

# FinCEN Issued Alert on **Illicit Iranian Oil Trade Networks**



Issue Date

06 Jun 2025

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# SUMMARY

- FinCEN issued an advisory on Iranian sanctions evasion involving oil smuggling, shadow banking, and arms procurement
- Financial institutions must include the key term 'FIN-2025-OILSMUGGLING' in the Suspicious Activity Reports (SARs)

## KEY RED FLAGS

- Funds routed through multiple exchangers or with unclear sources
- Business activity inconsistent with historical transaction patterns
- Use of false or scrapped IMO numbers
- Middle-east company receiving oil payments, then paying firms based in HKG/ China
- Oil labeled as Malaysian Blend but shows AIS irregularities.