

SIFMA's
ANTI-MONEY LAUNDERING AND
FINANCIAL CRIMES CONFERENCE

Panel 4:

- **Significant Sanctions Enforcement Actions and Other Financial Crime Developments**

- **Moderator:**
 - **Betty Santangelo**
Partner Schulte Roth & Zabel LLP

- **Panelists:**
 - **Christina Dugger**
Chief Assistant U.S. Attorney
U.S. Attorney's Office, Eastern District of New York
 - **Polly Greenberg**
Bureau Chief, Major Economic Crimes Bureau
New York County District Attorney's Office
 - **Lorraine Lawlor**
Vice President, Financial Crimes Risk Management
Wells Fargo
 - **Molly McLane**
Executive Director & Global Head of Sanctions
Morgan Stanley

OFAC Stripping Cases

Bank	Date	Fine	Time Frame	Agencies
ABN Amro	5/10	\$580 mil	Mid 1990s -2006	NYDA, DoJ, OFAC
ANZ	8/09	\$5.75 mil	2004-2006	OFAC
BTMU	12/12	\$8.6 mil	2006-2007	OFAC
Barclays	8/10	\$298 mil	1995 - 2006	NYDA, DoJ, OFAC
Credit Suisse	12/09	\$536 mil	1995 – 2006	NYDA, DoJ, OFAC
HSBC	12/12	\$375 mil	Through 2007	NYDA, DoJ, OFAC
ING	6/12	\$619 mil	1990 – 2007	NYDA, DoJ, OFAC
Lloyds TSB	1/09	\$350 mil	1990 – 2007	NYDA, DoJ, OFAC
Standard Chartered	8-12/12	DOJ/NYDA: 227 mil NY FED: 100 mil DFS: 340 mil	2001-2007	NYDFS, OFAC, DoJ, NYDA