



Global Watch®

THE NEWSLETTER OF THE INTERNATIONAL IMPORT-EXPORT INSTITUTE
AT DUNLAP-STONE UNIVERSITY
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Effective Trade Compliance Training Gets Measured

Efficiently Comparing Apples and Oranges

When comparing trade compliance training options, it is often a case of trying to compare Apples to Oranges when you haven't yet decided what you are making. To avoid this happening, experts say you should first decide what the training is to accomplish and how to measure its success. Every exporting organization's executive management allocates resources for trade compliance for the same purpose: To confidently ensure no export control violations occur. The objective of training then must be to fully train employees on the complete body of knowledge from which a violation can occur and then to build confidence validating the regulatory knowledge competency of those completing the training.

With the variety of training available to choose from, you should first establish criteria for evaluating which training meets senior management's mandate. Without determining your criteria first, you may make an Apples to Oranges comparison, when only one of them will meet your needs. Different trade compliance training is used for different purposes. The criteria listed below helps compliance management focus training directly in support of senior management's mandate.

1. After training, other than a certificate of attendance, what proof does management receive that the participant mastered the compliance regulations and concepts sufficiently to protect the organization from violations?

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Education Standards Rise for Top Jobs in Trade Compliance Industry

The Law Center at Dunlap-Stone University began enrolling students in the nation's only accredited Masters Degree (LL.M.) in Regulatory Trade Compliance (MS-RTC) law in the Winter term of 2013 after it gained ground-breaking accreditation from the Distance Education Accrediting Commission. Twelve cohorts (groups) entered the program during that time; all but three groups have completed the year and half long online program and have begun to spread out across industry. Graduates are finding that employers have taken notice of the degree's added value when interviewing candidates for compliance management positions. Many enrollees were sponsored by their employers, while some chose to pay out of pocket the \$22,040 program cost on a class by class basis. The acceptance of the program by industry leaders proves that students who pay for it themselves will see a quick return on their investment.

"We are extremely proud of our MSc-RTC graduates," said Dr. Donald N. Burton, President and founder of Dunlap-Stone University. "They have shown the world that even with extremely demanding jobs and hectic schedules that they could not only complete this intense, life-changing program, but nearly all did it Magna Sum Laude. Our graduates now possess the in depth practical and applied skills and expert knowledge of trade

regulations from not only the U.S. but from nations spanning the globe. They are prepared to lead their organization's compliance effort well into the 21st century. Well done to all."

A recent review of demographics of the program's graduates show how wide spread the interest is in this program. The age range of students is late twenties through early fifties with the median age group in the mid to late thirties. Previous education of program participants range from liberal arts bachelor degrees to MBAs and juris doctorate degrees.

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Notes from the President

The Rumbling Beneath the Surface

by *Dr. Donald N. Burton*



When Secretary of Commerce Wilbur L. Ross, Jr announced on March 7, 2017, “We are putting the world on notice: the games are over, Those who flout our economic sanctions and export control laws will not go unpunished – they will suffer the harshest of consequences”, a new era in export controls began.

I am not sure how many people are aware of the largest single fine ever made by BIS was made in March 2017. China’s Zhongxing Telecommunications Equipment Corporation and ZTE Kangxun Telecommunications Ltd., known collectively as ZTE, has agreed to a record-high combined civil and criminal penalty of \$1.19 billion. (See article page 4)

To demonstrate the seriousness taken by BIS under the new administration, it was announced at BIS Update that by the end of the third quarter, 2017 that BIS had already given fines for export violations in excess of \$500 million dollars. BIS said that was greater than BIS total annual budget. What does this tell exporters?

If you are going to export, you had better follow even the smallest rules buried deep within in the regulations.

Over the years, a review shows that few if any violations occur because someone missed the latest rule change. Violations for may reasons, including human error, But one category that should never be the basis is because of ignorance of the law., because oversight failed to do their due-diligence in knowing every word of the EAR and supporting regulations. It’s good to get the updates but to be excellent your compliance ef-

fort MUST know everything in the EAR , not just the latest changes or the things typically covered briefly in internal training sessions. I am very proud that Dunlap-Stone’s International Import-Export Institute provides the detailed information needed to meet the more intense scrutiny now taken by regulators.

When I talk with corporate C-level executives in organizations that have huge compliance staffs, I am always curious to find out how confident they feel about their export compliance regimen. Most say they are very confident in how their organizations handle exports. More than once, however, within a year or so I hear their organization was fined millions of dollars for violations. What this tells me is that even the most sophisticated compliance program is only as strong as its weakest team member. Organizations need to know by independent verification of the “compliance readiness” of each and every person that can impact compliance. Something to think about for sure. How confident should your C-level executives be in your organization’s readiness?

You have undoubtedly noticed we stopped GlobalWatch for a bit because we have ben sending out a steady stream of informative email . We thought that was enough. Hearing from you we have decided resume GlobalWatch issues again, but only periodically. I think you will find that articles in this issue meet our usual standards.

Thank you for your continued strong support over these past 22 years Be well.

When Export Violations Occur

By DSU Staff

After identifying a possible violation of export laws has occurred, US Government (USG) officials quickly zero in to determine the cause of the violation and the agency’s course of action. Depending on the severity of the violations, their impact on national security and their cause, the breadth and depth of the instance and the reputation of the offending firm, an on-site investigation may be ordered. If the violation was voluntarily disclosed and investigating officials feel it was explained and documented to the government’s satisfaction, a visit may not occur. However, if the violation was not voluntarily disclosed and there are concerns, a visit is often deemed warranted; it may be announced or unannounced.

During the visit, one of the most important considerations is the demonstrated effort put forth by the offending firm in proactively maintaining complete compliance with all USG agencies’ rules prior to the violation and the effort put forth in fixing what caused the current violation. Equally important is what the organization has done in light of the violation to ensure that whatever caused the violation will not happen again. These key points

cannot be overstated in importance. The quality of the overall effort by the offending firm helps USG officials determine what actions, sanctions and remedial efforts are to be leveled against the violator. The regulations require officials to carefully consider what effort the violating firm has made to guard against future violations. Though not an official breakdown listing of the possible causes of violations, here are a few of the general categories:

Human Error

No matter how hard humans try to prevent mistakes they can happen. Mistakes in this realm are called systemic errors. The compliance system works properly, it is just human error that caused the violation. Systems fail for technical reasons and people make human errors. Other than human error, all

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other failures should not happen as the reasons for such violations can be prevented with systems checks and balances. Even human error can be reduced with a systems approach providing proper oversight and controls to prevent errors by any single person. Thus in the USG’s view, these violations are preventable when a systems approach is taken.

Dominancy Factors Outside of the Compliance Department

When other factors take dominance over compliance, such as deadlines, sales quotas, fear of loss of job due to terms of an agreement not being met, the likelihood of violations increase. In this instance the system of controls put in place to assure compliance are ignored or circumvented and replaced with higher-ranking personal agendas that do not consider trade regulations. This shows a failure of the compliance effort as a system and is taken most seriously by the USG.

Purposefully Ignoring the Law

Organizations that put sales in front of compliance generally get the most severe penalties, including possible debarment.

Ignorance of the law

Based on codified law “ignorance of the law” is no excuse. By entering into an international trade transaction, the exporter or importer affirms that he will abide by all applicable laws. That means all parties to the transaction are held

to the same knowledge standard thus imposing the legal necessity that exporters and importers be knowledgeable and in

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BIS Update NEWS and Sanctions

China Telecom Agrees to Pay \$1.19 Billion Dollar Fine

It was announced that China’s Zhongxing Telecommunications Equipment Corporation and ZTE Kangxun Telecommunications Ltd., known collectively as ZTE, has agreed to a record-high combined civil and criminal penalty of \$1.19 billion after illegally shipping telecommunications equipment to Iran and North Korea in violation of the Export Administration Regulations (EAR) and the Iranian Transactions and Sanctions Regulations (ITSR).

As part of the settlement, ZTE has agreed to pay a penalty of \$661 million to Commerce’s Bureau of Industry Security (BIS), with \$300 million suspended during a seven-year probationary period to deter future violations. This civil penalty is the largest ever imposed by the BIS and, if the criminal plea is approved by a federal judge, the combined \$1.19 billion in penalties from Commerce, the Department of Justice, and the Department of Treasury, would be the largest fine and forfeiture ever levied by the

China Telecom Continued on page 7

“SUBJECT TO THE EAR” Defined

(1) “Subject to the EAR” is a term used in the EAR to describe those items and activities over which BIS exercises regulatory jurisdiction under the EAR. Conversely, items and activities that are not subject to the EAR are outside the regulatory jurisdiction of the EAR and are not affected by these regulations. The items and activities subject to the EAR are described in §734.2 through §734.5 of this part. You should review the Commerce Control List (CCL) and any applicable parts of the EAR to determine whether an item or activity is subject to the EAR. However, if you need help in determining whether an item or activity is subject to the EAR, see §734.6 of this part. Publicly available technology and software not subject to the EAR are described in §734.7 through §734.11 and Supplement No. 1 to this part.

(2) Items and activities subject to the EAR may also be controlled under export related programs administered by other agencies. Items and activities subject to the EAR are not necessarily exempted from the control programs of other agencies. Although BIS and other

agencies that maintain controls for national security and foreign policy reasons try to minimize overlapping jurisdiction, you should be aware that in some instances you may have to comply with more than one regulatory program.

(3) The term “subject to the EAR” should not be confused with licensing or other requirements imposed in other parts of the EAR. Just because an item or activity is subject to the EAR does not mean that a license or other requirement automatically applies. A license or other requirement applies only in those cases where other parts of the EAR impose a licensing or other requirement on such items or activities.

(a) Except for items excluded in paragraph (b) of this section, the following items are subject to the EAR:

Subject to EAR Continued on page 9

Major Export Enforcement Case Summaries

can be viewed at:

www.pmdtc.state.gov/compliance/documents/OngoingExportCaseFactSheet.pdf

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compliance with all regulations impacting trade. Although a third-party such as a shipper or freight forwarder may be involved in the transaction, in most cases, the final responsibility for regulatory compliance remains with the exporter of record (U.S. *Principal Party in Interest* (USPPI). There is no defense “for ignorance of the law”.

Dedicating too few resources/people

Mistakes made because of lack of compliance knowledge or expertise is seen as a systems failure by the oversight authorities. This often happens because senior management considers trade compliance as a “cost center” and thus a cost to be minimized. This can mean too few people in the compliance system, too minimal an organization structure, limited training of compliance staff or inadequate operation budgets. In short, to the USG allocating too few resources to the compliance effort is a system failure.

Each time a resource is reduced by senior management in times of budget constraints it may be viewed as acceptable if processing orders continue and no obvious violations occur. Over time the compounding effects of these cuts or the lack of more resources as compliance becomes more complex virtually assures the organization of a system failure at some point. The important question is: what is the correct budget level and resource allocation to the trade compliance department within your company? One simple test to answer this question is: How many hours per days do the salaried compliance personnel have to work to do their job? In many companies the answer is 3-5 hours more per day.

How accurate is a compliance staff member after weeks and weeks of 13-14 hour work days? Exhaustion causes mistakes and mistakes are violations.

Not supported by senior management/ lack of supervision

When senior management is not vested with a compliance attitude much can go wrong. Investing in an active company culture supporting compliance across the whole enterprise is the least costly alternative. As companies who have made violations will tell you, the remedial costs—fines, penalties and legal fees far outweigh the cost of building a first rate compliance system.

Compliance Personnel Ineffectively Used

Historically many compliance personnel spend a considerable amount of their time—sometimes 40 to 50%—NOT providing licensing and oversight control of the compliance process they were hired to perform. Instead they are used for something they are not trained or educated to do: They are used as trainers and teachers to teach the rest of the organization about trade controls. When they are training others, at that moment, the organization does not have a guardian of exports attentively being the watchdog of every step

of export licensing effort. Even though compliance personnel are knowledgeable about the regulations, it does not make them effective educators—they are hired to be experts at maintaining compliance with the regulations. Letting them do their job full time as the compliance gatekeeper is needed; it is a full time occupation.

Lack of knowledge/ competency

When front-line compliance workers lack the requisite knowledge or competency to provide oversight for licensed exports it puts the firm at considerable, mitigatable risk. The axiom that an organization’s trade compliance effort is only as strong as its least trained frontline worker holds true: Even if the compliance worker is dedicated and attempting to do things right, lack of knowledge of part of the rules and regulations is most likely where the violation will occur. That person will be the weakest link in the chain.

Failure to have policies and practices in place to manage compliance. Even if policies exist, if the organization does not follow its compliance policies and procedures, the organization will be seen by the USG during an audit as having a systemic failure to comply with regulations. If the compliance process manual for the

When - Continued on page 6



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firm is out of date or the training materials are out of date, the USG views this as a systems failure.

If the organization relies upon frontline workers to maintain the policies and compliance training materials for the organization, those workers may be spending a huge percentage of their work hours updating records and not focusing on the daily monitoring activities of exports and licensing controls. The key is keeping compliance staff members' focus on the daily gatekeeper actions and licensing effort. Failure to do that is seen as a systemic failure of your compliance effort.

Repeat Offenders

Organizations that are repeat offenders for the same violation receive the most severe consequences from the USG. This management failure proves that the remedial efforts agreed to after the first violation were not followed. Even more severe is if it is discovered that the organization is incapable or incompetent of maintaining compliance. Loss of export privileges are a likely possibility for this failure. Having compliance staff members focus on issues not pertaining to the daily monitoring of export license has been

reported as cause for repeat offenses.

The US Government sees any violation, whether systemic or otherwise, as a serious offense. As the adage goes, "an ounce of prevention is worth a pound of cure". Having a highly trained and focused trade compliance apparatus whose sole purpose is to develop and maintain a systemically strong compliance effort is the only way to prevent violations.

Traing Continued from page 1

2. Is the training under consideration sufficient in depth and breadth to provide all participants the regulatory knowledge and skills they need to help prevent trade violations?

3. What quantitative evidence is provided that management's mandate of "No Violations" is more secure because of the chosen training being offered?

4. After training does management receive a quantifiable report on each participant's demonstrated knowledge of the training topic?

5. The training provided requires participants to be "active" participants in the learning experience.

6 Participants must demonstrate their individual understanding of the



materials at the end of the training session

The criteria listed above ensure that training (Apples) directly support senior management's mandate. Other training (Oranges) that fails to meet the above criteria may meet other criteria for other purposes, such as being an informative presentation, team building or as a refresher for those needing it. The importance of establishing criteria directly aligned with the purpose of the action ensures efficiency as we are not trying to compare Apples and Oranges, when Oranges aren't what is needed. First decide what the training is to accomplish and then choose a method of training that will be directly aligned, one that enables you to measure its success.

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China Telecom *Continued from page 4*

U.S. government in an export control case.

“We are putting the world on notice: the games are over,” said Secretary Ross. “Those who flout our economic sanctions and export control laws will not go unpunished – they will suffer the harshest of consequences. Under President Trump’s leadership, we will be aggressively enforcing strong trade policies with the dual purpose of protecting American national security and protecting American workers.”

In addition to these monetary penalties, ZTE also agreed to active audit and compliance requirements designed to prevent and detect future violations and a seven-year suspended denial of export privileges, which could be quickly activated if any aspect of this deal is not met.

ZTE’s Scheme

Starting no later than January 2010 and continuing through April 2016, ZTE conspired to evade the long-standing and widely known U.S. embargo against Iran in order to obtain contracts with and related sales from Iranian entities, including entities affiliated with the Iranian Government, to supply, build, operate, and/or service large-scale telecommunications networks in Iran, the backbone of which would be U.S.-origin equipment and software.

As a result of the conspiracy, ZTE was able to obtain hundreds of millions of dollars in contracts with and sales from such Iranian entities. Additionally, ZTE undertook other actions involving

283 shipments of controlled items to North Korea with knowledge that such shipments violated the EAR.

Shipped items included routers, microprocessors, and servers controlled under the EAR for national security, encryption, regional security, and/or anti-terrorism reasons. In addition, ZTE engaged in evasive conduct designed to prevent the U.S. government from detecting its violations.

The Investigation, Sanction, and Subsequent Charges

This scheme included forming and operating a 13-member “Contract Data Induction Team” within ZTE between January and March 2016, that destroyed, removed, or sanitized all materials concerning transactions or other activities relating to ZTE’s Iran business that post-dated March 2012; deleted on a nightly basis all of the team’s emails to conceal the team’s activities; and required each of the team members to sign a non-disclosure agreement covering the ZTE transactions and activities the team was tasked with hiding. Under the non-disclosure agreement, team members would be subject to a penalty of 1 million Renminbi (or approximately \$150,000) payable to ZTE if it determined a disclosure occurred. (To read the complete article go to the source.)

Source:

<https://www.commerce.gov/news/press-releases/2017/03/secretary-commerce-wilbur-l-ross-jr-announces-119-billion-penalty>

What is the first thing you should do when you discover an export violation?

Popular Course Key Points Agreements Under the ITAR TRD-299

One of the school’s most popular classes, this six-week practical course examines the development and submission of Licensing Agreements for Technical Assistance Agreements (TAAs), Manufacturing License Agreements (MLAs) and Warehousing and Distribution Agreements (DAs) as required under the International Traffic in Arms Regulations (22 CFR 120-130) as administered by the U.S. State Department, Directorate of Defense Trade Controls (DDTC). The official “Guidelines for Preparing Agreements” and subsequent revisions published by the DDTC and the ITAR serve as the basis for this course. Students gain an understanding of the practical requirements that must be met for approval of agreements by the DDTC. Students will gain experience writing elements of agreements for submission.

Prerequisite: Understanding the ITAR (TRD-306)

Course Credit: 3 Credit Hours

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Next class start date January 18th.

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MSc-RTC *Continued from page 1*

Employers range from small manufactures to large multinational firms to research universities and global consulting firms to government agencies. At the time of entry into the program virtually all students held senior trade compliance positions (supervisor to corporate level) within their sponsoring organization. To date 100% of students who enrolled in the program have completed the program or are on track to graduate.

A survey of graduates showed that they felt more prepared to manage trade compliance in a global context as a result of the program. Understanding the practical implications of foreign treaties and other nation's export controls on trade compliance was cited as one of the main interests in pursuing this degree. Respondents said it isn't enough to understand the ITAR and EAR and expect to prevent violations; they said they needed the in depth knowledge the program gave them.

When asked if the work load of the program was manageable along with their normal duties, graduates said at time it was difficult but with the flexibility of faculty when travel or major events was happening (i.e. audits) that it was do-able. All said they would recommend the program to anyone who sees trade compliance as their career path.

Although the school does not make any guarantee, several graduates report they have received "substantial" promotions as a result of their new degree.

The next start date for the MS-RTC program is February 1, 2018. Those interested in enrolling in DSU's Graduate School should contact their favorite enrollment advisor to begin the process.

The graduates from this program have much to say about their experience in earning the MSC-RTC law degree. Here is a sample of some

of the graduates' comments in (printed in their entirety):

Testimonials (Names used with permission)

"The Master of Science Regulatory Trade program is a wonderful program with respect to international trade. I have been an empowered official for a number of years and thought I knew a lot about export controls. This program is more than export controls. This program has taught me so much more about international trade, such as how other nations manage international trade controls including how these sometimes agree or disagree with the United States controls. This program is great to provide individuals and companies with the knowledge of how international trade is so important to the success of business today. Thank you Dunlap Stone for such a wonderful program."

Jim Fox
Trade Controls Manager
Zodiac Aerospace

"In 2007, I found myself working for a manufacturing company who exported ITAR controlled items. I had never heard of export control regulations before but needed to learn. Following the advice of my then boss and mentor, I started taking compliance classes from DSU that year while gaining on-the-job training and working on my Bachelor's degree. In 2011, I heard DSU had plans to offer a Master's Degree program in Regulatory Trade Compliance. Shortly after the program became available I enrolled. As a result of the Master's level courses, I have not only acquired expert level knowledge of the regulations that govern global trade activities but recognition within my organization. Because I was able to demonstrate my knowledge of FCPA gained through this program, I was asked to take on the FCPA Compliance Officer responsibility in addition to Export Compliance."

Thank you to all the professors who answered my questions and to my advisor Wini who always encouraged me."

Janet Mantell MSc-RTC
Empowered Official
Harper International

"I just received my Master's in Regulatory Trade Compliance from Dunlap Stone University and it is not only a great personal accomplishment, but a professional one as well. While it took a year and half to complete, it was well worth the time and dedication. I work in the field of international trade and when I decided to pursue my Master's, this was the program I found that would be of real benefit because it provides professors with real-world experience, assignments and case studies with practical application and focuses on the effective management of trade compliance in a global setting. I feel the program prepared me for the daily challenges I face at work and has given me credentials that will open opportunities for continued professional growth. Thank you, Dunlap Stone University."

Helia Maritato MSc-RTC,
CUSECO, CIP
Expedited World Cargo, Inc.

"No doubt about it, the MSc-RTC program was the smartest move I made in furthering my career as a regulatory trade compliance professional."

**Wendy M. Epley, MSc-RTC, ECoP-
 EAR & ITAR**
Wendy Eply Trade Consulting

 MSc-RTC *Continued on page 9*

MSc-RTC Continued from page 8

"I completed my Masters degree in Regulatory Trade Compliance in 2016. I travel weekly for my job, and this on-line degree program worked perfectly with my schedule. The material is challenging, the professors are accomplished scholars and professionals in the compliance field; and I get to meet students from all over the globe to learn from their unique experience."

Val Chu

"The Masters in Regulatory Trade Compliance is a well-rounded program that allows the student to understand Export-Import (EXIM) requirements along with covering the Export Control regulations in over six countries. This program takes you through licensing, Free Trade Agreements, HS and Export Control Classification, Brokering and much more. It has also allowed me to apply my education in my daily work environment as Director of Export Controls. Thank you. "

Barb Flynn
Director of Export Controls
Cummins Inc.
A Global Power Leader

"I just completed the Masters of Science- Regulatory Trade Compliance program with Dunlap Stone University. While I wasn't sure I would like taking courses on-line, I decided to give it a try. Once I started I was pleasantly surprised at how much I enjoyed the classes. Taking one class every 8 weeks allowed me to delve into the topic and thoroughly research the subject we were discussing each week. Reading other peoples' comments on the discussion boards was interesting and informative. The teachers were all knowledgeable and professional. I

Advertisement for Graduate Law Degrees at Dunlap-Stone University. Includes logo, title 'Education Requirements for Advancement within the Trade Compliance Industry are changing quickly. Are you prepared?', and details for two programs: Master of Science (MSc) in Regulatory Trade Compliance and Master of Laws (LL.M.) in U.S. Regulatory Trade Law. Features 'Now Enrolling' and 'Space is Very Limited - Reserve your Place Early'.

would recommend this program to anyone working in the trade compliance field thinking about furthering their education."

Theresa Wiechman
:GE Global Operations - Legal

These are just of few of the comments and reasons why students chose this program Several of our graduates already had earned their

MBA or JD before entering the program. They realized that the trade compliance industry is rapidly maturing and that means to compete they need to meet higher education standards, including the right degree.

For more information or to enroll in the program contact an enrollment advisor.

(800) 474-8013

Remember why you didn't finish college?

According to published statistics 40% or more of those who start college never complete their degree (AA or BS). This happens for many reasons. Underlying the reasons, there is a one factor that researchers say is the number one reason why people don't overcome the initial factor of life's events and return and finish their degree. Many of the college courses they were required to take didn't interest them at all. Look at some of the electives you could take here at Dunlap-Stone. Courses like Commerce License Exceptions or 60 others. Does that sound interesting? Talk with an enrollment advisor and find out your graduation date. Do it today.

Subject to EAR *Continued on page 9*

- (1) All items in the United States, including in a U.S. Foreign Trade Zone or moving intransit through the United States from one foreign country to another;
- (2) All U.S. origin items wherever located;
- (3) Foreign-made commodities that incorporate controlled U.S.-origin commodities, foreign made commodities that are 'bundled' with controlled U.S. origin software, foreign-made software that is commingled with controlled U.S.-origin software, and foreign-made technology that is commingled with controlled U.S.-origin technology;

Source:www.NIS.DOC.GOV

"Open Enrollment" Opens the Door Wide

Dunlap-Stone University's (DSU) "Open Enrollment" policy allows anyone who meets the school general administration requirements to enroll in any course or courses for which they meet the course prerequisites. Most of the school's students register for courses under Open Enrollment, while declaring which course of study they are pursuing—such as certification exam preparation training for the Certified U.S. Export Compliance Officer® exam. Open Enrollment is a simple and easy way to take classes immediately.

What many students don't realize is that the vast majority of students who are currently enrolled in the bachelor degree program at DSU began as Open Enrollment students. What makes this so attractive is that many of the compliance related courses are either required in the bachelor degree program or can serve as elective credits in the degree program. After a few years of taking classes to fill knowledge gaps under Open Enrollment, students discover that they are well on their way to finishing their bachelor degree. All it takes to be in the degree program of your choice is to contact your enrollment advisor. They will help you declare your major and most importantly determine your graduation date.

Understanding the ITAR Course Receives 34th Update

The most popular "Understanding the ITAR" course (TRD-306) has just been updated again. It was the 34th update over this past three years, each update was made to reflect changes in the International Traffic in Arms Regulations or changes to the invaluable expert lecture guidance that the course is well known for. Those who took the course more than three years ago will find the updates very useful-- so you might take the course again as a refresher and gain from the added content in the course.

This course is so popular that it is recommended that you enroll early as they tend to fill up quickly.

If your organization would like a private class that your global dispersed employees would be the only participants, let your favorite enrollment advisor know. If you have 10 or more to enroll, there is a discount. But the most important aspect of private classes reserved just for your organization is that you can bring in your proprietary topics into the class so that no matter where your employees are in the world you can be confident they are all involved in the safe discussions that would be impossible in any other format. Your private six-week class can be scheduled to fit your organization's needs.

Contact an enrollment advisor for complete information and for schedule dates.

If you had enrolled in the Master of Science in Regulatory Trade Compliance in June 2016, you would be graduating next month.

Classes Starting Soon

January

TRD-214 Trade Compliance Environment 1
 STM-106 Computing Essentials
 HAS-188 Introduction to The Revolutionary War
 BUS-204 Innovation and Entrepreneurship
 TRD-306 Understanding the ITAR
 TRD-304 Customs Broker Exam Prep Course
 TRD-299 Agreements Under the ITAR
 TRD-129 Introduction to Importing
 MBA-585 Business and Society
 TRD-311 Documentation for Export Compliance
 SCM-127 Freight Forwarder Practices
 TRD-317 Introduction to FCPA
 BUS-404 Researching the Global Village
 TRD-321 The Harmonized Tariff Schedule

February

TRD-215 Trade Compliance Environment 2
 TRD-340 Import of Munitions Regulations for ATF&E
 TRD-505 Export Fundamentals
 TRD-307 Understanding the EAR
 TRD-365 Ethics in Import Compliance
 TRD-520 Trade Compliance Special Circumstances
 TRD-528 Trade Compliance Treaties & Guidelines
 TRD-330 Export Compliance Audits
 TRD-304 Customs Broker Exam Prep Course
 BUS-401 Global Culture
 HAS-105 Writing Across the Curriculum
 MGT-402 Global Strategic Management
 MGT-135 Introduction to Leadership
 HAS-132 Introduction to Psychology
 FAE-302 Introduction to Global Finance
 TRD-306 Understanding the ITAR
 SCM-376 Purchasing in the Global Marketplace
 BUS-118 Introduction to Business Writing
 TRD-225 Documentation for the Global Village
 MGT-335 Modern Management Principles
 MGT-445 Competitive HR Management
 TRD-216 Trade Compliance Environment 3
 TRD-307 Understanding the EAR
 HAS-260 Terrorism in the 21st Century
 HAS-198 Introduction to Humanities
 TRD-311 Documentation for Export Compliance

March

TRD-540 Management of Trade Compliance
 TRD-141 Incoterms 2010(R)
 TRD-214 Trade Compliance Environment 1
 TRD-318 Introduction to OFAC
 TRD-201 Export/Import Environment
 BUS-405 Global Business Plan
 TRD-308 Mastering ITAR Exemptions
 TRD-299 Agreements Under the ITAR
 MBA-505 International Management
 TRD-307 Understanding the EAR
 TRD-306 Understanding the ITAR
 TRD-366 Topics - Import Management
 MGT-390 Project Management
 TRD-215 Trade Compliance Environ 2
 TRD-309 Commerce License Exceptions
 BUS-403 Global Marketing

STM-160 Statistics in Business
 TRD-311 Documentation for Export Compliance
 TRD-140 Importing Duties and Regulations
 FAE-230 Business Accounting Concepts
 BUS-440 Legal Environment of Business
 SCM-412 Global Supply Chain Strategies
 MGT-345 Organizational Behavior
 FAE-450 International Economics
 TRD-141 Incoterms 2010(R)

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For over 20 years Dunlap-Stone's Customs Broker Exam Preparation course (TRD-304) has helped people pass the CBP's licensing exam, sometimes over 80%. This includes people who took the exam 3, 4 or five or more times before. Why? Because the course does not teach you how to be a customs broker; it teaches you how to pass the test. It is one of the school's toughest classes, students say. But if you want to pass the test and put everything into your studies, history shows you can pass the test.

The next start date for this class is January 18th. Class size is small so register soon and Good Luck.

Want a Dual Degree?

Many student start out wanting just the Trade Compliance Law emphasis for their bachelor degree. After all, that is where the big bucks are, right? Not necessarily. Having a dual degree with two majors including Trade Compliance Law and adding Global Supply Chain Management makes it even better, especially when it only adds four additional courses to your program, courses that are courses you would probably want to take anyway.

Talk with you enrollment advisor and discuss how a dual degree might give you the upper hand in your career.

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Regardless of the degree program or vocational training you choose, you can be confident that the quality education you receive will provide you the necessary up-to-date underlying theoretical principles and knowledge needed to succeed, and that it will be combined with industry best practices that are in demand by employers today.

Get a Pay Raise or Promotion

Over 40% of 2013 accreditation survey respondents reported they received a pay raise or promotion after completing their course of study at DSU and IIEI.

Change Your Life

It is not too late to apply for entry to the Master of Science in Regulatory Trade Compliance Degree Program

Classes Start February 1st

MBA Program Start Date for 2018

Already known for its quality international business programs, Dunlap-Stone University is proud to announce its new Master of Business Administration program with an International Management emphasis. This graduate program is designed for early and mid career professionals who want to better understand and operate within a global business environment. The program is now enrolling students for its **January 18th** cohort start date. The program consists of nine eight-week courses that are taken sequentially, so the typical student will complete the program in a year and a half (72 weeks).

The 36 graduate credit hour program follows DSU's widely acclaimed online instructional design model. The asynchronous 24/7 program is ideal for students juggling the demands of their professional life, careers, family, and more.

Students interested in applying must have a bachelor's degree from a post-secondary institution accredited by an accrediting body recognized by the US Department of Education. Students must also meet general admissions requirements and the program's prerequisites. Provisional entry may be granted as students work to meet prerequisite requirements, which can be completed at DSU.



Dunlap-Stone University Degree Graduates

The following individuals are congratuated on completing the degree requirements for the following degrees:

Bachelor of Science - International Trade Management

Master of Science - Regulatory Trade Compliance

Regina Essenmacher

Emphasis: Management
Graduating Magna Cum Laude

Alicia Fowler

Emphasis: Trade Compliance Law
Graduating Magna Cum Laude

Bradley Ryan Jones

Emphasis: Trade Compliance Law
Graduating Magna Cum Laude

Kelley Peachey

Emphasis: -Trade Compliance Law

Laura Roberts

Emphasis: -Trade Compliance Law
Graduating Magna Cum Laude

Dexter Camille

Graduating: Magna Cum Laude

Joshua Clepper

Graduating: Summa Cum Laude

Jennifer King

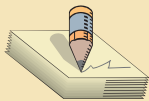
Graduating: Magna Cum Laude

Yegor Yelenchak

Graduating: Summa Cum Laude

Theresa Wiechman

Graduating: Magna Cum Laude



Dunlap-Stone University Student Honor Roll

The students shown here have demonstrated outstanding "A" performance .

Honor - Distinction - Excellence

ROBERT ADAMS
SHERRY AITKEN
ASHLEY AKERS
DANA ALVARES
MAGDELINE ANDRION
MIRONA AZIMIOARA
CHERYL BARKER
SEAN BARNI
BRANDI BETTIS
DANA BUSS
DEXTER CAMILLE
NICOLE CASTELLANOS
LISA CHAPIN
JOSHUA CLEPPER
TRENTON CONNER
ALISON COOPER
MONIQUE COX
RAMON CRUZ
KIM DILS
RYAN DOW

KATHLEEN DUBE
ROBYN DUNLAP
JENNIFER DURATO
ADRIENN DVORAK
CHRISTOPHER EAKIN
CAROLYN ELLIS
KRISTIN ESTENGER
TRACY EVANS
CLAY FACUNDO
JANICE GLAD
LESLEIGH GRAHAM
RUSTY GROVES
SHAILA GUILIANI
KIMBERLY HARPER
CHRISTINA HUELSMAN
DIANE HUSSEN
DEBORAH JANIS
MICHAEL JEFFERS
BRADLEY JONES
BRENDA JUNGE
JI KINNEAR
RYSZARD KOKOSZKA

LAURA KOSS
LYNN KRUSE
MICHAEL LANG
PATRICIA LATAXES
SCOTT LEWIS
SCOTT LONG
LISA MALDONADO
DEBRA MARROQUIN
SHERIE MATHIS
ANGELA MINER
STEVEN MONTGOMERY
SIMON MULLER
DAVID O'NEAL
SHELBY RICHARDSON
CHERYL ROCKWELL
JON ROSS
JUDITH SIMMONS
MARKUS SORRELLS
MARTIN STUNGER
AMY STYERS
JULIE SWINNEY

KORRIE THOMAS
EMIL TODOROV
BRENDA TRINKA
JOSEPH TURNER
KIMBERLY UNICK
CHERYL VAN ACHE
GILBERT WALTON
HUI INA WANG
KEVIN WHATTAM
SHERI WOLF
IAN WOLFE
ELIZABETH YANG
AARON YIP
NICOLE ZAMORA

Congratulations to these Outstanding Students.

Your Dedication, Perseverance and Hard Work are to be commended. Well done!



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at Dunlap-Stone University

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Phoenix, Arizona USA 85024

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