Article 7(2) of the International Convention on
Civil Liability for Bunker Oil Pollution Damage, 2001

NAME OF SHIP	CALL SIGN	PORT OF REGISTRY	NAME & ADDRESS OF OWNER
MIJOSHA	5IM 628	ZANZIBAR	SUCCESS SHIPPING CO. LTD. / ISLAND OF NEVIS, NEVIS

THIS IS TO CERTIFY:

That there is in force, in respect of the above named ship, a policy of insurance or other financial security satisfying the requirements of Article VII of
the International Convention on Civil Liability for Bunker Oil Pollution Damage, 2001.

TYPE OF SECURITY:	SATISFYING THE REQUIREMENTS OF ARTICLE 7(2) OF THE INTERNATIONAL CONVENTION ON CIVIL LIABILITY FOR BUNKER OIL POLLUTION DAMAGE, 2001
DURATION OF SECURITY:	NOON (GMT) 27 TH SEPTEMBER 2012 TO NOON (GMT) 26 TH FEBRUARY 2013

NAME & ADDRESS OF THE INSURER (S) AND / OR GUARANTOR (S):

NAME:	KISH P&I CLUB
ADDRESS:	SUITE 6, 96 MAJLEK ASHTAR ST., ANDISHEH BLVD., POSTAL CODE 7941777844, KISH ISLAND, I.R. IRAN

This Certificate is valid until	20 FEBRUARY 2013
Issued or Certified by the Government of	ZANZIBAR, TANZANIA

Place of Issue:	ZANZIBAR, TANZANIA
Date of Issue:	08 OCTOBER 2012



Notes:

1. If desired, the signature of the State may be put in addition to the signature of the authority of the country where the certificate is issued.
2. If the total amount of the security has been provided by more than one insurer, the amounts of each of them should be indicated.
3. If security is provided in several forms, these should be indicated.
4. The term "Duration of Security" must indicate the date on which such security takes effect.

Certificate No.: CLC-0102

Exhibit P

NATIONAL IRANIAN TANKER CO.		S.Q.E MANAGEMENT SYSTEM	
FORM FILE		ISM CODE / ISO 9001 / ISO 14001	
TITLE : LOADING STOWAGE PLAN		FORM NO. : CZ 333	
ISSUE DATE : JULY-2010		PAGE 1 OF 1	
ISSUE STATUS : 4		AUTHORIZED BY :QAR	

NITC LOADING STOWAGE PLAN				DATE : 13.10.12	
VESSEL NAME : M.T.MIDSEA		VOY. NO : 10-12		LAYCAN :	
CHARTER PARTY : NIOC		LOAD PORT :KHARK ISLAND IRAN		DISH PORT :	

Minimum amount of cargo to load in M/T as per C/P:

loadable by vessel						CHARTS NOMINATIONS :
Grade 1 : ILCO	Based on API :	32.6	& Temp :91.5 F	Loadable :	1960900 BBLs	GRADE 1: 1900000 BBLs
Grade 2 :	Based on API :		& Temp :	Loadable :		GRADE 2:
Grade 3 :	Based on API :		& Temp :	Loadable :		GRADE 3:
Grade 4 :	Based on API :		& Temp :	Loadable :		GRADE 4:
Grade 5 :	Based on API :		& Temp :	Loadable :		GRADES :

1 P :		1 S :	
Grade: ILCO	Grade: ILCO	Grade: ILCO	
M.T. : 12593	M.T. : 23475	M.T. : 12659	
Bbls : 92073	Bbls : 171631	Bbls : 92553	
Ullg : 2.3	Ullg : 2.3	Ullg : 2.3	
% : 95.2	% : 95.5	% : 95.7	
2 P :		2 S :	
Grade: ILCO	Grade: ILCO	Grade: ILCO	
M.T. : 14604	M.T. : 14791	M.T. : 14791	
Bbls : 106772	Bbls : 108142	Bbls : 108142	
Ullg : 5.5	Ullg : 5.5	Ullg : 5.5	
% : 83.7	% : 84.8	% : 84.8	
3 P :		3 S :	
Grade: ILCO	Grade: ILCO	Grade: ILCO	
M.T. : 14385	M.T. : 13816	M.T. : 13816	
Bbls : 105172	Bbls : 101016	Bbls : 101016	
Ullg : 6	Ullg : 7	Ullg : 7	
% : 82.5	% : 79.2	% : 79.2	
4 P :		4 S :	
Grade: ILCO	Grade: ILCO	Grade: ILCO	
M.T. : 14611	M.T. : 14791	M.T. : 14791	
Bbls : 106823	Bbls : 108138	Bbls : 108138	
Ullg : 5.5	Ullg : 5.5	Ullg : 5.5	
% : 83.8	% : 84.8	% : 84.8	
5 P :		5 S :	
Grade: ILCO	Grade: ILCO	Grade: ILCO	
M.T. : 10771	M.T. : 10765	M.T. : 10765	
Bbls : 78750	Bbls : 78708	Bbls : 78708	
Ullg : 2	Ullg : 2	Ullg : 2	
% : 97.2	% : 97.1	% : 97.1	
SLOP P :		SLOP S :	
Grade: ILCO	Grade: ILCO	Grade: ILCO	
M.T. : 2737	M.T. : 2662	M.T. : 2662	
Bbls : 20013	Bbls : 19469	Bbls : 19469	
Ullg : 5	Ullg : 5.5	Ullg : 5.5	
% : 82	% : 79.8	% : 79.8	
TOTAL :	Bbls GSV 1,900,900	MT= 260000	

CARGO TANKS		BBLs (TOV)
Group 1	2W+4W+SLOP(P+S)	555813
Group 2	1W+3C+5C	585977
Group 3	1C+2C+4C+3W+5W	990556
TOTAL		2132346

CAPACITY OF CARGO TANKS(BBLs)		
Tank No.	Ullage	98%
1C	1.59	178,735.0
2C	1.61	198,487.0
3C	1.6	198,487.0
4C	1.51	198,487.0
5C	1.6	195,130.0
1P	1.55	96,181.0
1S	1.69	96,181.0
2P	1.54	126,818.0
2S	1.85	126,818.0
3P	1.71	126,818.0
3S	1.75	126,818.0
4P	1.55	126,818.0
4S	1.86	126,818.0
5P	1.77	80,605.0
5S	1.79	80,605.0
Slop P	1.74	24,272.0
Slop S	1.79	24,272.0
TOTAL		2132346(TOV)

Seasonal Zones	
Summer	22.02
Winter	21.56
Tropical	22.48
Tr.Fresh	
NWA	
BBLs	

Cargo	Qty.MT	Bbls (GSV)	Load Port	Disch. Port
1 ILCO	260000	1,900,900	K.ISLAND	
2				
3				
4				
5				
TOTAL	260000	1,900,900		

DWT CALC.	DEP	ARR	STABILITY-DATAS	DEP	ARR	Remarks including ports restrictions & water levels
FO	5200	3600	DRAFT F	20.4	20.3	
DO	65	65	A	20.4	20.3	
Lub Oil	105	100	M	20.4	20.3	
FW + DW	570	570	CONDITION			
Ballast	1800	700	MAX SF	49	49	
Slop			MAX BM	78	77	
Constant	700	700	GM	6.9	6.93	
TOTAL CARGO	260000	260000	Sea. water DENSITY AT LOAD PORT	1.025		
TTL DWT	268440	265735	Sea. water DENSITY AT DISCH PORT	1.025		
Lt. Weight	42399	42399	* DEP DRAFT:DRAFT AT THE FINAL LDNG-PORT		20.4 EK	
DISPL	310839	308134	* ARR DRAFT:DRAFT AT THE FIRST DISCH-PORT.		20.3 EK	

PREPARED BY C/O	APPROVED BY MASTER	
(NAME :) R.SUSHANT	(CAPTAIN :)	CAPT. MICHAEL ROBERT

DISTRIBUTION :	UNIFIED FILING SYSTEM:
Original: Operation department	File No: 8
Copy: Ship's file	

Exhibit Q

QUESTIONNAIRE FOR DELIVERY CONTRACT

Vessel's name: MIDSEA

Ship's Q88 (version 3)

2 Charterer: NIOC

3 Grades and respective quantities delivered to Unipet:
ILCO 1900000BBL

4 The cargo's relevant special gravity at 15°C: 32.6 API

5 The cargo's pour point: Not Established

6 Load temperature: 91.5

7 What is charterer's heating instruction (if any, please specify)?
N/A

8 Does the ship have any special requirements for cargo discharge sequence? N/A

9 ETA discharge port? IF SHUIDONG WILL BE 12.11.2012

10 What are the maximum loadable quantity basis salt water arrival draft
19.60m, 19.80m, 20.00m and 20.50m respectively? DRAFT 19.8MTR-1850000 BBL
DRAFT 20.40 MTR-1900000 BBL

11 Does anyone of charterer, and/or owner, and/or disponent owner, and/or
supplier, have any special requirements with respect to barge and sts
operation procedures if under sts operation in discharge port? NO

12 Will everyone of charterer, and/or owner, and/or disponent owner, and/or
supplier follow discharge port local recommendation/regulation with
respect to under keel clearance (UKC)? If anyone of them have special
requirement, what is overall UKC required which includes squat, list and
other allowance? YES

13 What are those other grades and respective quantities and special
gravity at 15°C on board besides those delivered to Unipet? If yes, please
specify and also list the discharge ports of those grades (especially if
any of those discharge ports within any ports in Taiwan). NA

14 Demurrage Rate: