



Global Watch[®]

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New Trade Directions for Africa on Asia's Silk Road

Recently accelerating Asian trade and investment in Africa hold great promise for Africa's economic growth and development—provided certain policy reforms on both continents are implemented. This is a central finding of a new book, *Africa's Silk Road: China and India's New Economic Frontier*.

The author of the book, World Bank Economic Adviser **Harry Broadman**, says that skyrocketing Asian trade and investment in Africa is part of a global trend towards rapidly growing commerce among developing countries.

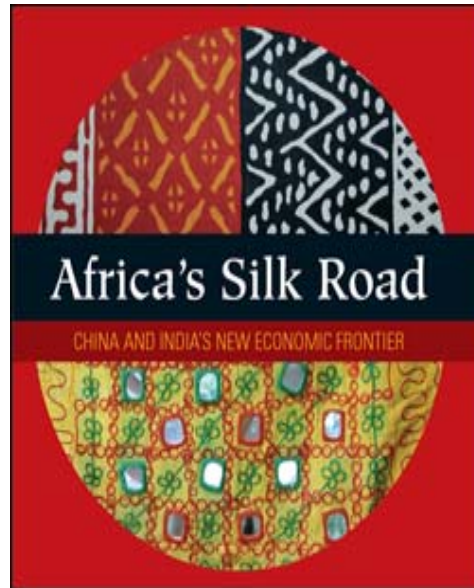
Africa's Silk Road provides, for the first time, systematic empirical evidence on how the two emerging economic giants of Asia—China and India—now stand at the crossroads of the explosion of African-Asian trade and investment.

Broadman surveyed 450 firms, including Chinese and Indian companies, operating in four African countries—South Africa, Tanzania, Ghana, and Senegal—and developed in-depth business case studies in the field of additional 16 Chinese and Indian firms in Africa. *Africa's Silk Road* offers original firm-level data on the African continent of Chinese and Indian firms operating there.

Growing demand and greater investment

The book shows that exports from Africa to Asia tripled in the last five years, making Asia Africa's third largest trading partner (27 percent) after the European Union (32 percent) and the United States (29 percent). Indian and Chinese foreign direct investment in Africa also grew, with China's amounting to \$US1.18 billion by mid-2006.

China and India each have rapidly modernizing industries and burgeoning middle classes with rising incomes and purchasing power. These societies are demanding not only natural resource-extractive commodities, agricultural goods such as cotton, and other traditional African exports, but also



diversified, nontraditional exports such as processed commodities, light manufactured products, household consumer goods, food, and tourism.

Because of its labor-intensive capacity, Africa has the potential to export these non-traditional goods and services competitively to the average Chinese and Indian consumer and firm.

"To be sure, if you take a snapshot of today, the overwhelming bulk of Africa's exports to Asia is natural resources," says Broadman. "But what's new is there is far more than oil that is being invested in—and this is an important opportunity for Africa's growth and reduction of poverty because Africa's trade for many years has been concentrated in primary commodities and natural resources."

Roadblocks along the way: asymmetries and the need for policy reforms

While growing Asian trade and investment is cause for optimism, the book cautions that there are major asymmetries in the economic relations between the two regions.

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**Donors Pledge - US\$4.5
Billion (€3.4 billion)
to Georgia**

Brussels: At a joint European Commission / World Bank Conference held in Brussels, 38 countries and 15 international organizations pledged to provide approximately US\$4.5 billion (€3.4 billion) to the country of Georgia. Without counting funding going to the financial sector, pledges amounted to some US\$3.7 billion, or €2.8 billion, to meet the urgent post-conflict and priority investment needs of Georgia over the coming three years (2008, 2009, and 2010). This level is even higher than the basic needs outlined in the *Joint*

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Notes from the President

2009 Bright Road Ahead... with Caution

by *Dr. Donald N. Burton*



One of the first things you will notice about this issue of GlobalWatch® is it is larger than previous issues by two pages. The expansion is indicative of our growth. We are gearing up for an incredible school year.

I believe the year 2009 is going to be a very important year for all of us involved in international trade. We are going to see many things come together as better cooperation between nations allows international controls on exports to gain momentum.

Here at DSU/IIEI we are doing our part by offering more courses on export regimens in 2009. We will be presenting, among others, an Ethics in Importing course, a Chinese Import Regulations course, and an overview course covering Australia's export controls. These six-week courses, like all of our courses, complement popular two-day briefing seminars on the topics, but cover the topic in-depth instead of just touching on a few key points. So if you are seeking to learn one of these important topics from beginning to end, watch for the announcement of their start-dates.

From all indications, 2009 is going to be a record setting year for the U.S. enforcement community. Our new Foreign Corrupt Practices Act (FCPA) course (IIEI-317) can help companies avoid the problems that resulted in Siemens AG receiving a Billion plus dollar fine related to the Foreign Corrupt Practices Act FCPA.

Brice Macartney's article on why industry professionals should become industry certified (see page 9) offers some good advice and pointers on the subject of certifica-

tion. Another article (see page 4) about how the European Union is prosecuting illegal cartel agreements demonstrates just how inter-connected the world is becoming. And Mike Turner's Outlook for 2009 (see page 7) forewarns us all about where enforcement actions will focus in the coming year.

There are many more compliance, business and general education courses under development. I think you'll be pleased with our growing offerings, so keep watching GlobalWatch® for announcements.

On January 1st we unveiled our new Dunlap-Stone University web site. It continues to be a work-in-progress for the next few months as we add content about the new School of Arts and Letters and the Graduate School at DSU. We will be adding information about these exciting programs in development, so check in often. We'll keep you in suspense a bit longer as to the specific timelines for these programs, but I'll hint that you'll soon see an Associate of Arts program as well as a host of new classes that you've suggested. The IIEI website will remain at it's current location for a bit longer and then will migrate to the DSU web site. The look and feel of the current site will be maintained, but we'll let you know when to change your bookmarks. Students will access the classroom via either site. Let us know what you think of the new DSU web site. Your comments and suggestions are always welcome.

There is a lot to read in this issue! We receive hundreds of inquiries about our programs every month

Advocacy Assistance for U.S. Exporters: What You Need to Know

U.S. Government advocacy support is a key component of the National Export Strategy. Within this strategy, the Advocacy Center plays a unique role among the array of U.S. Government trade promotion services. Since its creation in 1993, the Advocacy Center has helped hundreds of U.S. companies—small, medium and large enterprises—in various industry sectors win government contracts across the globe. Advocacy assistance is wide and varied but often involves companies that must communicate a message to foreign governments or government-owned corporations. The following is a brief synopsis of the commercial advocacy process and what you need to know to put U.S. Government resources and authority behind your company in foreign project or procurement competitions.

The Advocacy Application Process

1) The Advocacy Center grants U.S. Government (USG) commercial advocacy assistance on a case-by-case basis in response to requests made by firms pursuing foreign government procurements and/or projects.

a. Companies seeking USG support in specific commercial competitions must submit completed advocacy questionnaires to the Advocacy Center for review.

- The questionnaire must be signed by an officer of the filing company.

- In cases involving joint-ventures, consortia and teaming arrangements, the documents must be cosigned by an officer of the Bidder-of-Record.

- Lastly, the submitted advocacy questionnaire must be accompanied by a completed and signed agreement concerning bribery.

b. Together with the U.S. Embassy and relevant USG agencies, the Advocacy Center will conduct due diligence on the requesting company, bid/project and the competition.

c. On a case-by-case basis, following the due diligence process, the Advocacy Center and, if necessary, the USG Advocacy Network will make a national interest determination to identify whether the project qualifies for USG support. Typically, companies must demonstrate how supporting their bid will positively benefit the U.S. economy, primarily in the form of exports of goods and services.

Advocacy Center Services

2) Once a company's request has been qualified for USG advocacy assistance, the Advocacy Center will work with relevant agencies to devise an appropriate advocacy strategy.

a. USG advocacy ranges from U.S. Embassy and Consulate assistance to Sub-Cabinet and Cabinet messages delivered through a variety of media (e.g., letters, phone calls, or face-to-face meetings).

b. Typically, the Advocacy Center, working in unison with the company, plays a prominent role in coordinating both the message and the medium.

c. Recently, the Advocacy Center has developed a new role in marshaling U.S. export credit agency financing support, where appropriate, to relevant and qualified U.S. companies. The Advocacy Center has relationships with Ex-Im Bank, the Trade and Development Agency and the Overseas Private Investment Corporation that can aid U.S. competitiveness overseas.

Why We Advocate

3) These are the principal reasons why the USG provides advocacy services to U.S. firms in foreign government project or procurement competitions.

a. USG advocacy assistance promotes U.S. exports, supports U.S. employment and increases global market share for U.S. businesses.

b. In many cases, USG advocacy counters foreign government advocacy and political pressure, thus "Leveling the Playing Field" for U.S. companies.

c. USG advocacy encourages transparency, promotes fair treatment of U.S. companies and addresses bribery and corruption in tender processes.



BIS Update

Bureau of Industry and Security

Florida Co. Agrees to \$180,000 Civil Penalty

The U.S. Department of Commerce's Bureau of Industry and Security (BIS) announced that Marysol Technologies Inc., of Clearwater, Fla., agreed to pay a \$180,000 civil penalty to settle allegations that it committed nine violations of the Export Administration Regulations (EAR) when it exported laser equipment to the People's Republic of China (PRC), India, Belarus, and Russia without the required export licenses.

BIS alleged that between December 2003 and April 2006, Marysol Technologies committed nine violations of the EAR equipment resonator modules, module cavities, or components or parts for resonator modules and module cavities. These items are classified on the Commerce Control List under Export Control Classification Number 6A005, and are controlled for National Security reasons to the PRC, India, Belarus, and Russia.

Source: http://www.bis.doc.gov/news/2008/bis_press11042008c.htm

Illinois-Based Manufacturer of Scientific Equipment Settles Charges

BIS announced that Buehler Limited (BL) of Lake Bluff, Illinois has agreed to pay a \$200,000 civil penalty to settle allegations that it made 81 unlicensed exports of a lubricant containing Triethanolamine (TEA) in violation of the Export Administration Regulations. BL is a global manufacturer of scientific equipment and supplies for use in materials research and analysis. BL voluntarily disclosed the violations and cooperated fully in the investigation.

BIS alleged that between November 2001 and July 2006, Buehler Limited made 80 illegal exports of a lubricant containing Triethanolamine (TEA) to various destinations including China, Hong Kong, Thailand, India, Brazil and Israel without the required BIS licenses. TEA is a Schedule 3 chemical precursor and is controlled for Chemical/Biological, Anti-Terrorism, and Chemical Weapons reasons.

Source: <http://www.bis.doc.gov>

Chemical Weapons Convention Milestone Achieved



The Bureau of Industry and Security recently hosted a ceremony marking the completion of 100 industry inspections under the Chemical Weapons Convention (CWC), a milestone in the on-site verification of non-proliferation. Assistant Secretary Christopher Wall (right) presents a commemorative plaque noting the achievement to Julius Kozma of the Organization for the Prohibition of Chemical Weapons. The OPCW Member States and global chemical industry work in partnership to prevent the spread of chemical weapons by cooperating with on-site inspections of industrial facilities

U.S. Department of Commerce | Bureau of Industry and Security

UPDATE 2008

GLOBALIZATION, NATIONAL SECURITY, AND TECHNOLOGY LEADERSHIP

Conference on Export Controls & Policy

Update 2008 Web Portal Video Recordings Now Available Online

The Bureau of Industry and Security welcomes you to visit the Update 2008 Conference on Export Controls and Policy Web Portal at

http://live.blueskybroadcast.com/bsb/client/CL_DEFAULT.asp?Client=193656

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DDTC Update

Directorate of Defense Trade Controls

Annual Brokering Report Due

Section 38(b)(1)(A)(ii) of the Arms Export Control Act (22 U.S.C. 2778) and Part 129 of the International Traffic in Arms Regulation (ITAR) provide that every person engaged in the business of brokering activities shall register and pay a registration fee and that no person may engage in the business of brokering activities without a license that is issued in accordance with the Act. Section 129.9 of the ITAR requires an annual report of brokering activities to be submitted to the Office of Defense Trade Controls Compliance, Compliance and Registration Division from any person required to register under Part 129.

The report is due on **January 31, 2009** for all those who had current registrations during 2008.

The annual broker report must enumerate and describe your brokering activities by quantity, type, U.S. dollar value, purchaser(s) and recipient(s), license(s) numbers for approved activities and any exemptions utilized for other covered activities.

There is no specified format for this report at this time, provided all required information is included. Mail the report to:

Office of Defense Trade Controls
Compliance & Registration
Division
Attn: 2008 Annual Brokering Report
2401 E Street, NW, Suite 1304
Washington, DC 20522

If you have any questions, please send a facsimile letter to (202) 261-8198, to the attention of BROKERING ANNUAL REPORT.

Source: http://pmdtcc.state.gov/documents/Reminder_BrokerNotice.doc

Qioptiq S.a.r.L. Fined \$25 million

Luxembourg-based Qioptiq S.A.R.L. agreed to pay a \$25 million fine in connection with its unlicensed exports of military-grade night vision items and technology from its Singapore facility and other locations without required licenses from the Directorate of Defense Trade Controls. Most of the unlicensed exports were by a company before it was acquired by Qioptiq. Of the \$25 million, \$10 million was suspended — \$5 million in consideration of expenses already incurred by Qioptiq in its investigation of the illegal exports and \$5 million to be used to defray the costs of the compliance initiatives mandated by the consent agreement.

Source: <http://pmdtcc.state.gov>



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European Cartel Prosecution

**Legal and Political Question
Marks Remain**

BERLIN, GERMANY

The European Commission took action against illegal cartel agreements in the EU by imposing spectacularly heavy fines. Recently it hit the so-called Paraffin cartel. The companies concerned have to pay Euro 676 million to the EU treasury. Last year the leading manufacturers of elevators were hit, who together had to pay fines in an amount of just under Euro 1 billion. The Commission imposed a fine of Euro 479 million on ThyssenKrupp alone. Based on experts' observations, sanctions have been substantially increased over the last years. The total amount imposed tripled between 2005 and 2007.

Experts are not only alarmed on account of the amount of the fines imposed. Rather, many experts believe that the European cartel law has serious deficiencies. "The demand for a review of the cartel law system is appropriate and reasonable", conceded even the former Director-General for Competition of the EU Commission, Dr. Alexander Schaub, who discussed the legal and political question marks of the prosecution of cartels under EU law on Tuesday in Berlin in the German Parliamentary Society together with company representatives, expert politicians and jurists who had accepted an invitation from Prof. Dr. Rupert Scholz, an expert on constitutional law, and the ICC's national committees in Germany, Suisse and Austria.

Proceeding lacks legal standards

The well-known expert on European Law, Prof. Dr. Jürgen Schwarze, and lawyers from the law firm Gleiss Lutz have closely

In Compliance....

Export Enforcement Outlook for 2009

By Mike Turner, Partner
MK Technology
www.mktechnology.com

As we begin the New Year, we can look back at some important export enforcement developments in 2008. What can those developments tell us about compliance responsibilities in 2009 and beyond?

Enforcement Developments in 2008

In October, the Department of Justice (DOJ) released the results of the first 12 months of activity in its Export Enforcement Initiative. DOJ reported a 43% increase in the number of violators, with a total of 145 individual and corporate offenders charged with criminal violations of the Arms Export Control Act (AECA); International Emergency Economic Powers Act, (IEEPA), including violations of the Export Administration Regulations (EAR); and related statutes. Thirty-six percent of the cases involved illegal exports to Iran; an additional 19% involved illegal exports to China.

The Directorate of Defense Trade Controls (DDTC) at the State Department executed three new consent agreements, against Northrup-Grumman (\$15 million fine), Lockheed (\$4 million) and Boeing (\$3 million). This continued a trend of multi-million dollar consent agreements for AECA violations over the past few years that included the \$100 million fine against ITT Corporation – the largest fine ever assessed for export

control violations. DDTC also continued its practice of requiring that substantial portions of the fines be re-invested in improvements to the companies' compliance programs.

The Bureau of Industry and Security (BIS) began to apply the higher penalties, up to \$250,000 per violation, that went into effect in late 2007. BIS processed eight cases under the higher penalty provisions, with fines ranging from \$17,500 to \$400,000. BIS also issued new guidance on the principles of effective compliance that it considers when mitigating penalties for EAR violations. One particularly important principle is the conduct of a risk assessment to identify vulnerabilities to violations in your product line and international sales.

The Census Bureau published its revised Foreign Trade Regulations (FTR), which mandate export data submissions via the Automated Export System (AES) and create new criminal and civil penalties for failures to file and submission of false data via AES.

“Hot Button” Topics for 2009

What will be the export enforcement “hot button” topics for the coming year?

The enforcement agencies' mantras have remained unchanged: we can expect continued focus on any violations that involve Weapons of Mass Destruction (WMD)

proliferation or terrorism. The DOJ and DDTC cases evidence a continuing focus on exports of Munitions List articles in violation of the AECA.

Expect a focus on Iran and China. This will include not only direct exports to those countries, but also exports to transshipment countries such as the United Arab Emirates, Singapore and Hong Kong. Also expect a focus on exports to India as the US implements the civilian nuclear power agreement signed with that country in 2008.

Expect continuing emphasis on criminal prosecutions. The agencies will continue to emphasize exporters' submission of Voluntary Disclosures, and make use of the new penalty provisions for AES-related violations under the FTR.

What It Means for Compliance Professionals

If your company's export operations touch on any of these “hot buttons,” you should pay increased attention to your compliance efforts in the coming year. Do you deal in items or technology that have application in WMD programs or military systems? Be alert for “red flags” that could signal attempts to acquire your products for illicit end-uses.

Do you do business in China, India or countries with known transshipment histories? Review your due diligence efforts for those transactions to guard against diversions of your product to military end-uses or proscribed destinations.

In-Compliance - Continued from page 6

Do you have effective internal controls that facilitate compliance, uncover infractions, disclose violations and institute appropriate remedial action? Pay particular attention to the BIS principles of effective compliance, update your risk assessment, and address any vulnerabilities you may find.

Conclusion

Overall, we can expect 2009 to continue the trend of enhanced export enforcement. Focusing on enforcement developments and trends, and ensuring your internal controls address the “hot” enforcement issues, will help to maximize your compliance efforts and minimize your exposure to the agencies’ enforcement mechanisms.

About the Author

Mike Turner is the former director of the Office of Export Enforcement at BIS, and a senior law enforcement executive with US Immigration and Customs Enforcement and the US Customs Service. He is now a partner with MK Technology, a trade controls consulting firm in Washington, DC. He may be reached at mturner@mktechnology.com

President - Continued from page 2

from those wanting to enroll in one of our certification programs or in our very popular Bachelor of Science in International Trade Management degree. As a result, I encourage you not to wait until the last minute to enroll, because classes do tend to fill up quickly. I am pleased with the number of different courses we are now able to offer—just about anything a trade professional might want. If there is a topic that you’d like to see a course cover that we don’t currently offer, please let us know. Some of our most effective and popular courses have been ideas from students just like you.

I hope 2009 brings you prosperity and happiness. Thank you for your continued strong support. Be well.

Did You Know...

That in the Republic of Germany

German companies have to name a “person responsible for exports” and that person must be a member of the Board of Directors.

The government holds this person responsible and liable for the organization’s compliance with the export regulations, including responsibility for:

- Organization (structure and process)
- Selection of staff
- Further training of staff
- Supervision and monitoring
- Sign application forms (can be delegated)

Georgia - Continued from page 1

Needs Assessment (JNA) presented to the conference.

Georgia is now confronting two deep economic shocks – the first from the impact of the August conflict, and the second from the contagion effects on emerging markets of the current international financial crisis. At the same time, Georgia was commended for launching a swift and effective post-conflict recovery program. Repair of damaged infrastructure and social assistance and housing for internally displaced people began quickly.

The amount pledged is based on a *Joint Needs Assessment (JNA)* coordinated by the World Bank with the participation of the European Commission, the United Nations, the Asian Development Bank, the International Finance Corporation, the European Investment Bank, and the European Bank for Reconstruction and Development.

Donor contributions fall into a number of priority areas. First, there are clearly urgent social needs related to internally displaced people, as well as damaged infrastructure. Donors pledged a total US\$ 450 million, or €340 million, to support these more immediate needs.

Second, Georgia faces a severe budgetary shortfall, both as a result of

the fall in foreign investment as well as the slowdown in economic activity. If basic government services are to be maintained, donor support will be needed. Donors pledged a total of €445 million, or US\$586 million, to offset this budget shortfall.

Third, Georgia’s banking sector has been particularly hard hit with the fall in investor confidence as well as the overall international financial environment. Donors pledged a total of US\$850 million, or €650 million, to backstop the commercial banks in Georgia through loans, equity, and guarantees.

Finally, the conflict has highlighted the priority need for several core investments, particularly in transportation, energy, and municipal infrastructure. As a temporary measure to offset the fall in foreign investment in these areas, donors pledged a total of US\$2.65 billion, or €2 billion, for core investment priorities.

The total contributions pledged are in addition to ongoing programs. These contributions are also in addition to the recent approval of a new US\$750 million standby program by the International Monetary Fund (IMF). IMF funds are provided for

Georgia - Continued on page 11



Country Profile
Arab Republic of Egypt

Egypt is a country mainly in North Africa, with the Sinai Peninsula forming a land bridge in Western Asia. Covering an area of about 1,010,000 square kilometers (390,000 sq mi), Egypt borders the Mediterranean Sea to the north, the Gaza Strip and Israel to the northeast, the Red Sea to the east, Sudan to the south and Libya to the west. Its climate is desert; hot, dry summers with moderate winters

Egypt is one of the most populous countries in Africa and the Middle East. The great majority of its estimated 82 million people live near the banks of the Nile River, in an area of about 40,000 square kilometers (15,000 sq mi), where the only arable agricultural land is found. The large areas of the Sahara Desert are sparsely inhabited. About half of Egypt's residents live in urban areas, with the majority spread across the densely-populated centres of greater Cairo, Alexandria and other major cities in the Nile Delta.

Egypt is famous for its ancient civilization and some of the world's most famous monuments, including the Giza pyramid complex and its Great

Sphinx. The southern city of Luxor contains numerous ancient artifacts, such as the Karnak Temple and the Valley of the Kings. Egypt is widely regarded as an important political and cultural nation of the Middle East.

Egypt's economy depends mainly on agriculture, media, petroleum exports, and tourism; there are also more than three million Egyptians working abroad, mainly in Saudi Arabia, the Persian Gulf and Europe. The completion of the Aswan High Dam in 1970 and the resultant Lake Nasser have altered the time-honored place of the Nile River in the agriculture and ecology of Egypt. A rapidly-growing population, limited arable land, and dependence on the Nile all continue to overtax resources and stress the economy.

The government has struggled to prepare the economy for the new millennium through economic reform and massive investments in communications and physical infrastructure. Egypt has been receiving U.S. foreign aid (since 1979, an average of \$2.2 billion per year) and is the third-largest recipient of such funds from the United States following the Iraq war. Its main revenues however come from tourism as well as traffic that goes through the Suez Canal.

The best known examples of Egyptian companies that have expanded regionally and globally are the Orascom Group and Raya. The IT sector has been expanding rapidly in the past few years, with many new start-ups conducting outsourcing business to North America and Europe, operating with

Egypt
at a Glance

- GDP – official exchange rate: \$127.9 billion (2007 est.)
- GDP - real growth rate: 7.1% (2007 est.)
- GDP - per capita (PPP): \$5,000 (2007 est.)
- Inflation Rate: 9.5% (2007 est.)
- Labor Force: 22.1 million (2007 est.)
- Unemployment 9.1% (2007 est.)
- Population: 81,713,520 (July 2008 est.)
- Exports: \$24.45 billion f.o.b. (2007 est.)
- Exports - Commodities: crude oil and petroleum products, cotton, textiles, metal products, chemicals
- Exports - Markets: US 9.7%, Italy 9.5%, Spain 7.6%, Syria 5.5%, Saudi Arabia 4.9%, UK 4.2% (2007)
- Imports: \$44.95 billion f.o.b. (2007 est.)
- Import - Commodities: machinery and equipment, foodstuffs, chemicals, wood products, fuels
- Import - Markets: US 11.7%, China 9.7%, Italy 6.4%, Germany 6.3%, Saudi Arabia 4.7%, Russia 4.3% (2007)
- Foreign Exchange Rate: Egyptian pounds (EGP) per US dollar - 5.67 (2007)
- Internet Users: 8.62 million (2007)
- Internet Hosts: 175,342 (2008)

Source: CIA World Fact Book

companies such as Microsoft, Oracle and other major corporations, as well as numerous SME's. Some of these companies are the Xceed Contact Center, Raya Contact Center, E Group Connections and C3 along with other start ups in that country. The sector has been stimulated by new Egyptian entrepreneurs trying to capitalize on their country's huge potential in the sector, as well as constant government encouragement.



Multilateral Development Banks' Purpose

A Multilateral Development Bank (MDB) is partially a development agency and partially a bank. It obtains its funding from contributions from a number of nations, hence the term multilateral. The U.S. government is a substantial contributor to most of the active MDB's worldwide. The purpose of the MDB's is to provide a funding source for less developed countries (LDC) that otherwise may not have the ability to borrow for needed projects.

As a lender to the LDC's, a multilateral development bank can then promote long-term and stable growth in those countries. It can also coordinate sound financial decisions and provide oversight to the LDC's and the developments that are the basis of the MDB loans. Therefore, a MDB is both a contact and conduit for you to research and bid on those contracts and sub-contracts that will arise from MDB-funded development. The five principal multilateral development banks are: the World Bank, the Inter-American Development Bank, the Asian Development Bank, the African Development Bank, and the European Bank for Reconstruction and Development.

- **World Bank**
<http://www.worldbank.org/>
- **Inter-American Development Bank**
<http://www.iadb.org/>
- **Asian Development Bank**
<http://www.adb.org/>

Courtesy TradePort
<http://www.tradeport.org>

Why Become Industry Certified?

By Brice Macartney

'Why should I become IIEI industry certified?' This is a question I hear every day in IIEI's Certification Department. It is a fair question, and it has many answers. Here is a short list of just a few of the reasons you should earn an industry certification:

1. Increase your value to your employer and to yourself.

There is no doubt that employees who have earned an industry certification are more valuable to their employers. You have clearly demonstrated that you have mastered the skills required for your position. Certification is also valuable when you're looking for that next position.

2. Set yourself apart from the pack.

Industry certification is a distinction that, quite simply, not everyone has. It shows your dedication to your chosen vocation, which sets you apart from those who just show up for work everyday.

3. Keep yourself competitive.

A certification adds professional value to your resume. Let's face it: listing conferences and internal training on your resume just won't work. In the ever-changing and growing world of international trade, demonstrating that you stay current is a never-ending task. Certification is a competitive edge if you're seeking a new position or moving up in your company.

4. Increase your confidence!

Sometimes internal training can be the same old 'check the block' exercise of going through the motions just to satisfy management. IIEI's certification hold-

ers have demonstrated that they meet the knowledge requirements by completing hands-on training and continue to meet the high standards the certification represents. People notice the difference in our students before and after they get certified; you can hear the confidence in their voice.

5. Most employers will pay for, or reimburse you for the training and the certification test!

Most employers see the value in our accredited, college level courses that are relevant to the needs of the international trade community. You could get a free education as well as a possible raise and/or a promotion for successfully completing a program. By earning your certification, you gain third-party validation that you possess the knowledge and skills to your employer.

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EU Cartels - Continued from page 5

examined the critical issues of cartel law in a study. This study provides evidence of numerous weaknesses of the current practice. For a better understanding, one should take a look at the usual procedure. Naturally cartels are discreet associations. The Community's aim is to crack open the illegal groups by way of an immunity rule. The first member of the cartel who confessed will go unpunished. Other companies incriminating themselves will be granted a deduction from the fine. The Commission is free to determine the amount of the fine at its absolute discretion. The scope of such fine is up to ten percent of the sales of an undertaking or a group of undertakings. Theoretically large undertakings could thus be sanctioned by fines in the amounts of billions. The undertakings concerned are only able to a limited extent to take action against a decision of the Commission and can file a legal action with the Court of First Instance of the European Court of Justice in Luxemburg. However, the judges do not re-examine the underlying facts, but only conduct a limited examination without investigating the facts themselves. The same applies to the European Court of Justice itself as the next and at the same time last instance.

The study produced by Gleiss Lutz finds fault with the unclear legal basis of the law governing cartel fines. According to the study, the criteria for determining the amount of fines are too vague and there is no sufficient legal basis for a liability of the parent undertakings for their subsidiaries. The jurists consider the immunity rule as well to be questionable, because the other members of the cartel are factually forced to incriminate themselves in order to escape higher penalties. A further issue with which the experts find fault is the limited judicial control of the decisions. The co-author of

the study, Prof. Dr. Jürgen Schwarze, therefore demands a number of reforms of the applicable law. This includes, inter alia, regulations regarding the amount of fines and the requirement of evidence of an infringement of the cartel prohibition by specific employees. A further proposal is that compliance programmes by which undertakings intend to prevent infringements should be considered in mitigation. Primarily, however, the analysis advocates a procedure based on the rule of law in which the EU Commission acts as prosecutor, and a court examines the facts of the individual case and determines the amount of fines. Mr Schwarze demanded that "a new two-stage procedure should be introduced".

Panel discussion shows need for reforms

The experts largely agree that there is a need for reforms. "We believe that the European cartel law must be closely examined", Mr. Scholz explained. Klaus-Heiner Lehne, too, who is a member of the legal committee of the European Parliament, is of the view "that there is a need for improvement in terms of the rule of law". The EPP Member of Parliament pleaded for an independent cartel authority in Europe based on the model of the German Federal Cartel Office and for a discussion about introducing the formation of a cartel as a criminal offence. In this way offences could also be punished by a prison sentence. This is common practice in the USA. Mr. Lehne also considered it important that compliance programmes are taken into account when determining the award of punishment.

The spokesman for legal policy of the CDU/CSU parliamentary group in the German Bundestag, Jürgen Gehb, criticised the lack of a legal basis in the law governing cartel fines. Mr. Gehb said that it is not the amount

Assistance - Continued from page 3

Value-added to US Firms

4) There are a number of services the Advocacy Center provides which offer a competitive advantage to US companies competing in foreign competitions.

a. Within the large US Government bureaucracy, the Advocacy Center centralizes commercial advocacy services in one office.

b. The Center offers an ability to mobilize resources in support of US company proposals and business opportunities.

c. The Center also offers institutionalized process to support of the US national interest, creating and retaining US jobs and expanding the US export base.

Outside the Center's Scope of Work

5) There are certain company requests that fall outside the Advocacy Center's scope of work.

a. The Advocacy Center is focused almost exclusively on foreign business opportunities which involve foreign government decision-makers and does not typically become involved in private sector commercial transactions.

b. The Advocacy Center's focus is on specific commercial transactions, not policy advocacy. There are other offices in the International Trade Administration that handle policy-related or market access and trade compliance advocacy assistance.

Source: <http://export.gov/Advocacy/assistance.html>

FCPA Compliance... You Personally Are Liable

Attention Compliance Professionals: The Department of Justice (DOJ) has stepped up its efforts to curb corruption and bribery. Recent headlines tell the story: Companies like Fiat and Willbros are in the spotlight, each paying fines in the tens of millions of dollars, and in the case of Siemens AG, fined \$1.6 Billion. In each of these instances, potential prison sentences for the violators existed and may still be pending in some cases.

Not surprisingly, many compliance professionals are unaware of the risks and responsibilities set forth in the Foreign Corrupt Practices Act (FCPA) that may impact them. For compliance staff members, it is as important as understanding the EAR or ITAR, maybe more. Why? Because penalties for violations can be just as severe, if not more so personally than for an ITAR violation: fines to individuals up to \$1,000,000 and imprisonment of 5 years or more, and the company

cannot pay the fine for you! However, your company can be fined as much as twice the expected benefit per violation, and possible debarment.

Whether you are a contracts administrator, an empowered official, purchasing manager, compliance specialist, sales manager, senior manager, or the catch all “new guy”, the regulations must be followed. The DOJ’s enforcement of the FCPA applies equally to everyone in your company. How many of your co-workers know what FCPA stands for much less how to abide by it? The more you and you co-workers know, the safer you and your company will be. Just as it is with trade compliance, education is the key.

To fully learn this critical topic, enroll in IIEI’s online six week accredited course: Introduction to the FCPA (IIEI-317). The next class starts February 12th. Space is very limited in the popular course. Call an Advisor today (800) 474-8013.

Looking for a Class to fill CEUs in 2009?

Start 2009 off right by fulfilling your Continuing Education Requirement (CEUs) for your Certified U.S. Export Compliance Officer® (CUSECO®) designation. While offered throughout the year, this spring offers a host of courses that meet this requirement. Just a few include:

- **People’s Republic of China**
Export Controls (January 22)
- **Foreign Corrupt Practices Act**
(February 12)
- **UK Export Controls**
(February 26)
- **Agreements Under the ITAR**
(March 5)
- **Commerce License Exceptions**
(March 19)
- **Empowered Official Essentials**
(April 16)

Those that hold other certifications should speak with an advisor to determine an appropriate course to meet their certification’s requirements.

Georgia - Continued from page 7

international reserves and cannot be used for budget or investment purposes. However, donors welcomed the IMF program as a solid foundation for donor contributions to be used effectively.

The Government of Georgia welcomed the donor pledges as vital for Georgia’s speedy recovery. The Prime Minister of Georgia, Lado Gurgendze, stated that “*On behalf of the Georgian people we thank the international community for their solidarity. With their help, I know Georgia’s recovery will be swift.*”

Source: <http://web.worldbank.org>

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U.S. Antiboycott Laws: A Quick Tutorial

The U.S. antiboycott laws were adopted to encourage, and in specified cases, require U.S. firms to refuse to participate in foreign boycotts that the United States does not sanction. They have the effect of preventing U.S. firms from being used to implement foreign policies of other nations which run counter to U.S. policy.

Who Is Covered by the Laws?

The antiboycott provisions of the Export Administration Regulations (EAR) apply to the activities of U.S. persons in the interstate or foreign commerce of the United States. The term "U.S. person" includes all individuals, corporations and unincorporated associations resident in the United States, including the permanent domestic affiliates of foreign concerns. U.S. persons also include U.S. citizens abroad (except when they reside abroad and are employed by non-U.S. persons) and the controlled in fact affiliates of domestic concerns. The test for "controlled in fact" is the ability to establish the general policies or to control the day to day operations of the foreign affiliate.

What do the Laws Prohibit?

Conduct that may be penalized under the TRA and/or prohibited under the EAR includes:

- Agreements to refuse or actual refusal to do business with or in Israel or with blacklisted companies.
- Agreements to discriminate or actual discrimination against other persons based on race, religion, sex, national origin or nationality.
- Agreements to furnish or actual furnishing of information about business relationships

with or in Israel or with blacklisted companies.

- Agreements to furnish or actual furnishing of information about the race, religion, sex, or national origin of another person.
- Implementing letters of credit containing prohibited boycott terms or conditions.

The TRA does not "prohibit" conduct, but denies tax benefits ("penalizes") for certain types of boycott-related agreements.

What Must Be Reported?

The EAR requires U.S. persons to report quarterly requests they have received to take certain actions to comply with, further, or support an unsanctioned foreign boycott.

The TRA requires taxpayers to report "operations" in, with, or related to a boycotting country or its nationals and requests received to participate in or cooperate with an international boycott. The Treasury Department publishes a quarterly list of "boycotting countries."

How To Report:

The EAR requires reports of receipts of boycott requests to be filed quarterly on form BIS 621-P for single transactions or BIS 6051P for multiple transactions received in the same calendar quarter.

The forms are available on-line in a fillable pdf format, or you may still obtain paper forms.

Penalties:

The Export Administration Act (EAA) specifies penalties for violations of the Antiboycott Regulations as well as export control violations.

These can include:

Criminal:

The penalties imposed for each "knowing" violation can be a fine of up to \$50,000 or five times the value of the exports involved, whichever is greater, and imprisonment of up to five years. During periods when the EAR are continued in effect by an Executive Order issued pursuant to the International Emergency Economic Powers Act, the criminal penalties for each "willful" violation can be a fine of up to \$50,000 and imprisonment for up to ten years.

Administrative:

For each violation of the EAR any or all of the following may be imposed:

- General denial of export privileges
- The imposition of fines of up to \$11,000 per violation; and/or
- Exclusion from practice

When the EAA is in lapse, penalties for violation of the Antiboycott Regulations are governed by the International Emergency Economic Powers Act (IEEPA). The IEEPA Enhancement Act provides for penalties of up to the greater of \$250,000 per violation or twice the value of the transaction for administrative violations of Antiboycott Regulations, and up to \$1 million and 20 years imprisonment per violation for criminal antiboycott violations.

Where to Get More Information:

U.S. Department of Commerce
BIS/Office of Antiboycott Compliance
Room 6098
1401 Constitution Avenue, N.W.
Washington, D.C. 20230
(202) 482-2381

Source: www.bis.doc.gov/complianceand enforcement/antiboycottcompliance.htm

EU Cartels - Continued from page 10

of the fines which is at issue, but that such fines have to be enforced in a manner which is in accordance with the rule of law. Klaus Becher, chief corporate counsel at Daimler Financial Services and deputy chairman of the competition committee of the BDI, i.e. the Federal Association of the German Industry, also complained about legal deficiencies. Mr. Becher said that the industry finds it incomprehensible that the Court of First Instance does not conduct any examination of the facts. "This must be changed", demanded Mr. Becher.

"Medieval Clan Liability"

Another issue which causes considerable annoyance in the industry is the fact that the parent undertaking is held liable for offences in subsidiaries. "This corresponds to clan liability in the Middle Ages", said the chief corporate counsel of the Total SA group, Dr. Peter Herbel. He said that in criminal law as well, the rule is that it is not an offender's father or mother who is wanted, but the offender himself. Total itself is currently affected by penalty fines in the Paraffin cartel through a subordinated subsidiary. Mr Herbel complained about a high award of punishment set by the Commission and said that the fine was seven times the amount of the company's annual sales and 40 times the amount of its profit. Dr. Klaus Moosmayer, too, considers the Commission's practice of holding an entire undertaking liable for an infringement of an individual company to be questionable. Mr Moosmayer, who is the head of the compliance programme of Siemens AG, believes that a universal supervision of all employees is impossible in large undertakings. "There will always be inappropriate behaviour", fears Mr Moosmayer, and the efforts taken by the company groups to prevent infringements should therefore be taken into account. Prof. Dr. Karl Hofstetter, chief corporate counsel and member

of the supervisory board of the Swiss Schindler Holding AG, demands in addition that individual offenders be punished. "If the undertaking has done everything to prevent infringements, then the individual offender must be held liable", demanded Mr. Hofstetter.

Fines have a deterring effect - but fine practice should be reviewed

However, the former Director General for Competition of the EU Commission, Mr. Schaub, also asked the attendants to have sympathy for the severe course of action taken by the EU Commission. He said that cartel infringements had been regarded as a trivial offence for a long time and had virtually not been prosecuted, and that the Commission had taken care of this matter. The expert emphasised the effect of big fines as a deterrent. He defended the penalty fines by stating that "this has resulted in drastic changes in the undertakings", but that nonetheless it has meanwhile become necessary to review the current practice. The Federal Cartel Office as well considers the cartel law to be quite a sharp instrument. A representative of the Office emphasised that the immunity rule is "extremely effective" and that the amounts of fines are a deterrent.

In summary, Prof. Scholz expressed the warning that the efficiency of the measures aimed at combatting cartels must not serve as an authorisation to evade the rule of law.

Further information available from:

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Courtesy: PR Newswire Europe Limited.
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Silk Road - Continued from page 1

While Asia accounts for one-quarter of Africa's global exports, this trade represents only about 1.6 percent of the exports shipped to Asia from all sources worldwide. By the same token, FDI in Asia by African firms is extremely small, both in absolute and relative terms.

And, the rise of internationally competitive Chinese and Indian businesses cuts into both domestic sales and exports of African producers of, for example, textiles and apparels.

"It is imperative that both sides of this promising South-South economic relationship address asymmetries and obstacles to its continued expansion through reforms," says Broadman.

The study details a series of reforms:

- "At-the-border" reforms, such as elimination of China and India's escalating tariffs on Africa's leading exports; and elimination of Africa's tariffs on certain inputs that make its own exports uncompetitive.

- "Behind-the-border" reforms in Africa, to unleash competitive market forces, strengthen its basic market institutions, and improve governance.

- "Between-the-border" improvements in trade facilitation infrastructure and institutions to decrease transactions costs, such as customs administration, transport and communications.

- Reforms that leverage linkages between investment and trade to allow African businesses' participation in modern global production-sharing networks generated by Chinese and Indian investments in Africa.

With this newest phase in the evolution of world trade and investment flows taking root—the increasing emergence of South-South international commerce—African businesses cannot afford to be left behind. Those reforms are critically important to allow Africa to be able to genuinely participate—and most importantly, benefit from—the new patterns of international commerce.

Source: <http://go.worldbank.org/G002KIPA00>



Dunlap-Stone University

Honor - Distinction - Excellence

University Unveils New Web site

January 1st, DSU unveiled its new web site at www.dunlap-stone.edu. The new site, which serves as the administrative home for the university, will showcase the expanding schools within DSU and contains general university information.

Students enrolled in IIEI classes will now have a new look and a new direct source for information regarding the Bursars Office, Registrar's Office and records.

As we expand our offerings, we invite you to check in frequently with the DSU site for exciting offerings and new services.

The International Import-Export Institute remains the business school under the larger DSU umbrella, and it's site can be accessed through the DSU home page.

Customs Broker Exam Preparation Courses Added Starting February 5th

Due to increased demand, we have added another start-date for IIEI-304, US Customs Brokers Prep Exam Course. In addition to the January start-date already on the schedule, a Feb 5th date has been added, which ends March 18th. It is now open on a first come first served basis. Enrollment deadline for this class is January 29th.

VA Students

U.S. Military Veterans: To use your veteran's benefits at DSU/IIEI, you must be enrolled in a degree program. Students who enroll under "open enrollment" do not qualify for VA or the Montgomery GI Bill. Speak with your enrollment advisor for how to meet this requirement.

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derstanding the major factors affecting the global marketplace. It is an excellent exporting and importing skills-building course for the new entrant to international trade who wants a complete survey of the discipline, and a great refresher course for those wanting to revisit the discipline before sitting for the industry certification examinations. All of the major concepts and terminology of international trade are addressed in the hands-on activities and topic papers that form the basis of this course. The cost of the course is \$885.00 and typically starts three times per year. Enroll

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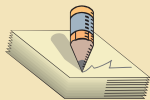
Belated Congratulations: Name Correction

The International Import-Export Institute strives to maintain the highest standards in communicating industry events and celebrating the achievements of IIEI students, faculty, and supporters. However, occasionally clerical mistakes do occur. We apologize for the following error in our November/ December issue of GlobalWatch®

Please join us in congratulating **Shery Thabet Michael** on receiving the designation of **Certified International Trade Marketing Specialist®** through the American University of Cairo, Egypt.

Disclaimer: IIEI Certification credential testing is separate from Dunlap-Stone University and the International Import-Export Institute. Distance Education and Training Council (DETC) accreditation does not cover such certification. All courses offered by DSU/IIEI that help prepare individuals for IIEI Certification testing are accredited by DETC.

Note: All CE® are from University of Texas Pan-American. The "N" marking is for Multimix Academy in Lagos, Nigeria



Student Honor Roll

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

Honor - Distinction - Excellence

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Leslie Boyd – OK
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Linda Esposito – FL
Derek Farias – MA

Susan Fernandez – FL
Kate Fraser – MI
Kenneth Galica – MA
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Aridth Gibbons – GA
Robin Green – NY
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Evelina Osmanova – WA
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Carol G Smith – IA
James W Smith – WA
Kallie Smith – TX
Kristen Smith – DC
Toni Stivers – CA
Kristin Thomas – WA
Leola Thomas – CA
Darline Torres – WA
Pamela Turinsky – PA
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Congratulations!



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