

September 14, 2012

Nicolae Timofti
President of the Republic of Moldova
Presidential Palace
B-dul Stefan cel Mare, 123 City Center
Chisinau, Moldova

Re: The Republic of Moldova's Reflagging of Iranian Vessels

Dear President Timofti:

United Against Nuclear Iran ("UANI") is writing to express its concern with the Republic of Moldova's extensive reflagging of Iranian shipping vessels. The Republic of Moldova has reflagged as many as 11 vessels owned, managed, or operated by the Islamic Republic of Iran Shipping Lines ("IRISL") and its affiliated entities. By collaborating with IRISL, the Republic of Moldova undermines U.S., EU and UN sanctions by enabling the Iranian regime to continue its nuclear proliferation activities as well as arms shipments to terrorist groups and the brutal Syrian regime.

UANI's Shipping Campaign demands that international shippers, certification firms and governments worldwide cease their business with IRISL and the Government of Iran. As you know, the 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 oil exports needed to fund these illicit activities.

In response to UANI's campaign, International Association of Classification Societies ("IACS") members ClassNK, Bureau Veritas, Germanischer Lloyd, and Russian Maritime Register of Shipping joined Det Norske Veritas and Lloyd's Register in ceasing all maritime activities related to Iran. Moreover, the U.S., EU and UN have sanctioned IRISL as well as IRISL subsidiaries and shell companies, and the UN Security Council has warned member states to be vigilant of and take action against IRISL's deceptive practices. (*Reuters*, "[Exclusive: Iran flouts U.N. sanctions, sends arms to Syria](#)," 5/16/12) Following the responsible decisions made by the governments of Sierra Leone, Tuvalu, and Tanzania to de-flag Iranian vessels, Moldova remains one of the few outlying countries that IRISL and the Iranian regime can rely on for ship flagging services. UANI calls on the Republic of Moldova to follow the lead of these responsible members of the international community and cease the flagging of all Iranian vessels.

Further, the government of Moldova should be aware of recently enacted U.S. sanctions that could seriously affect U.S.- Moldova trade relations should Moldova continue to partner with IRISL. For example, Executive Order 13608 permits the sanctioning of foreign persons known to engage in activities intended to evade U.S. economic and financial sanctions. Through

its reflagging of IRISL vessels, the Republic of Moldova has "...violated, attempted to violate, conspired to violate, or caused a violation of any license, order, regulation, or prohibition contained in, or issued pursuant to...the extent such conduct relates to property and interests in property of any person subject to United States sanctions concerning Iran or Syria..." (U.S. Federal Register: [Executive Order 13608](#) of May 1, 2012)

In addition, on August 10, 2012, President Obama signed into law the "*Iran Threat Reduction and Syria Human Rights Act of 2012*," which will impose sanctions on nations 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)."

Further, 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 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 cut in 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.

It is incumbent on all of us – private citizens, governments and corporations alike – to take concrete steps to oppose this ongoing and dangerous threat. The Republic of Moldova's reflagging of IRISL vessels runs counter to international sanctions and allows the regime to maintain its nuclear program and support for terrorism. Moreover, these actions cast a shadow over the Republic of Moldova's reputation internationally as well as its positive relationship with the U.S. It is time for the Republic of Moldova to end its reflagging of IRISL vessels.

Please let us hear from you by September 21, 2012 concerning the Republic of Moldova's intentions regarding its reflagging of Iranian vessels.

Thank you for your immediate attention to this matter.

Very truly yours,

A handwritten signature in black ink that reads "Mark 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

The Honorable Adam Szubin
Director, Office of Foreign Assets Control

Ambassador William H. Moser
Ambassador of the United States to the Republic of Moldova

Ambassador Igor Munteanu
Ambassador Extraordinary and Plenipotentiary of the Republic of Moldova to the United States

His Excellency Ambassador Vlad Lupan
Ambassador of the Republic of Moldova to the United Nations