

Bribery by Oil Services and Freight Forwarding Companies / Noble Corporation

Case ID:

ST-86

Case Cluster :

Bribery by Oil Services and Freight Forwarding Companies

Jurisdiction of Settlement:

Nigeria

Jurisdiction of Settlement / Enforcement Agency:

Economic and Financial Crimes Commission

Jurisdiction of Foreign Public Official(s) :

Nigeria

Year of Settlement:

2010

Month/Day of Settlement (or Notes):

01/28

Other Jurisdictions of Settlement:

United States

Settlement with Individual or Legal Person?:

Legal Person

Type of Settlement:

Criminal

Legal Form of Settlement:

Non-Prosecution agreement

Monetary Sanctions (Types):

Criminal Fine, Disgorgement

Total Monetary Sanctions (US\$):

\$2,500,000.00

Criminal Fine/Penalty (US\$) :

\$2,500,000

Monetary Sanctions Returned / Ordered Returned (US\$):

\$2,500,000

Monetary Sanctions Returned / Ordered Returned (Explanation):

Enforcement by "Affected" Jurisdiction

UNCAC Articles(s) Implicated:

Art.16

Art.26

OECD Anti-Bribery Convention Articles Implicated:

Art. 1, Art. 2, Art. 8

Offenses - Alleged:

Unknown (Bribery offenses)

Offenses - Settled:

Unknown

Public Procurement Contract / SOE Involved?:

No (Customs)

Summary:

According to a filing by the Noble Corporation with the US Securities and Exchange Commission, "Nigerian Customs Matter / In November 2010, Noble-Swiss reached a settlement with the U.S. Department of Justice and the Securities and Exchange Commission in connection with their investigation under the United States Foreign Corrupt Practices Act of certain reimbursement payments made by its Nigerian affiliate to customs agents in Nigeria. In January 2011, the Nigerian Economic and Financial Crimes Commission and the Nigerian Attorney General Office initiated an investigation into these same activities. A subsidiary of Noble-Swiss has resolved this matter through the execution of a non-prosecution agreement dated January 28, 2011. Pursuant to this agreement, the subsidiary will pay \$2.5 million to resolve all charges and claims of the Nigerian government." (Source: Noble Corporation, SEC Form 8-K, January 31, 2011.)

Sources :

Noble Corporation, "Form 8-K Report of Noble Corporation," filed with the US Securities & Exchange Commission, January 31, 2011, accessed at www.sec.gov/Archives/edgar/data/1169055/000095012311006909/h79316e8vk.htm.