



Global Watch[®]

THE NEWSLETTER OF THE INTERNATIONAL IMPORT-EXPORT INSTITUTE
19820 NORTH 7TH STREET, SUITE 100, PHOENIX, ARIZONA USA 85024

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Dunlap Stone University Tuition Remains Among Lowest in Nation

Dunlap-Stone University, recognized worldwide for its regulatory trade compliance law education programs for the U.S. and other countries, announced that it will not raise student tuition during the 2012-2013 school year. This is the third year in a row tuition has not been raised. "I am pleased that we have maintained costs and are not raising student tuition this year," said Dunlap-Stone's president, Dr. Donald Burton. He said there was much discussion about tuition rates before reaching that decision.

The fact that Dunlap-Stone is the market leader, being the only accredited university in the U.S. that offers degrees and extensive educational programs in U.S. and other countries' regulatory trade compliance laws arguably makes the school able

to charge more for its courses and degrees—premium pricing, experts agree. In considering the increase in tuition, management focused on the educational value the school offers and it's alignment with the school's mission. It determined the only reason to increase tuition was if the school was not performing adequately, which is not the case. The "profit skimming" strategy common in many industries, and favored by some schools having issues with the U.S. Department of Education, suggests that because the school has no real competition and considering the classes it offers are in high demand and that it alone offers them that it could charge much more for its educational programs. All that is true. The school's decision, however,

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Trade Compliance Education & Training in High Demand

Many students attend the International Import-Export Institute at Dunlap-Stone University because they work in regulatory compliance areas within large aerospace and defense organizations or within the global supply chain. They come seeking to gain practical knowledge to help advance in their careers. Others seek training to aid in preparing for an industry certification exam such as the Certified U.S. Export Compliance Officer[®] (CUSECO) or the Certified ITAR Professional[®] designations. Still others come because they want to begin a career in international trade and are looking for the practical skills they need to begin their journey, or simply because the school has

a reputation as the premier online university for people wanting to learn how to move goods and services between nations. Whatever the reason given, the bedrock of the school's value is here to greet them—student centered learning, professionally significant degrees[®], and friendly professional staff and faculty that care about helping students achieve their training & educational goals. Added to this strong foundation, all of the compliance related courses and programs offered at the school have one thing in common: they are intended to provide practical, relevant up-to-date knowledge that help students

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John Priecko Complaints against DSU Dismissed with Prejudice

During its regularly scheduled meeting August 23, 2012, the Arizona Board for Private Postsecondary Education, the state agency that licenses Dunlap-Stone University (DSU), dismissed Complaint # 11-NS007 against DSU made public by Mr. John Priecko of Manassas Park, Virginia. The Board determined allegations made by Mr. Priecko in the complaint

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Notes from the President

Offering Wide Appeal

by *Dr. Donald N. Burton*



It is always surprising to me how many topics are covered in a single issue of GlobalWatch®. This issue is no different. There is information about the university and the fact we have maintained one of the nation's lowest tuition rates for more than three years, a cost comparable to what many universities charged in the 1980s. (See article page 1) Also on the front page is an article about the high demand for compliance training and why. That explains why the university is seeing the huge influx of new students from new companies.

On page 3 there is an article entitled "Career Enhancing Courses are just what their Employer paid for" that should get some employers' attention. As the article points out, it's great when education becomes win-win for both the employee and employer. As usual our columns for BIS and DDTC show the latest fines and penalties incurred for violations of the regulations. (See pages 4 & 5) Answering questions about how "Consent Agreements" work is explored in a short article on page 5. Perhaps one of the most difficult compliance issues is whether the regulations you work

with—the reference material—is current? The In-Compliance column will help you ensure they are.

The school has gotten a lot of interest from attorneys and law schools and their students lately regarding our regulatory trade law related courses, now numbering nearly 50. The article on page 11 addresses the employment outlook for compliance professionals.

To those who will be sitting for the U.S. Government's Licensed Custom Broker Exam October 1st, we invite you to download a slide show to help you prepare for the test. It's FREE (See notice on top of page 13)

If you or someone you know would like to teach for the university in existing or new programs, or perhaps help develop courses, read the article on Page 14.

When I see the list of upcoming courses we offer (See page 14), I always smile. It wasn't too long ago that we offered a small fraction of that number. Now we offer dozens every month and more are on the way.

Thank you for your continued strong support. Be well.



Discover why training to become a Certified U.S. Export Compliance Officer® is important to all U.S. aerospace & defense contractors and their trade compliance personnel.

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Career Enhancing Courses are just what their Employer Paid for

International trade professionals in companies worldwide appreciate that the career enhancing courses available at Dunlap-Stone University (DSU) also fill general degree and elective course requirements. That enables companies to support both employee's education needs and the need to bring critical skills and knowledge into the organization.

Aerospace and defense industry members who need to finish their college degree have discovered elective courses at DSU are very relevant to their jobs. Accredited courses such as Empowered Official Essentials, Contemporary Management and Leadership are popular because, although they meet the school's degree requirements, they also provide much needed trade compliance knowledge and skills, skills that benefit the company and help individuals advance their careers.

A historical review of reasons why students drop out of college shows they don't see the relevance of the typical courses they are required to take to their daily lives and career. DSU's students are just the opposite. They are generally just as excited about enrolling in elective courses as they are their degree major courses.

Like all accredited universities, DSU is required to provide a well rounded education in its degree programs. That includes humanities, social sciences and STM—Science, Technology and Mathematics courses and more. What is uniquely different about DSU's course offerings is that in alignment with its

Mission statement, courses and classroom experiences are developed with an emphasis on making courses relevant to student lives—their interests, career path, employer's needs or personal life. Being relevant to students' lives means that students enjoy the learning experience, they are engaged and therefore retain the knowledge they learn. It also makes the online classroom experience an extremely positive learning environment for everyone. It all builds toward the student's future.

Nearly all of DSU's students have their tuition paid by their employer. The reason for this high percentage is every course offered by DSU has clearly stated learning objectives. Employers can see the deliverables their employees will be learning. Every course is built with defined learning outcomes that students should possess upon completion of the course. In short, employers see what skills and knowledge they are buying when they approve their employee to enroll in courses. Students know up-front what they are expected to walk away with from the experience.

Question: Is the education provided by DSU vocational training? No. It's much more than that as explained in a Chronicle of Higher Education article about the school's International Import-Export Institute. It cites the school's model as an example of the future of education and that it breaks the monopoly on what a college can be. According to DSU's creed, learning must be relevant to the human experience. It must connect people through educa-

tion to careers that can sustain their lives. Whether a course is intended to provide a student with a well-rounded educational viewpoint by exposing them to liberal arts, science, math or technology, every DSU course must connect the student to ideas that enliven the human experience and thus become part of them.

About Dunlap-Stone University

Dunlap-Stone University is a premier private online university. The Phoenix Arizona based university is nationally accredited by the Accrediting Commission of the Distance Education and Training Council (DETC). DETC is recognized by the Council for Higher Education Accreditation and by the U.S. Department of Education as a nationally recognized accrediting agency. DSU offers an accredited Bachelor of Science degree in International Trade Management with three potential emphasis areas: Trade Compliance Management; Global Supply Chain Management, and Management.

Link to article in Chronicle of Higher Education

<http://chronicle.com/blogs/innovations/for-profit-colleges-on-the-brink-part-4/28299>



**Have you visited the
DSU Online Store**

Go to:

<http://www.dunlap-stone.edu/store/>

It's new and growing



BIS Update

Bureau of Industry and Security

California Man Pleads Guilty To Attempting To Illegally Export Missile Components To Iran

CHICAGO – A California man pleaded guilty in Federal Court to a felony charge stemming from his efforts to illegally export missile components from the United States to Iran, via the United Arab Emirates. The defendant, **Andro Telemi**, 42, of Sun Valley, Calif., pleaded guilty to one count of attempting to export defense articles on the U.S. Munitions List from the United States without a license or approval from the U.S. Department of State in violation of the Arms Export Control Act.

Telemi faces a maximum penalty of 20 years in prison a \$250,000 fine. Telemi pleaded guilty without entering into a plea agreement with the government.

Telemi, a naturalized U.S. citizen from Iran, also known as “Andre Telimi,” and “Andre Telemi,” was indicted in December 2009, along with co-defendant **Davoud Baniameri**, 39, of Woodland Hills, Calif. A superseding indictment in July 2010 charged Baniameri, Telemi and a third defendant, **Syed Majid Mousavi**, an Iranian citizen living in Iran. Baniameri pleaded guilty last year and was sentenced to 51 months in federal prison. Mousavi, also known as “Majid Moosavy,” remains a fugitive and is believed to be in Iran.

According to Telemi’s guilty plea and court records, sometime before

Iran - Continued on page 10

BIS Website Solicitation

As a service to our exporters, the Bureau of Industry and Security (BIS) has established a webpage where sources of publicly available information on Commodity Classifications can be found. We invite companies to participate in this opportunity by providing information on where Commodity Classification information related to your products may be obtained.

We are taking this action to enhance procedural transparency in the licensing process and to help exporters comply with U.S. export and reexport control laws. Please be advised that any company information posted to the webpage is for informational purposes only and does not signify any additional obligations under the EAR. BIS will not validate or be responsible for the accuracy of the classification information, and inclusion on the webpage does not denote BIS endorsement of any company, its employees, or its products or services.

CLASSIFICATION INFORMATION TABLE

If your company currently has, or plans to have, Commodity Classification information available on your company’s website, or an export control point of contact, and you would like this information to be accessible via the BIS website, please contact CommodityClassifications@bis.doc.gov.

In your email, provide any of the following information you would like to be posted on the BIS website:

- 1) Company name
- 2) General description of the products/services
- 3) Commodity classification information website address
- 4) Export control point of contact (may be a general telephone number or email address)

Source: www.bis.doc.gov/commodityclassificationpage.htm

Experienced Healthcare Instructors Needed

See article on Page 14 for more information

DDTC

Directorate of Defense Trade Controls

Update**United Technologies Entered
\$55m Consent Agreement**

The Directorate of Defense Trade Controls, Bureau of Political-Military Affairs, United States Department of State (“Department”), has notified **United Technologies Corporation** of its intent to initiate an administrative proceeding against it pursuant to section 38 of the Arms Export Control Act, as amended, (the “AECA”) (22 U.S.C. 2778), and its implementing regulations, the International Traffic in Arms Regulations (22 C.F.R. Parts 120-130) (the “ITAR”); The proposed charges are based on al-

legations that the Respondent violated section 38 of the AECA and Parts 123, 126, and 127 of the ITAR in connection with the unauthorized export and transfer of defense articles, to include technical data, the unauthorized provision of defense services to various countries, including proscribed destinations, and violations related to the management of Department- authorized agreements;

UTC shall pay in fines and in remedial compliance measures a civil penalty of fifty-five million dollars (\$55,000,000) comprised of the amounts and payable, as stipulated below, in complete settlement of the

UTC- Continued on page 7

**\$2 Million Consent Agreement Reached
in FCPA Alleged Violation**

WASHINGTON- The NORDAM Group Inc., a provider of aircraft maintenance, repair and overhaul (MRO) services based in Tulsa, Okla., has entered into an agreement with the Department of Justice to pay a \$2 million penalty to resolve violations of the Foreign Corrupt Practices Act (FCPA), announced Assistant Attorney General Lanny A. Breuer of the Justice Department’s Criminal Division.

According to the agreement, NORDAM, its subsidiaries and affiliates paid bribes to employees of airlines created, controlled and exclusively owned by the People’s Republic of China in order to secure contracts to perform MRO services for those airlines. The bribes were

paid both directly and indirectly to the airline employees. In an effort to disguise the bribes, three employees of NORDAM’s affiliate entered into sales representation agreements with fictitious entities and then used the money paid by NORDAM to those entities to pay bribes to the airline employees.

In addition to the monetary penalty, NORDAM agreed to cooperate with the department for the three-year term of the agreement, to report periodically to the department concerning NORDAM’s compliance efforts, and to continue to implement an

FCPA - Continued on page 10

**About Consent
Agreements**

Pursuant to 22 CFR §127.10, the Assistant Secretary for Political-Military Affairs is authorized to impose civil penalties for violations of the Arms Export Control Act (AECA) and the International Traffic in Arms Regulations (ITAR). Imposition of civil penalties generally includes the payment of fines to the U.S. Treasury and a Consent Agreement, under which the company is required to institute enhanced compliance measures. The Consent Agreement outlines the measures required to enhance compliance programs. These may include appointment of a Special Compliance Officer (SCO), institution of a policy of denial, debar-

Consent- Continued on page 11

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In Compliance....

Are Your Copies of Ex/Im Regs Up to Date?

Source: Northrop Grumman Corporation's The Ex/Im Daily Update <file:///R:/Shared/NGC%20News/Sept%206%202012.htm>

The official versions of the following regulations are published annually in the U.S. Code of Federal Regulations (C.F.R.), but are updated as amended in the Federal Register. The below list contains the latest change to each regulation.

* **ATF ARMS IMPORT REGULATIONS** (ATF), Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives; 27 CFR Part 447-Importation of Arms, Ammunition, and Implements of War
 - Last Amendment: 2 Oct 08: 73 FR 57239-57242: 27 CFR Parts 447, 478, 479, and 555; Technical Amendments to Regulations in Title 27, Chapter II

- Source: <<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=0624fc9399af9afc346df6f1f00c88df&rgn=div5&view=text&node=27:3.0.1.2.2&idno=27>>

* **CUSTOMS REGULATIONS** (CR): 19 CFR, Ch. 1, Pts. 0-192

- Last Amendment: 6 Sep 2012: 77 FR 54808: 19 CFR Part 4, Vessels in Foreign and Domestic Trades; Correction
 - Source: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=7a725853611431bc58ba37d919f9324b&c=ecfr&tpl=/ecfrbrowse/Title19/19tab_02.tpl>, and other scattered regulations (e.g., 8 CFR Parts 103 and 235)

* **EXPORT ADMINISTRATION REGULATIONS** (EAR): 15 CFR Subtit. B, Ch. VII, Pts. 730-774

- Last Amendments: 2 Aug 12: 77 FR 45927: 15 CFR Part 774; The Commerce Control List; CFR Correction
 - Source: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=ae096b291da9d16eab0b4af95b5d5866&c=ecfr&tpl=/ecfrbrowse/Title15/15cfrv2_02.tpl#700>

* **FOREIGN ASSETS CONTROL REGULATIONS** (OFAC FACR), 31 CFR, Parts 500-599, Embargoes, Sanctions, Executive Orders

- Last Amendment: 8 Feb 12: 77 FR 6463-6465: 31 CFR Parts 543, 546, and 547; Definition of the Term "Financial, Material, or Technological Support" Under the Cote d'Ivoire, Darfur, and Democratic Republic of the Congo Sanctions Regulations
 - Source: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=7512a3e262e688321f54bbe4ee1aff1d&c=ecfr&tpl=/ecfrbrowse/Title31/31cfrv3_02.tpl#500>

* **FOREIGN TRADE REGULATIONS** (FTR): 15 CFR Part 30

- Last Amendment: 20 Mar 12: 77 FR 16170: 31 CFR Part 560; Iranian Transactions Regulations
 - Source: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=e04a50b601e3e05b3a1e870e3843b757&tpl=/ecfrbrowse/Title15/15cfr30_main_02.tpl>

* **HARMONIZED TARIFF SCHEDULE OF THE UNITED STATES** (HTS, HTSA or HTSUSA), 2012: 19 USC 1202 Annex. ("HTS" and "HTSA" are often seen as abbreviations for the Harmonized Tariff Schedule of the United States Annotated, shortened versions of "HTSUSA".)

- Last Amendment: 1 July 2012: Supplement 1 of the 2012 Harmonized Tariff Schedule is released effective July 1.
 - Source: <<http://www.usitc.gov/tata/hts>>.

* **INTERNATIONAL TRAFFIC IN ARMS REGULATIONS** (ITAR) 22 C.F.R. Ch. I, Subch. M, Pts. 120-130

- Latest Amendment: 3 July 2012, 77 FR 39392: 22 CFR Part 126.1(u); Removal of Yemen from presumed denial country list.
 - Source: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=6c0d30f40ed2aac29b20e86ead3a8861&c=ecfr&tpl=/ecfrbrowse/Title22/22cfrv1_02.tpl>, and scroll down to "SUBCHAPTER M". DDTC publishes a version at <http://www.pmdtct.state.gov/regulations_laws/itar_consolidated.html>. Printed copies of the ITAR (latest update July 2012) in several sizes are available for purchase from SIA at <<http://www.siaed.org/en/catalogs/search.asp>>. "The Annotated ITAR" (latest update 4 Sep 2012), a reprint of ITAR plus practice commentaries, summaries, Arms Export Control Act, and a robust Index, is available in Word and pdf formats, free upon request from author Jim Bartlett at JEBartlett@JEBartlett.com.



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UTC- *Continued from page 5*

civil violations contained in the Department’s Proposed Charging Letter and other information identified in the Consent Agreement.

UTC to pay thirty-five million dollars (\$35,000,000) of the fifty-five million dollars (\$55,000,000) through five (5) installments. Seven million dollars (\$7,000,000) of this civil penalty shall be paid to the Department within ten (10) days of signing of the Order, and seven million dollars (\$7,000,000) is to be paid within one year from the date of the Order and then on each of the second, third, and fourth anniversaries of the date of the Order. Such payments to be made by cashier’s or certified check payable to the Department of State.

Five million dollars (\$5,000,000) of the fifty-five million dollar (\$55,000,000) penalty referenced above will be suspended on the condition that UTC has applied this amount to self-initiated, pre-Consent Agreement remedial compliance measures, determined as set forth in paragraph (20)(b) of the Consent Agreement. Fifteen million dollars (\$15,000,000) of the fifty-five million dollar (\$55,000,000) penalty

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will be suspended on the condition that Respondent applies this amount to remedial compliance measures over the four (4) 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.

Any failure by UTC to apply suspended penalty funds appropriately for remedial compliance measures or provide satisfactory accounting shall result in the Respondent being required to pay within ten (10) days of the conclusion of the term of the Consent Agreement to the Department the amount specified, less credit for amounts the Department

Source :www.pmdtcc.state.gov/

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Tuition *Continued from page 1*

was put in perspective by Dr. Burton, “As a school, first and foremost we exist to help educate students with our Professionally Significant Degrees® and programs. Profits are not our mission—education is. Profits are the results—the score card—of successfully achieving our mission and satisfying our customers.” Dr. Burton then added, “Profits are very important. But we look at it differently. We strive foremost to provide superior online education programs available anytime and anywhere that are of such high quality that students and their employers are willing to reward us with superior profits.” Judging by the school’s customer list that continues to grow, Dunlap-Stone’s customers are pleased and the school is being rewarded for its efforts. As a comparison, Dunlap-Stone’s tuition ranks the school in the first quartile (lowest) among public and private, non-profit and for-profit postsecondary education institutions throughout the U.S. The current four-year tuition for a bachelor degree from Dunlap-Stone University is less than \$40,000. Veterans of any era and military service members and their family member’s four-year tuition is less than \$30,000, which is comparable to tuition rates at many schools during the early 1980s. Compared to many other for-profit online degree programs today, Dunlap-Stone is nearly half the cost. Employers appreciate the savings. Nearly 94 percent of all Dunlap-Stone University students’ tuition is paid by their employer.



Country Profile

Jamaica

An island nation discovered by Christopher COLUMBUS in 1494, Jamaica is comprised of 10,991 sq km of land, slightly smaller than Connecticut, is located in the Gulf of Mexico, a strategic location between Cayman Trench and Jamaica Channel, the main sea lanes for the Panama Canal. It is mostly mountains, with narrow, discontinuous coastal plain and its climate is tropical; hot, and humid; with a temperate interior.



Jamaica gradually increased its independence from Britain. In 1958 it joined other British Caribbean colonies in forming the Federation of the West Indies. It gained full independence when it withdrew from the Federation in 1962. The Jamaican economy is heavily dependent on services, which now account for nearly 65% of GDP. The country continues to derive most of its foreign exchange

from tourism, remittances, and bauxite/alumina. Tourism revenues account for roughly 10% of GDP, and both arrivals and revenues grew in 2010, up 4% and 6% respectively. Jamaica's economy faces many

challenges to growth: high crime and corruption, large-scale unemployment and underemployment. Despite the improvement, debt servicing costs still hinder the government's ability to spend on infrastructure and social programs, particularly as job losses rise in a shrinking economy. The SIMPSON-MILLER administration faces the difficult prospect of having to achieve fiscal discipline in order to maintain debt payments, while simultaneously attacking a serious crime problem that is hampering economic growth. High unemployment exacerbates the crime problem, including gang violence that is fueled by the drug trade. Jamaica has increasing access to the Internet, which opens the country to greater participation in global commerce.



Jamaica at a Glance

GDP (purchasing power parity): \$25.07 billion (2011 est.)

GDP - real growth rate: 1.5% (2011 est.)

GDP - per capita (PPP): \$9,100 (2011 est.)

GDP - composition by sector:
 agriculture: 5.8%
 industry: 29.5%
 services: 64.7% (2011 est.)

Labor force: 1.324 million (2011 est.)

Unemployment rate: 12.7% (2011 est.)

Inflation rate (consumer prices): 7.5% (2011 est.)

Industries: tourism, bauxite/alumina, agro processing, light manufactures, rum, cement, metal, paper, chemical products, telecommunications

Exports: \$1.613 billion (2011 est.)

Exports - commodities: alumina, bauxite, sugar, rum, coffee, yams, beverages, chemicals, wearing apparel, mineral fuels

Exports - partners: US 37%, Canada 18.1%, Netherlands 7.3%, UK 5.4%, Norway 4.3% (2011)

Imports: \$6.292 billion (2011 est.)

Imports - commodities: food and other consumer goods, industrial supplies, fuel, parts and accessories of capital goods, machinery and transport equipment, construction materials

Imports - partners: US 33.9%, Venezuela 15.5%, Trinidad and Tobago 14.6%, China 6.6% (2011)

Exchange rates: Jamaican dollars (JMD) per US dollar - 86.36 (2011 est.)

Internet country code: .jm

Internet hosts: 3,897 (2010)

Internet users: 1.581 million (2009)

Source: CIA World Fact Book



Strategies for Growth: Exporting Opportunities

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Source: <http://www.sba.gov/content/strategies-growth-exporting-opportunities>

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Customs & Border Protection **About "Audits"**

Audits (Regulatory Audit)

A risk-based approach to assess import compliance with trade laws and regulations. The audit reviews provide a systematic approach to data collection and an analysis of data to determine the likelihood of noncompliance, which includes assessing risks by reviewing corporate controls over trade compliance.

Regulatory Audit Field Offices

Regulatory Audit Field and Branch Offices are responsible for auditing major importers and other entities involved in international trade compliance with laws and regulations governing the importation and exportation of merchandise.

Focused Assessment Program (FA)

A Risk Based Approach to Audit

Quick Response Audits

Quick Response Audits (QRA) are single-issue audits with a narrow focus. QRA is a term used to cover a variety of audits that will have limited objectives as opposed to the complete evaluation of a company's Customs and Border Protection (CBP) activities in the focused assessment program.

Source: http://www.cbp.gov/xp/cgov/trade/trade_programs/audits/

INTERNATIONAL TRADE: **It's all about trade fundamentals**

The world of international trade is changing rapidly, but the fundamentals of international trade haven't changed in thousands of years. It's easy to get caught up in the macro view and events happening in the world and forget the fundamentals of trade.

Adam Smith clearly detailed the issues of supply and demand

Econometrics—

- Scarcity
- Demand – affordability \$\$
- Economies of scale – mass produced – requirements of distribution model

- Emerging nations – demand based on discretionary income affordability
- Shift in demand
- Micro climate – less volume needed in emerging markets. Failure of mass producers to sell into smaller markets.
- Majority fallacy
- Trade fundamentals

Identify need in global marketplace for a product or service
Match product attributes and manufacturing capability to the market needs

Can you meet the demand for the product and support considering marketing's 4-Ps and make a profit?

Demand- *Continued from page 1*

build skill sets that are in-demand in industry today and for many years ahead.

It isn't enough that someone holds a compliance related industry certification to succeed today. That is just the beginning. For example, the CUSECO certification identifies someone who has proven competency in knowing the regulations of U.S. State Department and Department of Commerce. Some companies require that workers in compliance minimally have earned this distinction. But this "ticket" to getting a job is really just the starting point. The certification doesn't address many of the finer knowledge points of being an Empowered Official or in conducting a compliance audit or developing a Technology Control Plan or dozens of other specialized knowledge sets needed in industry today. That is why the school offers nearly 50 trade compliance related online courses.

Those working in trade compliance are often working in a global theatre of trade where their supply chain partners are spread around the globe. Special skill sets are needed as partners interact regularly. Each must know and comply with the other's trade regulations. That is why the university not only offers U.S. regulatory courses but courses for other nations as well, including China, United Kingdom, Canada and Australia. As trade increases and as the regulatory requirements intensify, the university adds new courses, many times at the request of students and organizations. At the heart of every new

compliance-related course our subject matter experts and course designers complete the requirement that the skill sets needed to support & maintain compliance, advance people in careers and help professionals do their job better are built into each and every course. That is what makes our school a valuable asset in helping to make global trade safe. Dunlap-Stone University is proud to be the only university that is able to say it offers Professionally Significant Degrees®.

For more information, call (800) 474-8013 and speak with a compliance enrollment advisor today.

Iran - *Continued from page 4*

Aug. 17, 2009, Baniameri contacted Telemi and requested his assistance in purchasing and exporting to Iran via Dubai 10 connector adapters for the TOW and TOW2 anti-armor missile systems. Telemi agreed and over the next month, they negotiated the purchase of 10 connector adaptors for \$9,450 from a company in Illinois, which unbeknownst to them, was controlled by law enforcement. In September 2009, after Baniameri made a down payment to the Illinois company, he arranged for Telemi to pay the remaining balance and take possession of the connector adaptors in California. Telemi knew that he needed to obtain a license from the U.S. government to export the connector adaptors, and at no time did he or anyone else obtain, or attempt to obtain, such a license.

Source: www.bis.doc.gov

FCPA - *Continued from page 5*

enhanced compliance program and internal controls designed to prevent and detect FCPA violations.

The department entered into a non-prosecution agreement with NORDAM as a result of NORDAM's timely, voluntary and complete disclosure of the conduct, its cooperation with the department and its remedial efforts. In addition, the agreement recognizes that a fine below the standard range under the U.S. Sentencing Guidelines is appropriate because NORDAM fully demonstrated to the department, and an independent accounting expert retained by the department verified, that a fine exceeding \$2 million would substantially jeopardize the company's continued viability.

**GlobalWatch®
Newsletter Notice**

This may be your last GlobalWatch® newsletter. If you have not spoken with us within the last two years, you may soon be deleted from our database. Please call and say "HI" or go to:

<http://iei.dunlap-stone.edu/resources/globalwatch/> and register to be sure you don't miss a single issue.

(800) 474-8013

U.S. Military Family Members Can Receive 25% Military Scholarship

Service Members from all eras, including Vietnam Veterans and their Family Members Qualify*.

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* Certain restrictions and conditions apply. Speak with an Enrollment Advisor for complete details

Attorneys Retool for a Bright Employment Future

Phoenix, AZ (PRBuzz) July 23, 2012 -- Displaced lawyers, victims of downsizing of large law firms and others being impacted by belt tightening within the legal profession, are finding it difficult to find employment in traditional attorney roles, report articles published in the current ABA Journal. Adding to the problem, law schools graduate more than 40,000 new lawyers each year. Recent reports to the U.S. Department of Education show 50% of 2010 and 2011 graduates earning a JD degree did not obtain employment requiring their Juris Doctorate within 9 months of graduation. Christine Barth of Troutman Sanders LLP suggests strongly that law firms must change their marketing approach and organization structure to be more in alignment with market demand. She said, "Overall, my less than scientific poll revealed firms doing more with fewer dollars, but not skimping when it comes to face-to-face client efforts." Firms and individuals are scampering to survive. She suggests lawyers themselves need to

examine their skill sets and marketing approach to differentiate themselves in the job market.

A legal area that is growing rapidly and needing expertise in government and industry is U.S. regulatory trade law, said Dr. Donald Burton, president of Dunlap-Stone University (DSU). "The demand for regulatory trade law knowledge greatly exceeds the supply of trained experts", Dr. Burton said. "Export violations are increasing throughout the global supply chain. Fines and penalties are skyrocketing, costing U.S. firms tens of millions of dollars per offense. Companies need legal experts managing these processes," said Dr. Burton. The problem, he suggested, is that most attorneys don't know of the need and even if they do, they don't know where to gain the knowledge and expertise needed. He admitted that no law schools teach regulatory trade law. He said that it is too difficult and spread across too many government agencies involved for law schools to keep curriculum current as laws change quickly, often daily.

Dr. Burton noted, however, that "Dunlap-Stone University's business school, International Import-Export Institute, is the only accredited U.S. University that offers degrees in this specialty and has nearly 50 accredited courses related to regulatory trade compliance law." He added that all courses are taught online and offered year round. He further stated that DSU has been teaching these subjects online for over 17

years and that the subject matter experts who teach courses come from industry, many of whom are practicing attorneys with experience in both industry and government. Experts say that regulatory trade law is expected to continue being a growth area for decades as global trade continues to escalate. "Prior to the events of 9/11", Dr. Burton said, "Trade compliance was not a profession. Now it's an active career path leading all the way to senior management in some of America's largest corporations such as The Boeing Company, General Dynamics, Lockheed Martin and many others." Though not for every displaced attorney, regulatory trade law offers lawyers a rewarding career path to continue practicing law.

Consent - Continued from page 5

ment, conduct of comprehensive audits, or institution of a "cradle-to-grave" export tracking system. Each Consent Agreement is tailored to the export violations that occurred, the cooperativeness of the company in coming to resolution, and the level of compliance measures already in place at the company at the time when the Consent Agreement enters into force.

Upon signing of the Consent Agreement and accompanying Implementing Order, the documents are made available to the public. Click below to view current and past Consent Agreements.

Ssource: http://www.pmdtcc.state.gov/compliance/consent_agreements.html

IIEI Certification



**"The Global Trade
Certification Standard"**

www.industrycertification.org

A service of International Trade
Certification Authority, Inc.

Continued from Page 1

Priecko Complaints against DSU Dismissed with Prejudice

were not supported by fact, and dismissed the complaint with prejudice. As a result, Mr. Priecko and others are prohibited from raising the same complaint issues against the college before the Board at any point in the future.

For well over a year prior to the State Board's final decision, Mr. Priecko repeatedly made public on LinkedIn® and at conferences the now proven bogus allegations of wrongdoing he claimed against the school. In public he proclaimed "the school is under investigation by numerous government agencies." The school is only aware of the formal non-student Complaints he filed with the State Board, which have now been dismissed.

Since dissolving his 4 and a half year association with the college, Mr. Priecko has brought other complaints (all ultimately dismissed) to the Arizona State Board of Private Postsecondary Education. Observers believe the root of his battle against Dunlap-Stone University and its founder, Dr. Donald Burton, stems from not being given autonomous control over the international trade certification program for which he had been a volunteer. Mr. Priecko resigned from his volunteer position in July of 2008. At that time the certification organization was a sister division to the college and is now a separate corporation.

Mr. Priecko's false allegations have impacted innocent people and the industry—people who never did him harm, including University students and employees; people who worked hard to validate their compliance knowledge and earned their Certified US Export Compliance Officer® designation, and the industry that relies upon the school. In written complaints to the State

Board, he directly attacked Dr. Burton's immediate family members, including Dr. Burton's children by name, spreading hearsay with no evidence or grounding in fact, suggesting violations of the law supposedly committed by the family-owned and operated business. Upon investigation, the Board found no facts to support his allegations.

In another complaint letter to the Board, Mr. Priecko claimed there was some level of collusion between the college and the state agency. The school was told that because of the seriousness of the claim an independent special investigator examined the charge against the State Board. It found no facts to support his malicious allegation.

State records clearly show that since its founding 18 years ago, Dunlap-Stone University, Inc. has never had a single student complaint presented to the State Board, confirmed by Teri Stanfill, the Executive Director of the Arizona Board for Private Postsecondary Education, during the August 23rd meeting. A non-student, civil matter between two adjunct faculty members is the only issue ever brought to the state board other than those directly instigated by Mr. Priecko, and that matter is still pending further legal review by the school.

Unfortunately, the mere allegation of wrongdoing is all that is needed for some to believe it, regardless of facts, causing irreparable harm. The announcement of the final legal determination by the state board dismissing all of Mr. Priecko's complaints in 11-NS007 will be

missed by some who heard him defame the school. Dr. Burton requests help spreading the word that the school has been cleared of all charges. Though the half-truths and gossip spread by Mr. Priecko impacted a few unknowing listeners, the school and certification program have continued to grow rapidly during his tirade. The Certified U.S. Export Compliance Officer® designation may be the defacto standard within the industry, and as a review of job listings shows, it has become a requirement for compliance positions in more companies every year.

Dr. Burton said, "I apologize to students, friends and supporters who have been aggressively and sometimes viciously confronted by Mr. Priecko at conferences, events and

online as he spread his lies and hatred." He continued by sharing his frustration with others that the legal process took so long. With the State Board's ruling with prejudice against all the issues Priecko raised in his

complaint, school officials believe that Mr. Priecko may cease his efforts. If he continues to debase the school or certification programs, please contact the school's administration. (Email: legal@dunlapstone.edu) "To those who have defended our programs, we are forever in your debt and offer you our gratitude," Dr. Burton noted. "As we enter our 18th year, we renew our promise to you to continue supporting the highest international trade education and training standards and to meet your needs."

... the school has been cleared of all charges.

...all complaints were dismissed...

About John Priecko

From 2004 to July 2008, Mr. Priecko served as a volunteer, helping to establish and promote industry standards for the Certification Board of Governors, now IIEI Certification, and he taught for the school.

FREE Tips for Preparing for the Licensed Customer Broker (LCB) Exam

DSU's staff has prepared a lengthy slide presentation to help people prepare for the US Government's LCB examination. The next test date is October 1st. Click this link:

Test Date: Oct 1, 2012 <http://iiei.dunlap-stone.edu/customs-broker-exam-prep-course/>

Former Soldier Pleads Guilty to Participation in International Arms Smuggling Ring

Joseph Debose, a resident of North Carolina and a former Staff Sergeant in a U.S. Special Forces National Guard Unit, pled guilty today in United States District Court for the Eastern District of New York before the Honorable Eric N. Vitaliano to violating the Arms Export Control Act. According to court documents, Debose provided multiple shipments of firearms to co-conspirators who then secreted the weapons in packages and transported them to shipping companies to be sent to customers in China. The weapons included numerous semiautomatic handguns, rifles and shotguns. When sentenced, Debose faces up to 20 years in prison.

Authorities initially learned of the arms smuggling scheme after police in China seized a package containing firearms with defaced serial numbers, which had been shipped from Queens, New York. Upon learning of the seizure of the weap-

ons, U.S. law enforcement officials traveled to China to examine the evidence. The types of weapons seized by the Chinese authorities have been designated by the President of the United States on the United States Munitions List, and may not be exported without a license from the

Agents arrested Debose in a sting operation when he arrived at a meeting location with a truckload of guns

U.S. State Department. With the aid of forensic techniques, agents determined that one of the weapons seized in China had originally been purchased in North Carolina. Agents then traced that gun, and others, to Debose. Agents arrested Debose in a sting operation when he arrived at a meeting location with a truckload of guns for the next shipment. Debose was carrying a loaded .45 caliber pistol at the time of his arrest. To date, four

individuals have been charged with weapons trafficking and export offenses as a result of this investigation.

“The defendant traded the honor of his position in the National Guard for the money he received for smuggling arms to China. In blatant disregard for everything he was sworn to uphold, the defendant placed numerous firearms into a black market pipeline from the United States to China,” stated U.S. Attorney Lynch. “We utilize all available resources to stop the flow of illegal weapons through New York and overseas. This case demonstrates the effectiveness of a collaboration among multiple federal law enforcement agencies and our foreign partners to address a global challenge.” Ms. Lynch expressed her grateful appreciation to the federal agencies that worked closely together to investigate the case.

Source: <http://www.bis.doc.gov/news/2012/doj09062012.htm>



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Compliance Experts Still Needed to Help Develop Masters Degree Courses

In support of two U.S. Regulatory trade law Masters degree programs currently under development, Dunlap-Stone University (DSU) has immediate need for Subject Matter Experts (SME) in regulatory trade law. SMEs will help the university's curriculum specialists complete development of courses for the Masters of Science in Trade Compliance and the Masters of Legal Letters (LL.M.) programs. SMEs should be experts in trade law for the U.S. and other countries. They must qualify to be faculty members of the school and possess extensive industry knowledge and experience combined with a Master's Degree or a law degree from an accredited institution. Preference will be given individuals who have experience teaching for DSU. SMEs will be contracted on a course by course basis for their services. Individuals interested in learning more of the SME requirements and details of the knowledge requirements for these degrees should submit their letter of interest and resume/vite' via email to DSU's Faculty Services at registrar@dunlap-stone.edu

JDs Needed to Teach Courses in LL.M. in U.S. Regulatory Trade Law Program

DSU is seeking instructors to teach courses online in two new legal Masters degree programs now under development. Candidates must have a Juris Doctorate from an accredited law school or a suitable master degree and extensive practical experience in international trade law. Individuals interested in becoming adjunct faculty for one of these two programs should submit their letter of interest and resume/vite' via email to DSU's Faculty Services at registrar@dunlap-stone.edu

Nurses and Other Healthcare Professionals Needed to Assist in Development of New Healthcare Bachelor Degree

DSU has an immediate need for qualified healthcare Subject Matter Experts (SMEs) to assist in the development of health care related courses in support of a new bachelor degree in healthcare administration. Candidates should have experience in online course development in addition to their health care expertise.

Health Care Professionals are needed to teach courses in a new Bachelor of Science in Health Care Administration program online. If you possess a Masters Degree and are a Subject Matter Expert (SME) in course topics that comprise the program, we would like to hear from you. Please submit your letter of interest and resume/ vite' to DSU's Faculty Services at registrar@dunlap-stone.edu for consideration. Instructor assignments are expected to be assigned for January 2013.

Class Start Dates

August 2012

BUS-405 GBP Global Business Plan
 BUS-111 CSB Customer Service Basics
 BUS-113 TCB Topics in Contemporary Business
 BUS-403 MRK International Marketing
 BUS-440 LEB Legal Environment of Business
 FAE-230 ACT Business Accounting
 TRD-201 EXIM Exporting Importing Environment
 TRD-311 DCE Documentation for Export Compliance
 TRD-307 EAR Understanding the EAR
 SCM-412 GSC Global Supply Chain
 SCM-202 LOG 21st Century Logistics
 TRD-365 EIC Ethics in Import Compliance

September 2012

TRD-311 Documentation for Export Compliance
 BUS-404 Researching the Global Village
 TRD-307 Understanding the EAR
 TRD-324 Canada: Export Controls
 TRD-331 University Export Compliance Environment
 BUS-113 Topics in Contemporary Business
 BUS-118 Business Writing
 BUS-303 International Business Ethics
 FAE-263 Fundamentals of Microeconomics
 FAE-302 Global Finance
 HAS-105 Writing Across the Curriculum
 MGT-402 Global Strategic Management
 MGT-445 Human Resource Management
 SCM-202 21st Century Logistics
 SCM-379 Warehousing Principles and Practices
 TRD-225 Documentation for the Global Village
 TRD-306 Understanding ITAR
 TRD-320 Ethics in Trade Compliance

October 2012

STM-175 Introduction to Earth Science
 TRD-127 Freight Forwarder Practices
 TRD-129 Introduction to Importing
 TRD-143 Customs – Trade Partnership Against Terrorism
 TRD-330 Export Compliance Audits
 TRD-366 Topics in Import Management
 HAS-191 Introduction to Theatre History
 TRD-311 Documentation for Export Compliance
 TRD-201 Exporting Importing Environment
 TRD-320 Ethics in Trade Compliance
 TRD-350 People's Republic of China Export Controls
 BUS-405 Global Business Plan
 STM-106 Computing Essentials
 TRD-307 Understanding the EAR
 TRD-325 UK Export Controls
 TRD-306 Understanding ITAR
 TRD-322 Understanding NAFTA
 TRD-317 Foreign Corrupt Practices Act

Notice: All class offerings are subject to change or cancellation due to class enrollments.



Dunlap - Stone University

Topics for New Courses Wanted from Industry Leaders

Have an idea for a new course that you would like the university to offer? Now is the time of year our staff is looking for new topics. For example, recently it was suggested that the International Import-Export Institute offer a course covering **Importing Munitions**, specifically U.S Department of Treasury's Alcohol, Tobacco, Firearms and Explosives' 27 Code of



WAR. That course topic has been approved for development and it will emerge at some point as a course once it is accredited. (Please do not call to sign up for it yet, It will be announced when

Federal Regulations Part 447 and related regulations. Part 447's full title is— IMPORTATION OF ARMS, AMMUNITION AND IMPLEMENTS OF

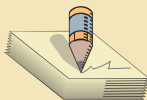
it is completed.) If you have a favorite trade topic you would like to see developed into a course, please submit your ideas to : director@dunlap-stone.edu.

We really do want to hear from you!

Training Cost Consideration

CFO said, "What if we paid for their compliance training and they leave?"

CEO said, "What if we don't pay for training and they stay?"



Dunlap-Stone University Student Honor Roll

Honor - Distinction - Excellence

The students shown here have demonstrated outstanding "A" performance for two or more consecutive semesters.

Diana Albert – AZ
 Glenn Aldrich - TX
 Julianne Behnke - NH
 Leon Blum - TX
 Kenly Brei – NY
 Christine Brekke - WI
 Megan Brown – MO
 Kelli Bullington - CA
 Catherine Cantasano – NY
 Kevin Carlson - IA
 Galen Cloud – TX
 Glade Cunningham – OH
 Lara Easley - NC
 Regina Essenmacher – TX
 Sherida Feazell - VA
 Ray Fischer - Canada
 Lisa Fritsch – AZ
 Eva Galfi - AU
 Delina Gaspard - FL
 Henry George – FL
 Janice Glad - FL
 Andrea Gulacsi – PA

Claire Hoberecht - WA
 Linda Itani – IN
 David Jones - TN
 Suzanne Kachigian - AZ
 Alisa Killian – AZ
 John Kirk - CA
 Deborah Kramer - PA
 Henry Lindon - LA
 Dana Madhu - TX
 Kyle Miller – TX
 Juan Misle - FL
 Trevor Morris – FL
 Aaron Murphy – MD
 Charles Murphy - TX
 Donna Parks – MD
 Allen Patch - IA
 Kristen Pittas - MD
 Robert Priskey – MI
 Kimberly Pritula - NH
 Lori Rece - CT
 Amy Roche – WI
 Bertha Rodriguez – TX

Robert Rulavage - PA
 Ulla Skeffington - NC
 Beth Schroll – PA
 Julie Shotwell - SC
 Stephen Shufelt – NY
 Erin Smith - VA
 Lisandra Smith - CA
 Cynthia Teed - CA
 Martin Tervo – MI
 Catchi Tomas – FL
 Andria Toscano - AZ
 Richard Towler - NY
 Selvin Valenzuela - FL
 Susan Washburn - NM
 Jody Wesley – CO
 Trudy Wilson - GA
 Charlton Winston – FL
 Philip Wolf - FL
 Yegor Yelenchak – VA
 Nicole Zamora - AZ



The International Import-Export Institute

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