



Incident Summary



- " Time period: May 24, 2013 to July 7, 2013
- The National Iranian Tanker Company (%ITC+) crude oil tanker %Splendour+initiates illicit oil smuggling scheme by transferring Iranian oil to the %Inthem,+a middleman tanker operating out of the United Arab Emirates (%IAE+).
- The %Inthem+then apparently disguises the origin of its cargo by making port call at the port of Fujairah, UAE.
- The % Leela, +a third tanker operated by the U.S.-based Heidmar Inc., performs Ship to Ship (% TS+) transfer with the % Inthem, +apparently loading Iranian oil before setting course for Singapore.

Name: Wag Leela+

Registered Owner at time of Incident:

Great Eastern Shipping Co Ltd.

Beneficial Owner:

Sigma Tankers, a subsidiary of Heidmar Inc.

Type: Crude oil tanker Insurance: Kish P&I

Flag: India



Incident Synopsis



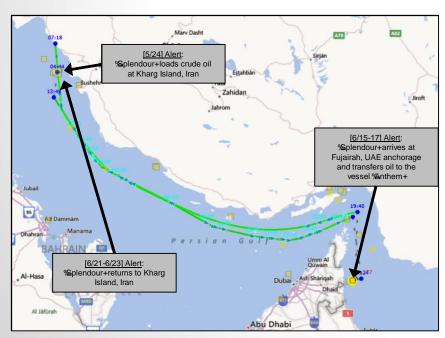
- "May 24, 2013: Splendour+loads crude oil from NIOC terminals at Kharg Island, Iran.
- June 11-12, 2013: Splendour+leaves Kharg Island for Fujairah anchorage, Sharp Heaves Fujairah port for Fujairah anchorage.
- June 13-17, 2013: While at Fujairah anchorage, Splendour+transfers approximately 350,000 barrels (%bl+) of oil to the %nthem,+which then makes a brief stopover in Fujairah port.
- June 19, 2013: Wag Leela+arrives in Fujairah.
- June 19-21, 2013: %Anthem+transfers approximately 350,000 bbl of oil to the %lag Leela.+
- July 6, 2013: % Leela+complete journey to Singapore, delivering cargo of apparent Iranian oil to global oil market.



The "Splendour's" Delivery of Oil to the UAE



- May 24, 2013: Splendour+loads 350,000 bbl of crude oil at NIOC oil terminals at Kharg Island, Iran.
- June 15-17, 2013: Seplendour+arrives at Fujairah anchorage and performs STS transfer with the Sentence approximately 350,000 bbl of oil.
- June 21-23, 2013: Splendour returns to Kharg Island, Iran.



"Splendour's" route: 5/25-6/23

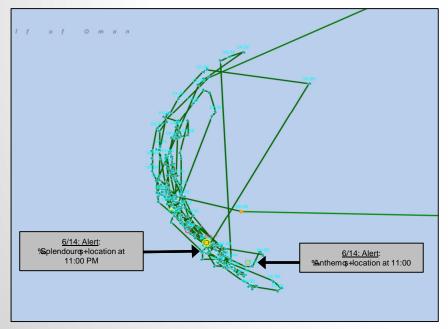


NIOC Oil Terminal, Kharg Island

First STS Transfer: "Splendour"-"Anthem"



- June 13-15, 2013: Seplendour+performs STS transfer with the tanker Senthem,+transferring approximately 350,000 bbl of Iranian oil.
- "Manthem+is a small product tanker then-owned and operated by Philippines-based Siqiriya Maritime Corp, known to operate in the Fujairah anchorage area. Following the Mag Leela+incident, the Manthem+was sold for scrap.
- December 12,2013: %Anthem+was sanction-designated as an NITC vessel by the U.S. Treasury.



STS transfer between "Splendour" and "Anthem," 6/13-6/15

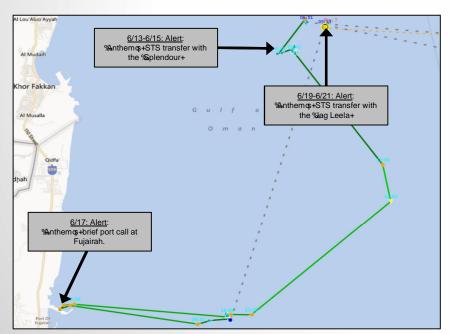


Example: Crude oil tanker performing STS with smaller product tanker

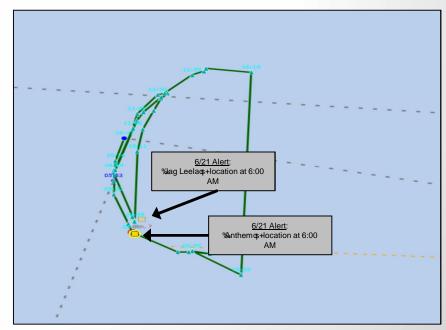
Second STS Transfer: "Anthem"-"Jag Leela"



- June 17, 2013: Following STS transfer with the Splendour,+the Anthem+makes brief port call at Fujairah Port in apparent attempt to disguise the Iranian origin of its oil.
- June 19-21: %Anthem+performs STS transfer with the tanker % Leela,+transferring approx. 350,000 bbl of oil.
- <u>At the time of the STS transfer,</u> % Lag Leela+was owned by India-based Great Eastern Shipping Co., Ltd and operated by U.S.-based Sigma Tankers, a subsidiary of Heidmar Inc.



"Anthem's" route 6/13-6/21



Detail: "Anthem's" STS transfer with the "Jag Leela"

"Jag Leela's" Delivery of Oil to the Global Oil Market



- June 21- July 6, 2013: Following STS transfer with the %Anthem,+%Lag Leela+sets destination to Singapore.
- July 6, 2013: % Leela+makes port call in Singapore, apparently delivering Iranian oil to the global oil market.

