

February 1, 2012

Pedro Duarte Neves
Board of Supervisors, EBA
Banco de Portugal
R. Francisco Ribeiro,
2 1150-165 Lisbon, Portugal

Re: SWIFT and Iran

Dear Mr. Neves:

Please find attached correspondence that United Against Nuclear Iran (“UANI”) has sent to the Society for Worldwide Interbank Financial Telecommunication (“SWIFT”). We urge you to review it. In our letter to SWIFT, UANI has called on SWIFT to publicly clarify its work in Iran and for SWIFT to:

1. Terminate its relationship with and deny SWIFT access to Bank Markazi, Iran’s Central Bank;
2. Terminate its relationship and deny SWIFT access to all sanction-designated Iranian financial institutions, and;
3. Terminate its relationship and deny access to all Iranian Banks.

As a regulatory and supervisory body for SWIFT or SWIFT participating institutions, we urge you to take immediate action to ensure SWIFT’s compliance with applicable U.S. and EU sanctions law and to ensure that SWIFT complies with its own rules related to corporate governance and membership eligibility.

We have no doubt that you have not sought to oversee an institution that has been an enabling financial mechanism for the Iranian regime to pursue an illicit nuclear weapons program, support terrorist activities, and engage in brutal human rights abuses. In recent months, however, the world has united in an effort to economically isolate the Iranian regime and to sanction its key industries. SWIFT must join that movement or risk continuing to run afoul of applicable sanctions law. Moreover, SWIFT jeopardizes its good reputation if it continues to work with Iran’s financial institutions.

Given the urgency of the Iranian threat, please let us hear from you on or before February 9, 2012 with information clarifying SWIFT's work in Iran and the steps you will take to ensure SWIFT terminates access to the Iranian Central Bank, sanction-designated Iranian Banks and the broader Iranian banking system that is controlled by the Islamic Revolutionary Guard Corps.

Thank you for your immediate attention to this matter.

Very truly yours,



Ambassador Mark D. Wallace

Enclosed:

--UANI Letter to SWIFT, January 30, 2012

cc: Chris Church
Chief Executive Americas and Global Head of Securities, SWIFT

Michael Fish
Chief Information Officer, Head of Information Technology and Operations,
SWIFT

Ian Johnston
Chief Executive, Asia Pacific Region, SWIFT

Gottfried Leibbrandt
Head of Marketing, SWIFT

Alain Raes
Chief Executive, Europe, Middle East and Africa Region, SWIFT

Francis Vanbever
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Chairman of the Board of Directors, SWIFT

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Chief Group Internal Audit, Swiss Bank at UBS AG
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Technology Advisor to ABS, Singapore
Board of Directors, SWIFT

The Honorable Joseph I. Lieberman

Chairman, United States Senate Committee on Homeland Security &
Governmental Affairs

The Honorable Susan M. Collins

Ranking Member, United States Senate Committee on Homeland Security &
Governmental Affairs

The Honorable John Kerry

Chairman, United States Senate Committee on Foreign Relations

The Honorable Richard Lugar

Ranking Member, United States Senate Committee on Foreign Relations

The Honorable Jon Tester

United States Senate

The Honorable Robert Menendez

United States Senate

The Honorable Peter T. King

Chairman, United States House Committee on Homeland Security

The Honorable Bennie Thompson

Ranking Member, United States House Committee on Homeland Security

The Honorable Ileana Ros-Lehtinen

Chairman, United States House Committee on Foreign Affairs

The Honorable Howard Berman

Ranking Member, United States House Committee on Foreign Affairs

The Honorable Howard P. McKeon

Chairman, United States House Armed Services Committee

The Honorable Adam Smith
Ranking Member, United States House Armed Services Committee

The Honorable Steve Israel
United States House of Representatives

The Honorable Leon E. Panetta
Secretary of Defense, United States Department of Defense

The Honorable David S. Cohen
Under Secretary for Terrorism and Financial Intelligence, United States
Department of the Treasury

The Honorable Adam Szubin
Director, Office of Foreign Assets Control