



IT IS THEREFORE ORDERED:

FIRST, that Respondent shall pay in fines and in remedial compliance measures a civil penalty of thirty-six million dollars (\$36,000,000), as stipulated below, in complete settlement of the civil violations arising from facts Respondent disclosed to the Department in its disclosures assigned the DTCC Case Numbers identified in paragraph 27 of the Consent Agreement and, also, summarized in the Department's Proposed Charging Letter.

SECOND, six million dollars (\$6,000,000) of this civil penalty is to be paid to the Department within ten (10) days of signing of the Order; six million dollars (\$6,000,000) is to be paid within one (1) year from the date of the Order; and six million dollars (\$6,000,000) is to be paid within two (2) years from the date of the Order.

THIRD, eighteen million dollars (\$18,000,000) of this civil penalty will be suspended as set forth in paragraph 19(b) of the Consent Agreement on the condition that Respondent applies this amount to Consent Agreement-authorized remedial compliance costs, in all instances determined as set forth in paragraph 19(c) of the Consent Agreement.

FOURTH, that any failure by Respondent to apply suspended penalty funds appropriately for remedial compliance measures or provide satisfactory accounting may result (in accordance with paragraph 19 of the Consent Agreement) in Respondent being required to pay immediately to the Department the entire 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.

FIFTH, the Department recognizes that 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 all terms of the Consent Agreement are satisfied.

SIXTH, that Respondent, and its assignees and successors, and in the event of reorganization all affected entities or units, shall comply with the compliance measures and its obligations under the provisions of the Consent Agreement and shall do so within the deadlines established therein.

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.

A handwritten signature in black ink that reads "Stanley L. Brown". The signature is written in a cursive style with a horizontal line underneath it.

Stanley L. Brown  
Senior Bureau Official  
Bureau of Political-Military Affairs

Entered this 17 day of April 2026