

United States Senate

WASHINGTON, DC 20510

January 11, 2024

Mrs. A. Monterrey
Department of Resolutions and Inquiries
Panama Maritime Authority (AMP)
404, Segumar Office
Albrook, Panama City, Republic of Panama

CC: H.E. Ramón Martínez de la Guardia
Panamanian Ambassador to the United States
2201 Wisconsin Ave NW, # C100
Washington, DC 20007

Dear Mrs. Monterrey:

We write to you in light of our shared belief that Panama is a strong democratic ally and a crucial trade and security partner of the United States. As you know, it has been bipartisan U.S. policy for decades to deprive Iran of the financing and resources it uses to fund international terrorism. In addition to threatening regional security in the Middle East, Iran has been credibly linked to transnational criminal activity and terrorism in our own hemisphere.¹ We therefore request that you cooperate with the United States and conduct investigations into a significant number of ships registered in Panama which are alleged to transport Iranian oil in violation of U.S. sanctions.

The United States has enacted a series of sanctions on the Iranian regime in response to and in condemnation of Iran's serious human rights abuses and state sponsorship of terrorism. From supporting proxy groups like Hezbollah and Hamas, to backing the brutal Syrian regime, to accelerating its nuclear, drone, and ballistic missile programs, to killing hundreds and arresting thousands of its own people in violent crackdowns on domestic protests, Iran consistently works in opposition to peace, stability, democracy, and shared American values and interests across the Middle East. Hamas' barbaric attack on Israeli civilians on October 7 highlights the urgency of depriving this regime of the funding it uses to advance its evil agenda.

In our own hemisphere, we note Iran's involvement in the heinous 1994 bombing of the Asociación Mutual Israelita Argentina (AMIA), which killed 85 people.² We further note Iran's ongoing support to the authoritarian regime of Nicolas Maduro in Venezuela, as well as the participation of Hezbollah, one of Iran's proxy groups, in narcotics and weapons trafficking in the western hemisphere.

¹ Benjamin Jaimes, *Reevaluating the Threat: Terrorism in Latin America*, GLOBAL AMERICANS, <https://theglobalamericans.org/2023/11/reevaluating-the-threat-terrorism-in-latin-america/>.

² *Remembering the Victims of Hizballah Attacks*, U.S. DEPARTMENT OF STATE, <https://www.state.gov/remembering-the-victims-of-hizballah-attacks/>.

Roughly a quarter of Iran’s revenue is derived from oil exports. In 2018 and 2019, the United States imposed sanctions on Iranian oil that significantly restricted these exports. In recent years, Iran and its buyers have used a “ghost fleet” of vessels employing creative techniques to conceal the origin of Iranian oil, allowing Iran’s oil revenues to rebound. These techniques include transferring oil between tankers at sea, turning off GPS trackers before docking in Iran, repainting vessels mid-journey, “flag hopping” between different national registries, and labeling oil as different types of fuels. Thanks to the ghost fleet, Iran has been able to export hundreds of millions of barrels of Iranian oil in recent years, which ultimately fund the regime’s continued human rights violations, terrorist proxy forces, and nuclear proliferation program.

Open-source satellite data can assist in identifying this behavior. As of December 2023, the nonprofit United Against Nuclear Iran (UANI) has identified 383 vessels suspected as belonging to the “ghost fleet,” of which 189 (49 percent) are flagged in Panama.³ The specific ships are listed in the appendix to this letter. AMP has so far de-flagged just 28 of 217 vessels of concern.⁴ In comparison, other registries have been much more diligent about de-flagging vessels identified as part of Iran’s ghost fleet, and no other nation flags more than five percent of vessels suspected to be a part of the ghost fleet. We are concerned that the Panama Maritime Authority is not exercising the due diligence necessary to address these vessels. We further worry that practices used to evade U.S. sanctions on Iranian oil might likewise be used to evade U.S. sanctions on Russian oil, aiding that nation’s abhorrent atrocities in Ukraine and elsewhere.

We respectfully ask that you thoroughly investigate the alleged involvement of these 189 ships in transporting sanctioned Iranian oil and follow your established procedures to de-flag ships whose involvement is corroborated by available evidence, decline to flag such vessels again in the future, and extend similar scrutiny to vessels under suspicion of evading sanctions on other countries.

We hope this issue can be given the urgent attention that it merits and serve as another example of the historic cooperation between our countries to advance international peace and security. We appreciate your time and attention to this crucial issue.

Sincerely,



Robert P. Casey, Jr.
United States Senator



Marco Rubio
U.S. Senator

³ Claire Jungman & Daniel Roth, *Stop the Hop II: the Ghost Armada Grows*, UNITED AGAINST NUCLEAR IRAN, <https://www.unitedagainstnucleariran.com/blog/stop-hop-ii-ghost-armada-grows>.

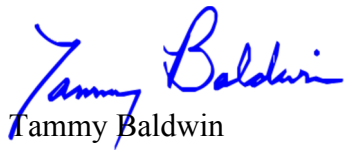
⁴ Some vessels were recently de-flagged because they were decommissioned, not due to concerns related to those vessels’ movements and sanctions compliance.



Richard Blumenthal
United States Senator



James E. Risch
United States Senator



Tammy Baldwin
United States Senator



Roger F. Wicker
United States Senator



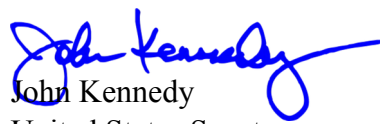
Sheldon Whitehouse
United States Senator



Charles E. Grassley
United States Senator



Jacky Rosen
United States Senator



John Kennedy
United States Senator



Joe Manchin III
United States Senator



Rick Scott
United States Senator



Catherine Cortez Masto
United States Senator



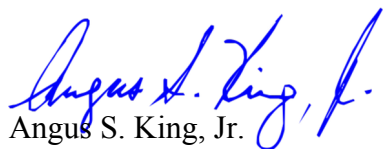
Pete Ricketts
United States Senator



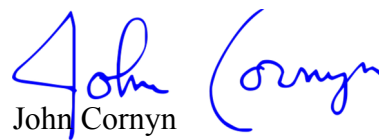
Amy Klobuchar
United States Senator



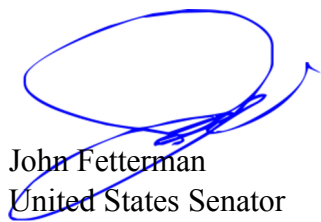
Mike Braun
United States Senator



Angus S. King, Jr.
United States Senator



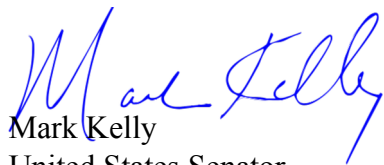
John Cornyn
United States Senator



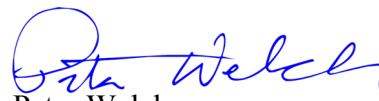
John Fetterman
United States Senator



Margaret Wood Hassan
United States Senator



Mark Kelly
United States Senator



Peter Welch
United States Senator