



# Global Watch<sup>®</sup>

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

JULY/AUGUST 2013, VOLUME 12, ISSUE 10

## Largest Ever Selection of Trade Compliance Classes Starting this Fall at DSU

A quick glance at the number of classes being offered this Fall on the school's web site shows the incredible growth happening at Dunlap-Stone University. The breadth and depth of courses and programs across the university's various schools continue to grow.

The number of trade-related and degree program courses scheduled by the International Import-Export Institute (IIEI) are far and away the most ever

*Classes - Continued on page 11*

## DOC Agenda for Action Spelled Out

The Department of Commerce recently issued its semiannual regulatory agenda, which lists regulations affecting international trade that could be issued within the next year as well as rulemaking proceedings that have been in process for some time and are not as likely to see further progress in the near term. **See article on page 4** "DOC Agenda Items", including rules about shotguns to Canada, routed export transactions, delegation of Foreign PPI, specially designed products on the CCI and more.

## Read about: When Do We Count the Money?

Page 3

## Bureau of Industry and Security BIS Update & More

Page 4

## DDTC: State Dept Announces Items on the Move

Page 5

## In-Compliance: Germany's New Export Control & Voluntary Disclosures

Page 6

## Read about Munitions under the ATF&E Course

Page 7

## Country Profile: Czech Republic

Page 8

## USG Consolidated Screening List Links

Page 9

## Canada Expands Customs Self-Assessment Program

Page 11

## DSU Student Awarded NCITD Scholarship

Washington DC - June 12, 2013 - At its monthly meeting, the National Council on International Trade Development, announced it had awarded Dunlap-Stone University student Connie Allen an education scholarship in the amount of \$2,000.

Connie is pursuing her Bachelor of Science in International Trade Management degree with an emphasis in Trade Compliance Law.

## Dunlap-Stone University Gains Re-accreditation

Phoenix, AZ – July 12, 2013 - The Accrediting Commission of the Distance Education and Training Council (DETC) met June 14, 2013 and voted to renew the accreditation of Dunlap-Stone University (DSU). As their action letter states, "Accreditation by DETC is a reliable indicator of the value and quality of distance education that an institution offers. In receiving renewal of accreditation, which was without conditions, DSU has demonstrated its commitment to educational standards and ethical business practices that assure quality, accountability, and improvement in higher education." The institution was found to meet or exceed each of the Commission's standards for accreditation.

"We are proud of this accomplishment as the accreditation standards and practices have become more rigorous and complex each year," said Dr. Caulyne Barron, DSU's Chief Academic Officer. The accreditation process relies on an extensive self-study process, volumes of data and exhibits, a visit from an examining committee, and a review by the Accrediting Commission. "Every five years the school has the opportunity to work with staff members from its peers to see where our strengths are and where we can improve in order to serve our students better. We greatly enjoyed discussing our approach to education throughout the process and are excited to have extended our accreditation through 2018," said Dr. Barron.

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### Dunlap-Stone University Program Director

Caulyne Barron, *M.Ed., V.P. - Online Programs*

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## Notes from the President

### Growth Brings New Friends & Challenges

by *Dr. Donald N. Burton*



Summer is always a good time to take a depth breath and reflect on how things are going at the school. As busy as it has been around here, I really didn't have a lot of time to ponder the issue, but in total—based on comments from students and industry leaders—Dunlap-Stone is fulfilling its mission and is doing well in meeting the needs of the markets we serve. That is rewarding when I consider all of the changes going on in the industry. Many of those changes can be seen on the pages of this GlobalWatch® newsletter.

Students enrolling at our school this Fall have the largest selection of accredited college courses pertaining to regulatory trade compliance ever offered anywhere before. That is amazing to me. (See page 1) So whatever the need, students should be able to find the compliance knowledge they need and classes starting soon.

The Accrediting Commission of the Distance Education and Training Council, our accrediting body, approved our accreditation for the next five years without any conditions. (See page 1) I congratulate our staff who worked so hard to make that happen. It really is a team effort to meet all the increasingly challenging standards in place today.

I was very pleased to see that one of our students received a scholarship from NCITD. (Page 1) Well done, Connie.

The changes taking place as part of the Export Reform Initiative

impact everyone within our industry. You will see several articles in this issue that detail or explain the changes and those proposed. I am pleased to report all of our courses are up-to-date with the changes.

Other countries, such as Germany, are also making changes to their export control regimen. See In-Compliance column (page 6) to read their latest changes.

I want to thank Kim Pritula for serving as the Subject Matter Expert in assisting our curriculum experts in developing a new course covering the ATF&E's munitions regulations. The title of the intense six-week course is U.S. Munitions Regulations under the ATF&E (TRD-340) (See page 7)

On BIS' new web site is a section that shows a "Consolidated Screening List". Read more about it on page 9. There is much more in this issue than I am able to cover here.

It has been several years since I attended the BIS Update. I really enjoyed seeing old friends and making new ones. I was pleased to see the warm reception both Wini Hunt (one our advisors) and I received from attendees. Thank you!

In closing, I want to congratulate our Summer graduates, Ji Kinnear and Joan Hornschemeir and all those who made the Honor Roll. Well done.

Once again, I want to thank you all for your continued strong and positive support. Be well!

## When do we Count the Money?

A close look at terms of sale

By Joseph Zodi

Terms of payment can include prepayment (payment in advance), net 30 days, net 60 days, or other arrangements as negotiated between seller and buyer. Modes of payment can include company check, wire transfer, or letter of credit. But when has the seller completed the responsibilities that entitle him to payment from the buyer?

In most cases, the answer is, “when was delivery made under the terms of sale that were negotiated.” In most international cases, the term of sale is an Incoterms® Rule. We are including a table showing the answers. These are shown in the order in which Incoterms® 2010 explains them. Copies are available at many public libraries and can be purchased from <http://www.iccbooks.com/Product/ProductInfo.aspx?id=653>

Why is delivery important? In most cases, when the seller delivers the cargo to the buyer, the seller is entitled to payment. For example: We order a desk from a

local furniture store. If we pick up the desk from them, they are entitled to payment when they turn it over to us. If they deliver the desk to us, they are entitled to payment when agreed or generally when they turn it over to us. How payment is made doesn't matter. If we paid in advance but don't get the desk, they aren't entitled to keep the money. If we are to pay in 30 days but don't get the desk, we aren't obligated to send them the money. But there is either a desk delivered or there isn't.

Suppose we place an order for 100 barrels of a chemical to be delivered by Friday. The seller ships only 99 but only 98 are delivered because one was damaged prior to delivery. The seller has an obligation to send us the remaining two, or we do not have to pay for all 100. We may also have a provision in the contract about the extent to which the seller must go to make up for not delivering the entire shipment. Perhaps we will contract for an ocean freight shipment but any non-delivered product will have to go air-freight at seller's expense. But who pays for the second customs clearance for the two airfreighted barrels? We may need to expand upon “what-if” in our contract.

Suppose again we are buying the 100 barrels of chemicals. The seller delivers 100 barrels to us. We lose one barrel and damage one. We owe the seller for all 100 because it wasn't their responsibility any longer.

What is delivery? This could be delivery to our receiving department's door. But it could also mean that the seller brought the 100 barrels to his shipping department

and our company truck picked up the cargo. Or, we could be sending in a common carrier (trucker) to pick up the cargo at our direction and expense, with our trucker accepting delivery at the seller's shipping department. In all of these cases, we have taken delivery at the seller's door. After our company truck or common carrier makes the pickup, it is no longer the seller's responsibility. If the common carrier loses or damages cargo, it is up to us to file a claim with them. It is up to us to make the payment to the seller.

**But “who paid the freight?” is irrelevant under Incoterms® 2010.** Many companies assume that whoever paid the freight is responsible for loss or damage and for filing the claim. This isn't an Incoterms® concept. It is true that sometimes the party (seller or buyer) paying the freight is responsible for the loss or damage, but it is just as true that the party paying the freight **isn't** responsible for damage. It has to do entirely with “when was delivery made?” and that depends on the specific Incoterms® Rule and the facts of the matter, unless otherwise arranged.

We say “unless otherwise arranged” because Incoterms® Rules aren't engraved in stone. Incoterms® Rules are a foundation, and many sellers and buyers find it expeditious to go exactly according to a printed Rule as they have decided upon between themselves. But there may be more to it: perhaps we are selling some exercise equipment to a fitness center (domestically or



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Advertisement

Money- Continued on page 12





## BIS Update

Bureau of Industry and Security

### Excerpted Remarks from Commerce Secretary Penny Pritzker Speech at 2013 Update Conference on Export Controls and Policy

“To get the ball rolling, in April [2013], the departments of Commerce and State published amendments to key regulations. These rules implemented the initial reform changes that allow us to transfer certain export controls to the Commerce Department.

Then, on July 8th, we published new rules that streamline the licensing of ships, ground vehicles, materials and equipment to our allies’ defense programs.

When all these revisions go into effect, we will have a clearer line between the State and Commerce lists so that exporters know who has jurisdiction over their products. Of course, I should note that we will still maintain our comprehensive sanctions against countries like Iran and North Korea.”

**Source:** <http://www.commerce.gov/news/secretary-speeches/2013/07/23/remarks-2013-update-conference-export-controls-and-policy>

### DOC Agenda ITEMS

The Department of Commerce recently issued its semiannual regulatory agenda, which lists regulations affecting international trade that could be issued within the next year as well as rulemaking proceedings that have been in process for some time and are not as likely to see further progress in the near term.

#### Upcoming Regulations

- a proposed rule amending the licensing requirements for exports to Canada of shotguns, shotgun shells and optical sighting devices (December)

- a proposed rule that (a) clarifies the parties’ responsibilities under the Export Administration Regulations in a routed export transaction and (b) details when and how a U.S. principal party in interest may delegate to the foreign PPI its responsibilities to determine license requirements and apply for a license (August)

- a proposed rule on positively identifying specially designed components on the Commerce Control List so as to decrease the use of the term (March 2014)

- a proposed rule adding the Unverified List to the EAR and removing the availability of license exceptions in transactions involving parties listed on the UVL, which is done when the Bureau of Industry and Security is

unable to conduct end-use checks for reasons outside of U.S. government control or unable to verify the existence or authenticity of a foreign transaction party (August)

- a final rule that (a) imposes a 180-day time limit from the date of the initial notification for submitting the comprehensive narrative account of violations when voluntarily disclosing EAR violations and (b) authorizes the use of delivery services other than registered or certified mail for service of charging letters in administrative enforcement proceedings (October)

**Source:** <http://www.strtrade.com/publications.html>

### Export Control Reform Webinar on License Exceptions

On August 14, instead of the weekly teleconference, BIS will hold a webinar on Export Control Reform – License Exceptions at 2:30p.m. Eastern Standard Time. Changes in many of the Export Administration Regulations license exceptions, which will be effective October 15, will facilitate the realignments being made in the Commerce Control List and the International Traffic in Arms Regulations of the Department of State. This webinar will discuss implementation of these changes. The webinar will include a detailed overview of license exceptions that are available for the "600 series" and explain the steps needed to determine whether these license exceptions may be used for a particular export, reexport or transfer (in-country) of a "600 series" item.

Speakers: Hillary Hess, Director, Regulatory Policy Division, Bureau of Industry and Security, Department of Commerce

William Arvin, Senior Export

**Webinar - Continued on page 10**

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**DDTC**

Directorate of Defense Trade Controls

**Update****DTrade SHA 256  
Digital Certificates**

The DDTC technology department is working to ensure DTRADE2 is SHA-256 digital certificate compliant by December 30, 2013. Further SHA-256 digital certificate guidance from DDTC will be provided by September 2013. Should your digital certificate require renewal prior to December 30, 2013 please ensure you are purchasing the SHA-1 digital certificate that is compatible with DTRADE2 from your ACES GSA authorized vendor. (04.25.13)

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**Note Worthy**

**US Circuit Court of Appeals Reverses U.S. v. TREK LEATHER, INC. and Harish Shadadpuri;**

**Holds Penalties Can't be Imposed on Person Acting in Capacity as Officer of Corporate "Importer of Record" for Negligently Filling out Entry Papers for Corporation**

Source: [http://www.charitableplanning.com/cpc\\_2057018-1.pdf](http://www.charitableplanning.com/cpc_2057018-1.pdf)

**PCB Fabricator Could Be  
Jailed in Arms Export Control  
Violation**

**Aug. 1, 2013** - by Chelsey Drysdale. WOODINVILLE, WA

A local printed circuit board fabricator contracted by the US Navy pleaded guilty Tuesday to wire fraud and violating the Arms Export Control Act. Precision Image and company owner Chih-Kwang Hwa admitted to illegally sending restricted US Navy technical information to a Taiwanese circuit board manufacturer that was illegally subcontracted to make the PCBs for the Navy. Under the terms of the contract, the boards were required to be made in the United States.

According to court records, between 2009 and 2011, Hwa obtained contracts worth more than \$180,000 to supply circuit boards to the Navy. The Navy supplied technical data to Precision Image that contained technical specifications for the circuit boards. This data was listed on the US Munitions List, International Traffic in Arms Regulations; as a result, the information could not be transmitted outside the US without a license from the State Department. Prosecutors say Hwa knew about this restriction and didn't get the appropriate licenses.

Under the terms of the plea agreement, prosecutors are recommending the company pay a \$300,000 fine and Hwa serve a sentence of 15 to 21 months in prison. Maximum penalties include a \$1 million fine and up to 20 years in prison. Sentencing is set for Oct. 28.

Source: <http://pcdandf.com/cms/fabnews/10261-pcb-fabricator-could-be-jailed-in-arms-export-control-violation>

**ST&R Trade Report  
"Numerous Items  
Moved from U.S. Munitions  
List to Commerce  
Control List"**

**Monday, July 08, 2013.** The Bureau of Industry and Security has issued a final rule adding to the Export Administration Regulations export controls on military vehicles and related items; vessels of war and related items; submersible vessels, oceanographic equipment and related items; and auxiliary and miscellaneous items that the president has determined no longer warrant control on the U.S. Munitions List. This rule also adds to the EAR export controls on items within the scope of the Munitions List of the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies that are not specifically identified on the USML

Trade Report - Continued on page 13

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# In Compliance....

## Far-reaching Changes to Germany's Export Control Legislation and their Significance for Exporters

Source: Baker & McKenzie

On 1 March 2013, Germany has adopted a new version of its Act on Foreign Trade (Außenwirtschaftsgesetz – "AWG"). The new act has finally been promulgated on 6 June 2013. It will enter into force on 1 September 2013. The aim of the reform is to streamline German export control law and to create a "level playing field" for German exporters in Europe. For exporters, the most important changes in Germany's export control legislation are the following:

### **Voluntary self-disclosures.**

The new act establishes, for the first time in Germany, legal rules for voluntary self-disclosures in the field of export controls. A voluntary self-disclosure will not lead to a reduction, but to a complete exclusion of punishment. However, in many cases, a self-disclosure will not provide significant relief to exporters, because it has some important drawbacks: An exporter can only benefit from a voluntary self-disclosure for non-compliance with requirements which are of relatively minor importance, such as formalities (e.g. submitting incorrect export declarations to customs authorities). An exporter cannot, however, benefit from a voluntary self-disclosure for non-compliance with export licensing requirements. In addition, in its voluntary disclosure, the exporter must explain the reasons for the non-compliance and which mea-

asures he has taken to avoid future non-compliance. In our experience, the most common cause for incorrect export declarations are typos. In practice, measures to completely avoid typos are either not feasible or would require unreasonable expenditures of time and / or personnel (e.g. to double-check each export declaration).

### **Penalties for non-compliance with export control regulations.**

Under current law, non-compliance with export control regulations is subject to different levels of penalties. In many cases, (negligent) non-compliance with licensing requirements is subject to administrative fines only. The export of military and of certain dual use items without license is subject to criminal penalties, even in cases of negligent non-compliance with licensing requirements. Since management is generally held responsible for all non-compliance committed within the company, criminal proceedings have been initiated against senior management in numerous cases where only minor, negligent errors had been committed by employees.

Under the new AWG, negligent non-compliance with export control requirements, in particular with licensing requirements, will be subject to administrative fines only. Criminal sanctions will only apply if items have been exported intentionally without the required licenses. In

practice, these amendments will have both positive and negative effects: The most important positive effect is that senior management will no longer face criminal proceedings for relatively minor errors by employees. Already to date, however, most criminal proceedings against senior management relating to the unlicensed export of controlled, e.g. military, items are closed either without further consequences for the manager concerned or against payment of a relatively modest amount. It must be expected that, in the future, customs authorities will issue rather high fines against the company itself. As a consequence, exporters must expect that non-compliance with export control licensing obligations will become more expensive.

### **Two working days for implementing embargos and financial sanctions.**

Under the new act, exporters must implement new embargos and amendments to embargos – in particular those adopted on the EU level – within two working days. This applies to product-related restrictions as well as to financial sanctions against Banned Parties / Designated Parties. Under the current law, the period for implementing new / amended embargos or

*In-Compliance - Continued on page 7*



**In-Compliance** - Continued from page 6

financial sanctions varies from a few days to up to six or eight weeks. The very short implementation period in the new law can create practical difficulties for exporters. In addition, product lists in EU embargos are frequently corrected after they have been adopted. In the future, exporters may have to implement faulty, unclear or ambiguous product-related restrictions before they can be corrected at EU level.

#### About Baker McKenzie

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For further information, please contact:  
Frankfurt/Main:  
Julia Pfeil  
,Email:  
Julia.Pfeil@bakermckenzie.com

## NEW Course

### *U S Import of Munitions Regulations*

*under the ATF&E  
(TRD-340)*

#### Course Description

This six-week course examines the rules, regulations, and best practices for the importation of arms, ammunition, and implements of war into the U.S. as regulated and administered by the U.S. Department of Justice's Bureau of Alcohol, Tobacco, Firearms & Explosives and other USG agencies. This course specifically addresses 27 CFR Part 447 Subpart C-F, including the ATF's U.S. Munitions Import Control list (USMIL), as well as 27 CFR Part 478, which implements the Gun Control Act (18 USC Chapter 44), and 27 CFR Part 479, which implements the National Firearms Act (26 USC Chapter 53). It also addresses Title 19 USC Sec 1102 Chapter 40,

and 27 CFR Part 555. Other laws and regulations included in this course are 22 USC 2778 Arms Export Control Act, and the implementing regulations under 22 CFR Parts 120 – 130, International Traffic in Arms Regulations (ITAR).

**Prerequisite:** None. It is strongly suggested, but not required, that students have experience with ITAR and have completed: Understanding the ITAR (TRD-306)

**Course Credit:** 3.0 Credit hours.

Contact your enrollment advisor for more information and scheduled class start dates. (800) 474-8013 or (602) 648-5750.

## Federal Register Notice of Final Rule

**Military Vehicles; Vessels of War; Submersible Vessels, Oceanographic Equipment, and Other Items that No Longer Warrant Control Under the USML**

This rule is effective January 6, 2014

Source: 78 FR 40891-40919: 15 CFR Parts 740, 742, 770, et al.; Revisions to the Export Administration Regulations:



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*Country Profile*

# Czech Republic

Slightly smaller than South Carolina, located in Central Europe between Germany, Poland, Slovakia, and Austria, the Czech Republic, a parliamentary democracy, is landlocked. Historically dominated by foreign forces, most notably by the former Austro-Hungarian Empire, Germany and Soviet Union, on 1 January 1993, the country underwent a nonviolent “velvet divorce” into its two national components, the Czech Republic and Slovakia. The Czech Republic joined NATO in 1999 and the European Union in 2004. It has a temperate climate with cool summers; cold, cloudy, humid winters. The west side of the country, Bohemia, consists of rolling plains, hills, and plateaus surrounded by low mountains; Moravia in the east consists of very hilly country.



The Czech Republic is a stable and prosperous market economy closely integrated with the EU, especially since the country’s EU accession in 2004. While the conservative, inward-looking Czech financial system has remained relatively healthy, the small, open, export-driven Czech economy remains sensitive to changes in the economic performance of its main export markets, especially Germany. When Western Europe and Germany fell into recession in late 2008, demand for Czech goods plunged, leading to double digit drops in industrial production and exports. As a result, real GDP fell 4.7% in 2009, with most of the decline occurring during the first quarter. Real GDP, however, slowly recovered with positive quarter-on-quarter growth starting in the second half of 2009 and continuing throughout 2011. In 2012,

however, the economy fell into a recession due to a slump in external demand.

The auto industry remains the largest single industry, and, together with its upstream suppliers, accounts for nearly 24% of Czech manufacturing.



## *Czech Republic at a Glance*

GDP (purchasing power parity):  
\$291.7 billion (2012 est.)

Labor force:  
5.404 million (2012 est.)

Labor force - by occupation:  
agriculture: 3.1%  
industry: 38.6%  
services: 58.3% (2009)

Inflation rate (consumer prices):  
3.3% (2012 est.)

Agriculture - products:  
wheat, potatoes, sugar beets, hops, fruit; pigs, poultry

Industries:  
motor vehicles, metallurgy, machinery and equipment, glass, armaments

Exports:  
\$131.7 billion (2012 est.)

Exports - commodities:  
machinery and transport equipment, raw materials and fuel, chemicals

Exports - partners:  
Germany 31.8%, Slovakia 9.1%, Poland 6.1%, France 5.1%, UK 4.9%, Austria 4.7% (2012)

Imports:  
\$124.2 billion (2012 est.)

Imports - commodities:  
machinery and transport equipment, raw materials and fuels, chemicals

Imports - partners:  
Germany 29.5%, Poland 7.7%, Slovakia 7.4%, China 6.3%, Netherlands 5.8%, Russia 5.3%, Austria 4.3% (2012)

Exchange rates:  
koruny (CZK) per US dollar - 19.578 (2012 est.)

Internet hosts:  
4.148 million (2012)

Internet users:  
6.681 million (2009)

**Source:** CIA World Fact Book



# USG Consolidated Screening Lists

Click hot links

Included here is a link to a downloadable file that consolidates export screening lists of the Departments of Commerce, State and the Treasury into one spreadsheet as an aide to industry in conducting electronic screens of potential parties to regulated transactions. In the event that a company, entity or person on the list appears to match a party potentially involved in your export transaction, additional due diligence should be conducted before proceeding. There may be a strict export prohibition, requirement for seeking a license application, evaluation of the end-use or user to ensure it does not result in an activity prohibited by any U.S. export regulations, or other restriction.

Prior to taking any further actions, users are to consult the requirements of the specific list on which the company, entity or person is identified by reviewing the webpage of the agency responsible for such list. The links below will connect you to the specific webpage where additional information about how to use each specific list is contained. These links are also embedded into the file for each listed entity to direct you to the proper website for information about how to resolve the issue. Note that the column on the attached file, which is titled “**Source List**”, indicates which specific consolidated screen-

ing list is the source for each entry on the spreadsheet. Blank data fields in the file are not applicable to the consolidated screening list in the “Source List” column.

## **Department of Commerce – Bureau of Industry and Security**

**Denied Persons List** - (<http://www.bis.doc.gov/dpl/default.shtm>) Individuals and entities that have been denied export privileges. Any dealings with a party on this list that would violate the terms of its denial order are prohibited.

**Unverified List** - ([http://www.bis.doc.gov/enforcement/unverifiedlist/unverified\\_parties.html](http://www.bis.doc.gov/enforcement/unverifiedlist/unverified_parties.html)) End-users who BIS has been unable to verify in prior transactions. The presence of a party on this list in a transaction is a “Red Flag” that should be resolved before proceeding with the transaction.

**Entity List** - (<http://www.bis.doc.gov/entities/default.htm>) Parties whose presence in a transaction can trigger a license requirement supplemental to those elsewhere in the Export Administration Regulations (EAR). The list specifies the license requirements and policy that apply to each listed party.

**Department of State – Bureau of International Security and Non-proliferation**

**Nonproliferation Sanctions** - (<http://www.state.gov/t/isn/>

[c15231.htm](http://www.state.gov/t/isn/c15231.htm)) Parties that have been sanctioned under various statutes. The linked webpage is updated as appropriate, but the Federal Register is the only official and complete listing of nonproliferation sanctions determinations.

## **Department of State – Directorate of Defense Trade Controls**

**AECA Debarred List** – ([http://www.pmdtc.state.gov/compliance/debar\\_intro.html](http://www.pmdtc.state.gov/compliance/debar_intro.html)) Entities and individuals prohibited from participating directly or indirectly in the export of defense articles, including technical data and defense services. Pursuant to the Arms Export Control Act (AECA) and the International Traffic in Arms Regulations (ITAR), the AECA Debarred List includes persons convicted in court of violating or conspiring to violate the AECA and subject to “statutory debarment” or persons established to have violated the AECA in an administrative proceeding and subject to “administrative debarment.”

## **Department of the Treasury – Office of Foreign Assets Control**

**Specially Designated Nationals List** – Parties who may be prohibited from export transactions based on OFAC’s regulations. The EAR require

Lists - Continued on page 11

## Announcing Dunlap-Stone University’s

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*Classes - Continued from page 1*

offered at one time by DSU's international business school. Many of the courses help students worldwide prepare for the various trade industry certification exams that have become a requirement for employment, such as the Certified U.S. Export Compliance Officer® designation. Other classes help those new to international trade gain a strong foundation so they can participate in the global marketplace with confidence. Whatever the need, IIEI has courses to meet most every need.

The University's College of Arts and Sciences (CoAS) is growing too. New courses in support of its Bachelor of Science in Health Care Administration have been added. To support students wide array of interests and needs, (See course start date listing on page 14.)

Students wanting a refresher compliance course will find that nearly all of the nearly 50 trade compliance related courses have been revised and updated to reflect the latest regulatory changes and discussion of the proposed USG changes.

Many of the accredited college courses now offered were developed in response to requests from students and their employers. If you don't see the topic you believe should be offered email us and let us know. Our experts will get in touch with you to see what we can do. Email: [courses@dunlap-stone.edu](mailto:courses@dunlap-stone.edu).

*Webinar - Continued from page 4*

Policy Analyst, Regulatory Policy Division, Bureau of Industry and Security, Department of Commerce

There will be a \$35.00 charge for this webinar. For detailed instructions on registration and how to join the webinar on the day of the broadcast, please visit the site at:

<https://www.mobilevideo.net/commerce-BIS/bisreform.php?webcastid=668525>

*Lists - Continued from page 9*

a license for exports or reexports to any party in any entry on this list that contains any of the suffixes "SDGT", "SDT", "FTO", "IRAQ2" or "NPWMD".

**Downloadable Consolidated Screening List**

**Instructions for Use:** The consolidated screening list is a list of parties for which the United States Government maintains restrictions on certain exports, reexports or transfers of items. If one of the agency lists noted above has been updated and this downloadable consolidated list file has not yet been updated, the date on the top row in these files will not match the date of last update on the appropriate agency website. If this occurs, the user must check the appropriate agency webpage for the most current party information. If a party to your transaction matches a party name on the consolidated list, the user must check the official publication of restricted parties in the Federal Register or the official lists of restricted parties maintained on the web sites of

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the Departments of Commerce, State and the Treasury to ensure full compliance with all of the terms and conditions of the restrictions placed on the parties on this list.

Instructions for Downloading the **Consolidated Screening List**

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[http://www.bis.doc.gov/export\\_consolidated\\_list/consolidated\\_party\\_list\\_final.csv](http://www.bis.doc.gov/export_consolidated_list/consolidated_party_list_final.csv)

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If you have any questions related to the content of the information in the consolidated list, please refer them to the appropriate agency responsible for the list as indicated in the "Source List" field.

**Email Updates** Sign up for email updates to the Consolidated Screening List Click here:

[https://public.govdelivery.com/accounts/USITAEXPORT/subscriber/new?topic\\_id=USITAEXPORT\\_40](https://public.govdelivery.com/accounts/USITAEXPORT/subscriber/new?topic_id=USITAEXPORT_40)

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## Canada Expands Customs Self-Assessment Program to U.S. Importers

On June 27, 2013, in *Canadian Customs Issues, Compliance, Trade Compliance News, U.S. Customs Issues*, by *Martin Rayner*

The Canada Border Services Agency (CBSA) launched the Customs Self-Assessment (CSA) program in December 2001. The CSA program offers participants streamlined clearance of eligible goods in situations involving a CSA authorized importer, CSA authorized carrier and registered driver, as well as streamlined accounting, payment, and adjustment processes for all imported goods. Subsection 10.5(2) of the Regulations enumerates the requirements that an importer must meet in order to receive an authorization to participate in the CSA program. Paragraphs 10.5(2)(a) and (b) require an importer to ordinarily reside in Canada or, in the case of corporations, to have its head office in Canada or operate a branch office in Canada.

On June 19, 2013, the *Canada Gazette* published *Regulations Amending the Accounting for Im-*

*ported Goods and Payment of Duties Regulations* (SOR/2013-116, May 31, 2013) pursuant to the *Customs Act*. Under the amended regulations, the CSA is now open to importing individuals who ordinarily reside in the U.S., importing partnerships in which at least one partner ordinarily resides in the U.S., and importing corporations that have their head offices in or operate a branch office in the U.S. (Carriers with their head offices in or operating branch offices in the U.S. are already eligible.)

According to the CBSA, U.S.-resident CSA-approved importers will receive all the benefits the program has to offer; i.e., they will be able to use their own business systems and processes, which must meet the CBSA's requirements, to forward trade data and to report and remit payment of taxes and duties once a month to their own financial institutions. As a result, they will no longer have to provide data at the time of each shipment to get their goods released.

This change represents Canada's implementation of a joint commitment with the U.S. under the Beyond the Border Action Plan to expand membership in their respective self-assessment programs. U.S. Customs and Border Protection took a similar step last fall when it opened its Importer Self-Assessment program to Canadian resident importers who have been importing into the U.S. for at least two years and meet all other ISA application requirements.

## Proposed Continuing Education Requirement for Customs Brokers

The Advisory Committee on Commercial Operations of U.S. Customs and Border Protection approved Aug. 7 two recommendations concerning continuing education requirements (CEUs) for customs brokers. CBP is drafting an update to the broker regulations in 19 CFR Part 111 that is expected to include a continuing education requirement.

COAC recommended a minimum of 40 hours of continuing education for brokers over the three-year reporting period, which works out to about one hour per month. COAC further proposed that a minimum of 32 hours be accredited, meaning that up to eight hours could come from non-accredited education providers, and CBP says it is "receptive" to this suggestion. CBP also agrees with COAC's recommendation that brokers be allowed to report their continuing education hours at the same time they file their triennial reports, both of which should be done together in the Automated Commercial Environment.

The committee urged CBP to take a "measured, commercially reasonable approach" to the continuing education requirement for brokers who want to reactivate an inactive license. No further details were given, but CBP officials have said they are considering requiring such brokers to only make up the continuing education hours for last triennial cycle they missed; i.e., a maximum of 40 hours (CEUs) would be needed to reactivate a license.

CBP agrees with brokers that there should be no-cost and low-cost options for complying with a continuing education mandate. A list of education opportunities compiled by a

Customs - Continued on page 14

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Incoterms® Rule	When is delivery made by seller to buyer?
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Free Carrier (FCA) Seller's Location	When ready for pickup.
Free Carrier (FCA) Named Place on Seller's Side other than Seller's Location	When ready for unloading (acceptance) by carrier.
Carriage Paid To (CPT) Named Place on Buyer's Side	Varies—depends on which of the delivery points possible under FCA is agreed to. If not stipulated, it is unclear.
Carriage and Insurance Paid To (CIP) Named Place on Buyer's Side	Varies—depends on which of the delivery points possible under FCA is agreed to. If not stipulated, it is unclear.
Delivered at Terminal (DAT)—Ready for Pickup—on Buyer's Side	When ready for pickup from terminal on buyer's side.
Delivered at Place (DAP)—Ready for Unloading—on Buyer's Side	When ready for unloading at place on buyer's side.
DDP (Delivered, Duty Paid), to Named Place on Buyer's Side	When seller has completed custom's entry into destination country and the cargo is ready for unloading at place on buyer's side.
Free Alongside Ship (FAS) Waterport, Seller's Side.	When placed alongside vessel at waterport on seller's side, ready for loading.
Free On Board (FOB) Loaded on Vessel, Seller's Side.	When loaded on vessel at waterport on seller's side.
Cost and Freight Paid (CFR) Ready for Unloading from Vessel, Buyer's Side	When loaded on vessel at waterport on seller's side.
Cost, Insurance and Freight Paid (CIF) Ready for Unloading from Vessel Buyer's Side	When loaded on vessel at waterport on seller's side.

**Money-** *Continued from page 3*

internationally, it doesn't matter), and we do not complete our contract until (a) we have delivered the equipment, and our team (b) installs it, (c) explains how to maintain it, and (d) teaches the trainers how to use it properly for their clients, all by a negotiated due date. Perhaps we have agreed to take half the payment before shipment and half after completion. But delivery can only be part of the story. If we don't get the entire project (and services) done by deadline, are we entitled to even partial payment? All this has to be spelled out in the contract, or it is not clear. Of course we fully intend to complete our responsibilities as seller and earn our money, but what if something unforeseen happens that stops us? We must look to the contract for the answer. What did we negotiate with the buyer?

In the end, "when do we count the money" depends on delivery unless otherwise arranged. When the delivery is made from the seller to the buyer, the seller has earned the money. Prior to that, prepayments are "unearned income." After that, payment due is an "account receivable" for the seller and an "account payable" for the buyer.

Many computer systems are designed to consider a sale as earned income when the goods have been ship-confirmed out of the seller's building. Simultaneously, it deducts them from inventory. This is correct under FCA Seller's Warehouse Hackensack, New Jersey, USA. It is not correct under FOB Newark, NJ, USA because the goods have to be loaded on the vessel, which could be days later. It is not correct under DAT because delivery has to be made by the goods being available at a terminal on buyer's side, say "DAT CFS (Container Freight Station) at riverport Cologne, Germany" which could be weeks later. This DAT sale would mean that the Hackensack company must count the goods as part of their inventory and not consider payment earned or payable until the goods have arrived at the CFS. We can easily have a shipment leave our facility December 10 and still be ours until January 31 of the following year.

What are the ramifications? We will assume our fiscal year is the calendar year. If we count the money and deduct the inventory in December but haven't made delivery until January, then our end of year financial statements are off. If they are

off, our report to our stockholders is off and if we are a public corporation the Securities and Exchange Commission can become interested. If we apply for a bank loan and the bank audits us, they can find that our application contained misleading information. And, of course, if our income statement is off, then our taxes are computed incorrectly, and the Internal Revenue Service can drill down into this with an audit. Then we have our state Department of Revenue as well. So the ramifications are enormous.

What about on buyer's side? Many computer systems are designed to count goods as inventory when checked in at the receiving department. Everything can be incorrect in reverse: We are purchasing goods FOB Shanghai and are located in Tulsa, Oklahoma. From the moment the goods were loaded on the vessel in Shanghai, they were ours. They are part of our inventory (sometimes called "goods in transit" by accountants) and we are responsible for payment. If we paid in advance, it is no longer to be on our books as prepayment for undelivered goods, as they have been delivered. If we will pay 30



Trade Report - Continued from page 5

or the Commerce Control List but that were subject to USML jurisdiction. Finally, this rule moves certain items that were already subject to the EAR to the new export control classification numbers created by this rule.

Concurrently, the State Department's Directorate of Defense Trade Controls has issued a final rule revising USML categories VI (surface vessels of war and special naval equipment), VII (ground vehicles), XIII (materials and miscellaneous articles), and XX (submersible vessels and related articles) to control those articles the president has determined warrant control in those categories of the USML.

Both of these rules will be effective 180 days after July 8, or approximately Jan. 8, 2014. These rules are being issued as part of the Export Control Reform Initiative, which includes amendments to (a) the International Traffic in Arms Regulations and the USML so that they control only those items that provide the U.S. with a critical military or intelligence advantage or otherwise warrant such controls and (b) the EAR to control military items that do not warrant USML controls. These changes are designed to enhance national security by improving the interoperability of U.S. military

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The class is ideal for individuals that have received previous ITAR & EAR training and worked in the field, as well as students who have taken IIEI online training, but would like a refresher course before sitting for the exam. You should already have: Familiarity of the US Munitions List and Commerce Control Lists, key definitions such as US Person and technical data, General Prohibitions, what the license forms are and when you would use them and the sections of both the ITAR and EAR.

Natascha Finnerty

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forces with allied countries; strengthening the U.S. industrial base by, among other things, reducing incentives for foreign manufacturers to design out and avoid U.S.-origin content and services; and allowing export control officials to focus government resources on

transactions that pose greater national security, foreign policy or proliferation concerns than those involving NATO allies and other multi-regime partners.

Source: <http://www.strtrade.com/publications-export-sanctions-violations-070213.html>

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Customs - Continued from page 11

work group within the COAC Trade Modernization Subcommittee includes courses offered by local associations of brokers, freight forwarders, importers and exporters; conferences and seminars offered by regional and national trade associations; relevant coursework offered by local colleges and universities; local port authority trade seminars; and courses offered by compliance firms, law firms and other consulting firms with expertise in customs broker compliance. CBP is "receptive" to the suggestion that any company that conducts compliance training for in-house brokers and is also a member of the Importer Self-Assessment program should not be required to have its education accredited.

The work group will next discuss how to establish the bonafides of brokers and hopes to have recommendations in this area later this year. The work group also plans to discuss customs broker permit modernization in the future.

**Source:** Sandler, Travis & Rosenberg Trade Report  
<http://www.strtrade.com/publications-customs-brokers-continuing-education-081213.html>

Money- Continued from page 12

days after delivery, delivery has already been made so this is now a live account payable. At 30 days, we may be responsible for payment even before the goods arrive.

There are no two ways about it, terms of sale and delivery are important parts of our contract negotiation as seller or buyer. They are critical in determining loss and damage, and just as important in the core of our

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The International Trade Certification Authority, Inc. governing board requires people holding one of IIEI Certification's compliance related certifications, such as the Certified U.S. Export Compliance Officer® and Certified ITAR Professional® designations, to document completion of 10 CEUs (Continuing Education Units) every year. The number of CEUs awarded for different time periods of training and various types of events can be found on IIEI Certification's web site/ University staff can help you sort out all the requirements to ensure you maintain your certification. Don't let your valuable certification lapse. If you are close to the expiration date, contact your friendly advisor at the International Import-Export Institute to discuss your options.

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organization's financial life as we determine when we count the money.

#### About the Author

Joseph Zodi MBA, CUSECO, DSU Faculty Member, has been a consultant to the international trade industry for over 30 years. He is a published author of numerous articles in various publications and his book, Export-Import: Everything You and Your Company Need to Know to Compete in world Markets is in its 5<sup>th</sup> edition.

## Classes Starting Soon

August 2013

TRD-141 Introduction to Incoterms(R) 2010  
TRD-304 US Customs Broker Exam Prep  
BUS-102 Introduction to Business  
BUS-111 Customer Service Basics  
BUS-403 Global Marketing  
BUS-440 Legal Environment of Business  
FAE-230 Business Accounting  
HCA-133 Introduction to Public Health  
MGT-345 Organizational Behavior  
SCM-125 Port Authority  
HAS-103 Critical Thinking and Analysis  
SCM-379 Warehousing Practices and Principles  
SCM-412 Global Supply Chain Strategies  
STM-385 Information Systems in Global Business  
TRD-307 Understanding the EAR  
TRD-311 Documentation for Export Compliance  
TRD-320 Ethics in Trade Compliance  
TRD-201 Exporting/Importing Environment  
STM-106 Computing Essentials  
TRD-306 Understanding the ITAR  
TRD-330 Export Compliance Audits  
TRD-216 Trade Compliance Environment 3  
HAS-198 Introduction to the Humanities  
TRD-366 Topics in Import Management  
TRD-317 Introduction to the Foreign Corrupt Practices  
TRD-257 Empowered Officials Essentials

TRD-299 Agreements Under the ITAR  
TRD-311 Documentation for Export Compliance  
BUS-404 Researching the Global Village  
TRD-307 Understanding the EAR  
TRD-308 Mastering ITAR Exemptions  
TRD-129 Introduction to Importing  
TRD-141 Introduction to Incoterms(R) 2010  
TRD-143 Introduction to CTPAT  
TRD-225 Documentation for the Global Village  
BUS-113 Topics in Contemporary Business  
BUS-118 Introduction to Business Writing  
BUS-303 International Business Ethics  
FAE-263 Principles of Microeconomics  
FAE-302 Global Finance Methods  
HAS-105 Writing Across the Curriculum  
HAS-132 Introduction to Psychology  
MGT-402 Global Strategic Management  
MGT-445 Competitive Human Resource Management  
SCM-202 21st Century Logistics  
SCM-376 Purchasing in the Global Marketplace  
TRD-306 Understanding the ITAR  
TRD-320 Ethics in Trade Compliance

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Course start dates subject to change.



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Emphasis: Trade Compliance Law

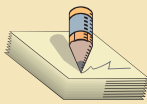
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