



Multimedia Journalist of the Year 2024
Winning Submission

Tomer Raanan

Lloyd's List

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Printed By **Tomer Raanan**

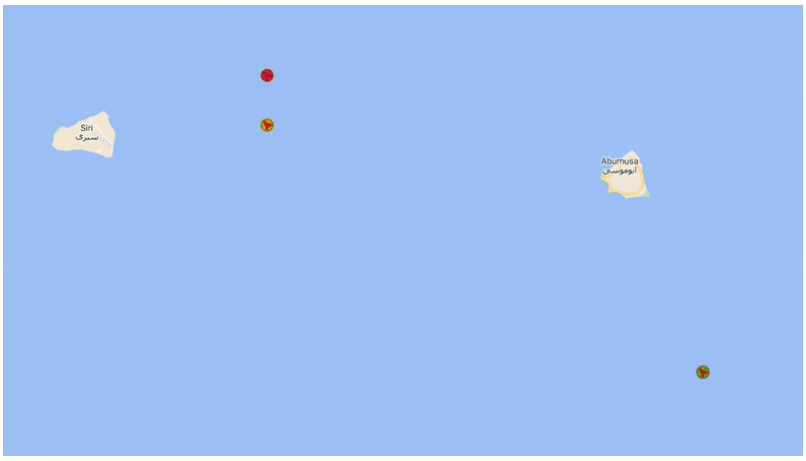
A spoofer's guide to sanctioned gas trades

How gas carriers are loading Iranian LPG despite being anchored hundreds of miles away

03 Jun 2024 | **ANALYSIS**

by Tomer Raanan | @tldraanan | tomer.raanan@lloydslistintelligence.com

The commercialisation of Automatic Identification System data in recent years and the increased access to vessel location data means sanctions skirters have to work harder to hide their activity



THREE VLGCS WERE SPOOFING THEIR AIS SIGNAL IN THE MIDDLE EAST GULF ON SEPTEMBER 7, 2022. *Source: LLoyd's List Intelligence / Seasearcher*

ON any given day, Automatic Identification System tracker signals from the port of Assaluyeh, Iran, would indicate that the massive petrochemical and products exports hub is eerily quiet, bereft of cargo-carrying vessels.

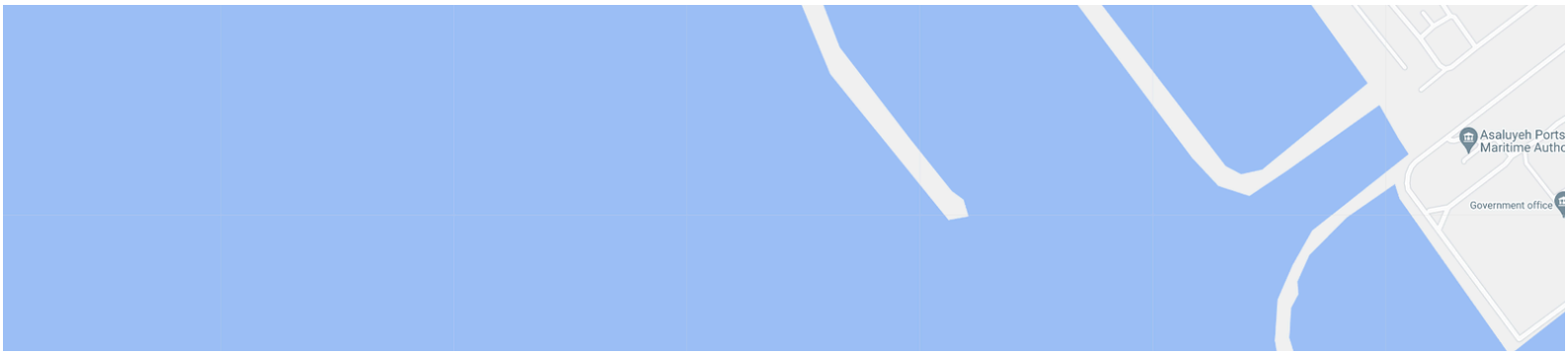
Satellite imagery on the other hand, would typically show its berths teeming with very large gas carriers and product tankers, while a look at AIS data from the waters off Dubai and the islands of Abu Musa and Sirri could provide guidance as to which those elusive ships may be.

Assaluyeh: AIS vs satellite

Image from May 25, 2024, 0712 UTC







Source: Sentinel Hub Landsat 2.0, Seasearcher

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When the so-called dark fleet* ferrying sanctioned Iranian oil emerged following the reimposition of oil sanctions on Iran in 2018, tankers that continued participating in the trade would simply turn off their AIS in Iranian waters to avoid detection. But the commercialisation of AIS data in recent years and the increased access to vessel location data meant sanctions skirters had to work harder to hide their activity.

Enter AIS manipulation, or spoofing — a popular deceptive shipping practice employed by ships that seek to obfuscate their activities and the origin of their cargo.

Just as tankers in sanctioned trades graduated from AIS gaps to spoofing, the tactic itself has evolved over time. Some operators are able to generate false AIS data that could easily be mistaken as genuine. Others are still leaving relatively clearer marks of manipulation.

The increasing sophistication of sanctions evaders coupled with the ever-growing array of sanctions regimes means companies face an increasingly arduous task in vetting vessels and clients.

But while spoofing undoubtedly complicates the lives of compliance officers conducting vessel due diligence, it also undermines the very reason AIS was introduced to begin with — improving navigational safety.

"The International Convention for the Safety of Life at Sea, known as Solas, requires AIS to not be switched off or disabled at any time other than for very specific safety and security reasons permitted by the regulations, such as avoiding detection by malignant actors in high-risk areas," explained Bimco's head of maritime safety and security Jakob Larsen.

"The AIS is designed to improve safety and when conducting AIS spoofing, the system is compromised, which can lead to a deterioration of safety.

"If this practice were to proliferate, there is a risk that the AIS could be compromised as a reliable anti-collision aid which, from a safety point of view, would be unfortunate."

Much of the attention to sanction evasion has been focused on Russian, Iranian, and Venezuelan oil trades and the dark fleet servicing them, leaving sanctioned Iranian LPG trades — which are much smaller in terms of the trading fleet and revenue — relatively under the radar.

But the gas carrier fleet ferrying Iranian LPG nearly doubled from 1.75m dwt in 2020 to 3m dwt 2023, according to data from commodities and analytics provider Vortexa, totalling over 70 vessels, mostly VLGCs. Meanwhile, data from energy consultants FGE shows Iran's seaborne LPG exports reached record levels of 11m tonnes in 2023, more than doubling from pre-sanctions levels. About 90% of those seaborne LPG exports go to China.

Actors in Iranian LPG trades bear the risk of being slapped with US blocking sanctions, and many key Iranian conglomerates exporting LPG are designated by the US Treasury Department. Leaked documents from dissident website WikiIran demonstrate how sanctioned entities like the PGPICC and Triliance Petrochemicals use dozens of shell companies in the Middle East and Asia to mask cargo origins and vessel ownership.

As such, it has become increasingly common to find VLGCs broadcasting anomalous AIS signals in the Middle East Gulf, usually in the waters off Sharjah, Khor Fakkan, and off the islands of Sirri and Abu Musa.

"The number of LPG carriers in Iranian trades grew substantially since we began tracking Iran's oil exports in 2020," said Claire Jungman, chief of staff at New York-based lobbying group United Against Nuclear Iran.

"It is common to see VLGCs spoofing their AIS in the Middle East Gulf to conceal loadings in Assaluyeh, Siraf, or Bandar Imam Khomeini."

Assaluyeh berths on September 7

VLGC Sona was spoofing its location to appear off Sirri Island in the Middle East Gulf on September 7, 2022. Satellite imagery and a leaked agent report suggest it was in the port of Assaluyeh (blue-decked vessel in yellow circle).



Source: Airbus / Google Earth

Lloyd's List

Satellite imagery of Assaluyeh taken on September 7, 2022, shows one VLGC, one bulk carrier and three product tankers, berthed at the port. However, vessel tracking data shows no cargo-carrying vessels there during that day.

Elsewhere in the Middle East Gulf on and around that day, the AIS of three VLGCs showed them anchored hundreds of kilometres away from Assaluyeh. There were nearly no changes to their AIS-broadcasted latitude and longitude positions, heading and speed over ground, for several days — an unrealistic behaviour for vessels supposedly anchored miles offshore that is highly indicative of spoofing. Satellite imagery of their alleged locations confirms that the vessels were not where their AIS reported them to be.

An analysis of satellite imagery and leaked emails from dissident website WikiIran suggests the blue-decked vessel in the image is the 1993-built VLGC *Sona* (IMO: 9005053) — one of three vessels that was seen spoofing in the Middle East Gulf during that period. A leaked port report contained in the emails shows *Sona* arrived in Assaluyeh on September 4 and departed six days later with 44,000 tonnes of propane and butane.

A slightly more sophisticated form of spoofing was illustrated by the 1972-built *White Purl* (IMO: 7230666), an LPG carrier that went ablaze off the coast of Assaulyeh in August 2023 while signalling its location as hundreds of miles to southeast near Abu Musa.

White Purl's AIS data purports that it was sailing north in the Middle East Gulf towards Basrah on July 8, 2023, and arrived at the anchorage the next day. It began heading south on July 10 following the exact same route until it stopped off Abu Musa on July 12, where its AIS patterns indicate "anchored" spoofing. The vessel "reemerged" on July 16 and headed to Sharjah, where it appears to have bunkered.

However, an analysis using Lloyd's List Intelligence data and satellite imagery from Planet Labs suggest it was spoofing while supposedly sailing up and down the Middle East Gulf. The imagery suggests *White Purl* loaded in Iran's Siraf port on July 9, and transferred its cargo on July 12 off Assaluyeh to another small gas carrier.

"A potential AIS spoofing method to create a voyage that travels along a repeated path; travelling first north, then back south, through the Middle East Gulf, may be to design a computer programme that supplies GPS co-ordinates to the vessel, via an onboard GNSS (Global Navigation Satellite System) signal emitter, which in turn would be transmitted via AIS," explained Lloyd's List Intelligence analyst Thomas Spriggs.

"Often, such instances of AIS spoofing are conducted in an attempt to deceive anyone watching the AIS of the vessel; a cursory glance would see only generic AIS movements which would not immediately reveal any signs of illicit activity. Only when you look closely with a trained eye, watching for the tell-tale signs of AIS manipulation and spoofing, is the actual situation revealed to be made up of false AIS information."

White Purl

Satellite imagery suggests White Purl loaded in Siraf on July (top) and transferred the cargo via ship-to-ship transfer on July 12 (second row, right), while its AIS showed it to be sailing in the MEG. The next satellite image was taken on August 14, four days after it caught fire off Assaluyeh



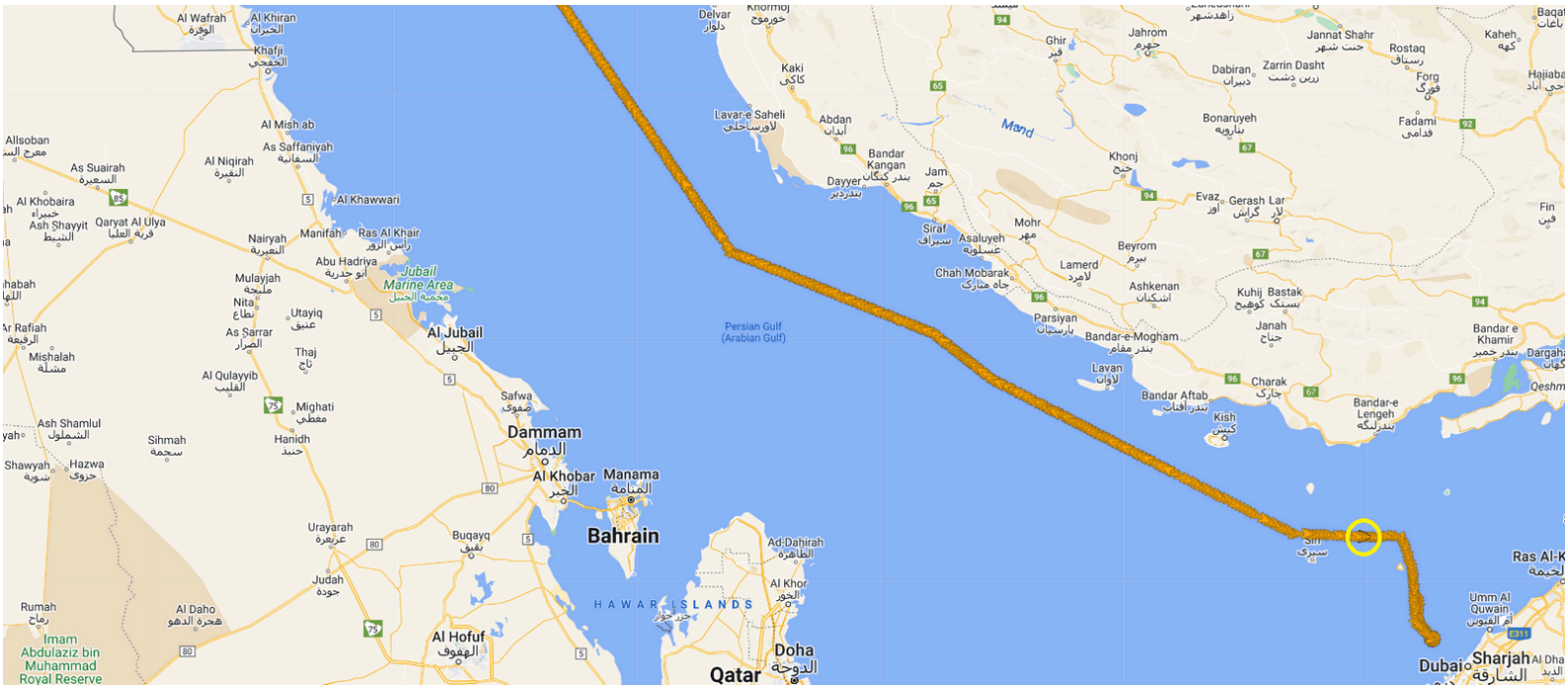




White Purl's AIS data, July 8-16, 2023

‘Anchored’ spoofing spot circled in yellow





Source: Planet Labs (satellite), Lloyd's List Intelligence (AIS)

Lloyd's List

White Purl's AIS signal shows it returned to the same spoofing spot near Abu Musa on July 18, where it stayed until an AIS gap opened on August 10, the day of the casualty. Its AIS signal reemerged off Assaluyeh on August 28 ahead of its final journey to the Alang scrapyard in India.

A Lloyd's List investigation published in November uncovered that *White Purl*, *Sona*, and more than a dozen other LPG carriers active in Iranian gas trades were linked through opaque corporate structures.

Increasing sophistication

One of the tell-tale signs of spoofing is a vessel being "anchored" offshore with no or little change to their latitude and longitude coordinates. This often takes the shape of incredibly close location "pings" on vessel-tracking software.

Samir Madani, co-founder of Tanker Trackers, said he first noticed tankers spoofing their location in 2020.

"Initially, they were not doing anything advanced. It looked more like little anchor rings, which were geometrically perfect," he told Lloyd's List, referring to how the AIS signals appear on vessel tracking software.

"Sometimes, you could even see a box-like or a square pattern. You have to really zoom in to the maximum level to see these geometric patterns."

The increased availability of satellite imagery has made easier to uncover and prove spoofing incidents, but it involves a certain degree of luck, and cannot always be relied upon. Coverage is relatively scarce offshore, where ship-to-ship transfers, a common tool in the sanctions evasion playbook, take place. Cloudy days present another uncontrollable obstacle.

Moreover, as spoofing has evolved over time, the methods also became increasingly sophisticated. And while some operators continue to use the more basic variety of "anchored" spoofing, others have taken the practice to a new level.

The introduction of sanctions on Russian oil following its incursion into Ukraine in 2022 spurred new entrants to sanctioned trades market, and the dark fleet ballooned in size. Sanctions-skirting methods used in Russia trades have mimicked those in

Iranian and Venezuelan trades, and in some cases, surpassed them in deception.

"I think the most sophisticated [form of spoofing] I have ever seen was this tiny, 30-plus year-old Russian handysize [tanker] which was 'going' east and west in the Mediterranean. But it was not," Madani said.

The tanker's position was manipulated with much care to ensure its AIS signal did not "collide" with other vessels' vessel tracking software, Madani explained. The spoofers essentially factored-in the fake AIS signal's route and ensured it did not get too close to other vessels on genuine voyages.

"It was very, very sophisticated. And I could not believe it; they used that on an old rust bucket, and it worked."

** Lloyd's List defines a tanker as part of the dark fleet if it is aged 15 years or over, anonymously owned and/or has a corporate structure designed to obfuscate beneficial ownership discovery, solely deployed in sanctioned oil trades, and engaged in one or more of the deceptive shipping practices outlined in US State Department guidance issued in May 2020. The figures exclude tankers tracked to government-controlled shipping entities such as Russia's Sovcomflot, or Iran's National Iranian Tanker Co, and those already sanctioned.*

Download our explainer on the different risk profiles of the dark fleet here



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Printed By **Tomer Raanan**

Iran's tankers double down on concealment efforts post-sanctions

Tankers sanctioned by the US for Iran links are manipulating their AIS, making their whereabouts and activity difficult to determine

22 Jul 2024 | **ANALYSIS**

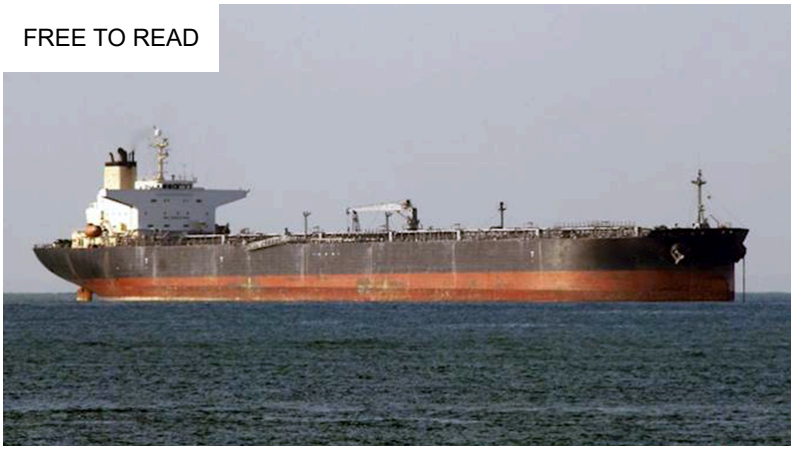
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Analysis of satellite and AIS data shows these ships still play a role in Iran's oil sector, but experts insist the financial restrictions are nonetheless degrading Iran's capabilities

FREE TO READ



SOME TANKERS ARE MANIPULATING AIS DATA MONTHS AFTER THEY WERE SANCTIONED, PRETENDING TO SAIL IN CIRCLES AROUND THE SAME SPOT, SUCH AS MOLECULE (PICTURED).

Source: Lloyd's List Intelligence / Seasearcher

IT IS no secret that tankers engaged in sanctions trades are masters at deceptive shipping practices, from manipulation of Automatic Identification System signals to document forgery. Those that end up under US sanctions usually double down on their manipulation of AIS, which makes tracking their activity — and the impact of sanctions — all the trickier.

What is clear though is that while sanctions raise cumbersome obstacles for tankers, they are not a kiss of death for their commercial endeavours.

Lloyd's List tracked 11 tankers sanctioned by the US for Iran links between January and March and found the majority disappeared, manipulating their locations. Some hoisted false flags to continue trading.

Seven of the tracked tankers have emitted false location data via AIS since being designated.

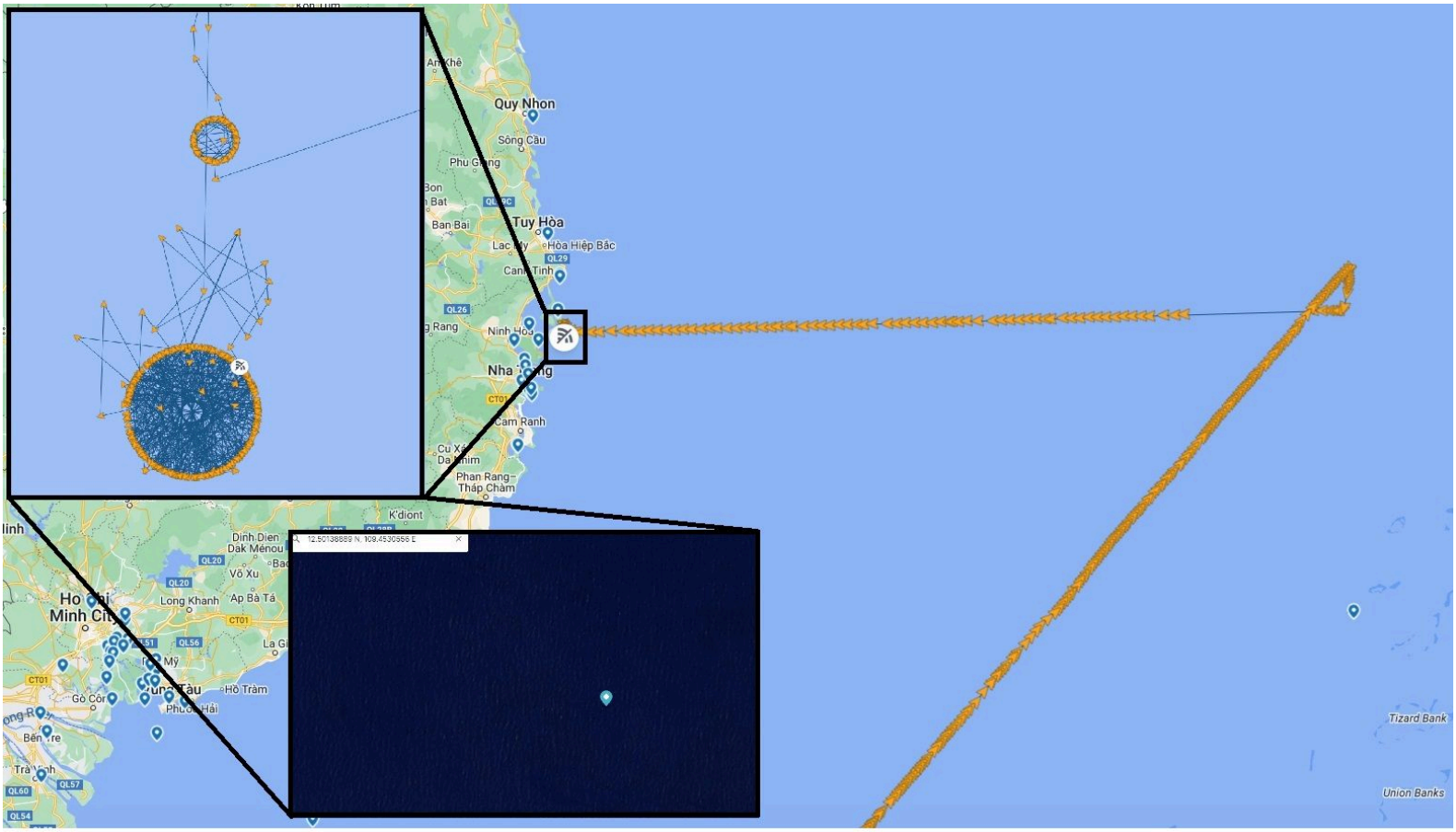
Very large crude carrier *Moonbay* (IMO: 9230907), formerly *Eternal Fortune,* began manipulating its location just days after being designated on March 6.

AIS data shows the ship anchored off Vietnam from March 10 to April 18.

The vessel is moving in an impossible pattern during this period, a telltale sign of AIS manipulation. Satellite imagery verifies the transmitted location is false.

Moonbay (IMO: 9230907) spoofing its location from March 10 to April 18

The AIS data is consistent shows clear evidence of tampering with the vessel moving in an impossible pattern



Source: Lloyd's List Intelligence / Seasearcher, Planet Labs PBC

Lloyd's List

Some tankers are still falsifying their location months after they were designated, pretending to sail in circles around the same spot, such as *Sincere 02*(IMO: 9226011), *Molecule* (IMO: 9209300) and *Fortune Galaxy* (IMO: 9257010).

This set of tankers routinely engaged in deceptive shipping practices prior to designation by Ofac, but this activity was more targeted to hide illicit activity, such as dark ship-to-ship transfer or port calls in Iran, rather than broadly trying to disguise their whereabouts over long periods of time.

In the lead-up to being sanctioned the 11 tankers were tracked with AIS data making some 116 calls to ports and anchorages in China, Iraq, the UAE and Malaysia.

While many of these calls were not legitimate, rather part of location manipulation techniques, the post-sanction activity remains a distinct shift away from these "normal" patterns with just 10 arrivals to ports and anchorages recorded, legitimate or otherwise.

Only three tankers reviewed in this analysis have completely disabled their AIS.

Dawn II (IMO: 9185530) was trading in the Black Sea when Ofac implemented sanctions against it. The ship sailed to the area south of the Kerch Strait, a ship-to-ship transfer spot used to transport Russian commodities, and stopped transmitting AIS data on April 9.

Lady Sofia (IMO: 9212759) spent over a month loitering in different parts of the Yellow and East China Sea before disabling AIS on May 9.

Mehle (IMO: 9191711) spent some time faking its location southeast of Taiwan and then stopped transmitting AIS on April 15.

The sanctions designations have not put an end to trade.

Moonbay unloaded cargo at Dongjiakou, China, on May 27 with its AIS enabled, more than two months after it was sanctioned. Suezmax *Artura* (IMO: 9150365) discharged a cargo at the same terminal on July 10.

Moonbay appears to be deliberately trying to mislead anyone trying to track it using AIS. The vessel has been consistently, and for several months, transmitting data under two different MMSIs.

One MMSI, linked to *Eternal Fortune* and Panama flagged, erroneously shows the vessel off the coast of Vietnam.

The data linked to the second MMSI is related to Guyana-flagged *Moonbay* and is the legitimate source of AIS information.

Guyana raises rogue registry warning as sanctioned tankers falsely fly its flag

By Tomer Raanan

06 May 2024

Over a dozen tankers linked with Iran, including several that were recently sanctioned, are fraudulently flying the Guyanese flag. The country's maritime administration said an organisation named the International Maritime Safety Agency of Guyana, with which it used to have a contract, has been registering ships under its flag without authorisation

Read the full article here ›

Moonbay is falsely flying the flag of Guyana. More than a dozen tanker linked to Iran, including some that are sanctions, are doing so without the authorisation of the country's maritime administration.

Aframax *Reneez*(IMO: 9232450) loaded a cargo at Kharg Island, a major Iranian oil export port, two months after being sanctioned.

The tanker was signalling its position near the Basrah oil terminal offshore Iraq, a common manipulation tactic.

Reneez (IMO: 9232450) spoofing its location in May

The pink polygon represents Basrah Oil Terminal anchorage. AIS data suggests this is where *Reneez* is anchored, but the vessel appears to be berthed at Kharg Island on May 9



Source: Lloyd's List Intelligence / Seasearcher, Planet Labs PBC, Sentinel Hub

Lloyd's List

The tankers' behaviours following their designations illustrate how sanctions impede their ability to trade but does not take it away altogether.

"Sanctions can effectively immobilise vessels by restricting their access to ports, insurance, and international shipping services," explained Claire Jungman, chief of staff at US lobbying group United Against Nuclear Iran, who tracks Iran's oil flows.

"This can make it difficult for sanctioned ships to operate, thereby reducing their participation in global trade."

"Some vessels are sitting off China for months waiting for a buyer, which is in turn taking it out of play. In other instances, we've seen spoofing and the use of flags of convenience to evade sanctions."

Tanker Trackers.com co-founder Samir Madani said it was common for sanctioned tankers to be used for moving cargoes out of Iran and unto other ships through STS transfers, or as floating storage.

Helping to keep these blocked tankers in play are buyers in China, who remain willing to find ways around sanctions, although they too sometimes balk at the risk of dealing with a blocked vessel.

"Many sanctioned ships attempt to continue their journey to China, as China often remains a willing buyer despite the risk of sanctions." said Jungman.

"This is largely due to China's significant demand for oil. In certain cases, if no buyer is willing to risk sanctions, the vessels may return their cargo to Iran. This is often seen as a last resort due to the high costs and logistical challenges involved."

Through July 18, the US has sanctioned 48 vessels, including 43 tankers, four liquified petroleum gas carriers, and one tug under its Iran programmes, according to Lloyd's List Intelligence data. Crude tankers accounted for about 4.3m dwt.

But Iran is apt at recruiting new ships to its tanker fleet, numbing the impact of sanctions. About 3.85m dwt of crude tankers have joined Iran's trading fleet since the year began (excluding five sanctioned tankers), according to UANI's data, which is updated as of June 30.

While Iran's exports have been robust so far this year, Jungman said preliminary figures for June, which were the second lowest this year, could indicate that sanctions were beginning to bite.

As China accounts for over 85% of Iran's exports, the drop in June could also be due to lower Chinese demand overall, with crude imports falling below last year's levels since February, according to Vortexa's China oil market analyst Emma Li. However, UANI's preliminary figures indicated exports to China rose almost 17% year on year, while falling about 18% month on month.

One of the effects of sanctions on Iran's oil supply chains is that they lengthen the export process, for instance by requiring more STS transfers that necessitate more tonne-miles and increase costs.

A US State Department spokesperson acknowledged Iran is "making every effort to evade US sanctions" but noted that these efforts take a toll.

"Sanctions evasion is very costly — paying middlemen, laundering money and so on. We assess that the Iranian regime receives only a fraction of the revenue from its oil sales as a result," the spokesperson told Lloyd's List in a statement.

"We are always working to increase pressure on Iran and add to our sanctions. And we have been active in diplomacy with a wide range of allies and partners to make sure their jurisdictions are not used and abused by Iran in its effort to fund terrorism and destabilising behaviour. That work continues."

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Printed By **Tomer Raanan**

How a south London restaurateur became a nexus for sanctioned Iranian gas trades

Exclusive Lloyd's List investigation reveals how the owner of an unassuming south London restaurant became the front for a fleet of ageing gas tankers used to ship hundreds of millions of dollars' worth of sanctioned propane and butane from Iran

17 Nov 2023 | **ANALYSIS**

by Tomer Raanan | @tldraanan | tomer.raanan@lloydslistintelligence.com

Analysis of the ownership links behind an LPG tanker that exploded off the coast of Iran in August provides a rare glimpse into the workings of an operation designed to sidestep US sanctions on Iran through the use of front companies and deceptive shipping practices, much like the dark fleet of tankers shipping sanctioned oil



WHITE PURL (PICTURED) CAUGHT FIRE IN AUGUST WHEN ANCHORED OFF THE PORT OF ASSALUYEH IN THE SOUTHERN PROVINCE OF BUSHEHR IN IRAN, BUT ITS AIS SIGNAL SHOWED IT TO BE HUNDREDS OF MILES TO THE SOUTHEAST, NEAR THE ISLAND OF ABU MUSA.

Source: Vile Gecko / Wikimedia Commons

A FLEET of ageing liquefied petroleum gas carriers used to ship hundreds of millions of dollars worth of propane and butane from Iran has been tracked to a complex network of companies controlled on paper by the part-owner of a Georgian restaurant in south London.

A Lloyd's List investigation has uncovered how corporate structures established for the fleet over the past decade helped sidestep US sanctions on Iran's oil and petrochemical shipping sector. The paper trail also yields a rare glimpse into those behind the web of brass plate companies created to obfuscate the controlling interests of ships that routinely deployed deceptive shipping practices to carry sanctioned Iranian cargoes.

The investigation was sparked by an explosion on board a 51-year-old LPG tanker on August 10.

The Panama-flagged *White Purl* (IMO: 7230666) was anchored off the port of Assaluyeh in the southern province of Bushehr when the fire broke, but its Automatic Identification System signal showed it to be hundreds of miles to the southeast, near the island of Abu Musa — a tactic widely used by tankers violating sanctions known as 'spoofing'.

The fire was later found to have been caused by an explosion in one of the compressors of the vessel during tank preparation. However, the incident revealed a complicated network of ownerships behind the veteran tanker that eventually led to Tamila Jmukhadze, a Georgian and UK national and part-owner of the Kartuli restaurant in East Dulwich, a swish neighbourhood in London.

Jmukhadze was president of Panama-based Taboga Maritime & Transport SA, the registered owner of *White Purl* from October 2021 until the vessel was scrapped last month following the fire in August.

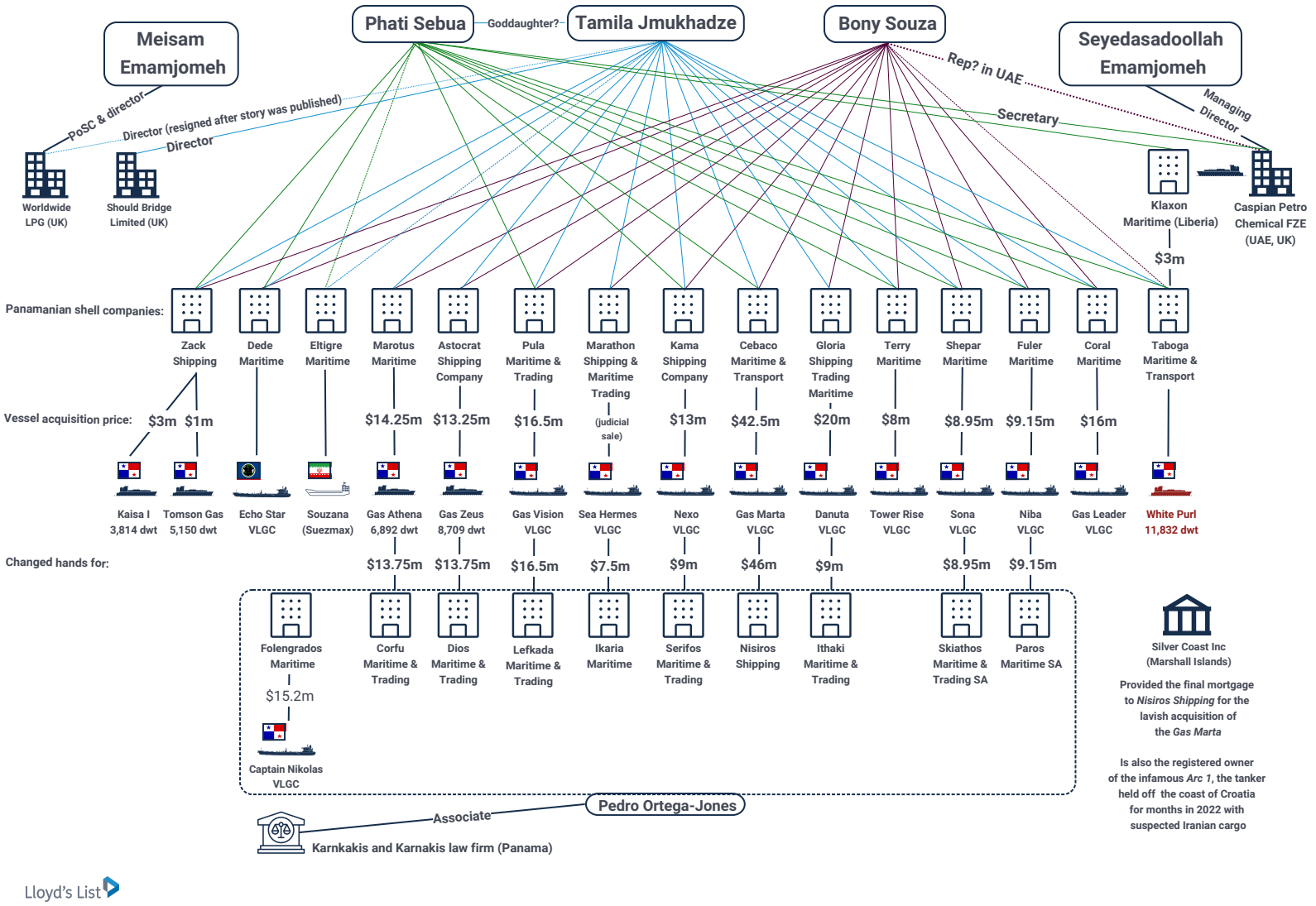
According to Lloyd's List's analysis of sale and purchase documents, public access databases and a cache of leaked documents posted on the WikiIran website, Jmukhadze is also linked to 13 other gas carriers involved in shipping Iranian LPG via her control of numerous Panamanian companies.

Just as *White Purl* had been found spoofing its location, as evidenced by Lloyd's List's analysis of AIS data and satellite imagery compared with reported AIS positions, so did the rest of the fleet linked back to Jmukhadze.

Alongside spoofing, most of the gas carriers notionally controlled by Jmukhadze have been observed at various points over the past three years engaging in a range of deceptive and evasive shipping tactics also used by the dark fleet of tankers shipping Russian, Venezuelan and Iranian oil and oil products.

Lloyd's List has not been able to establish whether Jmukhadze was simply a nominee for the actual beneficial owner of the fleet.

There is no suggestion that Jmukhadze, the restaurant, or any companies mentioned at any point have directly breached sanctions or were engaged in illegal activity.



However, the investigation does reveal how Jmukhadze, along with two other directors — Phati Sebua, and Bony Souza, an Indian national and UAE resident — were central to the complex series of corporate entities set up to allow this fleet to operate.

It also shows how Iranian gas exports have relied upon the willingness of flag states to support opaque structures behind shipping companies with apparently limited due diligence targeted at the ultimate beneficial ownership of assets and their operations.

"The involvement of a south London restaurateur in facilitating Iranian LPG shipments through a network of Panama-based companies, with seemingly little due diligence, highlights a critical loophole," explained Claire Jungman who serves as chief of staff at the pressure group United Against Nuclear Iran (UANI) and tracks suspicious tanker trades.

"Panama's continued role as a hub for these entities is extremely concerning, as it allows the diversion of funds from these illegal trades to support Iran's terrorist proxies like Hamas. This situation emphasises the urgent need for stronger oversight and enforcement mechanisms to close these gaps in sanction implementations," said Jungman.

All but one of the ships linked to Jmukhadze are flagged in Panama, and five ships were also investigated by Panama in 2020 for using such deceptive practices.

Sailing under the regulatory radar

Combining Lloyd's List Intelligence data, satellite imagery, and data from UANI, Lloyd's List analysis has identified at least 10 ships linked to Jmukhadze lifting Iranian cargoes while their AIS was switched off.

Jmukhadze's companies spent $150m to amass a fleet of at least 14 elderly LPG carriers between 2018 and 2021. The initial purchases coincided with the reimposition of US sanctions on Iran's oil and shipping sector.

At its peak, Jmukhadze-controlled companies were the registered owners of at least nine very large gas carriers, each capable of transporting 44,0000 tonne cargoes, as well as five smaller LPG carriers. All but five of Jmukhadze's gas carriers have been sold since March 2022 to shell companies registered to an associate in Panamanian law firm Karnakis and Karnakis, which serves as the companies' corporate agents, public records show. However, their trading activity remains largely unchanged, and they continue to deploy deceptive shipping practices.

Panama-flagged LPG carriers investigated for Iran shipments

By Michelle Wiese Bockmann

05 Jun 2020

The eight vessels have been tracked shipping liquefied petroleum gas to China and India during the past year. Five under investigation have reflagged to Panama after being deregistered by Liberia

Read the full article here ›

WikiIran has published leaked emails from officials in the sanctioned Iranian petrochemical broker Persian Gulf Petrochemical Industries Commercial Company (PGPICC) that suggest the fleet shipped hundreds of millions of dollars' worth of LPG for the petrochemical giant. One 44,000 tonne cargo of propane and butane shipped on board the VLGC *Gas Leader* (IMO: 9114581) in August was priced at more than $30m, according to one of the invoices seen by Lloyd's List.

Documents from WikiIran also show significant links between the LPG carriers and the PGPICC via complicated global corporate structures, alongside a series of deceptive and evasive shipping tactics during the period when Jmukhadze owned these ships.

Leaked demurrage invoices, for example, that were issued by shell companies but sent by PGPICC employees, imply that the Iranian petrochemical giant is the operator of at least some of these vessels.

The leaked documents underscore the elaborate and expansive nature of the scheme to keep the origin of the cargo and the true beneficial owners of the fleet hidden.

The opaque structures behind this LPG fleet have also raised concerns regarding safety and environmental risks, as witnessed by the explosion of the 51-year old *White Purl*. What is more, much of the oversight applied to this fleet is currently unknown.

Nearly all of the Jmukhadze-linked LPG fleet was until recently entered with Russian insurer Ingosstrakh, but coverage appears to have been withdrawn from all the ships after UANI contacted the insurer and alerted it that one of the vessels - *Danuta I* (IMO: 9193721) — participated in sanctioned Iranian trades.

Ingosstrakh also issued the *White Purl*'s blue cards, according to the Panama flag registry. However, the insurer said its policies are subject to "very strict and detailed" sanctions exclusion clause that effectively exclude coverage in Iranian waters or ports.

"A policy becomes null and void as soon as the vessel concerned is engaged in any activity that may violate applicable sanctions," a spokesperson told Lloyd's List.

"It might be difficult to comment on the terms of the contracts with specific clients due to certain legal constraints. However, based on the information provided [of the *White Purl*'s casualty], it is quite clear that it would be absolutely

impossible to make any payout in connection with the mentioned incident as it cannot be covered under the terms of our policies."

Ingosstrakh confirmed it withdrew coverage from a VLGC vessel called *Danuta I* but declined to comment on the specific details of contracts with its clients, past or present. It stated that it "operates in strict compliance with all applicable legislation, and follows strict internal compliance procedures. We regularly review the risks associated with our clients, using all available sources of information."

Greece-based Phoenix Register of Shipping classed the vessel at the time of its casualty. Panama-based recognised organisation Overseas Marine Certification Services withdrew class from *White Purl* in 2020 due to non-compliance, Panama City-based chief executive Javier Bru told Lloyd's List.

White Purl's ISM manager since 2012 was Marine Shipping Line FZE, one of six UAE-based companies that exclusively managed the Jmukhadze-linked LPG fleet.

Marine Shipping Lines did not respond to an email request for comment, and a phone call went unanswered.

In addition to environmental concerns, vessels linked to the Jmukhadze fleet were involved in at least seven seafarer abandonment cases in 2022, largely related to unpaid wages, according to the International Labour Organisation's database. Most of the 2022 cases were reported as resolved, but new ones were opened this year involving *Gas Vision* (IMO: 9115303), *Gas Marta* (IMO: 9307748), and *Gas Zeus* (IMO: 9267962). Most of the complaints occurred after the vessels were sold to companies registered to the Panamanian lawyer.

The associate from Karnakis and Karnakis did not respond to an email for comment on the identification of the ultimate beneficial owners of the vessels during and after the period Jmukhadze was linked to them.

White Purl

To understand those links it is necessary to track the history of *White Purl* before it exploded and how it came to be linked to an unassuming south London restaurant.

Until 2012, *White Purl*'s registered owner was the government-controlled National Iranian Tanker Company (NITC). United Arab Emirates-based Caspian Petro Chemical FZE bought the vessel in 2012, when the EU first agreed to ban imports of Iranian oil, and the US expanded its threat of secondary sanctions on companies doing business with Iran.

A Lloyd's List Intelligence credit report from 2012 raised strong suspicions that Caspian was beneficially owned by the National Iranian Tanker Company and incorporated in Dubai solely to evade sanctions. At the time, Caspian's management denied any association with the NITC.

In 2011, Caspian Petro Chemical FZE created a UK-incorporated company alongside the Dubai company, of the same name, "to co-ordinate foreign investment projects and relationship with UK and EU partners," according to Companies House filings.

The secretary for this company was UK-based Phati Sebua, while Iranian national Seyed Asadoollah Emamjomeh was its managing director, filings show.

Caspian Petro Chemical sold the *White Purl* in 2012 to Liberia-incorporated Klaxon Maritime SA for $9.5m, sale and purchase documents show. Sebua approved the sale on behalf of both Caspian Petro Chemical and Klaxon.

In 2021, Taboga Maritime & Transport SA bought the *White Purl* for $3m from Klaxon. Jmukadze and Sebua approved the deal on behalf of Taboga and Klaxon, respectively.

Sebua also became the director of the new registered ownership company, Taboga Maritime & Trading SA, for which Jmukhadze was listed as president.

Jmukhadze described a Pati Sebua as her goddaughter in a social media post in 2020.

Phati Sebua is also listed as a director on at least eight other Panamanian companies linked to LPG carriers that ship Iranian-origin LPG, all of which are controlled by Jmukhadze.

Bony Souza also appears as director for several of these companies, documents show, although he is no longer a director in Taboga.

Documents leaked by WikiIran show that Bony Souza acted as a representative for several companies suspected as fronting for the PGPICC.

The PGPICC is the marketing arm of Iran's petrochemical conglomerate Persian Gulf Petrochemical Industry Company (PGPIC). The US Office of Asset Control (Ofac) previously said the PGPIC accounted for half of all of Iran's total petrochemical exports, generating the equivalent of tens of billions of dollars annually for the regime.

Ofac sanctioned PGPICC in July, 2019.

Souza was tasked with collecting guarantee checks on behalf of these companies — including Caspian, according to the documents, illuminating links between PGPICC, the Panamanian shell companies, and Jmukhadze.

Lloyd's List linked Jmukhadze and her Panamanian entities with the UK Companies House filings that also name her as the director of UK-based Worldwide LPG Limited (incorporated in 2011) and Shoulder Bridge Limited (incorporated in 2005).

Jmukhadze's London address on Shoulder Bridge's filing matches the addresses listed for her, Sebua, and Souza in the Panamanian companies' incorporation documents.

Jmukhadze became the sole shareholder of Worldwide LPG in December 2014 but passed control to Meisam Emamjomeh in March 2017. She remains a director.

Lloyd's List could not establish whether the two Emamjomehs are related, but Caspian's Seyed Asadoollah is 28 years older than Worldwide LPG's Meisam.

It is not illegal for UK nationals to trade in Iranian oil or LPG, and Lloyd's List is not suggesting that any of the people or companies, including Sebua, Souza, Jmukhadze, or Jmukhadze's restaurant, Kartuli — where she became a director and shareholder last June — have broken any laws, or that the restaurant was involved in the LPG trades.

Sebua did not respond to emails sent to Caspian Petro Chemicals asking for comment. She did not respond to approaches on social media. A phone call to the company was not answered. Lloyd's List has reached out to a Meisam Emamjomeh on Linkedin but did not receive a response. Souza did not respond to messages and a phone call. Seyed Asadoollah Emamjomeh could not be reached.

Complex corporate structures

Marine Shipping Line, which managed *White Purl*, also manages *Kaisa I* (IMO: 9038763), formerly known as *Gas Amazon*.

The 5,000 dwt LPG carrier was acquired in 2017 by Fanlight Shipping, a company where Sebua was secretary and treasurer until the Panama-incorporated company was suspended earlier this year.

The vessel was sold to Jmukhadze-controlled Zack Shipping in 2021.

The address listed for Sebua in documents disclosing her directorship in Fanlight in 2012 — a unit in the Jumeirah Business Center in Dubai — matches that of Pacific Petroline DMCC, based in Dubai. Petroline is one of the six managers of the 14 LPG carriers connected to Jmukhadze.

The ILO seafarer abandonment complaints say the vessels are from "the same principal in the UAE".

Jmukhadze is also the president of Panamanian shell company Eltigre Maritime, the registered owner of the 1991-built, Iran-flagged suezmax *Souzana* (IMO: 8919154), which has not pinged its location since September 2019.

Emailed requests for comment to Caspian addressed to Emamjomeh and Sebua were not answered, and a phone call went unanswered as well.

Lloyd's List has made several attempts to contact Tamila Jmukhadze.

Jmukhadze has declined to respond to emails sent to her personal address, or messages left at the restaurant over the past five weeks.

After reaching out to her via social media on November 9, Jmukhadze, who also uses the first name, Tamuna, blocked the reporter who contacted her.

Lloyd's List could not find an email or phone number for Pacific Petroline DMCC.

This story has been updated with the White Purl's blue cards issuer and class society.

