

IT IS THEREFOR ORDERED:

FIRST, that the Respondent shall pay in fines and in remedial compliance measures a civil penalty of \$ 25,000,000 (twenty-five million dollars) comprised of the amounts and payable, as stipulated below, in complete settlement of the civil violations contained in the Department's Proposed Charging Letter and other information identified in the Consent Agreement;

SECOND, of the aforementioned twenty-five million dollar penalty, fifteen million dollars shall be paid to the Department within thirty (30) days of signing of the Order. The payment is to be made by cashiers or certified check payable to the Department of State;

THIRD, the aforementioned twenty-five million dollar penalty includes a penalty of ten million dollars in remedial compliance measures. Respondent may apply five million dollars over the three (3) year period commencing on the date of this Order, for the purpose of defraying a portion of the costs associated with the remedial compliance measures specified in the Consent Agreement. Respondent may apply five million dollars for approved self-initiated remedial compliance cost spent prior to the date of this order;

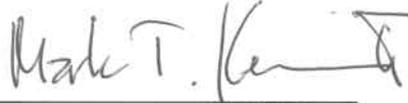
FOURTH, the Department recognizes that the Respondent agrees to waive its rights to raise the defense of Statute of Limitations with regard to the collection of the civil penalty imposed by the Consent Agreement and this Order, and that the Statute of Limitations shall be tolled until the last payment is made and all terms of the Consent Agreement are satisfied;

FIFTH, that any failure by the Respondent to apply suspended penalty funds appropriately for remedial compliance measures or provide satisfactory accounting shall result in the Respondent's being required to pay immediately to the Department the amount specified, less credit for amounts the Department deems to have been properly applied and accounted for as expenditures in compliance with the Consent Agreement;

SIXTH, that the Respondent shall comply with the compliance measures and its obligations under the provisions of the Consent Agreement (including the Annex of Compliance Measures) and shall do so within the deadlines established therein; and

SEVENTH, that the Proposed Charging Letter, the Consent Agreement and this Order shall be made available to the public.

This Order becomes effective on the day it is signed.



Mark T. Kimmitt
Assistant Secretary for
Political-Military Affairs
Department of State

Entered this 19 day of Dec. 2008