

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

In the Matter of:

Online Micro, LLC
215 E. Baker Street
Costa Mesa, CA 92626

Respondent

ORDER RELATING TO ONLINE MICRO, LLC

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Online Micro, LLC, of Costa Mesa, CA (“Online Micro”), of its intention to initiate an administrative proceeding against Online Micro pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (the “Act”),² through the issuance of a Proposed Charging Letter to Online Micro that alleges that Online Micro committed four violations of the Regulations. Specifically, the charges are:

Charge 1 15 C.F.R. § 764.2(d) – Conspiracy

Beginning on or about November 9, 2009, and continuing through in or around December, 2010, Online Micro, LLC (“Online Micro”) conspired or acted in concert with others, known and unknown, to bring about or to take actions that constituted a violation

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2011). The charged violations occurred between 2009-2010. The Regulations governing the violations at issue are found in the 2009-10 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2011 Regulations set forth the procedures that apply to this matter.

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)), which has been extended by successive Presidential Notices, the most recent being that of August 12, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*).

of the Regulations. The purpose of the conspiracy was to bring about the export of U.S.-origin computer equipment, items subject to the Regulations and the Iranian Transaction Regulations (“ITR”),³ classified under Export Control Classification Number (“ECCN”) 5A992, controlled for anti-terrorism reasons and valued at approximately \$1.9 million, from the United States to Iran, through the United Arab Emirates (“UAE”), without the required U.S. Government authorization. Pursuant to Section 560.204 of the ITR, which are administered by the Department of the Treasury’s Office of Foreign Assets Control (“OFAC”), an export to a third country intended for transshipment to Iran is a transaction that requires OFAC authorization. Pursuant to Section 746.7 of the Regulations, no person may engage in the exportation of an item subject to both the Regulations and the ITR without authorization from OFAC.

Online Micro sold the computer equipment and exported it from the United States to Iran, via the UAE, without OFAC authorization. Online Micro forwarded the items to a co-conspirator in the UAE, whose business consisted of the purchase of U.S.-origin computer equipment from suppliers in the United States, such as Online Micro, on behalf of Iranian customers. In addition, Online Micro, through one of its three owners, Massoud Habibion, a/k/a Matt Habibion, a/k/a Matt Habi (“Habibion”), knew that one of their co-conspirators resided in Tehran, Iran, and was engaging in business with Online Micro from Tehran.

Online Micro knew that exports to Iran, including specifically exports transshipped through the UAE, required a license because, *inter alia*, BIS Special Agents conducted outreach visits to Online Micro in March 2007 and January 2010. Online Micro participated in and furthered the conspiracy described herein despite this knowledge.

In so doing, Online Micro committed one violation of Section 764.2(d) of the Regulations.

Charges 2-4 15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation

As further detailed in the Schedule of Violations attached hereto and incorporated herein by reference, on three occasions, between on or about November 11, 2009, and on or about May 15, 2010, Online Micro, LLC (“Online Micro”) sold and forwarded items subject to the Regulations from the United States to Iran, via the UAE, with knowledge that a violation of the Regulations was about or intended to occur in connection with the items. Specifically, on these three occasions, Online Micro sold and forwarded U.S.-origin computer equipment, items subject to the Regulations and the Iranian Transactions Regulations (“ITR”),⁴ classified under ECCN 5A992, and controlled for anti-terrorism reasons, from the United States to Iran, through the UAE, without the required U.S.

³ 31 C.F.R. Part 560 (2009-2010).

⁴ 31 C.F.R. Part 560 (2009-2010).

Government authorization. Pursuant to Section 560.204 of the ITR, which are administered by OFAC, an export to a third country intended for transshipment to Iran is a transaction that requires OFAC authorization. Pursuant to Section 746.7 of the Regulations, no person may engage in the exportation of an item subject to both the Regulations and the ITR without authorization from OFAC.

Online Micro knew that exports to Iran, including specifically exports transshipped through the UAE, required a license because, *inter alia*, BIS Special Agents conducted outreach visits to Online Micro in March 2007 and January 2010. Online Micro also knew that the U.S.-origin computer equipment it sold and forwarded it from the United States to the UAE was being transshipped through the UAE to Iran, because, *inter alia*, Online Micro, through one of its three owners, Massoud Habibion, a/k/a Matt Habibion, a/k/a Matt Habi (“Habibion”), knew that one of its customer resided in Tehran, Iran, and was engaging in business with Online Micro from Tehran, Iran. Nonetheless, Online Micro sold and forwarded the items for export to Iran, via the UAE, without seeking or obtaining U.S. Government authorization for the export transactions described herein.

In so doing, Online Micro committed three violations of Section 764.2(e) of the Regulations.

WHEREAS, BIS and Online Micro have 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

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, that for a period of ten (10) years from the date of this Order, Online Micro, with a last known address of 215 E. Baker Street, Costa Mesa, CA 92626, and acting for or on its behalf, its successors, assigns, directors, officers, employees, representatives, or agents (hereinafter collectively referred to as “Denied Person”), may not, directly or indirectly, participate in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as “item”) exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

- A. Applying for, obtaining, or using any license, License Exception, or export control document;
- B. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations; or
- C. Benefitting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations.

SECOND, that no person may, directly or indirectly, do any of the following:

- A. Export or reexport to or on behalf of the Denied Person any item subject to the Regulations;
- B. Take any action that facilitates the acquisition or attempted acquisition by the Denied Person of the ownership, possession, or control of any item subject to the Regulations that has been or will be exported from the United States, including financing or other support activities related to a transaction whereby the Denied Person acquires or attempts to acquire such ownership, possession or control;
- C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from the Denied Person of any item subject to the Regulations that has been exported from the United States;

- D. Obtain from the Denied Person in the United States any item subject to the Regulations with knowledge or reason to know that the item will be, or is intended to be, exported from the United States; or
- E. Engage in any transaction to service any item subject to the Regulations that has been or will be exported from the United States and which is owned, possessed or controlled by the Denied Person, or service any item, of whatever origin, that is owned, possessed or controlled by the Denied Person if such service involves the use of any item subject to the Regulations that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

THIRD, that, after notice and opportunity for comment as provided in Section 766.23 of the Regulations, any person, firm, corporation, or business organization related to the Denied Person by affiliation, ownership, control, or position of responsibility in the conduct of trade or related services may also be made subject to the provisions of the Order.

FOURTH, that, as authorized by Section 766.18(c) of the Regulations, the ten-year denial period set forth above shall be suspended, and shall thereafter be waived at the conclusion of the ten-year denial period, provided that Online Micro has complied with the plea agreement and any sentence imposed upon or following the entry of its plea and conviction and has committed no other violation of the Act or any regulation, order, license or authorization issued thereunder during the ten-year denial period. If Online Micro does not comply with the plea agreement and any sentence imposed upon or following the entry of its plea and conviction, the suspension may be modified or revoked

by BIS and a denial order including a ten-year denial period activated against Online
Micro.

FIFTH, 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.

A handwritten signature in black ink, appearing to read 'David W. Mills', is written over a horizontal line. The signature is stylized and cursive.

David W. Mills
Assistant Secretary of Commerce
for Export Enforcement

Issued this 22nd day of February, 2012.

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

In the Matter of:

Online Micro, LLC
215 E. Baker Street
Costa Mesa, CA 92626

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Online Micro, LLC, of Costa Mesa, CA (“Online Micro”), and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”),¹ issued pursuant to the Export Administration Act of 1979, as amended (the “Act”).²

WHEREAS, BIS has notified Online Micro of its intentions to initiate an administrative proceeding against Online Micro, pursuant to the Act and the Regulations;

WHEREAS, BIS has issued a Proposed Charging Letter to Online Micro Online Micro that alleges that Online Micro committed four violations of the Regulations, specifically:

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2011). The charged violations occurred between 2009-2010. The Regulations governing the violations at issue are found in the 2009-10 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2011 Regulations set forth the procedures that apply to this matter.

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)), which has been extended by successive Presidential Notices, the most recent being that of August 12, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*).

Charge 1 15 C.F.R. § 764.2(d) – Conspiracy

Beginning on or about November 9, 2009, and continuing through in or around December, 2010, Online Micro, LLC (“Online Micro”) conspired or acted in concert with others, known and unknown, to bring about or to take actions that constituted a violation of the Regulations. The purpose of the conspiracy was to bring about the export of U.S.-origin computer equipment, items subject to the Regulations and the Iranian Transaction Regulations (“ITR”),³ classified under Export Control Classification Number (“ECCN”) 5A992, controlled for anti-terrorism reasons and valued at approximately \$1.9 million, from the United States to Iran, through the United Arab Emirates (“UAE”), without the required U.S. Government authorization. Pursuant to Section 560.204 of the ITR, which are administered by the Department of the Treasury’s Office of Foreign Assets Control (“OFAC”), an export to a third country intended for transshipment to Iran is a transaction that requires OFAC authorization. Pursuant to Section 746.7 of the Regulations, no person may engage in the exportation of an item subject to both the Regulations and the ITR without authorization from OFAC.

Online Micro sold the computer equipment and exported it from the United States to Iran, via the UAE, without OFAC authorization. Online Micro forwarded the items to a co-conspirator in the UAE, whose business consisted of the purchase of U.S.-origin computer equipment from suppliers in the United States, such as Online Micro, on behalf of Iranian customers. In addition, Online Micro, through one of its three owners, Massoud Habibion, a/k/a Matt Habibion, a/k/a Matt Habi (“Habibion”), knew that one of their co-conspirators resided in Tehran, Iran, and was engaging in business with Online Micro from Tehran.

Online Micro knew that exports to Iran, including specifically exports transshipped through the UAE, required a license because, *inter alia*, BIS Special Agents conducted outreach visits to Online Micro in March 2007 and January 2010. Online Micro participated in and furthered the conspiracy described herein despite this knowledge.

In so doing, Online Micro committed one violation of Section 764.2(d) of the Regulations.

Charges 2-4 15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation

As further detailed in the Schedule of Violations attached hereto and incorporated herein by reference, on three occasions, between on or about November 11, 2009, and on or about May 15, 2010, Online Micro, LLC (“Online Micro”) sold and forwarded items subject to the Regulations from the United States to Iran, via the UAE, with knowledge that a violation of the Regulations was about or intended to occur in connection with the items. Specifically, on these three occasions, Online Micro sold and forwarded U.S.-origin computer equipment, items subject to the Regulations and the Iranian Transactions Regulations (“ITR”),⁴ classified under ECCN 5A992, and controlled for anti-terrorism reasons, from the United States to Iran, through the

³ 31 C.F.R. Part 560 (2009-2010).

⁴ 31 C.F.R. Part 560 (2009-2010).

UAE, without the required U.S. Government authorization. Pursuant to Section 560.204 of the ITR, which are administered by OFAC, an export to a third country intended for transshipment to Iran is a transaction that requires OFAC authorization. Pursuant to Section 746.7 of the Regulations, no person may engage in the exportation of an item subject to both the Regulations and the ITR without authorization from OFAC.

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In so doing, Online Micro committed three violations of Section 764.2(e) of the Regulations.

WHEREAS, Online Micro has reviewed the Proposed Charging Letter and is aware of the allegations made against it and the administrative sanctions that could be imposed against it if the allegations are found to be true;

WHEREAS, Online Micro fully understands the terms of this Agreement and the Order ("Order") that the Assistant Secretary of Commerce for Export Enforcement will issue if he approves this Agreement as the final resolution of this matter;

WHEREAS, Online Micro enters into this Agreement voluntarily and with full knowledge of its rights, after having consulted with counsel;

WHEREAS, the Parties enter into this Agreement having taken into consideration a plea agreement entered by Online Micro in the U.S. District Court for the District of Columbia;

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

WHEREAS, Online Micro wishes to settle and dispose of all matters alleged in the Proposed Charging Letter by entering into this Agreement; and

WHEREAS, Online Micro agrees to be bound by the Order, if issued;

NOW THEREFORE, the Parties hereby agree, for purposes of this Settlement Agreement, as follows:

1. BIS has jurisdiction over Online Micro, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. Online Micro admits the allegations contained in the Proposed Charging Letter;

3. The following sanctions shall be imposed against Online Micro in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:

a. For a period of ten (10) years from the date of the Order, Online Micro, with a last known address of 215 E. Baker Street, Costa Mesa, CA 92626, and when acting for or on its behalf, its successors, assigns, directors, officers, employees, representatives, or agents (hereinafter collectively referred to as "Denied Person"), may not, directly or indirectly, participate in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

i. Applying for, obtaining, or using any license, License Exception, or export control document;

ii. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction

involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations; or

iii. Benefitting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations.

b. BIS agrees that, as authorized by Section 766.18(c) of the Regulations, the ten-year denial period set forth in Paragraph 3.a shall be suspended, and shall thereafter be waived at the conclusion of the ten-year denial period, provided that Online Micro has complied with the plea agreement and any sentence imposed upon or following the entry of its plea and conviction, and has committed no other violation of the Act or any regulation, order, license or authorization issued thereunder during the ten-year denial period. If Online Micro does not comply with the plea agreement and sentence, or commits a violation of the Act or any regulation, order, license or authorization issued thereunder, during the ten-year probationary period under the Order, the suspension may be modified or revoked by BIS and a denial order including a ten-year denial period activated against Online Micro.

4. Subject to the approval of this Agreement pursuant to Paragraph 8 hereof, Online Micro 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 issued), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Online Micro also waives and will not assert any Statute of Limitations defense, and the

Statute of Limitations will be tolled, in connection with any violation of the Act or the Regulations arising out of the transactions identified in the Proposed Charging Letter or in connection with collection of the civil penalty or enforcement of this Agreement and the Order, if issued, from the date of the Order until the later of the date Online Micro has complied with the plea agreement and any sentence imposed upon or following the entry of its plea and conviction.

5. BIS agrees that upon compliance with the plea agreement and any sentence imposed upon or following the entry of its plea and conviction, BIS will not initiate any further administrative proceeding against Online Micro in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

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 issued; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

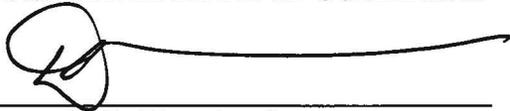
8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by issuing the Order, which will

have the same force and effect as a decision and order issued after a full administrative hearing on the record.

9. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

10. 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.

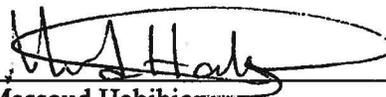
BUREAU OF INDUSTRY AND
SECURITY
U.S. DEPARTMENT OF COMMERCE



Douglas R. Hassebrock
Director of Export Enforcement

Date: 2/16/2012

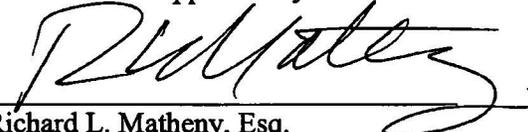
ONLINE MICRO, LLC



Massoud Habibion,
a/k/a Matt Habibion, a/k/a Matt Habi
Managing Director

Date: 02/16/2012

Reviewed and approved by:



Richard L. Matheny, Esq.
John Moustakas, Esq.
Goodwin Procter, LLP
Counsels for Online Micro, LLC

Date: 2/16/12

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Online Micro, LLC
215 E. Baker Street
Costa Mesa, CA 92626

Attention: Massoud Habibion, a/k/a Matt Habibion, a/k/a Matt Habi
Mohsen Motamedian, a/k/a Max Motamedian, a/k/a Max Ehsan
Fred Ladjavardi
Managing Directors

Dear Messieurs Habibion, Motamedian and Ladjavardi:

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Online Micro LLC, of Costa Mesa, California (“Online Micro”), has committed four violations of the Export Administration Regulations (the “Regulations”),¹ which are issued under the authority of the Export Administration Act of 1979, as amended (the “Act”).² Specifically, BIS alleges that Online Micro committed the following violations:

Charge 1 15 C.F.R. § 764.2(d) – Conspiracy

Beginning on or about November 9, 2009, and continuing through in or around December, 2010, Online Micro, LLC (“Online Micro”) conspired or acted in concert with others, known and unknown, to bring about or to take actions that constituted a violation of the Regulations. The purpose of the conspiracy was to bring about the export of U.S.-origin computer equipment, items subject to the Regulations and the Iranian Transaction Regulations (“ITR”),³ classified under Export Control Classification Number (“ECCN”) 5A992, controlled for anti-terrorism reasons and valued at approximately \$1.9 million, from the United States to Iran, through the United Arab Emirates (“UAE”), without the required U.S. Government authorization. Pursuant to Section 560.204 of the ITR, which are administered by the Department of the Treasury’s Office of Foreign Assets Control

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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)), which has been extended by successive Presidential Notices, the most recent being that of August 12, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*).

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(“OFAC”), an export to a third country intended for transshipment to Iran is a transaction that requires OFAC authorization. Pursuant to Section 746.7 of the Regulations, no person may engage in the exportation of an item subject to both the Regulations and the ITR without authorization from OFAC.

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Online Micro knew that exports to Iran, including specifically exports transshipped through the UAE, required a license because, *inter alia*, BIS Special Agents conducted outreach visits to Online Micro in March 2007 and January 2010. Online Micro participated in and furthered the conspiracy described herein despite this knowledge.

In so doing, Online Micro committed one violation of Section 764.2(d) of the Regulations.

Charges 2-4 15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation

As further detailed in the Schedule of Violations attached hereto and incorporated herein by reference, on three occasions, between on or about November 11, 2009, and on or about May 15, 2010, Online Micro, LLC (“Online Micro”) sold and forwarded items subject to the Regulations from the United States to Iran, via the UAE, with knowledge that a violation of the Regulations was about or intended to occur in connection with the items. Specifically, on these three occasions, Online Micro sold and forwarded U.S.-origin computer equipment, items subject to the Regulations and the Iranian Transactions Regulations (“ITR”),⁴ classified under ECCN 5A992, and controlled for anti-terrorism reasons, from the United States to Iran, through the UAE, without the required U.S. Government authorization. Pursuant to Section 560.204 of the ITR, which are administered by OFAC, an export to a third country intended for transshipment to Iran is a transaction that requires OFAC authorization. Pursuant to Section 746.7 of the Regulations, no person may engage in the exportation of an item subject to both the Regulations and the ITR without authorization from OFAC.

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In so doing, Online Micro committed three violations of Section 764.2(e) of the Regulations.

* * * * *

Accordingly, Online Micro is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions and any other liability sanction or penalty available under law, including, but not limited to any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of \$250,000 per violation, or twice the value of the transaction that is the basis of the violation;⁵
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

If Online Micro 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. *See* 15 C.F.R. §§ 766.6 and 766.7. If Online Micro defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Online Micro. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter.

Online Micro is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. *See* 15 C.F.R. § 766.6. Online Micro is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. *See* 15 C.F.R. §§ 766.3(a) and 766.4.

⁵ *See* International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should Online Micro have a proposal to settle this case, Online Micro should transmit it to the attorney representing BIS named below.

Online Micro is further notified that under the Small Business Regulatory Enforcement Flexibility Act, Online Micro may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter. To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, Online Micro'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 Online Micro's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Adrienne Frazier, Esq.
Room H-3839
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Adrienne Frazier is the attorney representing BIS in this case; any communications that Online Micro may wish to have concerning this matter should occur through her. Ms. Frazier may be contacted by telephone at (202) 482-5301.

Sincerely,

Douglas R. Hassebrock
Director
Office of Export Enforcement

Schedule of Violations

Charge	Export Date	Destination	Item	ECCN
2	11/11/09	Iran	computers and accessories	5A992
3	04/09/10	Iran	computers and accessories	5A992
4	05/15/10	Iran	computers and accessories	5A992