

July 17, 2013

Bo Andersson  
Chief Executive Officer  
Stoc Holding AB  
01, Strandvagen 7A  
SE-114 56 Stockholm  
Sweden

**Re: Stoc Holding AB and Iran**

Dear Mr. Andersson:

United Against Nuclear Iran (“UANI”) is writing to express its concern about the apparent business dealings of Stoc Holding AB's ("Stoc Holding") with Iran. Specifically, the Stoc Holding-controlled vessel "Persia" (IMO 8316845) appears to operate a dedicated route in support of Iran's petrochemical exports and advertises ties to sanctioned Iranian entities on its website. (Stockholm Chartering AB: [Stoctank](#)) Stoc Holding's business activities undermine U.S., EU, and UN sanctions as well as the efforts of responsible non-governmental actors to isolate the Iranian regime and counter Iran's smuggling and proliferation activities. Accordingly, UANI calls on Stoc Holding to cease all business with Iran and Iranian-controlled entities and specifically clarify the activities and exact route of the vessel "Persia".

UANI initiated its Shipping Campaign to compel international shippers, certification firms and governments worldwide to cease their business with the Islamic Republic of Iran Shipping Lines ("IRISL"), National Iranian Tanker Company ("NITC"), and the Iranian regime. 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 its illicit activities. Additionally, UANI recently launched its Maritime Intelligence Network and Rogue Vessel Analysis ("MINERVA") system, in order to provide real-time tracking and course prediction for every Iranian and Iran-related vessel, including clandestine vessels, anywhere in the world. UANI utilizes MINERVA to expose the regime's efforts to smuggle oil and cargo in circumvention of international sanctions, and publicize and put an end to the activities of Iran's allies in the international shipping industry. (*The New York Times*, "[Group Keeps Long-Distance Watch on Iran and Possible Sanction Violations](#)," 06/20/13)

In response to UANI's campaigns and investigative activities, International Association of Classification Societies (“IACS”) members China Classification Society, ClassNK, Korean Register of Shipping, 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. Furthermore, Barbados, Hong Kong, Moldova and Mongolia have ended their

reflagging of Iranian vessels. 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)

Despite these positive developments, a few irresponsible entities unfortunately continue to provide valuable services and business to the Iranian regime. For example, Stoc Holding appears to be involved in a regular and dedicated tanker route in support of Iran's sanctioned petrochemical industry. Specifically, UANI has been monitoring the activities of the "Persia", a tanker operated and managed by Stoc Holding subsidiary Stoc Tankers AB, and owned by Stoc Tankers AB subsidiary Lanautique Shipping Co Ltd. The "Persia" appears to be one of the most active non-Iranian vessels frequenting Iran's petrochemical facilities at Bandar Imam Khomenei, Lavan Island and the port of Chah Bahar, Iran. The "Persia", also appears to operate a regular and dedicated route between these Iranian facilities.

In addition, UANI is highly concerned that petrochemical deliveries made by the "Persia" to Chah Bahar may risk providing support for Islamic Republic of Iran Navy ("IRIN") forces operating out of the nearby port of Konarak and Islamic Republic of Iran Air Force ("IRIAF") forces operating out of the nearby Chah Bahar/Konarak Aerodrome. (Islamic Republic of Iran: [Chah Bahar/Konarak Aerodrome](#): Open Source IMINT: [Iran's Veleyat Naval War Games & the Ghadir Submarines](#)) Moreover, UANI is concerned that P&I coverage for the "Persia" is provided by Kish P&I, the Iranian regime's fraudulent P&I club that operates as part of a larger scheme to fraudulently classify and insure vessels working for Iran. Simply put, Stoc Holding appears to be profiting from its involvement in the Iranian regime's schemes to prop up its sanctioned petrochemical and shipping sectors. Such involvement is also exposing Stoc Holding to the risk that its services are providing support for Iran's military forces.

Sweden-based Stoc Holding should also be aware of EU sanctions leveled against entities facilitating Iran's access to the international shipping industry and transport of Iranian petrochemical products. For instance, in 2012 the EU prohibited EU entities "to transport crude oil or petroleum products if they originate in Iran, or are being exported from Iran to any other country." (Official Journal of the European Union: [Council Regulation \(EU\) No 267/2012 of 23 March 2012](#)) In light of the "Persia's" ongoing activities, UANI will be calling on its allies in the EU to investigate Stoc Holding's apparent violation of EU sanctions.

The international community has taken unprecedented steps to counter the grave threat posed by Iran's illicit nuclear weapons program. Concentrated international pressure on the Iranian regime, particularly its shipping industry, has had a profound impact in driving Iran to the negotiating table. 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. Please let us hear from you by July 27, 2013 concerning Stoc Holding's intentions regarding its business with Iran.

Thank you for your immediate attention to this matter.

Very truly yours,

A handwritten signature in black ink, reading "Mark Wallace". The signature is written in a cursive, flowing style with a prominent initial "M" and a long, sweeping tail.

Ambassador Mark D. Wallace