

Innospec, Inc. / Paul W. Jennings

Case ID:

ST-214

Case Cluster :

Innospec Inc.

Jurisdiction of Settlement:

United States

Jurisdiction of Settlement / Enforcement Agency:

Securities and Exchange Commission

Jurisdiction of Foreign Public Official(s) :

Indonesia, Iraq (UN Oil-for-Food); Iraq

Year of Settlement:

2011

Month/Day of Settlement (or Notes):

01/24

Other Jurisdictions of Settlement:

None

Settlement with Individual or Legal Person?:

Individual

Type of Settlement:

Civil

Legal Form of Settlement:

Consent to Final Judgment

Monetary Sanctions (Types):

Disgorgement of Profits, Prejudgment Interest, Civil Penalty

Total Monetary Sanctions (US\$):

\$229,037.00

Civil Disgorgement of Profits (US\$) :

\$116,092

Civil Prejudgment Interest (US\$) :

\$12,945

Civil Fine / Penalty (US\$):

\$100,000

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

\$0

UNCAC Articles(s) Implicated:

Art.16

OECD Anti-Bribery Convention Articles Implicated:

Art. 1, Art. 8

Offenses - Alleged:

Bribery of foreign officials, Falsification of books and records, Internal controls violations, Aiding and Abetting Innospec's falsification of books and records, Aiding and Abetting Innospec's internal controls violations

Offenses - Settled:

No admission or denial of alleged offenses

Public Procurement Contract / SOE Involved?:

Yes

Summary:

According to the US Securities and Exchange Litigation Release and Complaint in SEC v. Paul W. Jennings, Mr. Jennings joined Innospec in 2002 as the Chief Financial Officer. the SEC Complaint alleged that Mr. Jennings became aware of Innospec's bribery scheme in Iraq and as he took on additional executive roles, approved and/or facilitated bribes and he also was aware of and approved bribery payments to Indonesian officials, including one scheme involving Pertamina, the Indonesian state-owned oil and gas company. (Sources: US Securities and Exchange Commission Litigation Release No. 21822 / January 24, 2011, Securities & Exchange Commission v. Paul W. Jennings, 1:11-CV-00144 (D.D.C.) (RMC), "SEC Files Settled Bribery Charges against Paul W. Jennings," and Securities & Exchange Commission v. Paul W. Jennings, 1:11-CV-00144-RMC (D.D.C.), Complaint filed on January 24, 2011.)

Sources :

US Securities and Exchange Commission Litigation Release No. 21822 / January 24, 2011, Securities & Exchange Commission v. Paul W. Jennings, 1:11-CV-00144 (D.D.C.) (RMC), "SEC Files Settled Bribery Charges against Paul W. Jennings," accessed at <http://www.sec.gov/litigation/litreleases/2011/lr21822.htm>; Securities & Exchange Commission v. Paul W. Jennings, 1:11-CV-00144-RMC (D.D.C.), Complaint filed on January 24, 2011, accessed at <http://www.sec.gov/litigation/complaints/2011/comp21822.pdf>