檔　　號:
保存年限:

金融監督管理委員會保險局 函

地址：220232新北市板橋區縣民大道2段7號17樓
承辦人：李漢勝
電話：02-8968-0791
傳真：

受文者：中華民國人壽保險商業同業公會(代表人陳慧遊先生)

發文日期：中華民國114年9月26日
發文字號：保局(綜)字第11404303181號
速別：普通件
密等及解密條件或保密期限：
附件：

主旨：檢送美國務院及財政部制裁伊朗石油走私行為者事如附件，請依說明二、三辦理，請查照。

說明：

一、依據駐美國代表處經濟組114年9月3日經美字第1140000891號函副本辦理，併檢送前揭函文如附件。

二、請持續關注及更新相關制裁資訊，注意相關交易之風險，並採取適當控管措施。如發現疑似洗錢或資恐(資武擴)之情形，應向法務部調查局申報。

三、對於依「資恐防制法」第4條第1項或第5條第1項指定制裁之個人、法人或團體，應依同法第7條規定辦理。

正本：臺灣產物保險股份有限公司（代表人李泰宏先生）、兆豐產物保險股份有限公司（代表人梁正德先生）、富邦產物保險股份有限公司（代表人許金泉先生）、和泰產物保險股份有限公司（代表人蔡伯龍先生）、泰安產物保險股份有限公司（代表人李松季先生）、明台產物保險股份有限公司（代表人矢持健一郎先生）、南山產物保險股份有限公司（代表人蔡漢凌先生）、第一產物保險股份有限公司（代表人李正漢先生）、旺旺友聯產物保險股份有限公司（代表人洪吉雄先生）、新光產物保險股份有限公司（代表人吳昕紘先生）、華南產物保險股份有限公司（代表人涂志佶先生）、國泰世紀產物保險股份有限公司（代表人蔡鎮球先生）、新安東京海上產物保險股份有限公司（代表人藤田桂子女士）、中國信託產物保險股份有限公司（代表人許東敏先生）、中央再保險股份有限公司（代表人戴錦銓先生）、美商安達產物保險股份有限公司台灣分公司（代表人曾增成先生）、法商法國巴黎產物保險股份有限公司台灣分公司（代表人蔡端賢先

1142397229

生）、法商科法斯產物保險股份有限公司台灣分公司（代表人朱玲儀女士）、德商科隆再保險股份有限公司台灣分公司（代表人曾蕙芬女士）、英屬百慕達商美國再保險股份有限公司台灣分公司（代表人何軒傑先生）、新加坡商美國國際產物保險股份有限公司台灣分公司（代表人廖曉俐女士）、比利時商裕利安宜產物保險股份有限公司台灣分公司（代表人游振東先生）、臺銀人壽保險股份有限公司（代表人張志宏先生）、台灣人壽保險股份有限公司（代表人許舒博先生）、保誠人壽保險股份有限公司（代表人劉添先生）、國泰人壽保險股份有限公司（代表人熊明河先生）、凱基人壽保險股份有限公司（代表人王銘陽先生）、南山人壽保險股份有限公司（代表人尹崇堯先生）、新光人壽保險股份有限公司（代表人魏寶生先生）、富邦人壽保險股份有限公司（代表人林福星先生）、三商美邦人壽保險股份有限公司（代表人翁肇喜先生）、遠雄人壽保險事業股份有限公司(孟嘉仁先生)、宏泰人壽保險股份有限公司（代表人李啓賢先生）、安聯人壽保險股份有限公司（代表人陶奕馥女士）、中華郵政股份有限公司（代表人王國材先生）、第一金人壽保險股份有限公司（代表人楊棋材先生）、合作金庫人壽保險股份有限公司（代表人徐錫漳先生）、台新人壽保險股份有限公司（代表人林維俊先生）、全球人壽保險股份有限公司（代表人林文惠女士）、元大人壽保險股份有限公司（代表人翁健先生）、安達國際人壽保險股份有限公司（代表人李崇言先生）、英屬百慕達商友邦人壽保險股份有限公司台灣分公司（代表人侯文成先生）、法商法國巴黎人壽保險股份有限公司台灣分公司(代表人黃宥甄女士)

副本：中華民國人壽保險商業同業公會(代表人陳慧遊先生)、中華民國產物保險商業同業公會(代表人陳萬祥先生)、本局綜合監理組 電子公文交換章 2025/09/26 21:54:09

檔　　號:
保存年限:

駐美國代表處經濟組 函

地址：4301 Connecticut Ave., N.W., Suite 420, Washington, D.C. 20008, U.S.A.
承 辦 人：張旨華
聯絡電話：1-202-686-1691
電子郵件：chhchang@sa.moea.gov.tw

受文者：金融監督管理委員會

發文日期：中華民國114年9月3日
發文字號：經美字第1140000891號
速別：普通件
密等及解密條件或保密期限：
附件：如文 (678317_1140000891R1.pdf、678317_1140000891R2.pdf)

主旨：有關美國務院及財政部制裁伊朗石油走私行為者事，報請查參。

說明：

一、美國務院及財政部於本(114)年9月2日依據白宮於2月4日公布之「國家安全總統備忘錄」(National Security Presidential Memorandum 2, NSPM-2；查該備忘錄旨在對伊朗實施最大限度經濟壓力，以斷絕伊朗取得核武之一切路徑、反擊伊朗之惡意影響)，以及針對伊朗經濟經營者(包括石油及石化業者)之第13902號行政命令，制裁走私伊朗石油之行為者。

二、美國務院發布「制裁透過伊拉克走私伊朗石油」新聞稿，要點如下：

(一)美國採取果斷行動，阻止資金流向伊朗政權，避免其用於伊拉克、中東及世界各地之破壞性與不穩定行為。

(二)本次受制裁者包括商人Waleed al- Samarra´i及其領導的公司及船隻網路，渠擁有伊拉克以及聖克里斯多福及

金管會 銀行局
1140146828 114/09/04

尼維斯雙重國籍，因走私偽裝為伊拉克石油之伊朗石油而受制裁。

三、美財政部亦同時發布「加大施壓於伊朗石油走私以及透過伊拉克規避制裁」新聞稿，其要點如下：

(一)美財政部外國資產管理辦公室(OFAC)本(2)日對由伊拉克商人Waleed al- Samarra′i領導之航運公司及船隻網路實施制裁，該網路將伊朗石油與伊拉克石油混合，然後故意將其以伊拉克為產地銷售，以規避制裁。

(二)美財政部長貝森特(Scott Bessent)表示，伊拉克不能成為恐怖分子之避風港，美國努力遏制伊朗在伊拉克之影響力。透過打擊伊朗石油收入來源，削弱伊朗政權對美國及盟友發動攻擊之能力。美國將持續確保石油供應不受伊朗影響，並阻止德黑蘭持續試圖規避美國制裁之行為。

四、檢送美國務院及財政部新聞稿如附件，另詳細制裁名單請見財政部新聞稿內OFAC之網站連結https://ofac.treasury.gov/recent-actions/20250902。以上，併請卓參。

正本：經濟部國際貿易署
副本：行政院經貿談判辦公室、交通部、財政部、金融監督管理委員會(均含附件)

電子公文交換章 2025/09/04 08:02:48

An official website of the United States Government Here's how you know

Sanctioning Smugglers of Iranian Oil through Iraq

PRESS STATEMENT

THOMAS "TOMMY" PIGOTT, PRINCIPAL DEPUTY SPOKESPERSON

SEPTEMBER 2, 2025

Today, the United States is acting decisively to stem the flow of revenues to the Iranian regime for its destructive and destabilizing conduct in Iraq, the Middle East, and around the world.

Among those sanctioned today are a network of companies and vessels led by businessman Waleed al-Samarra'i (al-Samarra'i), a dual citizen of Iraq and Saint Kitts and Nevis, for smuggling Iranian oil disguised as Iraqi oil.

The United States will continue to pursue measures implementing **National Security Presidential Memorandum 2**, which directs the imposition of maximum pressure on the Iranian regime to deny it access to revenues that fund its destabilizing activities. We will not hesitate to utilize all available tools at our disposal to counter those who enable Iran's illicit oil trade.

*Today's action is being taken pursuant to Executive Order (E.O.) 13902, which targets those operating in certain sectors of the Iranian economy, including Iran's petroleum and petrochemical sectors. For more information on today's action, please see the Department of the Treasury **press releases**.*

Cookie Settings

TAGS

Bureau of Near Eastern Affairs | Division for Counter Threat Finance and Sanctions | Iran | Iraq | Office of the Spokesperson | Saint Kitts and Nevis | Sanctions and Designations | Smuggling

White House
USA.gov
Office of the Inspector General
Archives
Contact Us
America 250

Privacy Policy
Accessibility Statement
Copyright Information
FOIA
No FEAR Act

An official website of the United States government Here's how you know

U.S. DEPARTMENT OF THE TREASURY

Treasury Intensifies Pressure on Iranian Oil Smuggling and Sanctions Evasion Schemes in Iraq

September 2, 2025

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned a network of shipping companies and vessels led by Iraqi-Kittitian businessman **Waleed al-Samarra'i** (**al-Samarra'i**) for smuggling Iranian oil disguised as Iraqi oil. This network operates primarily by covertly blending Iranian oil with Iraqi oil, which is then marketed intentionally as solely of Iraqi origin to avoid sanctions. This scheme has generated hundreds of millions of dollars in revenue for both the Iranian regime and **al-Samarra'i** himself.

"Iraq cannot become a safe haven for terrorists, which is why the United States is working to counter Iran's influence in the country," said **Secretary of the Treasury Scott Bessent**. "By targeting Iran's oil revenue stream, Treasury will further degrade the regime's ability to carry out attacks against the United States and its allies. We remain committed to an oil supply free from Iran and will continue our efforts to disrupt the ongoing attempts by Tehran to evade U.S. sanctions."

Click here to watch a video from Secretary Bessent on today's action.

Today's action builds on OFAC's July 3, 2025 sanctions targeting the network of Salim Ahmed Said, which also smuggled blended Iraqi and Iranian oil and generated significant revenue for the Iranian regime. Collectively, these actions demonstrate the United States' commitment to eliminating Iran's pernicious influence on Iraq's economy and upholding a campaign of maximum economic pressure on Iran, in accordance with National Security Presidential Memorandum-2. This action is being taken pursuant to Executive Order (E.O.) 13902, which targets those operating in certain sectors of the Iranian economy, including Iran's petroleum and petrochemical sectors.

IRAN-IRAQ NETWORK COMPLICIT IN IRANIAN OIL SMUGGLING

Waleed Khaled Hameed al-Samarra'i (**al-Samarra'i**), a citizen of both Iraq and St. Kitts & Nevis, is a United Arab Emirates (UAE)-based businessman who runs a network of companies

managing vessels that have been involved in the sale of Iranian oil to international markets. This network operates primarily by covertly blending Iranian oil with Iraqi oil, which is then marketed intentionally as solely of Iraqi origin. Based on conservative estimates, al-Samarra'i's network generates around $300 million of value to both Iran and its partners annually.

Al-Samarra'i relies on his two UAE-based companies, **Babylon Navigation DMCC** (**Babylon**) and **Galaxy Oil FZ LLC** (**Galaxy Oil**), to manage his network's operations. While Babylon handles the logistics and shipping aspects of al-Samarra'i's operations, Galaxy Oil features as the main trader of al-Samarra'i's energy products on the global market.

To smuggle the Iranian-origin oil, al-Samarra'i uses a group of vessels operated by Babylon—the Liberia-flagged **ADENA**, **LILIANA**, **CAMILLA**, **DELFINA**, **BIANCA**, **ROBERTA**, **ALEXANDRA**, **BELLAGIO**, and **PAOLA**—to blend Iranian and Iraqi oil at sea, via ship-to-ship transfers in the Arabian Gulf, and in Iraqi ports. While Babylon manages and operates these vessels, al-Samarra'i relies on a number of Marshall Islands-based shell companies—**Tryfo Navigation Inc.** (**Tryfo**), **Keely Shiptrade Limited** (**Keely**), **Odiar Management S.A.** (**Odiar**), **Panarea Marine S.A.** (**Panarea**), and **Topsail Shipholding Inc.** (**Topsail**)—to serve as the registered owners of these vessels and likely further obfuscate the extent of al-Samarra'i's control over them.

To obscure their activity in smuggling Iranian oil, Al-Samarra'i's vessels use ship-to-ship transfers with U.S.-sanctioned vessels publicly affiliated with Iran's shadow fleet to distance themselves from direct interactions with the Iranian petroleum sector. Iran's network of tankers includes both Iranian and foreign-owned vessels that are used to evade international sanctions by concealing oil shipments. Al-Samarra'i's vessels also engage in other obfuscation techniques to hide their activities, such as unsafe ship-to-ship transfers at night, Automated Identification System (AIS) spoofing, and conspicuous gaps in AIS location reporting.

Al-Samarra'i and Babylon are being designated pursuant to E.O. 13902 for operating in the petroleum sector of the Iranian economy.

Galaxy Oil is being designated pursuant to E.O. 13902 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, al-Samarra'i.

The ADENA, LILIANA, CAMILLA, DELFINA, BIANCA, ROBERTA, ALEXANDRA, BELLAGIO, and PAOLA are being identified pursuant to E.O. 13902 as property in which Babylon has an interest.

Tryfo, Keely, Odiar, Panarea, and Topsail are being designated pursuant to E.O. 13902 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Babylon.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the designated or blocked persons described above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by one or more blocked persons are also blocked. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of blocked persons.

Violations of U.S. sanctions may result in the imposition of civil or criminal penalties on U.S. and foreign persons. OFAC may impose civil penalties for sanctions violations on a strict liability basis. OFAC's Economic Sanctions Enforcement Guidelines provide more information regarding OFAC's enforcement of U.S. economic sanctions. In addition, financial institutions and other persons may risk exposure to sanctions for engaging in certain transactions or activities involving designated or otherwise blocked persons. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any designated or blocked person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

Furthermore, engaging in certain transactions involving the persons designated today may risk the imposition of secondary sanctions on participating foreign financial institutions. OFAC can prohibit or impose strict conditions on opening or maintaining, in the United States, a correspondent account or a payable-through account of a foreign financial institution that knowingly conducts or facilitates any significant transaction on behalf of a person who is designated pursuant to the relevant authority.

The power and integrity of OFAC sanctions derive not only from OFAC's ability to designate and add persons to the Specially Designated Nationals and Blocked Persons List (SDN List), but also from its willingness to remove persons from the SDN List consistent with the law. The ultimate goal of sanctions is not to punish, but to bring about a positive change in behavior. For information concerning the process for seeking removal from an OFAC list, including the SDN List, or to submit a request, please refer to OFAC's guidance on Filing a Petition for Removal from an OFAC List.

Click here for more information on the persons designated and any property identified as blocked today.

###