

the Department and the Respondent have agreed to settle this matter in accordance with the terms and conditions set forth therein;

IT IS THEREFORE ORDERED,

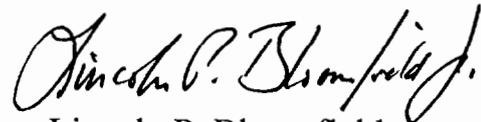
FIRST, that the Respondent shall pay in fines and in remedial compliance measures a civil penalty of \$8,000,000 (eight million dollars), comprised of the amounts stipulated herein and in paragraph (2), in complete settlement of the alleged civil violations pursuant to Section 38 of the Act arising from facts which the Respondent has disclosed in writing to the Department or that have been identified in the Department's Draft Charging letter. This civil penalty shall be payable as follows: \$1,000,000 (one million dollars) shall be paid to the Department of State within 10 days of the signing of this Order: \$1,000,000 (one million dollars) shall be paid annually in installments payable on the first and second anniversary of the signing of this Order. The Respondent agrees that the effect of any statutory limitation to the collection of the civil penalty imposed by the Consent Agreement and this Order shall be tolled until the termination of the Consent Agreement.

SECOND, that the rest of the civil penalty consisting of \$5,000,000 (five million dollars) is hereby assessed for remedial compliance enhancements specified in the Consent Agreement's Annex of Compliance Measures. The Respondent will apply \$5 million of this penalty over a five (5) year period commencing from the date of the signing of this Order. The Respondent will provide annually to the Department on the anniversary of the date of this Order written accounting of the expenditures associated with this penalty assessed for remedial compliance enhancements. The accounting shall be accompanied by a copy of a certification by the Respondent to the U.S. Department of Defense that the expenditures for the civil penalty's remedial compliance enhancements have not been treated as allowable costs allocated to any U.S. government contract for reimbursement, either as a prime contractor or indirectly as a sub-contractor. Any failure by the Respondent to use these funds appropriately for the purpose of remedial compliance enhancements or to provide a satisfactory accounting shall result in a lifting of the suspension, in which case the Respondent shall be required to pay immediately to the Department the balance of the penalty suspended to promote future compliance activities.

THIRD, The Respondent shall institute the compliance measures in the Consent Agreement, and shall do so within the deadlines established therein.

FOURTH, that the Charging Letter, the Consent Agreement, the Annexes of Compliance Measures and this Order shall be made available to the public.

This Order becomes effective on the day it is signed.



Lincoln P. Bloomfield, Jr.
Assistant Secretary for
Political-Military Affairs
Department of State

Entered this 1st day of November 2004