

January 31, 2012

Stephen Zimmerman
Board Member, SWIFT
UBS AG
Bahnhofstrasse 45
8001 Zurich

Re: SWIFT and Iran

Dear Chairman Zimmerman:

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 Board Member of SWIFT, we urge you to take immediate action to ensure SWIFT’s compliance with applicable U.S. and EU sanction 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 to 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 its work with Iran’s financial institutions.

Given the urgency of the Iranian threat, please let us hear from you on or before February 8, 2012 with clarifying information on SWIFT’s work in Iran and what you will do to ensure that

SWIFT terminates access to the Iranian Central Bank, sanctioned 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: Yawar Shah
Customer Intelligence, Citi
Chairman of the Board of Directors, SWIFT

Guy Beniada
Chief Financial Officer and Managing Director, ING Belgium & Board of
Directors, SWIFT

Udo Braun
Group Markets Operations, Commerzbank, Germany & Board of Directors,
SWIFT

Fabrice Denele
Head of Payments, BPCE, France & Board of Directors, SWIFT

John Ellington
Director, Retail Banking Operations, The Royal Bank of Scotland, UK
& Board of Directors, SWIFT

Giorgio Ferrero
Head of Payment Systems Strategy and Development, Intesa Sanpaolo, Italy
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Goran Fors
Global Head of Custody Services, SEB, Sweden & Board of Directors, SWIFT

Wolfgang Gaertner
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Chairman of the Australian National Member Group & Board of Directors,
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Godelieve Mostrey

Executive Director and Chief Technology and Services Officer, Euroclear
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Head of Clearing, Custody and Corporate Trust Services, BNP Paribas, Securities
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Marcus Treacher

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

Francis Vanbever

Chief Financial Officer, 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