



NATIONAL UNDERWRITING BULLETIN

FROM: Underwriting Department

DATE: March 13, 2014

**TO: All Policy Issuing Agents of WFG Title Insurance Company and
WFG National Title Insurance Company**

BULLETIN No.: NATIONAL – 2014-02

SUBJECT: Specially Designated Nationals and Blocked Person List (“SDN List”)

Since 2003, settlement agents have been required to search the SDN List for all parties to real estate transactions who provide or receive funds as a part of those transactions. Access to a searchable list is available on WFG National Title Insurance Company’s web site under “Agent Services”. A link to that list is <https://www.wfgsecure.com/sdn/>. The list may also be accessed at <http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>.

The search should be conducted prior to the closing on all parties known prior to the closing, and an additional search may be necessary if other parties are identified later. In reviewing the search results, the Office of Foreign Assets Control (“OFAC”) has provided some guidance to distinguish whether or not a particular party might be on the list, as follows:

Step 1. Is the “hit” or “match” against OFAC’s SDN list or targeted countries, or is it “hitting” for some other reason (i.e., “Control List” or “PEP,” “CIA,” “Non-Cooperative Countries and Territories,” “Canadian Consolidated List (OSFI),” “World Bank Debarred Parties,” “Blocked Officials File,” or “government official of a designated country”), or can you not tell what the “hit” is?

- If it’s hitting against OFAC’s SDN list or targeted countries, continue to 2 below.
- If it’s hitting for some other reason, you should contact the “keeper” of whichever other list the match is hitting against. For questions about:
 - The Denied Persons List and the Entities List, please contact the Bureau of Industry and Security at the U.S. Department of Commerce at 202-482-4811.
 - The FBI’s Most Wanted List or any other FBI-issued watch list, please contact the Federal Bureau of Investigation (<http://www.fbi.gov/contact/fo/fo.htm>).
 - The Debarred Parties list, please contact the Office of Defense Trade Controls at the U.S. Department of State, 202-663-2700.
 - The Bank Secrecy Act and the USA PATRIOT Act, please contact the Financial Crimes Enforcement Network (FinCEN), 1-800-949-2732.
- If you are unsure whom to contact, please contact your interdict software provider which told you there was a “hit.”

- If you can't tell what the "hit" is, you should contact your interdict software provider which told you there was a "hit."

Step 2. Now that you've established that the hit is against OFAC's SDN list or targeted countries, you must evaluate the quality of the hit. Compare the name in your transactions with the name on the SDN list. Is the name in your transaction an individual while the name on the SDN list is a vessel, organization or company (or vice-versa)?

- If yes, you do not have a valid match.*
- If no, please continue to 3 below.

Step 3. How much of the SDN's name is matching against the name in your transaction? Is just one of two or more names matching (i.e., just the last name)?

- If yes, you do not have a valid match.*
- If no, please continue to 4 below.

Step 4. Compare the complete SDN entry with all of the information you have on the matching name in your transaction. An SDN entry often will have, for example, a full name, address, nationality, passport, tax ID or cedula number, place of birth, date of birth, former names and aliases. Are you missing a lot of this information for the name in your transaction?

- If yes, go back and get more information and then compare your complete information against the SDN entry.
- If no, please continue to 5 below.

Step 5. Are there a number of similarities or exact matches?

- If yes, please call the hotline at 1-800-540-6322.
- If no, you do not have a valid match.*

Note particularly, the information identified in Step 4. The more of that information that is available, the easier it will be to eliminate ambiguous possible hits.

As noted, if there appears to be a hit, contact OFAC immediately at 1-800-540-6322 or 1-202-622-2490, and be guided by their response.

Further information can be obtained from OFAC's Frequently Asked Questions site at http://www.treasury.gov/resource-center/faqs/Sanctions/Pages/ques_index.aspx.

Please contact your WFG underwriter with any questions.

NOTE: This Bulletin is intended for use by title issuing offices, title insurance agents and approved attorneys of WFG National Title Insurance Company and any reliance by any other person or entity is unauthorized. This bulletin is intended solely for the purpose of underwriting policies of WFG National Title Insurance Company.