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Stateless Tankers, Stranded Value

Maritime Asset Seizure and Reappropriation of Iranian Crude

Companion paper to the Hostile State Asset Denial and Settlement Act: how much of the false-flag tanker fleet serving Iran the United States can lawfully take, what it would yield, and for how long it would deny Iran the ships it needs

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ABSTRACT

Tankers flying flags no state has granted carry sanctioned Iranian and Russian oil, and carried Venezuelan oil under the Maduro government. This paper asks how much of the Iran-trade fleet the United States can lawfully take, what that would yield, and whether it would deny Iran the ships it needs. It screens an open-source register of 262 Iran-trade vessel records to 188 candidate tankers broadcasting non-registry or impersonated flags on 8 October 2026; 156 form a core inventory and 91 carry a documented third-party false-flag finding. It maps each legal step from boarding to retention, values seizure scenarios, and estimates post-blockade crude-carriage capacity. The governing judgment is that, under existing law, seizure is lawful only ship by ship; it pays for itself only if custody costs stay well below those observed so far; and on its own it is very unlikely to keep Iran's carriage capacity below its pre-war level for more than about five months. Seizing 70 percent of the candidates would net about $1.8 billion under stated assumptions, within an illustrative range of −$1.6 billion to $6.5 billion. Under the central assumptions, removing ships lowers carriage capacity below the pre-war level only if nearly the whole candidate fleet is taken while tankers remain tied up in storage; longer voyage cycles lower that threshold, and an assumed replacement rate closes any shortfall within about five months. The paper sets out policy options and, separately, the author's proposed maritime title for the Hostile State Asset Denial and Settlement Act.

KEYWORDS

sanctions evasion; shadow fleet; stateless vessels; civil forfeiture; prize law; maritime interdiction; Iran; Strait of Malacca

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DATA

Stateless_Tankers_Register_and_Model_v3_2026-10-12.xlsx — vessel register (262 records), valuation model, carriage-capacity model and change log. Every figure in this paper is computed by formula from the register.

DECLARATION

No one commissioned or paid for this paper. The author has no client relationship with any party to the matters discussed. This is not legal or investment advice. AI assistance was used for source retrieval, verification against primary sources and editing for tone and clarity; the analysis, judgments and text are the author's; separate reviews audited the valuation, the legal claims and the key judgments. Those reviews are not source authentication or legal validation. The author is responsible for the analysis and conclusions. License: CC BY-NC-ND 4.0.

IF YOU READ NOTHING ELSE

What can be taken	Under existing law the United States can lawfully seize part of the false-flag fleet serving Iran, but only ship by ship, and only where it can prove a predicate for the specific hull or cargo and hold jurisdiction over it. Boarding, seizure and retention are three separate legal steps, and each stops in a different place.
What it is worth	Seizing 70 percent of the candidates would net about $1.8 billion under the stated assumptions, within an illustrative range of −$1.6 billion to $6.5 billion. The program pays for itself only if custody costs stay well below those observed so far.
What it denies	Very little, for very long. Removing ships lowers Iran's carriage capacity below its pre-war level only if nearly the whole candidate fleet is taken while tankers remain tied up in storage, and an assumed replacement rate closes the shortfall within about five months. Lasting denial depends on cutting off the supply of replacement tankers.

Governing judgment

Under existing law, the United States can lawfully seize part of the false-flag fleet that serves Iran, but only ship by ship, and only where it can prove a predicate for the specific hull or cargo and hold jurisdiction over it (key judgments 1a and 1b). A seizure program is unlikely to pay for itself at the custody costs observed so far (key judgment 4). Seizure alone is very unlikely to keep Iran's tanker capacity below its pre-war level for more than about five months (key judgment 5); lasting denial would require near-total removal of the candidate fleet and a cut in the supply of replacement tankers, and whether such a cut can be achieved is uncertain (key judgment 6).

Key judgments. Probability uses the scale remote, very unlikely, unlikely, roughly even, likely, very likely, almost certain. Analytic confidence (low, moderate, high) is stated separately and reflects the quality of the evidence and the number of assumptions. Evidence tiers are defined in the Methodology.

#	Judgment	Probability	Confidence	Main evidence (tier)	Would change if
1a	Existing U.S. law permits boarding a candidate, outside any state's territorial sea, on reasonable suspicion that it has no nationality.	Very likely	High	UNCLOS Arts. 92 and 110 as custom; Marino-Garcia (Tier 1)	A coastal-state objection in its EEZ that the United States accepts
1b	Seizure requires a predicate tied to that hull, its cargo or its crew's conduct; statelessness alone does not supply one.	Very likely	Moderate	18 U.S.C. §§ 981 and 983: no forfeiture provision reaches a vessel merely because it lacks nationality (Tier 1). 18 U.S.C. § 2237(a)(2)(B) makes a false nationality claim during a boarding a personal offense; whether it supports forfeiture of the hull is untested	A ruling that § 2237 conduct supports forfeiture of the vessel, or a statute creating a new predicate

#	Judgment	Probability	Confidence	Main evidence (tier)	Would change if
2	Most of the 156 core candidates are without nationality as international law (UNCLOS Art. 92) and 46 U.S.C. § 70502(d) use the term.	Likely	Low	Flag-state disavowals and IMO notices where documented (Tier 1); analyst false-flag records (Tier 3); the rest (Tier 4); no registry check yet	A random registry sample of at least 30 ships showing valid registration for more than about 40 percent; above 10 percent would require revising the counts used in the valuation
3	Terrorism forfeiture of a cargo with proven IRGC ownership survives a claimant who asserts that title had passed to a third party.	Roughly even	Low	Uncontested forfeitures and the Suez Rajan plea (Tier 1); no contested merits ruling; claimants contest only the cases they expect to win	A contested ruling in the Skipper or 2026 tanker cases
4	A seizure program at the base-case scale pays for itself.	Unlikely	Low	The base case is positive only because per-ship cost is assumed at $18 million, below the $32 million break-even; the one observed cost (Skipper, about $47 million) is above it (Tier 3). Litigation risk and delay are not discounted	Custody costs and sale proceeds from the pending cases at or below the break-even level
5	Seizure alone keeps Iran's post-blockade crude-carriage capacity below its pre-war level for more than about five months.	Very unlikely	Low	Vortexa and BRS data (Tier 3); fleet size, cycle time and the replacement rate are modeling assumptions with no source, treated as Tier 4; the result is a model output, not an observation	Evidence that Iran cannot buy or reactivate replacement tankers, or that oil stays stored on ships for months
6	Measures against the sellers, brokers and service providers that supply replacement tankers would extend a capacity shortfall by more than three months.	Roughly even	Low	Shadow-fleet growth of about 30 ships a month in 2025 despite designations; reactivation of retired Iranian tankers (Tier 3)	Replacement purchases continuing at the 2025 rate despite designations of sellers and brokers (lower); a sustained fall in sales of older tankers to opaque buyers (higher)
7	Option A of the proposed offense, which needs no U.S. nexus, would survive constitutional challenge.	Roughly even	Low	Campbell and Caicedo uphold no-nexus jurisdiction over stateless vessels on the high seas in drug cases; Bellaizac-Hurtado and Davis concern foreign waters and flagged vessels (Tier 1); Kontorovich (Tier 2)	An appellate ruling on a non-drug offense aboard a stateless vessel, or a grant of certiorari in an MDLEA nexus or statelessness case

1 Introduction

The false-flag fleet is a maritime-safety problem, a sanctions-enforcement problem and a national-security problem at once. A ship that broadcasts a flag no state has granted escapes flag-state inspection, and documented cargoes carried by such ships have paid sanctioned governments and designated networks. This paper examines the legal and economic consequences of a seizure program whose stated purpose would be to reduce that trade: maritime trafficking, false flagging and sanctions evasion, and the illicit activity they finance. Recovering value would be a secondary effect.

Four propositions must be kept apart, because the evidence and the law treat each differently:

1. **The flag is false.** The ship broadcasts or claims a flag that the named state has not granted.
2. **The ship has no nationality.** No state has validly registered it under any flag. A false flag is evidence of this, not proof; a ship may hold a valid registration elsewhere.

3. **The ship or cargo is subject to seizure or capture.** That requires a domestic predicate (a forfeiture offense with a nexus to the property) or a belligerent right (enemy character, contraband, or breach of blockade).
4. **The United States may keep it.** Retention requires a forfeiture judgment or a prize condemnation, after claimants have been heard.

This paper is the operational and economic companion to the Hostile State Asset Denial and Settlement Act (HSADSA, discussion draft v3.2). The Act sets three tiers for hostile-state assets taken during armed hostilities: Tier 1, reversible custody; Tier 2, confiscation only on a second joint resolution of Congress; Tier 3, use of vested assets for claims, transfer to the Defense Cooperation Account, and an export-revenue levy. This paper applies those tiers to one class of asset, tankers in the Iranian trade and the cargo they carry, and asks four questions:

- How large is the false-flag problem, and how much of it is in reach?
- What legal authority supports each step from visit to retention, and where does each stop?
- What would seizure yield under stated assumptions, net of the cost of custody and the risk of losing title?
- How should the value of any cargo the United States lawfully acquires be applied?

The figures in this paper are conditional. They assume lawful acquisition of custody and successful adjudication, and they are illustrative scenarios, not verified recoverable values.

2 The problem beyond Iran

False flagging is not an Iranian invention, and it is growing. Windward reports that the IMO database listed about 580 falsely flagged vessels in the second quarter of 2026, up from 470 at the end of 2025 (note 1). It separately identified about 275 internationally trading tankers on fraudulent registries, about 90 percent of them under Western sanctions, most in the Russian, Iranian and Venezuelan trades. Two-thirds of the falsely flagged ships the IMO identified in the year to April 2026 had no classification society, so they sail without the surveys and insurance that make a casualty manageable. The Iran trade is the most concentrated part of this fleet: an estimated 62% of the roughly 430 tankers in it fly false flags.

Why it matters. A false flag defeats the controls that keep the sea lanes lawful and safe:

- **Sanctions evasion.** Without a flag state, no administration inspects the ship, answers for it, or can be pressed to act against it. Ownership and cargo origin are hidden behind shell companies and ship-to-ship transfers.
- **Finance of hostile states and illicit networks.** The cargo revenue funds the states and networks that operate the fleet, including the IRGC.
- **Safety and environment.** Old, unclassed and often uninsured tankers carry full cargoes through congested straits. A casualty leaves no insurer and no flag state to answer for the cleanup.

- **Erosion of the registry system.** Fraudulent registries sell flags in the names of states that run none, and IMO members have filed a growing number of disavowals.

Where the money goes. Sanctioned states evade because the revenue pays for things sanctions are meant to stop. U.S. designations, forfeiture complaints and UN expert reports link shadow-fleet oil money to specific end uses. The table states what kind of finding supports each link, because a designation, an allegation and a judgment carry different weight:

State	How the trade evades	Revenue	What it is linked to	Type of finding	Primary source
Iran	False flags, AIS spoofing, ship-to-ship transfers off Johor, front companies in Hong Kong and the UAE, falsified certificates of origin, sales to Chinese independent refiners	About $50 billion a year in oil exports, up to half through IRGC-managed channels; at least $12.6 billion budgeted to the IRGC	The IRGC and IRGC-Qods Force; the Armed Forces General Staff through Sepehr Energy, which Treasury calls its "oil sales arm"; MODAFL procurement for ballistic missile and nuclear programs	Revenue: non-government estimates (congressional testimony; press reports of the Iranian budget). End uses: Treasury designation findings	Treasury press release sb0015 (Feb. 2025, Sepehr Energy network) and follow-on Sepehr actions; House Foreign Affairs Committee testimony, April 2025
Iran, proxy channel	The Sa'id al-Jamal network: Iranian fuel sold in East Asia, proceeds moved through exchange houses and cryptocurrency	"Tens of millions of dollars" to the Houthis	Houthi attacks on Red Sea shipping and arms procurement; Iranian crude shipped to Hizballah	Treasury designation findings	Treasury press releases on the Sa'id al-Jamal network, including jy2469 and jy2538 (2024)
Russia	Shadow fleet outside International Group P&I cover; false flags, then the Russian flag; price-cap evasion	86% of crude exports on the shadow fleet in January 2025; about $158 billion in oil export revenue in 2025	What Treasury calls the "Kremlin's war machine"	Revenue: non-government estimates. End use: Treasury designation statement	Treasury, sanctions on Rosneft and Lukoil, 22 Oct. 2025; KSE Institute estimates
Venezuela	Shadow tankers shared with the Iran trade	Not quantified in sources reviewed	The Maduro government (until its fall in January 2026); Cartel de los Soles	FTO designation (executive determination); IRGC link pleaded in a forfeiture complaint (allegation, not adjudicated)	State Department FTO designation, 90 Fed. Reg. (24 Nov. 2025), FR Doc. 2025-20750; DOJ, "United States Seeks Forfeiture of Oil Tanker and 1.8M Barrels of Crude Oil," 27 Feb. 2026 (D.D.C. No. 1:26-cv-00697)
North Korea	Ship-to-ship transfers on the high seas; direct deliveries	Imports above the UN cap of 500,000 barrels of refined petroleum a year, every year to 2024; more than 165,000 barrels from Russia in March 2024 alone	Nuclear and ballistic missile programs under UN sanctions	UN expert panel findings; U.S. government statements	UN Panel of Experts final report (S/2024/215, 7 March 2024) for imports above the cap through 2023; the March 2024 deliveries from Russia come from a statement by White House National Security Communications Adviser John Kirby on 2 May 2024, not from the Panel report

The methods are documented in joint advisories by OFAC, State and the Coast Guard (May 2020), the Price Cap Coalition (October 2024) and Treasury on Iranian oil (April 2025). The IMO Assembly defined

the “dark fleet” in Resolution A.1192(33) (December 2023) as ships operating illegally to circumvent sanctions, evade safety and environmental rules, or avoid insurance costs. The shared fleet ties the trades together: the tanker *Skipper* delivered about three million barrels of Iranian crude to Syria in 2024 and was seized in December 2025 carrying Venezuelan crude. DOJ pleaded it as an asset affording a source of influence over the IRGC.

Why the Strait of Malacca matters more than Hormuz for this problem. The Strait of Malacca carries more oil than any other chokepoint: about 23.2 million barrels a day in the first half of 2025, against 20.9 million through the Strait of Hormuz (note 2). Hormuz is the exit for Gulf supply; Malacca and its alternates, the Sunda and Lombok straits, are the entry to East Asia for crude from every origin, sanctioned or not. Iranian cargoes pass through or near it, and the main ship-to-ship transfer hub for Iranian crude bound for Chinese refiners lies off Johor, at its eastern approach. An interdiction program in the approaches to Malacca therefore reaches the false-flag fleet of every sanctioned trade bound for East Asia, not only Iran’s.

The legal reach differs by trade. Against stateless ships carrying Russian or Venezuelan cargo, the United States has the right of visit and, where a predicate exists, civil forfeiture. Prize law applies only to an enemy in an armed conflict, which in October 2026 means Iran. The program can be broad in its targets only if it is precise about which authority applies to each ship.

Note 1. The IMO counted 529 ships falsely flying a state’s flag in the year to April 2026, 356 of them unclassed (IMO LEG 113, as reported by Splash247). Windward reports that the IMO database listed about 580 falsely flagged vessels in Q2 2026, up from 470 at the end of 2025, and separately identified about 275 internationally trading tankers on 22 fraudulent registries. The EU External Action Service has estimated the shadow fleet at 600 to 1,400 vessels, and more than 650 tankers have been sanctioned for Russia-related evasion. These counts use different dates and definitions and should not be added together; they indicate the potential scale of the problem.

Note 2. U.S. Energy Information Administration, World Oil Transit Chokepoints, updated 3 March 2026. Malacca carried 24.0 million b/d in 2023 and 22.5 million in 2024; Hormuz carried 21.8 and 20.7 million.

3 The candidate inventory

The register compiled for this paper holds 262 Iran-trade vessel records; 188 of them form the candidate inventory. The register merges 257 records built from UANI Ghost Armada tables and a TankerTrackers data snapshot with five records added from official notices and trade reporting (AQUA LIVE, KYLO, AURA, SETTEBELLO and LAVIN). Four records were corrected on review, as logged on the Changes sheet of the supplementary workbook: SKIPPER (IMO 9304667), seized by U.S. forces in December 2025, was moved out of the count; RICH STARRY and DISHA, which had been turned back rather than seized, were restored to it; and G SUMMER, also turned back, was restored to active status but remains uncounted because it carries a genuine Angolan flag. The net effect raised the inventory from 187 to 188 (91 documented, 97 candidates). Every figure in Section 5 is computed by formula from the workbook’s vessel list. Annex A lists every record and whether it is counted: Annex A.

Step	Records	Removed	Reason
Merged register	262	—	257 base records + 5 added
Not seized, disabled, sunk or in custody	237	25	Enforcement or casualty reported
Not reflagged to a valid registry	229	8	Current flag Russia, Iran or another valid registry, recorded as reflagged
Flag on 8 October is a non-registry or impersonated state	188	41	27 on real registries where misuse is reported (Comoros, Cameroon, Gambia, Angola and others); 13 on valid open registries; 1 identity conflict
Candidate inventory	**188**		91 with a documented false-flag finding (high or medium confidence); 97 meeting the flag test without vessel-level confirmation

The 41 ships on real registries are not presumed false. Comoros, Cameroon and Gambia run genuine registers and have disowned specific ships; a ship on those flags needs a vessel-level finding before it can be treated as without nationality. Annex A also lists, as a watchlist, twelve recently designated ships on such registries or being removed from Panama's.

Size class	Ships	Cargo capacity, each (million bbl, approx.)	Fleet capacity (million bbl)	Lightweight, each (thousand LDT, approx.)
VLCC	46	2.0	92.0	42
Suezmax	11	1.0	11.0	22
Aframax	33	0.7	23.1	17
Panamax / LR1	7	0.5	3.5	13
Handysize / MR	86	0.3	25.8	9
LPG and unclassified	5	—	not valued	10.5 (assumed midpoint)
Total	**188**		**155.4 liquid**	**3,653 in all**

Classes come from the register's type field, which records size, not cargo. The paper treats VLCC to Panamax capacity (129.6 million barrels) as crude and Handysize/MR capacity (25.8 million) as refined products. That is an assumption: some Handysize ships carry bitumen, chemicals or crude, and some LR1 ships carry products. LPG and unclassified ships are excluded from cargo value. Per-ship capacity and lightweight tonnage are class averages, not vessel figures.

The fleet is concentrated in three places:

- **Off Sri Lanka.** Vortexa reported 27 sanctioned Iran-linked tankers waiting there in ballast in early September.
- **The transfer anchorage off Johor.** UANI counted 18 to 26 Ghost Armada tankers in or near it from late September, down from 49 in early September.
- **The Gulf and the Gulf of Oman.** UANI identified at least 51 laden tankers along the Iranian coast on 8 October, 17 near Kharg Island, most of them Iranian-flagged.

The current flags of the 188 are Nicaragua (37), Curaçao (31), Guyana (29), Malawi (26), Mozambique (14), Aruba (10), Mali (9), Guinea (8), Botswana (7), Madagascar (6), Benin (4), Timor-Leste (3), Syria (2) and Zimbabwe (2). A state's notice that registries in its name are fraudulent shows that the flag is suspect. It does not show that every ship using that name lacks a valid registration elsewhere.

Flags of states with genuine registers. Curaçao and Aruba register ships within the Kingdom of the Netherlands, and Guyana and Syria also run registers. Fraudulent registries operate in some of those names, but a ship flying one of those flags may hold valid registration. Of the 188, 31 fly Curaçao's flag, 10 Aruba's, 29 Guyana's and 2 Syria's; 32 of them (16 Curaçao, 7 Aruba, 9 Guyana) are candidates without a vessel-level finding. Excluding those 32 gives a core inventory of 156. Even the documented findings for these flags rest mostly on analyst records rather than written confirmation from the registry, so each needs a direct registry check before any action. Section 5 reports results for the full inventory, the core inventory and the 91 documented ships.

Limits of the inventory. Most medium-confidence findings come from UANI tables dated 12 May 2026. An October broadcast of a flag found false in May is evidence of continuing misuse, not proof that the ship has no nationality. Absence of a reported seizure is not proof that a ship is still operating. Before any action, each ship needs a documented identity (hull, IMO and MMSI history), a current registration check in IMO GISIS and Equasis, confirmation from the named administration, and dated evidence of recent Iranian trade. GISIS is public and updated weekly, but it corroborates rather than decides nationality.

4 Legal authority

Boarding, seizure and retention are three separate legal steps, and each needs its own basis. Reasonable grounds to suspect statelessness can support the first, a nationality check. Seizure requires an applicable legal predicate and jurisdiction over the property; permanent retention requires adjudication or another specifically authorized process.

Step	What it permits	Basis	What must be shown	Limits
Visit	Boarding to verify nationality	Right of visit over ships suspected of having no nationality, as reflected in UNCLOS Art. 110(1)(d), applied in the EEZ through Art. 58(2); the United States, not a party, accepts these provisions as customary law	Reasonable grounds to suspect the ship has no nationality	High seas and EEZ only; not territorial seas or internal waters; due regard for coastal-state rights in the EEZ (Art. 58(3)); transfers no title
Seizure for forfeiture	Arrest of a specific hull or cargo as property subject to forfeiture	18 U.S.C. § 981(a)(1)(G); venue for property abroad in the District of Columbia, 28 U.S.C. § 1355(b)(2)	A terrorism predicate and a nexus between that predicate and each hull and each cargo, proved separately; sanctions status alone is not enough	Venue does not authorize enforcement inside foreign territory; foreign recognition or custody by U.S. forces is needed
Capture as prize	Taking an enemy ship or goods, or a neutral ship or contraband, for adjudication	Law of naval warfare (San Remo Manual paras. 135, 146–148); 10 U.S.C. ch. 883	Enemy character of ship or cargo, contraband destined for enemy territory, or breach of blockade	Not in neutral waters (Hague XIII, Art. 2); untested in modern U.S. practice; applies only against a belligerent
Retention	Title to hull or cargo	Forfeiture judgment after claims under Supplemental Rule G and 18 U.S.C. § 983; or prize condemnation	Owner, lienholder and cargo-interest claims heard and resolved	Innocent-owner defenses, maritime liens and wrongful-capture claims can defeat or reduce retention

Primary and secondary evasion are reached differently. Evidence of sanctions evasion does not by itself authorize boarding a validly flagged ship on the high seas; that requires flag-state consent or another recognized basis. Once a ship is lawfully boarded, evasion supports seizure only where the conduct supplies a forfeiture predicate that reaches the specific hull or cargo and a court has jurisdiction over that property. Seizure is provisional. The government's interest relates back to the act giving rise to forfeiture (18 U.S.C. § 981(f)), but apart from a court-ordered interlocutory sale it cannot dispose of the property until a judgment resolves the claims.

Conduct	U.S. offense today?	Seizure basis
Evasion with any U.S. nexus: dollar clearing, U.S. persons, banks, insurers or services	Yes, if the conduct violates a specific prohibition. IEEPA, 50 U.S.C. § 1705, reaches anyone who violates or causes a violation; criminal liability requires a willful violation (§ 1705(c)). A dollar payment alone is not a violation. IEEPA violations are money-laundering predicates (18 U.S.C. § 1956(c)(7)(D))	Forfeiture under 18 U.S.C. § 981(a)(1)(C) (proceeds traceable to the violation) or (A) (property involved in money laundering), each requiring a nexus to the specific hull or cargo
Trade that supports the IRGC or another designated terrorist organization	Yes, if the government proves the organization is engaged in planning or perpetrating a federal crime of terrorism against the United States, which requires both an offense listed in 18 U.S.C. § 2332b(g)(5)(B) and conduct "calculated to influence or affect the conduct of government by intimidation or coercion, or to retaliate against government conduct" (§ 2332b(g)(5)(A)), and that the property affords a source of influence over it; material support to a designated FTO is separately an offense (18 U.S.C. § 2339B), but it requires proof of knowing provision of material support; a designation does not make every commercial shipment material support	Forfeiture of assets "affording any person a source of influence over" the organization, 18 U.S.C. § 981(a)(1)(G)(i)

Conduct	U.S. offense today?	Seizure basis
Secondary evasion with no U.S. nexus: foreign ship, foreign buyer, non-dollar payment	No. IFCA, NDAA FY2012 § 1245, CISADA and E.O.s 13846 and 13902 authorize designation and loss of dollar access; they do not make a foreign person's foreign conduct a U.S. crime	None today. Partly addressed by the proposed stateless-petroleum offense (Section 9), which reaches only vessels without nationality and requires knowledge
Enemy-owned cargo or breach of blockade (Iran only, in armed conflict)	Not required	Prize capture, 10 U.S.C. ch. 883

What makes a vessel stateless in U.S. law. The Maritime Drug Law Enforcement Act treats a vessel as without nationality when the claimed nation denies the claim, when the master fails to claim nationality on request, or when the claimed nation does not affirmatively and unequivocally assert that the vessel is of its nationality, or, since a 2022 amendment, when no one on board claims to be or is identified as the master or person in charge and the vessel makes no other claim of nationality (46 U.S.C. § 70502(d)(1)(A)–(D)). The third test has been challenged as beyond Congress's power; the en banc First Circuit avoided the question in *United States v. Dávila-Reyes*, 84 F.4th 400 (1st Cir. 2023), by finding the vessel stateless on other grounds. The Eleventh Circuit continues to uphold the MDLEA's definition and prosecutions without a U.S. nexus (United States v. Martinez, No. 22-13361 (11th Cir. 2026)), so the constitutional limits remain unsettled. A new statute would rest on firmer ground if it defined statelessness by the tests international law accepts: a denied claim, no claim, or sailing under two or more flags (UNCLOS Art. 92(2)).

The constitutional question is open. Congress's power to punish conduct at sea comes from the Felonies Clause and the Define and Punish Clause (U.S. Const. art. I, § 8, cl. 10). Kontorovich argues that, without a U.S. nexus, Congress may punish only conduct that international law subjects to universal jurisdiction, and that drug trafficking does not qualify (Eugene Kontorovich, Beyond the Article I Horizon: Congress's Enumerated Powers and Universal Jurisdiction Over Drug Crimes, 93 Minn. L. Rev. 1191 (2009); The "Define and Punish" Clause and the Limits of Universal Jurisdiction, 103 Nw. U. L. Rev. 149 (2009)). The appellate cases address related drug offenses in different settings. The Eleventh Circuit held that the Offences Clause does not reach drug trafficking in a foreign state's territorial waters (United States v. Bellaizac-Hurtado, 700 F.3d 1245 (11th Cir. 2012)), and upheld a no-nexus MDLEA prosecution of drug trafficking aboard a stateless vessel under the Felonies Clause (United States v. Campbell, 743 F.3d 802 (11th Cir. 2014)). In MDLEA prosecutions, the Ninth Circuit requires a due-process nexus for foreign-flagged vessels (United States v. Davis, 905 F.2d 245 (9th Cir. 1990)) but not for stateless vessels engaged in drug trafficking (United States v. Caicedo, 47 F.3d 370 (9th Cir. 1995)). Kontorovich's analysis is a substantial objection to Option A of the proposed offense in Section 9. The drug cases support a broad reading of Congress's power over stateless vessels, but none decides whether Congress may punish

foreign nationals for carrying petroleum that is prohibited mainly by U.S. sanctions law. The Supreme Court has not addressed the question.

Statelessness removes one objection, not all of them. A ship without nationality has no flag state entitled to object to its boarding. *United States v. Marino-Garcia*, 679 F.2d 1373 (11th Cir. 1982), held that international law permits any nation to subject stateless vessels on the high seas to its jurisdiction; it did so in a narcotics prosecution under a criminal statute. It does not establish a general right to take commercial ships or cargo. One conduct-based predicate arises during the boarding itself: giving a boarding officer materially false information about a vessel's registration or nationality is a federal crime when the vessel is subject to U.S. jurisdiction, which includes a vessel without nationality (18 U.S.C. § 2237(a)(2)(B); 46 U.S.C. § 70502(c)). The offense applies to any person aboard who knowingly provides materially false information during the boarding; it does not by itself establish forfeiture of the hull, and whether it can support one is untested. Boardings themselves need a domestic authority: the Coast Guard acts under 14 U.S.C. § 522, and Navy ships conduct law-enforcement boardings with embarked Coast Guard teams. Owners, masters, lienholders and cargo owners keep their interests, and the states of owners and crews can still raise claims.

Prize law turns on the character of the cargo, not on the flag. Under the law of naval warfare, enemy ships and goods may be captured outside neutral waters (San Remo para. 135). Goods on a neutral merchant ship may be captured only if they are contraband (para. 147), and contraband means goods destined for territory under enemy control that may be used in armed conflict, on published lists (paras. 148–149). Iranian crude sold to a neutral buyer is therefore not contraband merely because its proceeds benefit Iran. A neutral merchant ship itself may be captured outside neutral waters on the grounds in para. 146, which include carrying contraband, breach of blockade, operating under enemy control, and presenting irregular or fraudulent documents or lacking necessary documents; capture of the ship and condemnation of its cargo are separate questions. A further theory is arguable but unsettled: a stateless ship flies no neutral flag, so the rule that a neutral flag protects enemy goods arguably does not shield its cargo, and cargo still owned by NIOC or another Iranian state entity may be capturable as enemy goods. The San Remo Manual does not address that case directly, so the theory needs separate proof of vessel character and cargo ownership and should not be treated as settled. Iranian-flagged NITC tankers are enemy ships. A ship that breaches or attempts to breach the declared blockade may be captured. Each theory must be proved for each ship and cargo; ownership often changes in ship-to-ship transfers.

Domestic prize jurisdiction is narrow. Chapter 883 applies to prize captured during war (§ 8851); Congress has not declared war on Iran. The main argument that the condition is met anyway is The Prize Cases, 67 U.S. 635 (1863), which upheld captures under a blockade without a declaration; the question is untested since World War II. Congressional authorization would settle the domestic question but not the international rules. Under § 8852, district courts have jurisdiction over prizes brought into the United States, into the territorial waters of a co-belligerent, into a locality possessed or occupied by U.S. armed forces, or appropriated for U.S. use, and § 8852(b) extends jurisdiction to certain prizes that are lost or destroyed or cannot be brought in. A cooperating neutral state such as Malaysia or Sri Lanka is not a co-belligerent, and its consent does not make its port a prize port. Section 8863 separately allows a

designated agency to appropriate prize property before adjudication, on survey, inventory and a deposit or undertaking for its value.

Forfeiture needs a predicate for each piece of property. Section 981(a)(1)(G) reaches assets of persons engaged in planning or perpetrating a federal crime of terrorism, and property derived from or involved in one. The March 2025 complaint over $47 million in Iranian-oil proceeds rested on a specific theory that NIOC provided material support to the IRGC; it is an allegation, not a judgment that every Iranian cargo is forfeitable. The hull and the cargo often have different owners, and each must be tied to the predicate.

The forfeiture track has a record; prize has none. Since 2020 the government has used the terrorism forfeiture provision against Iranian cargoes and tankers repeatedly:

Matter	Property	Basis pleaded	Type of finding	Outcome or status
Bella, Bering, Pandi, Luna (2020)	About 1.116 million barrels of IRGC fuel bound for Venezuela	Terrorism forfeiture, IRGC	Forfeiture order and court-supervised sale; not contested on the merits in sources reviewed	Sold for about $45 million (USAO-DC); $20.0 million deposited in the USVSST Fund; the difference is not explained in sources reviewed
Suez Rajan (2023)	Iranian crude cargo	IEEPA; terrorism forfeiture	Corporate guilty plea and forfeiture (judicial findings)	Cargo sold for $74 million; $56.0 million deposited in the USVSST Fund; Suez Rajan Ltd pleaded guilty to IEEPA conspiracy and was fined $2.46 million (DOJ NSD, United States v. Empire Navigation Inc. and Suez Rajan Limited)
M/T Abyss (2024)	More than 500,000 barrels of Iranian fuel oil, over $25 million	Source of funds to the IRGC and IRGC-QF	Complaint allegation	Complaint filed
Croatia storage case (March 2025)	$47 million in proceeds of Iranian oil disguised as Malaysian	NIOC material support to the IRGC; dollar payments through U.S. banks	Complaint allegation	Complaint filed
Skipper (seized Dec. 2025; complaint Feb. 2026)	Tanker and 1.8 million barrels of Venezuelan crude	Asset affording a source of influence over the IRGC	Complaint allegation	Complaint filed February 2026 (D.D.C. No. 1:26-cv-00697); interlocutory sale sought
Shamkhani network (March 2026)	$15.3 million (D.D.C. Nos. 1:26-cv-00802, -00807)	IRGC-linked oil network	Complaint allegations	Complaints filed
Tifani, Majestic X, Lenore (2026)	Three VLCCs and their Iranian crude	Forfeiture begun; prize considered	Seizure reported; no adjudication	Pending; sources conflict on whether each ship was stateless or flagged when boarded

These recoveries are small next to the revenue flow. Their value is in the precedent: courts have entered forfeiture orders in cases pleaded on the terrorism-forfeiture theory, and the USVSST Fund has received the proceeds. The sources reviewed show no contested ruling on the theory's merits, so its strength against an active claimant is untested.

Geography. The right of visit stops at another state's territorial sea, and belligerent visit, search or capture in neutral territorial waters violates neutrality (Hague XIII, Art. 2). Most of the Strait of Malacca is Malaysian, Indonesian or Singaporean territorial sea. Inside it, only the coastal state, acting under its own

law, can board, and transit passage under UNCLOS Part III limits interference with ships passing through the strait. In the approaches, the zone must be fixed by coordinates against the coastal state's baselines before any boarding; distance from a named coast is not enough. The Johor transfer anchorage is reported to lie about 38 nautical miles offshore, which would place it in Malaysia's EEZ, but that has not been verified against baselines.

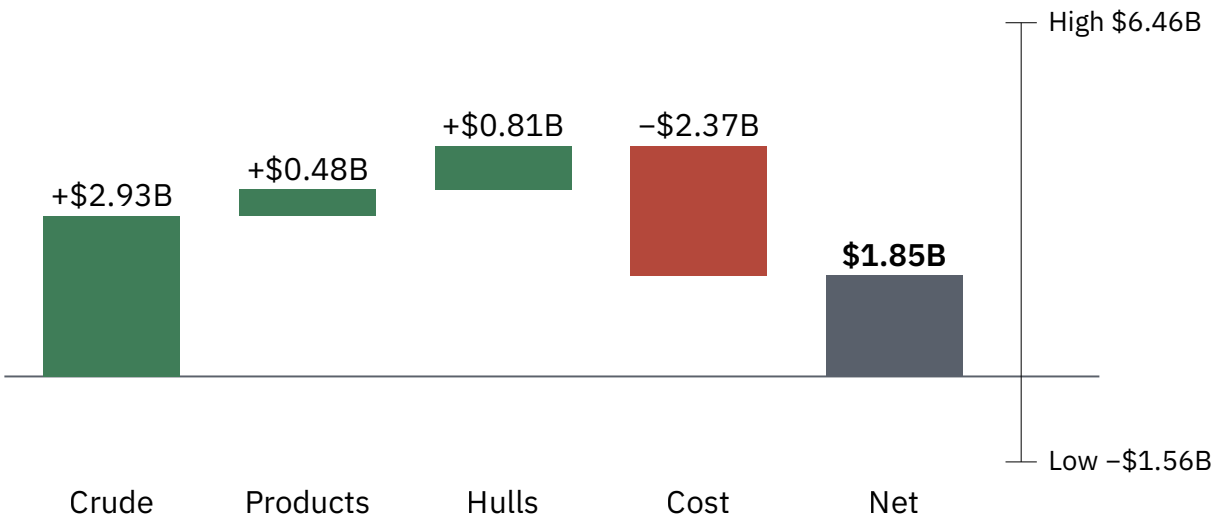
The Act's tiers. Visit and custody pending adjudication fall within Tier 1. A forfeiture judgment or prize condemnation transfers title by court decree. If Tier 2's joint-resolution requirement reaches such decrees, it would slow existing judicial authority. The Act would need to state precisely whether a decree under 18 U.S.C. § 981 or 10 U.S.C. ch. 883 is a Tier 2 confiscation. That choice must be checked against the v3.2 definitions, and keeping the joint-resolution safeguard for sovereign Iranian property held outside those proceedings would preserve the Act's structure.

5 Illustrative value

Under the base assumptions below, a program that boarded 132 of the 188 candidates would yield about $1.8 billion: $2.9 billion in crude, $0.5 billion in refined products and $0.8 billion in recycled hulls, less $2.4 billion in costs. These are joint scenarios that bundle assumptions; they are not a confidence interval or a verified recoverable value, and each assumes lawful custody and successful adjudication.

Input	Low	Base	High	Basis
Share of the 188 ships seized before they reflag	50%	70%	85%	Assumption; not derived from evidence on this fleet
Ships seized	94	132	160	188 × share seized (unrounded 94.0, 131.6, 159.8)
Share laden when taken	25%	40%	55%	Assumption, applied uniformly across classes
Crude taken (million bbl)	15.4	34.5	57.6	129.6 million bbl × share seized × share laden × 95% fill
Products taken (million bbl)	3.1	6.9	11.5	25.8 million bbl Handysize/MR capacity; same factors
Crude price ($/bbl)	75	85	100	Realized price after sour-grade and forced-sale discounts, at a sale months after seizure. EIA daily Brent ranged from $61.08 (7 January) to $138.21 (7 April) in 2026; it was $94.00 on 20 August, $121.18 on 17 September and $125.44 on 6 October. The inputs are deliberately below current Brent; see the price stress case
Product price ($/bbl)	60	70	85	Assumption
Cargo value ($ billion)	1.34	3.41	6.73	Crude and products at the prices above
Net recycling price ($/LDT)	250	350	450	Delivered yard prices of $485–540 (Sept 2026), less towing to the yard; towing is not counted again in program cost
Hulls recoverable	85%	90%	95%	Assumption; some hulls are damaged, sunk or unfit to tow
Hull value ($ billion)	0.39	0.81	1.33	3.653 million LDT × share seized × share recoverable × price

Input	Low	Base	High	Basis
Cost per ship ($ million)	35	18	10	Assumption covering boarding, custody, terminal, legal and repatriation costs; not a validated operating estimate
Program cost ($ billion)	3.29	2.37	1.60	Ships seized × cost per ship
Net under stated assumptions ($ billion)	**−1.6**	**1.8**	**6.5**	Cargo + hulls − cost



Base scenario, $ billion, assuming lawful custody and title. Whisker: range across the low and high scenarios. Source: supplementary workbook, Model sheet.

Base case from the table above; capacities and costs are stated assumptions; prices and recycling rates as of Aug–Sep 2026.

Custody time and title decide the result. The stress cases below hold every base input fixed except the one named.

Case	Net ($ billion)	What changes
Base	1.85	—
Seize only laden ships	2.79	Ballast ships not taken
Title fails on 30% of seized ships	0.58	Value of 30% of hulls and cargo lost or returned; all costs still incurred
Skipper-level cost, $47 million per ship	−1.97	Cost per ship
Break-even laden share	18.3%	Laden share at which net value is zero

Case	Net ($ billion)	What changes
Break-even cost per ship	$32.0 million	Cost at which net value is zero

Prices near current Brent raise the base case. At $110 a barrel for crude and $95 for products, with every other base input unchanged, net value is about $2.88 billion (workbook, Model sheet, row 44).

The result depends on which inventory is used. Holding the scenario inputs fixed, the core inventory of 156 ships yields about $1.5 billion in the base case (–$1.3 billion to $5.4 billion), and the 91 ships with documented third-party findings yield about $1.0 billion (–$0.7 billion to $3.4 billion). The supplementary workbook computes these from the vessel list (Model sheet, rows 54–60).

Inventory	Ships (VLCC / Suezmax / Aframax / Panamax / MR / other)	Crude capacity (million bbl)	Product capacity (million bbl)	Lightweight (thousand LDT)	Net, low / base / high ($ billion)
All counted	188 (46 / 11 / 33 / 7 / 86 / 5)	129.6	25.8	3,652.5	−1.56 / 1.85 / 6.46
Core	156 (37 / 10 / 31 / 6 / 67 / 5)	108.7	20.1	3,034.5	−1.30 / 1.54 / 5.36
Documented third-party finding	91 (21 / 10 / 23 / 4 / 31 / 2)	70.1	9.3	1,845.0	−0.71 / 1.02 / 3.36

The *Skipper* figure is a stress case, not a rate. The government reported spending $47 million in about three months to repair, maintain and store that tanker and its cargo, against a $10 million hull and a $120–135 million cargo; onshore storage alone cost $15,000 a day. Those figures come from secondary reporting of a March 2026 government motion in the District of Columbia and have not been checked against the filing. They show that a cost per ship near the break-even level is plausible if custody runs for months.

Ballast ships lose money under the base inputs. A laden VLCC yields about $157 million after an $18 million cost. An empty VLCC returns about $13 million in steel against that cost, a loss of about $5 million, and an empty Handysize tanker loses about $15 million. The 79 ballast ships in the base case cost about $0.94 billion more than their hulls return. Under the high-case inputs an empty VLCC yields a small positive return of about $8 million, so the finding holds for the base case, not universally.

Denial: seizure alone constrains Iran only briefly. The program's purpose is to deny Iran the ships it needs, so the paper tests that claim (supplementary workbook, Denial sheet). Under the U.S. blockade, Iran's crude loadings fell to roughly 0.22–0.26 million barrels a day in August 2026. Vortexa measured about 135 million barrels of Iranian crude in floating storage in early August; other trackers report lower, regionally narrower figures. The question is what happens when the blockade ends. Iran loaded about 1.7 million barrels a day before the war and 2.33 million at its 2025 peak. The fleet needed to carry that volume depends on the round trip from Kharg Island to the Johor transfer area and on to Chinese ports, which this paper puts at 65 to 80 days including loading, waiting and transfer. Scaling the candidates' size

mix to the estimated 430-tanker Iran-trade fleet gives about 296 million barrels of crude-capable capacity; that scaling assumes the candidates' size mix is representative of the whole fleet, and vessel-level verification could change both the capacity removed and the ceiling. The central case assumes 40 percent of that storage (54 million barrels) still occupies ships when the blockade ends; the high case assumes 50 percent. The result is a crude-carriage ceiling, not a forecast of exports, which also depend on production, loading access and buyers.

Ships removed	Capacity removed (million bbl)	Capacity in storage (million bbl)	Cycle (days)	Carriage ceiling (million b/d)	Months to close the shortfall
None	0	54	65	3.54	No shortfall
91 documented	70.1	54	65	2.52	No shortfall
70% of 188 (base)	90.7	54	65	2.22	No shortfall
156 core	108.7	54	65	1.95	No shortfall
156 core	108.7	54	80	1.59	About 1
All 188	129.6	54	65	1.65	Under 1
All 188	129.6	54	80	1.34	About 3
All 188	129.6	67.5	65	1.45	About 2
All 188	129.6	67.5	80	1.18	About 5

The results limit the denial claim. At the central 65-day cycle, removing the 91 documented ships, the base-case 70 percent, or even the 156-ship core leaves Iran's carriage ceiling above its pre-war volume. At that cycle, only removal of all 188 candidates pushes the ceiling below 1.7 million barrels a day, and only while storage still occupies more than about 50 million barrels of tanker capacity. Longer cycles lower the threshold: at 80 days, removing the 156-ship core is enough (1.59 million barrels a day), and removing all 188 is enough if more than about 24 million barrels remain in storage. Across these cases the ceiling falls to 1.2–1.65 million. The shortfall then depends on replacement. The global shadow fleet grew by about 30 ships a month in 2025 (BRS Shipbrokers). If ten crude-capable tankers a month averaging 0.9 million barrels reached the Iran trade, a hypothetical rate, not an observed one, the shortfall would close in under one to about five months. Seizure therefore cannot carry the denial goal alone. Lasting denial depends on cutting off the sellers, brokers and service providers that move aging tankers into the trade, where the evidence meets an existing sanctions authority. Fleet size, class mix, cycle time and the replacement rate are all assumptions.

The April laden count is not additional value. CENTCOM counted 41 laden tankers holding 69 million barrels in April 2026, about 1.7 million barrels a ship. Those ships overlap the fleet counted here; the count is a snapshot within the laden-share range.

Model limits. Laden share and seizure share are applied uniformly, although a program that targets laden ships changes the mix; hull condition, location, registration certainty and cargo status are correlated. Fill is

assumed at 95% for laden ships. The title-failure case applies a uniform 30% loss; if failures fall mainly on laden VLCCs, the loss is larger. Each input needs vessel-level calibration: actual type, tank capacity, lightweight, condition, measured cargo, assay and ownership, and firm yard and buyer bids. An independent language-model review of an earlier version found that it counted product tankers as crude carriers, overstated hull and cost figures, assumed every ship would be taken, and double counted the April laden pool; a second review reproduced the corrected arithmetic and identified the stress cases above.

6 Disposition of the oil

Under the base case and the allocation proposed below, about 11 million barrels would reach the Strategic Petroleum Reserve. That is a small share of what the Reserve has lost this year. EIA weekly data put the Reserve at 413.5 million barrels on 2 January 2026, 357.1 million on 29 May and 283.0 million on 2 October, a decline of 130.5 million barrels (October figure from the EIA weekly series released 7 October, not retrieved directly for this revision). Eleven million barrels is about 8.3% of that decline, 19% of the 58.3 million-barrel draw from March to May, and 6.3% of the 172 million barrels the United States lent in the coordinated IEA exchange. Before costs and allocation, the base case's 34.5 million barrels of crude would equal about 26% of the decline.

The exchange barrels are owed back, with a premium, by the companies that borrowed them. Seized crude would be additional government inventory; it would not discharge those obligations without a separate transaction. The value of the oil and an equivalent purchase saving must not be counted as two benefits.

Use	Legal path	When available	Main risk
Strategic Petroleum Reserve, in kind	After forfeiture, transfer to DOE under 18 U.S.C. § 981(e)(1); before condemnation, appropriation of prize property under 10 U.S.C. § 8863	After judgment (forfeiture) or on survey and deposit or undertaking (prize)	Unresolved interaction with the USVSST deposit rule; grade, terminal and cavern fit; an undertaking is a liability if title fails
Interlocutory sale	Court-ordered sale before judgment; proceeds held under court control	When the court orders it	Owner and claimant litigation, as in *Skipper*; proceeds are not available to spend until judgment
Allied supply	Sale or exchange to refiners built for Middle East sour crude (Japan, South Korea, India)	After sale authority exists	Buyer screening; price
Claims	USVSST Fund, 34 U.S.C. § 20144; the Act's Settlement and Claims Account	After judgment and deposit	Competing claimants; victims contest any diversion

The USVSST rule is triggered by the offense, not by the country. Section 20144(e)(2)(A) directs 100% of net proceeds of criminal forfeitures, and 75% of net proceeds of civil forfeitures and penalties, arising from violations of IEEPA or TWEA and related offenses involving a state sponsor of terrorism into the Fund. Whether an in-kind transfer of forfeited crude to DOE, which involves no sale, falls within that rule is unresolved. It should not be treated as a way around the Fund. Prize sale proceeds are deposited with the Treasurer under § 8862(5), which does not by itself make them available for any purpose.

Section 8863 is the only pre-judgment route to physical use. It lets an agency the President designates appropriate captured prize property after survey and inventory, by depositing its value with the Treasurer or under a United States undertaking to pay it. The undertaking is a contingent liability: if the court later finds the capture unlawful, the United States owes the value. Iranian Heavy is near the upper sulfur range the Reserve stores, and the Reserve takes in crude slowly; assays, terminal acceptance and cavern compatibility have not been checked. Barrels that do not meet specification could be exchanged for compliant crude.

Victims of Iranian terrorism will contest any route that bypasses the Fund. Prize proceeds go to the Treasury, not the Fund. A fixed statutory allocation reduces the incentive to litigate the choice of authority, but it does not end other litigation.

Proposed order of application. The proposal applies the value of each cargo, once the United States holds title or a court-approved substitute, in this order. For forfeitures covered by 34 U.S.C. § 20144(e), which now directs 100% of qualifying criminal and 75% of qualifying civil net proceeds to the Fund, this order requires an express amendment to that section:

1. **Costs.** Seizure, custody, offloading, legal, environmental and crew-repatriation costs.
2. **Reserve for disputed title and restitution.** A held-back amount, set by the court or by formula, until claims are resolved and any wrongful-capture compensation is paid.
3. **Claims, half the remaining value, in cash.** Paid into the USVSST Fund and the Settlement and Claims Account in shares the Act must state.
4. **The Strategic Petroleum Reserve, the other half, in barrels.** Valued at the date of transfer, until the Reserve returns to its level of 2 January 2026.
5. **Surplus.** Sold, with proceeds to the Defense Cooperation Account.

Under the base case, product sales and hull recycling would cover about $1.3 billion of the $2.4 billion in costs, and about 12.7 million barrels of crude would be sold to cover the rest. Before any disputed-title reserve, the remaining 21.7 million barrels would deliver about $0.92 billion to claims and about 10.9 million barrels to the Reserve. These are upper bounds: the disputed-title reserve, other claims and the Fund's existing statutory share would reduce them.

The fiscal machinery has to be written into the Act. Without express direction, money received by the government goes to the general fund under the Miscellaneous Receipts Act (31 U.S.C. § 3302), and forfeiture proceeds follow the Assets Forfeiture Fund rules (28 U.S.C. § 524(c)) and § 20144. The Act must define each account, state the split within the claims half, set valuation rules and allowable

deductions, provide appropriations for deposits and undertakings, and require reconciliation of barrels transferred, proceeds held and liabilities outstanding.

7 Operational design

A program built on this analysis would verify each ship before acting, take laden ships first, work with coastal states rather than around them, and keep every disposition under court control. Its targets are the false-flag fleet in the approaches to Malacca and the Gulf of Oman, whatever the cargo's origin; the authority used for each ship depends on that origin (Section 2).

The financial track comes first. Treasury's tools reach the buyers, banks and insurers that seizure cannot. Secretary Bessent said in August 2026 that anyone who facilitates Iran's regime "will lose access to the world's primary reserve currency," and that new secondary sanctions would follow weekly, "starting with the banks." FinCEN then proposed a special measure under Section 311 of the USA PATRIOT Act (31 U.S.C. § 5318A) that would bar U.S. correspondent accounts for Banque Misr's UAE operations (notice of proposed rulemaking, FR Doc. 2026-17871; not yet final in sources reviewed), stating that those operations processed about $1.8 billion for 103 companies linked to Iran between January 2024 and June 2026, and OFAC warned on 5 October 2026 that foreign financial institutions could be targeted under E.O. 13902 without notice. Treasury reports sanctioning more than 100 vessels linked to Iran's shadow fleet in 2026. A dollar link can establish U.S. jurisdiction, but it is an offense only if the conduct violates a specific prohibition and, for criminal liability, was willful (50 U.S.C. § 1705(c)); a cargo may be forfeitable as proceeds traceable to specified unlawful activity under 18 U.S.C. § 981(a)(1)(C), or as property involved in a separately established money-laundering offense under § 981(a)(1)(A), subject to the nexus requirement and claimant protections. Seizure then handles the stateless hulls and cargoes already at sea.

1. **Verify and secure cooperation (weeks 0–4).** For every candidate, document hull identity, AIS and MMSI history, GISIS and Equasis records, confirmation from the named administration, any alternative valid registration, and dated evidence of the trade. Use a second analyst on every ship and keep unresolved cases out of the confirmed list. Conclude cooperation agreements with Malaysia, Indonesia, Sri Lanka and India covering enforcement by those states under their own law inside their waters, information sharing, port access and disposition. Sharing of forfeited property under 18 U.S.C. § 981(i) requires the Secretary of State's agreement and an international agreement authorizing the transfer, and the recipient bears specified expenses.
2. **Take laden ships (months 1–4).** Laden ships carry the program's net value and are the most likely to reflag first. Board them in the South China Sea approaches to Johor and at the Gulf of Oman blockade line, at positions fixed against coastal baselines. Boarding off Johor rests on the right of visit plus a separate seizure authority. Operations at the blockade line depend on an armed conflict and on a blockade that has been lawfully declared and is effective; each case file must document both.
3. **Deny the ballast fleet at least cost (months 3–8).** Empty ships cost more to hold than they return. Deny them service rather than take them: port entry, bunkering, insurance, classification and ship-

to-ship counterparties. Detain them only where a partner state has grounds under its own law, or where a U.S. forfeiture or prize basis exists; otherwise document and release. A registration that was never valid cannot be struck off. The step that matters is a recorded disavowal by the named administration, which other states and service providers can act on.

4. **Address reflagged and residual ships (month 6 onward).** A ship that obtains a valid registration loses its stateless status. Pursue it through sanctions designations where the evidence supports them, through the new flag state, and through prize capture where it carries enemy cargo or breaches the blockade.

Where cargo can be disposed of depends on the authority. For forfeiture, 28 U.S.C. § 1355(b)(2) allows an action in the District of Columbia for property located abroad or detained by a foreign government, but carrying out a U.S. order inside another state's territory requires that state's cooperation or recognition. For prize, § 8852 jurisdiction attaches only to prizes brought into the United States, into a co-belligerent's waters, into a locality U.S. forces possess or occupy, or appropriated for U.S. use. A cooperating neutral port does not qualify. Captured cargo must therefore reach U.S. territory or a qualifying locality, be appropriated under § 8863, or fall within § 8852(b). Jurisdiction over a prize proceeding does not by itself authorize sale or use of particular cargo. The three tankers seized from April to June 2026 were still at sea off Brazil and in the South Atlantic in late September, so transit time is a large part of the cost.

Boarding capacity sets the pace. Each seizure needs a boarding team, a prize or custody crew and an escort. At 15 to 20 ships a month, 132 seizures would take seven to nine months. A faster pace depends on partner states acting under their own law.

Crews. Crews are mostly Indian and other third-country nationals. The DAVINA crew was repatriated through Pakistan, and the United States released six Iranian seafarers while it moved to forfeit two tankers. A program consistent with obligations toward seafarers would repatriate crews promptly, at program cost, and hold them no longer than needed to take statements. Each boarding also needs a stated domestic authority for the boarding officers (for the Coast Guard, 14 U.S.C. § 522), and the step from a nationality check to seizure needs a warrant or a warrantless-seizure basis under 18 U.S.C. § 981(b). Detention of persons aboard, access to counsel and treatment of crew who are not suspects need written rules; this paper does not supply them.

8 Risks and countermeasures

The risks most likely to end the program are a wrongful boarding or strike, a loss of title after costs are spent, and custody costs that exceed cargo value. Rules can reduce these risks; they cannot remove them.

Risk	Evidence	Countermeasure
Wrongful boarding or strike	SETTEBELLO, Palau-flagged, was disabled on 9 June 2026; three crew were killed and the IMO Secretary-General condemned the attack. TankerTrackers listed it as unsanctioned; that has not been checked against an official screen	Documented reasonable grounds and administration checks before boarding; separate rules for visit, capture and use of force
Loss of title	Owners, lienholders and cargo interests can contest forfeiture or prize; innocent-owner defenses and wrongful-capture compensation can defeat retention or consume value	Prove a predicate for each hull and cargo; disputed-title reserve; restitution funding; stress case in Section 5
Custody cost exceeds value	*Skipper*: reported $47 million in three months against a $10 million hull and a $120–135 million cargo	Expedited motions for interlocutory sale under court control; dispose near the point of seizure where the law allows
Ballast ships lose money	An empty tanker returns $5–15 million less than its base-case cost	Deny service rather than take; detain only on independent legal grounds
Mass reflagging	Russia moved 60 tankers from fraudulent registries to its own flag in the first half of 2026	Act on laden ships first; pursue reflagged ships through designations and prize where cargo is enemy
Neutrality violations	Belligerent capture or search in neutral territorial waters violates neutrality (Hague XIII, Art. 2)	No U.S. boarding in territorial seas; partner states act under their own law
Environmental export limits	EPA rules on PCB exports (40 C.F.R. § 761.97) apply to exports by any person; a court-ordered private sale does not create an exemption. Hong Kong Convention compliance is an additional requirement, not an override	Hazardous-materials inventory for each hull; jurisdiction-specific disposal advice; recycle hulls already abroad under the receiving state's law
Reciprocal prize claims	Legal commentators warn that a revived U.S. prize practice could be invoked against the United States	Limit capture to stateless ships and enemy property in an armed conflict; publish the legal basis for each case
Spill and casualty	356 of the 529 ships the IMO found falsely flagged in the year to April 2026 had no classification society	Survey on boarding; tow or recycle unseaworthy hulls locally
Coastal-state friction	The Johor transfer anchorage lies off Malaysia	Cooperation agreements; positions fixed against baselines
Iranian retaliation at sea	IRGC claims of mine strikes on three tankers on 10–11 October 2026 and threats to act beyond Hormuz	Seizures far from Iran; escort and mine countermeasures in the Gulf remain separate tasks

Selling seized floating cargo brings forward supply that the blockade is already holding off the market; storing it in the Reserve does not release it. This paper has not estimated any price effect.

Alternative hypotheses. Six alternatives were considered. The first four compete with the governing judgment and are rated lower; the last two are consistent with it and are listed because a reader would test them first.

- *Seizure alone produces lasting denial* (very unlikely). The carriage model leaves Iran above its pre-war capacity unless nearly all 188 candidates are taken while tankers remain tied up in storage, and an assumed replacement rate closes any shortfall within months.
- *Financial measures alone are enough* (unlikely). Stateless, non-dollar trades with independent refiners continued while Treasury designated more than 100 Iran-linked vessels in 2026, and designation does not remove a ship from the water.
- *Most candidates are validly registered and only broadcast false flags* (unlikely, the converse of key judgment 2). Flag-state disavowals and IMO counts point to false registration, but no registry check has been done; the registry sample described in the Methodology would test both judgments.
- *Prize capture is the faster route* (unlikely). Domestic prize jurisdiction without a declaration of war is untested, captured cargo cannot be brought into a neutral port, and a revived U.S. prize practice invites reciprocal claims.
- *Iran shifts routes or tonnage instead of losing volume* (likely, and consistent with the governing judgment). Iran can rely more on its Iranian-flagged NITC fleet, more ship-to-ship transfers, or valid reflagging to permissive registers; a ship validly reflagged after a boarding warning loses its stateless status before it can be seized.
- *Tankers are not the binding constraint after the blockade* (likely, and consistent with the governing judgment). Buyers, payment channels or loading terminals may limit Iran’s exports more than ships do; the carriage model, which leaves ship capacity above the pre-war level in most scenarios, points the same way.

9 Policy options and the author's legislative proposal

This section sets out the author’s proposed statutory text for a maritime title of the Act, followed by options for the executive branch and their consequences. The statutory text is a proposal, not an analytic judgment; the judgments it relies on are those in the table at the front of the paper. Each provision would need to be checked against the operative text of v3.2 before it is placed; section numbers are left open.

1. **Authority and predicates.** Authorize the visit of any vessel reasonably suspected of having no nationality that is engaged in transporting petroleum of a hostile state; the seizure of a hull or cargo only where a stated forfeiture predicate applies to that property; and the capture of enemy vessels and goods, contraband and blockade runners under the law of armed conflict during hostilities authorized by Congress. Provide judicial review, and protect the rights of owners, lienholders and cargo interests.

2. **Verification and use of force.** "No vessel shall be boarded under this title unless the boarding officer has documented reasonable grounds, including a check of International Maritime Organization records and, where practicable, confirmation from the administration whose flag the vessel claims." Set use-of-force rules separately for visit, for capture of enemy vessels, and for self-defense, so that the verification rule does not conflict with lawful capture.
3. **Relation to Tier 2.** State whether a judgment under 18 U.S.C. § 981 or a decree under 10 U.S.C. ch. 883 is a confiscation requiring a joint resolution. If it is excepted, limit the exception to property adjudicated under those procedures and keep the joint-resolution requirement for sovereign property of a hostile state held outside them.
4. **Expedited disposition under court control.** Require the Attorney General to move for interlocutory sale of seized cargo within 30 days, and for expedited adjudication where lawful, with notice to claimants, court-held substitute proceeds, extensions for documented obstacles, and reporting of every delay. Bar recycling of a hull before title is resolved unless the court orders sale for recycling to preserve value.
5. **The Strategic Petroleum Reserve.** Authorize the transfer of forfeited crude to the Secretary of Energy after judgment, and direct the President to designate the Secretary under 10 U.S.C. § 8863 to appropriate captured crude before condemnation. Appropriate funds for the required deposits or undertakings, and for restitution if a capture is found unlawful. State how these transfers relate to 34 U.S.C. § 20144.
6. **Order of application and accounts.** Costs; then a reserve for disputed title and restitution; then half of the remaining value in cash to claims, divided between the USVSST Fund and the Settlement and Claims Account in stated shares; then half in barrels to the Reserve, valued at transfer, until it returns to its 2 January 2026 level; then surplus to the Defense Cooperation Account. Amend 34 U.S.C. § 20144(e) expressly to state how this order applies to qualifying forfeitures, cash proceeds and in-kind transfers. Define each account, valuation rules, allowable deductions and reconciliation, and keep exchange receivables separate from physical inventory.
7. **Vessels without cargo.** Require that any detention or disposition of an empty vessel rest on an independent legal basis and established title, and that the least costly lawful option be chosen, including release with a recorded finding and notice to registries and service providers.
8. **Foreign cooperation.** Authorize agreements with coastal states for enforcement under their own law, information sharing, port access and disposition, and for sharing forfeited property on the conditions of 18 U.S.C. § 981(i). State that cooperation does not make a neutral state a co-belligerent and does not authorize U.S. belligerent action in neutral waters.
9. **Reporting.** A quarterly report to the Armed Services, Foreign Relations, Foreign Affairs and Judiciary Committees listing, for each vessel boarded: IMO number, registration finding, legal basis, cargo volume, days in custody, disposition, costs, claims filed, compensation paid, environmental costs, crew treatment, and every unsuccessful or reversed action.

1. **Sanctioned petroleum aboard vessels without nationality.** Reach purely foreign, non-dollar trades with a narrow offense aimed at the people who run the trade. This provision requires separate legal review before introduction, and Congress must choose between two jurisdictional models. Option A reaches conduct with no U.S. nexus. Congress's power to punish petroleum carriage, as opposed to

drug trafficking, by foreign nationals on a stateless vessel is untested; it would rest on the Felonies Clause and on the vessel's lack of nationality, not on universal condemnation of the conduct. Option B limits the offense to cases with a stated U.S. connection; it is more defensible but gives up the goal of reaching purely foreign trades. Draft text (Option A): "(a) Offenses. (1) It is unlawful for the master or person in charge of a vessel without nationality, while the vessel is seaward of the territorial sea of every State, knowingly and willfully to transport, transfer between vessels, or possess with intent to sell covered petroleum. (2) It is unlawful for any person, wherever located, knowingly and willfully to direct, organize or finance conduct described in paragraph (1), or to exercise substantial operational control over it. (3) Each offense requires actual knowledge of the facts that make the petroleum covered petroleum and that the vessel lacks nationality; deliberate avoidance of that knowledge, proved beyond a reasonable doubt, satisfies this requirement. (b) Covered petroleum. 'Covered petroleum' means crude oil, condensate or refined petroleum products that, at the time of the conduct, were produced in or exported from a country listed in [schedule], or are owned or controlled by a person listed in [schedule], each schedule as published in the Federal Register before the conduct. The definition does not depend on whether any other prohibition applies to the transaction; the choice of listed countries and persons is for Congress. A change to the schedule has no retroactive effect. The Secretary of the Treasury shall prescribe rules for commingled and transformed petroleum. (c) Vessel without nationality. 'Vessel without nationality' means a vessel that, at the time of the conduct, was not validly registered in, and had not otherwise been granted the nationality of, any State. The Government shall prove that fact beyond a reasonable doubt. Failure of the master or person in charge to make a claim of nationality or registry on request, denial of a claim by every State whose registry is claimed, a false flag, and use of two or more flags are evidence of that fact; they do not establish it and do not relieve the Government of its burden, and treatment of a ship as without nationality for purposes of visit does not by itself establish this element. (d) Alternative valid registration. The defense may offer evidence of valid registration in any State, including a State other than the one claimed, without assuming any burden of persuasion. Before charging, the Secretary of State shall request confirmation from each State whose registry is claimed or indicated by IMO records. (e) Evidence. A listing under section [11], or evidence of fraudulent registration or false vessel identity, is admissible but creates no presumption as to any element and does not shift any burden of proof. (f) Exceptions. This section does not apply to conduct licensed or authorized by the Secretary of the Treasury, to a vessel in distress, or to the performance of navigational, maintenance, safety or other seafaring duties without knowing participation in the transaction. (g) Penalties. [Imprisonment of not more than __ years, a fine under title 18, United States Code, or both.] An attempt or conspiracy is punishable as the completed offense. (h) Jurisdiction and venue. There is extraterritorial jurisdiction over an offense under subsection (a), including acts under subsection (a)(2) committed on land outside the United States. Subsection (a)(1) does not apply within the territorial sea or internal waters of any State. Venue lies under 18 U.S.C. § 3238. (i) Forfeiture. Any vessel or petroleum directly involved in a violation is subject to forfeiture under [express amendments adding this section to 18 U.S.C. §§ 981(a)(1) and 982(a)]. Civil forfeiture shall proceed under 18 U.S.C. §§ 981 and 983 and Supplemental Rule G. Criminal forfeiture shall proceed under 18 U.S.C. § 982, 21

U.S.C. § 853 and Federal Rule of Criminal Procedure 32.2. The Excessive Fines Clause applies to both." Option B adds to subsection (a): "This section applies only where the transport, financing, sale or attempted sale involves a United States person, property in the United States, a transaction through a United States financial institution, an intended import into the United States, or [another stated connection]." The draft departs from the MDLEA deliberately. Statelessness is an element proved to the jury, not a preliminary question for the judge (contrast 46 U.S.C. § 70504(a)); the contested 'unequivocal assertion' test (§ 70502(d)(1)(C)) is omitted; and reckless disregard is not enough, because Option A has no conduct-based nexus to the United States. Review should address the Felonies and Define and Punish Clauses as applied to foreign nationals with no U.S. nexus (compare Dávila-Reyes with United States v. Martinez, No. 22-13361 (11th Cir. 2026)), due process limits on extraterritorial application, and the penalty range. The findings should cite UN Security Council measures on DPRK petroleum and IMO Resolution A.1192(33), so that the offense rests on conduct of international concern.

2. **Fraudulent registries and identity fraud.** Direct the Secretary of State to maintain a public list of purported registries that operate in a State's name without that State's authorization or that the named State has disavowed in writing, drawn from IMO GISIS records, IMO circulars and guidance on fraudulent registration, and State communications, with publication in the Federal Register, notice to affected States, a petition procedure for removal and judicial review. The list classifies registries, not vessels. A listing does not establish the nationality or statelessness of any particular vessel, which may hold valid registration elsewhere; a vessel-specific determination must consider official registration records, dated State communications and any alternative valid registration. A claim of registry in a listed registry, display of an IMO number assigned to another vessel, or transmission of a false AIS identity may be considered in deciding whether reasonable grounds exist to visit a vessel and verify its nationality. False AIS identity is treated separately from registry fraud, because it can occur aboard a validly registered vessel. None of this evidence creates a presumption as to any element of an offense or ground of forfeiture, or shifts any burden of proof.
3. **Coordination and flag-state agreements.** Require Treasury to refer to the Attorney General every vessel and cargo tied to a person designated for shadow-fleet activity, for forfeiture review. Direct the Secretary of State to seek agreements with the ten largest flag registries for expedited consent to board vessels suspected of carrying sanctioned petroleum, on the Proliferation Security Initiative model, and with Malaysia and other coastal states hosting transfer hubs; report annually on registries that decline. Direct the Secretary of the Treasury to evaluate sellers, brokers, classification societies and insurers for designation where credible evidence establishes conduct meeting an applicable sanctions authority, and to report quarterly on transfers of tankers 15 years or older to buyers whose beneficial ownership cannot be verified, while preserving authorized safety, environmental and emergency services.

Executive-branch options. The analysis identifies six options, which can be combined. (1) The financial track could be used first, with designated ships and cargoes referred for forfeiture review; it reaches buyers, banks and insurers, but not stateless, non-dollar trades. (2) Terrorism forfeiture under 18 U.S.C. § 981(a)(1)(G)(i) could be used where its elements can be proved for the specific property; it has a record of uncontested success and does not depend on a declaration of war, but it has not been tested against an

active claimant. (3) Verifying and publishing the vessel list before acting, and acting first on laden ships with a proven predicate, would lower the risk of a wrongful boarding and raise expected recoveries, at the cost of speed. (4) Denying service to ballast ships, rather than taking them, would avoid custody losses but leave the hulls in the trade. (5) Restrictions on the networks that supply replacement tankers could slow replenishment where the evidence meets an existing sanctions authority, but their effect depends on action against parties in third countries and has not been measured. (6) Prize capture remains a separate option for enemy-owned cargo and blockade runners, with the claimant safeguards of 10 U.S.C. § 8854; it offers a route to use before judgment under § 8863, but it is untested since the Second World War and invites reciprocal claims.

What each agency would gain if the title were enacted.

Agency	Gain
Treasury (OFAC, FinCEN)	Designations with enforcement consequences, because designated ships and cargoes can be taken; protection of the dollar system against correspondent abuse
State	A coalition program with coastal and flag states; leverage for boarding agreements; support for IMO action against fraudulent registries; Rewards for Justice offers on IRGC finance (up to $15 million)
Justice	A clear statutory predicate for non-dollar cases; faster disposition; prosecutions of masters and operators
Defense and Coast Guard	Defined legal authority for boarding teams, separating visit, seizure and capture
Victims of state-sponsored terrorism	A funded share of proceeds; the USVSST Fund reports about $126 billion in unpaid compensatory damages on 21,723 claims (January 2026)
Congress	A quarterly record of what the program costs, recovers and gets wrong

10 Conclusion

The false-flag fleet persists. Fraudulent registries are still in use, which shows that sanctions and maritime enforcement have not removed the demand for this capacity. The fleet has moved Iranian oil to Chinese refiners and Russian oil past the price cap, and it moved Venezuelan oil under the Maduro government, on ships whose claimed flag states do not answer for them.

The United States already has tools that reach part of it. Treasury can designate the banks, buyers and facilitators. The Justice Department can seek forfeiture of cargoes and hulls where it can prove a predicate for each. U.S. forces can board ships on the high seas when there are reasonable grounds to suspect they have no nationality. Existing authorities leave purely foreign, non-dollar trades on stateless ships outside U.S. criminal reach and set no rule for allocating forfeited oil; the author’s separate proposal in Section 9 addresses both.

The evidence also sets limits. The inventory is a candidate list until each ship is checked against registry records. The money is modest and conditional. Under the paper's assumptions, removing ships constrains Iran's crude-carriage capacity only briefly unless replacement tankers are also denied. A program that verifies first, seizes laden ships with a proven predicate, denies service to the rest and targets the networks that supply replacement tankers is more consistent with that evidence than one built on seizure alone.

Congress faces three paths. It can rely on existing authorities, which leaves purely foreign, non-dollar trades outside U.S. reach. It can enact the maritime title with Option B, which carries lower constitutional risk (key judgment 7) and reaches fewer trades. Or it can enact the title with Option A, which reaches purely foreign trades but carries the constitutional risk described in Section 4. On any of these paths, the executive branch can pursue the financial track, the forfeiture referrals and the verification work under existing law.

Methodology, author note and sources

Method. The vessel records come from a merged register of 262 records (Annex A): 257 built on 12 October 2026 (01:00 UTC data snapshot) from UANI Ghost Armada tables (displayed update 12 May 2026), TankerTrackers data, Windward and Lloyd's List reporting, registry notices to the IMO and U.S. enforcement releases, plus five records added from official notices and trade reporting. The register was assembled from a data snapshot taken at 01:00 UTC on 12 October 2026 (11 October in U.S. time); the flag status of each candidate is the flag observed in that snapshot's 8 October 2026 data. Version 1.0 of the paper is dated 22 October 2026. The selection steps from 262 records to the 188 candidates are shown in Section 3. Valuation inputs and their basis are stated in Section 5; all are assumptions unless a source is named.

Evidence tiers. Tier 1 is primary official or legal text: statutes, regulations, the Federal Register, OFAC and DOJ releases, court decisions and EIA data. Tier 2 is peer-reviewed or authoritative secondary analysis, such as law-review articles and UN expert reports. Tier 3 is reputable reporting and commercial tracking data (Vortexa, Windward, TankerTrackers, UANI, Lloyd's List and trade press). Tier 4 is unverified or single-source material. The legal analysis rests mainly on Tier 1. The inventory rests on Tier 3, and on Tier 4 for the 97 candidates without a vessel-level finding. Revenue estimates are Tier 2 or 3. Valuation and denial inputs not tied to a source are assumptions and are labeled as such.

Version history. Version 1.0 (22 October 2026): first public release, after final review that aligned the denial horizon to about five months, narrowed the § 2237 evidence for key judgment 1b, corrected the Skipper dates, stated the denial threshold for each voyage cycle, separated the publication date from the data date, recast the executive options in conditional terms and replaced two unreachable statute links. Earlier drafts, dated 11–12 October 2026, went through four rounds of external review; corrections from those reviews are incorporated. Planned version 1.1: results of a random 30-ship sample (seed 20261012) checked against IMO GISIS registration records.

Author note. Collin B. George, CISSP, National Security Advisor, Sanctir. This paper accompanies the author's discussion draft of the Hostile State Asset Denial and Settlement Act (v3.2). AI assistance was used for source retrieval, verification against primary sources, a structured research pass on the evidence chain and legal authorities, and editing for tone and clarity. The analysis, judgments and text are the author's. Separate reviews audited the valuation and the legal claims; they checked arithmetic and consistency but are not source authentication, legal validation or a substitute for specialist review. The author is responsible for the analysis and its conclusions. No one commissioned or paid for this paper.

Limits and open items. The figures are illustrative scenarios, not verified recoveries. Vessel-by-vessel verification of identity, registration and recent trade has not been completed. Treaty texts (UNCLOS, the San Remo Manual, Hague XIII) and several opinions (*Marino-Garcia*, *Dávila-Reyes*, The Prize Cases) are cited from standard sources and should be checked against the official texts. The *Skipper* filings (D.D.C. No. 1:26-cv-00697) and any 2026 prize docket were not retrieved. The difference between the *Bella* sale proceeds and the USVSST deposit is unexplained. Sources conflict on the flag status of *Tifani* and *Majestic X* at boarding. Estimates of Iranian oil revenue and the IRGC's share come from non-government sources. The Treasury, Justice and State releases cited for funding links were identified by title, date and release number through search indexes; the an external reviewer and an external reviewer reviews of 12 October 2026 each located sb0015, jy2469, jy2538, FR Doc. 2025-20750, S/2024/215, the Skipper and Shamkhani dockets and the EIA chokepoint figures, but that is not a substitute for the author's own reading of each primary page. Designation findings are executive determinations and complaint statements are allegations; neither is a judicial finding. The proposed offense (Section 9, provision 10) has not had independent legal review. The denial model in Section 5 rests on assumed fleet size, class mix, voyage cycle, storage occupancy and replacement rate; it estimates crude-carriage capacity, not exports.

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ANNEX

Annex A. Vessel register

Annex A: Vessel register

All 262 records in the register compiled for this paper, as of 12 October 2026 (data snapshot 01:00 UTC). Sources: UANI Ghost Armada tables (displayed update 12 May 2026), TankerTrackers data (flag as of 8 October 2026), Windward, Lloyd's List, registry notices to the IMO and U.S. enforcement releases. A listing here is not a finding that a vessel has no nationality; see Section 3. Confidence: H = explicit vessel-level false-flag finding with corroboration or an official entry; M = explicit analyst or catalogue finding with limited independent confirmation.

A.1 Counted, documented false-flag finding (91)

Vessel	IMO	Flag (8 Oct)	Conf.
ABROS	9247388	Curaçao	M
ADITYA	9203784	Guyana	M
ALBA	9268112	Mozambique	M
ALTARIS WOLF	9237412	Malawi	M
AMIL	9308778	Mozambique	M
ANIKA	9305609	Mozambique	M
AQUA	9248473	Malawi	H
AQUALIS	9258674	Guyana	H
AR MZ	9232450	Malawi	M
ARENA	8806321	Nicaragua	M
ATLANTIS I	9229362	Curaçao	M
AZELIA	9365776	Benin	H
AZURE VOYAGER	9181649	Aruba	M
BAO YU	8519966	Nicaragua	M
BERG 1	9262168	Benin	M
BINARY STAR	9380570	Nicaragua	H
CAMELIA	9070072	Guyana	M
CHLOE	9173745	Guyana	M

Vessel	IMO	Flag (8 Oct)	Conf.
COBA	9235737	Curaçao	M
DA LI	9113379	Zimbabwe	M
DAHAB	9233222	Guyana	M
DEYNA	9299903	Mozambique	M
DIGNITY	9572111	Guinea	M
DING XIANG	9280366	Curaçao	M
DISHA	8818219	Mozambique	H
EK	9191553	Curaçao	M
FABULE	9276573	Malawi	M
FENGHUANG	9236248	Mozambique	M
FLORA	9365752	Benin	H
FOUR PLUS	9203930	Guyana	M
FREYA	9238052	Zimbabwe	M
FURY	9280873	Guinea	M
GAS GALAXY	8818843	Nicaragua	M
GOLDCREST	9292486	Mozambique	M
GONG DE TIAN	9005065	Nicaragua	M
GREAT	9197832	Nicaragua	M
GUANG TAI	9526693	Timor-Leste	M
HAI LONG	9256468	Malawi	M
HAIHE	9007386	Nicaragua	M
HORNET	9197844	Benin	M
JAYA	9410387	Curaçao	M
LIMAS	9254082	Guyana	M
LITI	9216547	Guinea	M

Vessel	IMO	Flag (8 Oct)	Conf.
LORA	9297319	Curaçao	M
LOTUS	9392822	Syria	M
LOUIZA	9281554	Curaçao	M
MAHVA	9150365	Guyana	M
MARIS	9263382	Guinea	M
MOONBAY	9230907	Guyana	M
MT CUMA	9379703	Guyana	M
MT TIBER	9411288	Guinea	M
MUNICH	9417490	Nicaragua	M
NEW FUTURE	9259185	Malawi	M
NICHOLA	9224271	Guyana	M
NOBLE	9162928	Guinea	M
NORA	9237539	Guyana	M
OLGA	9309239	Curaçao	M
OLYM	9212759	Guyana	M
ORPHIC	9221671	Curaçao	M
PHENIX VI	9255880	Guyana	M
PHOEBEII	9226011	Guyana	M
PYRA	9002491	Mozambique	M
RAINE	9223540	Nicaragua	M
RATNA	9160475	Curaçao	M
RENS	9242223	Mozambique	M
RICH STARRY	9773301	Malawi	H
ROMAN	9155341	Malawi	H
SALUS	9198082	Mozambique	M

Vessel	IMO	Flag (8 Oct)	Conf.
SANAR	9185530	Madagascar	M
SCALER	9254915	Mozambique	M
SEA HONOR	9315654	Guyana	M
SLT EMPIRE	9192258	Malawi	M
SOUFIA1	9273052	Mozambique	M
STAR LINE	9237618	Nicaragua	M
STELLAR ORACLE	9194127	Guyana	M
SYRMA	9204805	Guyana	M
TAVARIS CASSEL	9235244	Aruba	M
TITAN	9293143	Curaçao	M
TORNADO	9242118	Curaçao	M
TWENTY ONE	9288265	Curaçao	M
UJALA	9546722	Mali	M
UMA	9258870	Guyana	M
V OCEAN	9281695	Malawi	H
VAST PLUS	9203928	Aruba	M
VENTURA	9216559	Guyana	M
VERA	9304655	Curaçao	M
VERA	9271406	Syria	M
VERNON	9232876	Guinea	M
VIRTUOUS X	9208215	Malawi	H
VIVIAN	9293741	Botswana	M
XAVIA	9052331	Guinea	M

A.2 Counted, candidates without vessel-level confirmation (97)

Flag of 8 October belongs to a state with no international tanker register or to a registry impersonated in a state's name, and the vessel appears in Iran-trade listings; no vessel-specific registration check has been made.

Vessel	IMO	Flag (8 Oct)
AMAK	9244635	Madagascar
AMEN	9365764	Botswana
ANCIENT FLY	9257993	Malawi
ANGELIC BO	9237228	Malawi
ARGO MARIS	9041643	Curaçao
ASHA	9326902	Curaçao
ASTRAM	9307748	Nicaragua
ASTRID 1	9176656	Aruba
AURA	9274563	Mozambique
AURORA	9088536	Madagascar
AXON I	9005053	Nicaragua
BANIAN	9046784	Nicaragua
BIG VIEW	9149249	Mali
BINARY STAR II	9453729	Nicaragua
BLOOMING DALE	9125724	Aruba
BRAVO	9045807	Mali
CELESTIAL SEA	9397030	Aruba
CELESTINE	9422847	Mali
CHEMEX	9240914	Mali
DORIN	9260055	Guyana
ECLIPSE WIND	9399167	Nicaragua
ELCANO	9341512	Guyana
ELIAH	9309227	Nicaragua
ELLY	9134294	Madagascar
ELMO	9256913	Malawi

Vessel	IMO	Flag (8 Oct)
EMMA	9321421	Guyana
EVA	9404572	Nicaragua
FAAS	9233208	Malawi
FAROG	9252072	Curaçao
FIBI	9242443	Nicaragua
GALVIN	9387762	Aruba
GARDIAN	9114581	Nicaragua
GAS CONCORD	9108099	Botswana
GAS ELIOT	9386304	Nicaragua
GLOBAL RANI	9136113	Nicaragua
HEANLIMO	9220914	Malawi
HH GLORY	9534614	Nicaragua
HIRA	9180164	Nicaragua
HOOT	9267962	Nicaragua
INFINITA	9258595	Curaçao
JI XIANG	9301005	Curaçao
LAND ROVER	9320843	Curaçao
LATTAFA	9245794	Aruba
LAVIN / MACHO QUEEN	9177686 (stolen)	Mali
LEGACY 2	9294795	Curaçao
LITUS	9232620	Nicaragua
LYNN	9352559	Malawi
M.T. SULLANA	9180152	Curaçao
MARSER	9031519	Nicaragua
MIRAAN	9242481	Curaçao

Vessel	IMO	Flag (8 Oct)
MT VIRGO	9236250	Botswana
MT. SHELIF	9102241	Guyana
MURLIKISHAN	9269403	Nicaragua
NAUTILUS I	9193721	Nicaragua
NAVIS	9008108	Nicaragua
NAVIXON	9115303	Nicaragua
NECLEUS	9371608	Malawi
NORITA	9197727	Guyana
NOVA	9283801	Curaçao
OCEAN 11	9194969	Timor-Leste
OCEAN RIVER	9284594	Curaçao
OCEANA KAI	9221267	Nicaragua
OLINA	9282479	Timor-Leste
OSTRIA	9260067	Botswana
PEARL	9672301	Guyana
PUYANG	9174220	Guyana
SALUTE	8912546	Nicaragua
SEA STAR	9220940	Mali
SHEN ZHOU	9300996	Curaçao
SIMBA V	9113094	Nicaragua
SIRIUS1	9285847	Mali
SIYA	9363182	Nicaragua
TARAWA	9225342	Madagascar
TAURUS	9259745	Curaçao
TAWANNA	9247780	Curaçao

Vessel	IMO	Flag (8 Oct)
THIRTY ONE	9307932	Curaçao
TIMA	9237797	Guyana
TRIDENT II	8982888	Nicaragua
UDAY	9546710	Nicaragua
UNIDENTIFIED HULL broadcasting NATURE HEART	9251585 (borrowed; actual hull not verified)	Mozambique
URANUS	9307633	Aruba
USHA	9387152	Guyana
V VOW	9241114	Malawi
VALOUR X	9216717	Malawi
VICEROY X	9197909	Malawi
VICTOR CAT	9256975	Malawi
VIGOR	9262156	Botswana
VISION RANGER	9326055	Malawi
VL X	9182291	Curaçao
VORAS	9203265	Botswana
VOSS BAY	9264893	Malawi
VR SKY	9262754	Malawi
WOLF	9240885	Aruba
XI	9174397	Mali
YFABULOUS	9276585	Malawi
YONG TAI	9231511	Madagascar
YULIN	9231224	Nicaragua

A.3 Not counted (74)

Vessel	IMO	Flag (8 Oct)	Reason excluded
AGNI	9337389	Comoros	Real registry; misuse reported
AKKORD	9259599	Russia	Reflagged
AKSEL	9410894	Russia	Reflagged
AL JAFZIA	9171498	Nicaragua	Seized, disabled or lost
ALGORITM	9299745	Russia	Reflagged
AMIE	9233234	Samoa	Real registry; misuse reported
ANABEL	9246279	Gambia	Real registry; misuse reported
ANHONA	9354521	Belize	Valid open registry
AQUA LIVE	9282792	Cameroon	Real registry; misuse reported
ASGARD	9322267	Russia	Reflagged
ASPHALT STAR	9463528	Mali	Seized, disabled or lost
ASTRA	9350422	Guatemala	Real registry; misuse reported
ATILA	9233753	Comoros	Real registry; misuse reported
ATLANTIS MZ	9218181	Comoros	Real registry; misuse reported
ATOMIS	9194139	Comoros	Real registry; misuse reported
AZHIN	9288095	Iran	Reflagged
BATUMI	9198094	Senegal	Valid open registry
BELMA	9289491	Curaçao	Seized, disabled or lost
BLUEBELL	9251810	Eq. Guinea	Real registry; misuse reported
CERES I	9229439	Nicaragua	Seized, disabled or lost

Vessel	IMO	Flag (8 Oct)	Reason excluded
CHARMINAR	9318022	Comoros	Seized, disabled or lost
CITA	9167162	Nicaragua	Seized, disabled or lost
CRYSAL	9135547	Saint Kitts and Nevis	Valid open registry
DARAN	9080493	Iran	Reflagged
DELFINA	9256248	Benin	Seized, disabled or lost
DUOS	9293959	Cameroon	Real registry; misuse reported
ELISA	9249685	Sao Tome and Principe	Real registry; misuse reported
ELPIS	9212400	Comoros	Real registry; misuse reported
ERA	9230880	Comoros	Seized, disabled or lost
EVELINA	9235713	Panama	Valid open registry
G SUMMER	9143506	Angola	Real registry; misuse reported
GOLDEN MARIN	9234616	Iran	Reflagged
HALO 6	9232448	Guatemala	Real registry; misuse reported
IMPALAS	9171448	Sao Tome and Principe	Real registry; misuse reported
INFINITY	9179701	Mozambique	Seized, disabled or lost
IZUMO	9249324	Gabon	Valid open registry
JAMES II	9174660	Haiti	Seized, disabled or lost
KAVIZ	9282041	Comoros	Seized, disabled or lost
KUSH	9282522	Comoros	Real registry; misuse reported
KYLO	9189146	Comoros	Seized, disabled or lost
LENORE / DAVINA	9259367	Curaçao	U.S. custody
LEXIE	9203277	Botswana	Seized, disabled or lost

Vessel	IMO	Flag (8 Oct)	Reason excluded
LIA	9041057	Eq. Guinea	Real registry; misuse reported
MAJESTIC X	9198317	Guyana	U.S. custody
MAOMING	9215103	Iran	Reflagged
MARINE SPIRIT	9288019	Comoros	Real registry; misuse reported
MARIVEX	9464156	Palau	Seized, disabled or lost
MARVEL 7	8223050	Tanzania	Valid open registry
MAYA	9171357	Netherlands	Valid open registry
MEDNA	9281683	Comoros	Real registry; misuse reported
MEHLE	9191711	Panama	Valid open registry
NEW POWER	9266853	Comoros	Real registry; misuse reported
OCTANS	9224295	Nicaragua	Seized, disabled or lost
PANDA	9284582	Vietnam	Valid open registry
PING SHUN	9231901	Panama	Valid open registry
QUINN	9220952	Angola	Real registry; misuse reported
RIESCO	9251822	Zimbabwe	Seized, disabled or lost
SERAM II	9275995	Eritrea	Valid open registry
SETTEBELLO	9162916	Palau	Seized, disabled or lost
SHAURYA 2	9257010	Curaçao	Seized, disabled or lost
SIA	9397080	Angola	Real registry; misuse reported
SIFRA	9185346	Anguilla	Real registry; misuse reported
SILVIO / REMIZ	9223344	Cameroon / Panama	Identity conflict
SKIPPER	9304667	Guyana	U.S. custody

Vessel	IMO	Flag (8 Oct)	Reason excluded
SKYLYN	9259197	Panama	Valid open registry
SKYWAVE	9328716	Botswana	Seized, disabled or lost
SUN	9131101	Sao Tome and Principe	Real registry; misuse reported
TAVIAN	9147447	Guyana	Seized, disabled or lost
TELA	9189110	Gambia	Real registry; misuse reported
TIFANI	9273337	Botswana	U.S. custody
UNIDENTIFIED HULL broadcasting LNG JAMAL	9200316 (borrowed; actual hull not verified)	Japan	Valid open registry
URI	9248497	Comoros	Real registry; misuse reported
ZARO	9176773	Eq. Guinea	Real registry; misuse reported
ZENITH	9157765	Guyana	Seized, disabled or lost

A.4 Watchlist (not in the register count)

Recently designated tankers on registries where misuse has been reported, or being removed from Panama's registry, which may move to fraudulent flags.

Vessel	IMO	Listed flag	Why on watchlist
STELLAR BEVERLY	9208069	Unknown (per OFAC)	OFAC records flag as unknown
YASHAR	9129380	Comoros	Comoros has disowned 60+ tankers; no vessel-level finding located
SOGL	9208227	Comoros	As YASHAR
PARITOSH	9383352	Comoros	As YASHAR
GOLDEN SUNRISE	9183362	Comoros	As YASHAR
G JADES	9131096	Comoros	As YASHAR
G SILVER	9139696	Cameroon (ex Panama)	Cameroon de-listed 39 ships in June 2026

Vessel	IMO	Listed flag	Why on watchlist
NARSIS	9408358	Cameroon	As G SILVER
CAUVERI	9282508	Cameroon	As G SILVER
BITU	9531765	Panama (de-registering)	Panama cancelling registration after 8 Oct 2026 designation
STARWAY	9273246	Panama (de-registering)	As BITU
MACKEREL	9234628	Panama (de-registering)	As BITU

SUGGESTED CITATION

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AUTHOR

About the author

Collin B. George, CISSP, is National Security Advisor at Sanctir, an independent research and advisory practice working on sanctions, export controls, maritime enforcement and defense industrial base risk.

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National Security Advisor, Sanctir · cgeorge@sanctir.com · sanctir.com · ORCID 0009-0007-8162-6839