



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Industry and Security
Washington, D.C. 20230

REGISTERED MAIL - RETURN RECEIPT REQUESTED

Jeffrey Woodbridge
59 High Street
Minister
Ramsgate
Kent, England CT124AB

Dear Mr. Woodbridge:

The Bureau of Industry and Security, United States Department of Commerce (“BIS”) has reason to believe that you, Jeffrey Woodbridge, General Manager of Sigma Enterprises Ltd., in your individual capacity (“Woodbridge”), violated the Export Administration Regulations (the “Regulations”),¹ which are issued under the authority of the Export Administration Act of 1979 (the “Act”),² on two occasions. Specifically, BIS charges that Woodbridge committed the following violations:

Charge 1 (15 C.F.R. §764.2(d) - Conspiracy to Violate the Export Administration Regulations)

Beginning in or about September 2001 and continuing through in or about June 2002, Woodbridge, General Manager of Sigma Enterprises Ltd., conspired and acted in concert with others, known and unknown, to violate the Regulations. The purpose of the conspiracy was to export spare parts for hydraulic shears, items subject to the Regulations, from the United States to Libya without prior authorization from BIS as required by Section 746.4 of the Regulations. To accomplish the conspiracy, the conspirators, including Woodbridge, participated in a scheme to buy parts for hydraulic shears from the U.S. manufacturer of the spare parts and then to export the parts from the United States through the United Kingdom and Germany to their ultimate destination in Libya. In doing so, Woodbridge committed one violation of Section 764.2(d) of the Regulations.

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2002). The violations charged occurred in 2001 and 2002. The Regulations governing the violations at issue are found in 15 C.F.R. Parts 730-774 (2001-2002). The 2001 Regulations are substantially the same as the 2002 Regulations. The procedural aspects of this case are governed by the 2002 Regulations.

² 50 U.S.C. app. §§ 2401- 2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended by the Notice of August 14, 2002 (67 *Fed. Reg.* 53721 (August 16, 2002)), has continued the Regulations in effect under IEEPA. The Act and Regulations are available on the Government Printing Office website at: <http://w3.access.gpo.gov/bis/>.



Charge 2 (15 C.F.R. §764.2(h) - Actions to Evade the Export Administration Regulations Requirements for Exports to Libya)

In connection with conspiracy referenced in Charge 1, from in or about September 2001 through in or about on June 2002, Woodbridge, General Manager of Sigma Enterprises Ltd., took actions to evade the Regulations. Specifically, Woodbridge enlisted and paid a co-conspirator in Florida a fee to receive the spare parts from the U.S. manufacturer of the spare parts and then to export the spare parts from the United States to Libya through the United Kingdom and Germany. These actions were taken to conceal the ultimate destination of the spare parts. In doing so, Woodbridge committed one violation of Section 764.2(h) of the Regulations.

Accordingly, Woodbridge is hereby notified that an administrative proceeding is instituted against him pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

The maximum civil penalty allowed by law of \$11,000 per violation;³

Denial of export privileges; and/or

Exclusion from practice before BIS.

If Woodbridge fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. (Regulations, Sections 766.6 and 766.7). If Woodbridge defaults, the Administrative Law Judge may find the charges alleged in this letter are true without hearing or further notice to Woodbridge. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty on each charge in this letter.

Woodbridge is further notified that he is entitled to an agency hearing on the record if Woodbridge files a written demand for one with his answer. (Regulations, Section 766.6). Woodbridge is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent him. (Regulations, Sections 766.3(a) and 766.4).

The Regulations provide for settlement without a hearing. (Regulations, Section 766.18). Should you have a proposal to settle this case, you or your representative should transmit it to me through the attorney representing BIS named below.

³ See 15 C.F.R. §6.4(a)(2) (2001).

Woodbridge
Charging Letter
Page 3

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, Woodbridge's answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center
40 S. Gay Street
Baltimore, Maryland 21202-4022

In addition, a copy of Woodbridge's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Melissa B. Mannino
Room H-3839
United States Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Melissa B. Mannino is the attorney representing BIS in this case; any communications that you may wish to have concerning this matter should occur through her. She may be contacted by telephone at (202) 482-5301.

Sincerely,

Mark D. Menefee
Director
Office of Export Enforcement

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:)
)
Jeffrey Woodbridge)
59 High Street)
Minister)
Ramsgate)
Kent, England CT124AB,)
)
Respondent.)
)

SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between Respondent, Jeffrey Woodbridge, General Manager of Sigma Enterprises Ltd., in his individual capacity, ("Woodbridge"), and the Bureau of Industry and Security, United States Department of Commerce ("BIS") (collectively referred to as "Parties"), pursuant to Section 766.18(a) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2003)) ("Regulations"),¹ issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) ("Act"),²

¹ The violations charged occurred in 2001 and 2002. The Regulations governing the violations at issue are found in 15 C.F.R. Parts 730-774 (2001-2002). The Regulations define the violations that BIS alleges occurred and establish the procedures that apply to this matter.

² Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended by the Notice of August 7, 2003 (68 *Fed. Reg.* 47833, August 11, 2003), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (2000)).

WHEREAS, BIS has notified Respondent of its intention to initiate an administrative proceeding against Respondent, pursuant to the Act and the Regulations;

WHEREAS, BIS has issued a proposed charging letter to Respondent that alleged that Respondent committed two violations of the Regulations, specifically:

1. *One Violation of 15 C.F.R. § 764.2(d) - Conspiracy to Violate the Export Administration Regulations:* Beginning in or about September 2001 and continuing through in or about June 2002, Woodbridge, General Manager of Sigma Enterprises Ltd., conspired and acted in concert with others, known and unknown, to violate the Regulations. The purpose of the conspiracy was to export spare parts for hydraulic shears, items subject to the Regulations, from the United States to Libya without prior authorization from BIS as required by Section 746.4 of the Regulations. To accomplish the conspiracy, the conspirators, including Woodbridge, participated in a scheme to buy parts for hydraulic shears from the U.S. manufacturer and then to export the parts from the United States through the United Kingdom and Germany to their ultimate destination in Libya.
2. *One Violation of 15 C.F.R. § 764.2(h) – Actions to Evade the Export Administration Regulations Requirements for Exports to Libya:* In connection with conspiracy referenced above, from in or about September 2001 through in or about on June 2002, Woodbridge, General Manager of Sigma Enterprises Ltd.,

took actions to evade the Regulations. Specifically, Woodbridge enlisted and paid a co-conspirator in Florida a fee to receive the spare parts from the U.S. manufacturer and then to export the spare parts from the United States to Libya through the United Kingdom and Germany. These actions were taken to conceal the ultimate destination of the spare parts.

WHEREAS, Woodbridge has reviewed the proposed charging letter and is aware of the allegations made against him and the administrative sanctions which could be imposed against him if the allegations are found to be true;

WHEREAS, Woodbridge fully understands the terms of this Agreement and the Order (“Order”) that the Assistant Secretary of Commerce for Export Enforcement will issue if she approves this Agreement as the final resolution of this matter;

WHEREAS, Woodbridge enters into this Agreement voluntarily and with full knowledge of his rights;

WHEREAS, Woodbridge states that no promises or representations have been made to him other than the agreements and considerations herein expressed;

WHEREAS, Woodbridge neither admits nor denies the allegations contained in the proposed charging letter;

WHEREAS, Woodbridge wishes to settle and dispose of all matters alleged in the proposed charging letter by entering into this Agreement; and

WHEREAS, Woodbridge agrees to be bound by the Order, if entered;

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over Woodbridge, under the Regulations, in connection with the matters alleged in the proposed charging letter.

2. The following sanction shall be imposed against Woodbridge in complete settlement of the violations of the Regulations set forth in the proposed charging letter:

- a. Woodbridge shall be assessed a civil penalty in the amount of \$15,000 which shall be paid to the U.S. Department of Commerce within 30 days from the date of entry of the appropriate Order.
- b. The timely payment of the civil penalty agreed to in paragraph 2.a. is hereby made a condition to the granting, restoration, or continuing validity of any export license, permission, or privilege granted, or to be granted, to Woodbridge. Failure to make timely payment of the civil penalty set forth above shall result in the denial of all of Woodbridge's export privileges for a period of one year from the date of imposition of the penalty.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Woodbridge hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if entered), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in the proposed charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if entered; (c) request any relief from the Order, if entered, including without limitation relief from

the terms of a denial order under 15 C.F.R. § 764.3(a)(2); and (d) seek judicial review or otherwise contest the validity of this Agreement or the Order, if entered.

4. Upon entry of the Order and timely payment of the \$15,000 civil penalty, BIS will not initiate any further administrative proceeding against Woodbridge in connection with any violation of the Act or the Regulations arising out of the transactions identified in the proposed charging letter.

5. BIS will make the proposed charging letter, this Agreement, and the Order, if entered, available to the public.

6. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

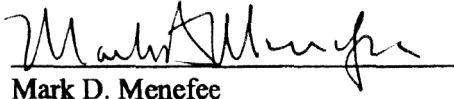
7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if entered, nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the United States Government with respect to the facts and circumstances addressed herein.

8. This Agreement shall become binding on BIS only if the Assistant Secretary of Commerce for Export Enforcement approves it by entering the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

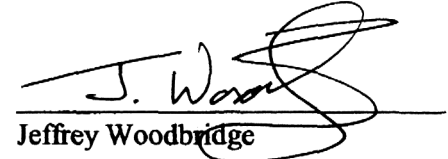
9. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind his respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY
U.S. DEPARTMENT OF COMMERCE

JEFFREY WOODBRIDGE



Mark D. Menefee
Director
Office of Export Enforcement



Jeffrey Woodbridge

Date: 1/28/04

Date: 12/1/04

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:)
)
Jeffrey Woodbridge)
59 High Street)
Minister)
Ramsgate)
Kent, England CT124AB,)
)
Respondent.)

ORDER

The Bureau of Industry and Security, United States Department of Commerce (“BIS”) notified Jeffrey Woodbridge, General Manager of Sigma Enterprises Ltd., (“Woodbridge”), of its intention to initiate an administrative proceeding against Woodbridge in his individual capacity, pursuant to Section 766.3 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2003)) (“Regulations”),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (“Act”),² based on the proposed charging letter issued to Woodbridge that alleged that Woodbridge committed two violations of the Regulations. Specifically, the charges are:

1. *One Violation of 15 C.F.R. § 764.2(d) - Conspiracy to Violate the Export Administration Regulations: Beginning in or about September 2001 and*

¹ The violations charged occurred in 2001 and 2002. The Regulations governing the violations at issue are found in 15 C.F.R. Parts 730-774 (2001-2002). The 2003 Regulations establish the procedures that apply to this matter.

² Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended by the Notice of August 7, 2003 (68 *Fed. Reg.* 47833, August 11, 2003), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (2000)).

continuing through in or about June 2002, Woodbridge, General Manager of Sigma Enterprises Ltd., conspired and acted in concert with others, known and unknown, to violate the Regulations. The purpose of the conspiracy was to export spare parts for hydraulic shears, items subject to the Regulations, from the United States to Libya without prior authorization from BIS as required by Section 746.4 of the Regulations. To accomplish the conspiracy, the conspirators, including Woodbridge, participated in a scheme to buy parts for hydraulic shears from the U.S. manufacturer and then to export the parts from the United States through the United Kingdom and Germany to their ultimate destination in Libya.

2. *One Violation of 15 C.F.R. § 764.2(h) – Actions to Evade the Export Administration Regulations Requirements for Exports to Libya:* In connection with conspiracy referenced above, from in or about September 2001 through in or about on June 2002, Woodbridge, General Manager of Sigma Enterprises Ltd., took actions to evade the Regulations. Specifically, Woodbridge enlisted and paid a co-conspirator in Florida a fee to receive the spare parts from the U.S. manufacturer and then to export the spare parts from the United States to Libya through the United Kingdom and Germany. These actions were taken to conceal the ultimate destination of the spare parts.

BIS and Woodbridge having entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein, and the terms of the Settlement Agreement having been approved by me;

IT IS THEREFORE ORDERED:

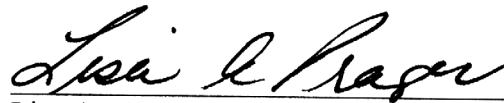
FIRST, that a civil penalty of \$15,000 is assessed against Woodbridge which shall be paid to the U.S. Department of Commerce within 30 days from the date of entry of this Order. Payment shall be made in the manner specified in the attached instructions.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2000)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and, if payment is not made by the due date specified herein, Woodbridge will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the timely payment of the civil penalty set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Woodbridge. Accordingly, if Woodbridge should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of Woodbridge's export privileges for a period of one year from the date of entry of this Order.

FOURTH, that the proposed charging letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.



Lisa A. Prager
Acting Assistant Secretary of Commerce
for Export Enforcement

Entered this 5th day of February 2004.