



SANCTIONS BOARD

MEMORANDUM FOR THE BOARD

Sanctions Board
1000 L Street, N.W.
Washington, D.C. 20005
Tel: 202-473-1000

RE: [REDACTED]

1. [REDACTED]

2. [REDACTED]

3. [REDACTED]

4. [REDACTED]

5. [REDACTED]

6. [REDACTED]

7. [REDACTED]

8. [REDACTED]

9. [REDACTED]

10. [REDACTED]

11. [REDACTED]

12. [REDACTED]

13. [REDACTED]

14. [REDACTED]

15. [REDACTED]

16. [REDACTED]

17. [REDACTED]

18. [REDACTED]

19. [REDACTED]

20. [REDACTED]

21. [REDACTED]

22. [REDACTED]

23. [REDACTED]

24. [REDACTED]

25. [REDACTED]

Selection and

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...

... takes respondents' request, in accordance with Article VI of the Sanctions Procedures, participated in the hearing through

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...

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...

...

Recommendations (‘‘Recommendations’’, ‘‘Additional Evidence’’), and

vii. **UN Comments to Respondent’s Additional Evidence**, submitted by DNI to Secretary to the Sanctions Board on August 10, 2012 (‘‘DNI’s Submission’’).

Further, in the preparation or implementation of any Bank-financed Project, provided, however that after a minimum net

of three (3) years

Project (part of the Project), which shall be provided to

small, family-owned, and community-based businesses

under the Project shall be

to the extent possible

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10. Pursuant to Section 8.02(b)(i) of the Sanctions Procedures, the Sanctions Board determines whether the evidence presented to the Board is sufficient to establish, by a preponderance of the evidence, that the respondent, a natural person, is a senior manager or a person in a position of significant responsibility in the financial institution or other entity, and that the respondent is responsible for the conduct that forms the basis of the case.

11. The Board has reviewed the evidence presented in this case and has concluded that the evidence is sufficient to establish that the respondent is a senior manager of the respondent bank and is responsible for the conduct that forms the basis of the case. The Board has also determined that the respondent is a senior manager of the respondent bank and is responsible for the conduct that forms the basis of the case.

STANDARD OF REVIEW

9.

Pursuant to Section 8.02(b)(i) of the Sanctions Procedures, the Sanctions Board determines whether the evidence presented to the Board is sufficient to establish, by a preponderance of the evidence, that the respondent, a natural person, is a senior manager or a person in a position of significant responsibility in the financial institution or other entity, and that the respondent is responsible for the conduct that forms the basis of the case.

The Board has reviewed the evidence presented in this case and has concluded that the evidence is sufficient to establish that the respondent is a senior manager of the respondent bank and is responsible for the conduct that forms the basis of the case. The Board has also determined that the respondent is a senior manager of the respondent bank and is responsible for the conduct that forms the basis of the case.

The Board has reviewed the evidence presented in this case and has concluded that the evidence is sufficient to establish that the respondent is a senior manager of the respondent bank and is responsible for the conduct that forms the basis of the case. The Board has also determined that the respondent is a senior manager of the respondent bank and is responsible for the conduct that forms the basis of the case.

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1. The Board has reviewed the information provided by the complainant and the respondent, and the Board's previous decision in this matter. The Board notes that the complainant has provided evidence that the respondent has engaged in activities that are prohibited under the Board's sanctions policy. The Board has also reviewed the respondent's explanation of these activities and has found it to be unconvincing. The Board therefore decides to impose sanctions on the respondent.

2. The Board has determined that the respondent's activities constitute a violation of the Board's sanctions policy. The Board has therefore imposed the following sanctions on the respondent:

- (a) The respondent is prohibited from participating in any financial transactions with the Board or any of its member institutions.
- (b) The respondent is prohibited from providing any services to the Board or any of its member institutions.
- (c) The respondent is prohibited from receiving any funds from the Board or any of its member institutions.
- (d) The respondent is prohibited from providing any information to the Board or any of its member institutions.

3. The Board has also determined that the respondent's activities have caused significant harm to the Board and its member institutions. The Board has therefore ordered the respondent to pay compensation to the Board and its member institutions for the harm caused. The Board has also ordered the respondent to take steps to prevent such harm from occurring in the future.

4. The Board has also determined that the respondent's activities have caused significant harm to the public. The Board has therefore ordered the respondent to take steps to prevent such harm from occurring in the future. The Board has also ordered the respondent to pay compensation to the public for the harm caused.

5. The Board has also determined that the respondent's activities have caused significant harm to the environment. The Board has therefore ordered the respondent to take steps to prevent such harm from occurring in the future. The Board has also ordered the respondent to pay compensation to the environment for the harm caused.

6. The Board has also determined that the respondent's activities have caused significant harm to the economy. The Board has therefore ordered the respondent to take steps to prevent such harm from occurring in the future. The Board has also ordered the respondent to pay compensation to the economy for the harm caused.

(text has been added)

14. Respondents assert that while they do not intend to modify, negate, contradict, or abandon the facts set forth in their Annex to the RCF and the Response provide information relevant to the determination of an appropriate sanction.

15. Respondents assert that the Board's recommendations are not appropriate.

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mitigation and non-pairing forth arguments as to

1. Physical Evidence

2. Witness Testimony

3. Expert Testimony

4. Other Evidence

5. Conclusion

6. Findings of Fact

7. Legal Analysis

8. Final Decision

9. Other Matters

10. Comments

11. Appendix

12. References

13. Other Documents

14. Other Matters

15. Comments

16. Appendix

17. References

18. Other Documents

19. Other Matters

20. Comments

21. Appendix

22. References

23. Other Documents

24. Other Matters

22. At the merits

presentations at the September 2012 hearing,

the Commission received testimony from the following witnesses:

1. Mr. [Name], [Title], [Company]

2. Mr. [Name], [Title], [Company]

3. Mr. [Name], [Title], [Company]

4. Mr. [Name], [Title], [Company]

5. Mr. [Name], [Title], [Company]

6. Mr. [Name], [Title], [Company]

7. Mr. [Name], [Title], [Company]

8. Mr. [Name], [Title], [Company]

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ed on August 5, 2011,
bi information relating to
admitted to

2. Respondents' request for additional materials

28. By request of July 26, 2011, as amended, Respondents requested the following materials: (i) an documents

Sanctions Board is considered that although the Sanctions Process do not define the text of the Sanctions Board's findings or conclusions, the Sanctions Board's findings and conclusions are available to other respondents under Section 5.04(b).

31. With regard to the second category of materials, Respondent's connection with IREP, and therefore no further action is warranted.

Sanctions Board's findings and conclusions are available to other respondents under Section 5.04(b).

Sanctions Board is granted the right to review any additional evidence (Respondent's comments).

5.4. The Sanctions Board is granted the right to review any additional evidence (Respondent's comments).

52. The § 87(2)(b) information has been withheld pursuant to the provisions of Section 87(2)(b) of the Freedom of Information Act.

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62. The § 87(2)(b) information has been withheld pursuant to the provisions of Section 87(2)(b) of the Freedom of Information Act.

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19.12.2017

19.12.2017

The Respondent Consultant has submitted a letter dated 19.12.2017, in which it has stated that it has been separated from the Manager and S. The Respondent Consultant has also stated that it has been separated from the Manager and S. The Respondent Consultant has also stated that it has been separated from the Manager and S.

The Respondent Consultant has submitted a letter dated 19.12.2017, in which it has stated that it has been separated from the Manager and S. The Respondent Consultant has also stated that it has been separated from the Manager and S. The Respondent Consultant has also stated that it has been separated from the Manager and S.

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of the measures. It took steps to demonstrate that it took those measures in response to the sanctionable practices at issue.¹⁴ Respondents must provide proof

Project Director until January 2009, at which time he left the project. Respondents do not
the link between the respondent's involvement in the project and the sanctionable practices. Nor do Respondents
to the other personnel whose involvement is reflected in the record. In such circumstances,
mitigation against only one of the concerned individuals does not warrant mitigation.¹⁵

06. *Effective compliance program.* Section V of the *Sanctions Board Reasoning Guide* provides
that mitigation may be appropriate for the establishment of a compliance program and implementation

limited by the fact that

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While the conflict of interest allegations against Respondent C
arise from Respondent C's not being able to identify the source of the
information, Respondent C's cooperation with DFC's investigation thus merits limited criticism.

Respondent C

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regarding the subject, and the other by outside counsel after Respondents became aware of the continuing nature of the said proceedings.

These proceedings are exogenous to the ADB's "exogenous"

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www.worldbank.org/sanctions

passers continued value in sanctioning entities that have ceased to operate, in order to limit the risk that they may later resurface and circumvent the effect of sanctions.

Sanctions Board Decision No. 56 (03/20)

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dependent Co-guarant and Respon

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1. The Board has received a request from the Board of Directors to consider the proposed sanctions against the following individuals and entities:

2. The Board has reviewed the request and the supporting information provided by the Board of Directors. The Board has also received input from the Board of Directors regarding the proposed sanctions.

3. The Board has concluded that the proposed sanctions are appropriate and should be implemented.

4. The Board has determined that the proposed sanctions are in the best interests of the World Bank Group and its stakeholders. The Board has also determined that the proposed sanctions are consistent with the World Bank Group's policies and procedures.

5. The Board has approved the proposed sanctions and has directed the Board of Directors to implement them.

6. The Board has also approved the proposed sanctions against the following individuals and entities:

7. The Board has determined that the proposed sanctions are in the best interests of the World Bank Group and its stakeholders. The Board has also determined that the proposed sanctions are consistent with the World Bank Group's policies and procedures.

8. The Board has approved the proposed sanctions and has directed the Board of Directors to implement them.

9. The Board has also approved the proposed sanctions against the following individuals and entities:

10. The Board has determined that the proposed sanctions are in the best interests of the World Bank Group and its stakeholders. The Board has also determined that the proposed sanctions are consistent with the World Bank Group's policies and procedures.

11. The Board has approved the proposed sanctions and has directed the Board of Directors to implement them.