



# ICPA

International Compliance Professionals Association

## **TRADE WINDS - MAY 2010**

*ICPA's "Pirate Quest, 2010" – "Yo-ho-ho" and Another Fun and "Compliance Fact-Filled" Annual Conference!*

*By Karen Wilder*



This past March (March 14 – 18, 2010), the ICPA "family" (some 600 of them in total) met at Disney World's Contemporary Resort in Orlando, Florida for the Annual Conference on import and export trade compliance. Embracing the theme of the "Pirate Quest, discovering the treasures of compliance", attendees charted a course across three and half days of informative sessions (54 sessions in total -- covering import, export, and individual / compliance department development) and availed themselves of the plentiful opportunities to meet, reconnect, and network with ICPA colleagues and service providers, and completed their voyage with a treasure chest full of valuable trade compli-

ance knowledge and insight. The sessions and longer format workshops were exceptional; and for any sessions that attendees missed or want to see again and again (yes, these sessions were **THAT GOOD!!**), the ICPA has posted the presentations to the ICPA Library. In addition to our importer and exporter and trade services provider members, ICPA was also happy to host a number of officials from CBP, BIS, and CPSC who presented and participated in the conference.

Our ICPA "mateys" like to have fun and that was on full display at the opening reception on the eve of the conference: Boisterous buccaneers in full pirate dress (Yes! That really was Ann Lister and Craig McClure under-

neath the fantastic, fearsome pirate garb! And hats off to

Dana Alvarez and Cindy Allen and others in their great "pirate" get-ups!!), plenty of grog, good music and merriment awaited all the adventurous compliance souls that joined in the festivities! And the conference activities finished on a very light-hearted note with the comedian and musician David Glickman and a full-scale, swashbucklin' fun "Treasure Hunt" at EPCOT! (The First Place Winner of the Hunt, Jayakumar Pilla, receives an all expense paid trip to next year's ICPA conference! Congratulations Jayakumar).

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## Annual Conference—Continued from pg 1

**“IT’S A GREAT  
“FACE-TO-FACE”  
FORUM WHERE  
THE ICPA  
MEMBERSHIP  
COMES TO  
SHARE ITS  
KNOWLEDGE  
AND  
EXPERTISE. “**

The ICPA newsletter caught up with a couple of this year’s attendees to ask them what they liked about the conference. *“What I most appreciated about the Orlando ICPA conference was the opportunity it gave for our staff to focus on diverse compliance training topics during one week. Diverse in the sense that they ranged in level of experience as well as in subject matter. This ability to bring together our team for training at a reasonable cost in a short time frame with valuable content is what distinguishes the conference from other training venues. In addition, we are able to network and share best practices. I have established contacts over the years at ICPA who I regularly confer with on challenging trade compliance topics. This has been invaluable to me. At this year’s conference I had a problem with a license (we still are managing compliance even though we are in attendance!) and I was able to get a response from an industry expert on the spot.”* Heather Kramer/Henkel USA

And *“It’s a great “face-to-face” forum where the ICPA membership comes to share its knowledge and expertise. We do share our knowledge throughout the year (like with the Q/A email program), but at the conference we get the opportunity to do so in person, over the course of a few, info packed days. I’ve been attending the conferences since 2006, and they just get better and better with each successive year. We have such good people in ICPA who share their compliance talents through great presentations and discussions that happen during the conference. It’s also a great deal (\$\$ wise) and definitely worth it when you think about all you can get out of it.”* Quinn O’Rourke/ LaCrosse Footwear

We also caught up with one of the representatives from fellow international trade organization NCBFAA, who attended and presented at the conference. *“Over the past year the NCBFAA has worked closely with the ICPA to strengthen our partnership. Not only does our membership at the NCBFAA, typically customs bro-*

*kers and freight forwarders, benefit from this type of partnership, but the ICPA members do as well. The recent conference allowed us to highlight that by offering a joint panel with ICPA and the NCBFAA focused on education. I always enjoy the relaxed atmosphere of the ICPA and meeting our Certified Customs Specialist (CCS) and Certified Export Specialist (CES) participants that are ICPA members. Cindy Allen/ NCBFAA*

After a wonderful conference in Orlando, we’re already preparing for the fun and value to be found in next year’s conference! Get ready for the ICPA Annual Conference, 2011 that takes place in Phoenix, Arizona from March 20-24, 2011. (And for those of you planning your budgets for 2012 and 2013, please include attending ICPA’s 2012 conference in Atlanta GA and ICPA’s “10<sup>th</sup> Anniversary” conference in Honolulu, HI. The “10<sup>th</sup> Anniversary” conference will be free – free registration, that is



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**Avast Yee Mateys**



**Jayakumar Pilla—Treasure Hunt Winner with some of the local color**



**The Marine Corps Color Guard at the Opening Ceremonies**

## Meet your Board Members and Officers—by Cindy Hazlett

This grid is to introduce you to the current Officers, Board Member and staff of ICPA. As you can see we are from a diversified background covering many areas of the industry. We are also located throughout the United States, from East Coast to West Coast. The things we have in common are that we are volunteers and we love ICPA.

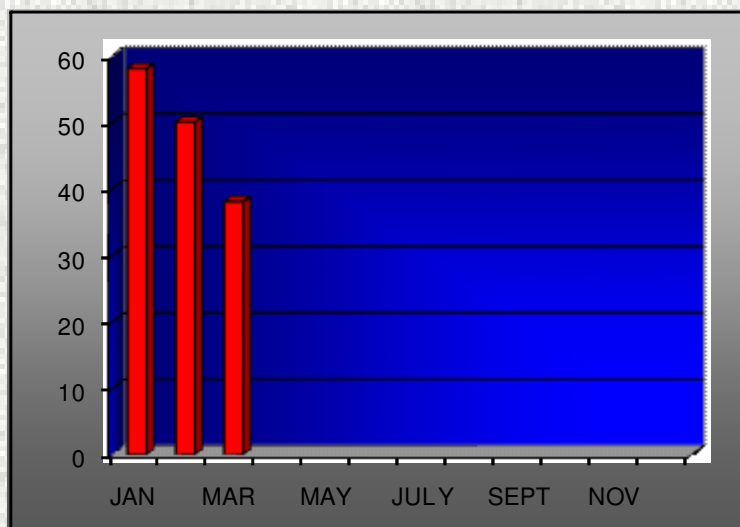
Position	Name	Company	Nature of Business	Location	Obscure Fact
President	Mario Aleman	Sure Power Inc/ Cooper Bussman	Manuf. Power management for DC electrical systems	Tualatin, OR	Actually admits to having two lawyers in his family!
1 <sup>st</sup> V. P	Blane Carroll	Volvo Logistics, N.A.	Logistics provider for Volvo, N.A.	Greensboro, NC	Taking first family (including new baby daughter) vacation
2 <sup>nd</sup> V. P.	Dan Hall	Lockheed Martin Missiles and Fire Con-	Defense Contractor (makes things go "boom")	Grand Prairie, TX	Was once a C&W DJ for KIKN radio in Corpus Christi
Secretary	Sheree Lupo	Corning Inc.	Telecommunications Manufacturer	Hickory, NC	7 <sup>th</sup> great granddaughter to Daniel Boone. Fittingly, cur-
Treasurer	Kathy Bumpus	Stryker	Medical Devices, Manufacturer	Kalamazoo, MI	Grew up on a 40 acre vineyard.
Chairman of the Board	Margo Hammer	Verizon Communications	Communications products and solu-	Washington, D.C.	Was Chief Privacy Officer prior to current position
Board Member	Steve Aiello	Vista Print	Custom Printing, Business, promotional, family	Boston, MA	HUGE Boston sports teams fan (even when they are losing). Go Red Sox!
Board Member	Joseph Burks	Cooper Industries	Diversified manufacture of electrical	Peachtree, GA	Loves to ride, rides to live. Loves riding his Harley!
Board Member	Bobby Butler	Universal Weather and Aviation	global provider of trip support services, jet fuel and ground support to corporate flight departments.	Houston, TX	Primary goal in life is to put a smile on his daughters' faces, even if it means attending a Hannah Montana concert!

**The Inaugural ICPA EU conference is filling up fast! Don't miss this opportunity to get your EU counterparts involved in this 2 day networking conference. See the link below and forward to your counterparts.**

<http://icpainc.org/conferences/eu>

## Meet your Board Members and Officers (continued)

Board Member	Ken Carlstedt	Momentive Performance Materials	Specialty chemicals	Albany, NY	Lived, worked or traveled to 23 countries so far.
Board Member	Christina Fanfara	Acushnet Co.	Sporting Goods – Golf	Fairhaven, MA	Connoisseur of chewing gum.
Board Member	Toni Garcia	Emerson Tool Co.,	Manuf. Wet Dry Vacuums, Pro. Vacuums & Ceiling Fans	St. Louis, MO	Has worked in almost every facet of industry, imp-exp, CFS, broker, forwarder, SS line, integrated carrier
Board Member	Andrew Gray	W. R. Grace	Chemicals	Columbia, MD	Once owned a coffee house where he played guitar and sang self written songs
Board Member	Cindy Hazlett	Superior Industries	Aluminum Wheels	Van Nuys, CA	First job was playing Paul Newman's daughter in a movie
Board Member	Mike Rafferty	Mercedes-Benz U.S. Int'l.	Automotive Mfg.	Tuscaloosa, AL	He was once a pirate
Board Member	Lynda Westerfield	Alcon Labs	Eye Care Products	Fort Worth, TX	Lived in Saudi Arabia for couple of years and has extremely dainty feet!
Project Director	Ann Lister	Texas Instruments	Calculators	Fort Worth, TX	Aspires to be a miniature cattle rancher
Web Master	Rick Miller	Tyler Search	Cat Herder	Clark Hill, SC	Bee Keeper and speaks fluent French
Administrator	Elisabeth Sherrell			Fort Worth, TX	Was once the only Passenger on commercial flight from Chicago to Dallas



**Watch Us Grow—ICPA New Member Counts in 2010**

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## A Dog's Fairy Tale

By Linda Mills



As in all good fairy tales, this one includes a creature in peril, big hearts, creative minds, an epic journey and a happy ending. In this tale, the creature in peril was a little puppy adopted by a U.S. Army unit. Among those perils were war, culture, regulations, logistics, great distances, international boundaries, illness and weather. Yet the biggest peril facing the little puppy was an uncertain future if he had to be left behind.

The happy ending all began with a little social networking.

“RECON WAS IN  
VERY DIRE  
STRAITS”

ICPA member John McPeak was catching up with a friend on Facebook when he came across a posting from a U.S. Army Sergeant. The Sergeant mentioned a little puppy named Recon that they had adopted. The reconnaissance unit was in Afghanistan and had rescued the puppy while on patrol. The unit found Recon in a pipe while they were taking cover in a firefight. Little Recon was so young he hadn't even opened his eyes yet. The soldiers took him back to their base and soon he was serving duty as playmate, stress reliever and a reminder of a kinder, gentler world. Each night he'd pick a member of the unit and sleep with them on that narrow cot.

As John learned, the unit had several members killed and several more wounded in action. They were finally coming home the first part of the year but due to a military regulation they would not be able to bring Recon with them. To make matters worse, due to culture and conditions, if left behind, Recon faced an all but certain death. John contacted the Sergeant (he'd read about in Facebook) and told him he thought there was a way to get Recon home. The Sergeant wrote back that he had tears in his eyes when he got the message as they'd all but given up hope. Now Recon had to come home.

John thought of the ICPA and our vast network of compliance professionals. Surely we could help one small dog and one army unit that had already suffered too much loss. In response to an “Ask the Membership” question, several ICPA members volunteered to do what they could. The solution was clear and straightforward get Recon on a flight from Afghanistan to the United States.

That was almost a no go from the beginning. Flights in and out of the country to the west are almost non-existent. There is nothing like a rescue organization or humane society in Afghanistan. Just when it looked like things were hopeless, your author discovered that the SPCA International had set up “Operation Baghdad Pup” to bring adopted animals to the United States from Iraq. Hopefully they could help with the Afghan pup. John contacted the SPCA International and waited and waited for an answer.

In the meantime and with the help of an Afghani, Recon was moved from the unit's outlying base to a forward operating base. The move was in the hopes of facilitating his transport out. After still not hearing from the SPCA Intl. contact, John received a heartbreaking email from the unit's Sergeant about Recon being ill and the likelihood that if Recon got loose at his new base he'd be

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## A Dog's Fairy Tale (continued)

At last Terri Crisp of the SPCA Intl. contacted John. The catch was that the SPCA Intl. had not set up the same rescue service in Afghanistan. But, she knew of a safe house that had been set up by a U.S. reporter based in Pakistan. The reporter had rescued a Pakistani dog and set up a small organization named Tigger House in Islamabad to try and help other animals. Your author remembered the tearjerker of a story that she wrote and was able to find her contact information. But how to get Recon from Afghanistan to Pakistan?

It was here that the ICPA, in the form of our own Ann Lister, jumped in to help. Ann with the help of Tigger House was able to get Recon on a flight to Islamabad, Pakistan. In Pakistan he was met by a Tigger House volunteer. There he received his inoculations, was crate trained and prepared for his journey to the United States. After some weeks, more hurdles which included getting bumped from a flight, and many hours of behind the scenes work from Ann, he finally began the long journey from Pakistan to JFK in New York and then on to Georgia. At JFK he was met by Sanjay Hurry, a friend of John's. Sanjay took him to stretch his legs and then drove him to New Jersey.



In New Jersey he got a little rest and relaxation at the home of Victoria Quick (sister of ICPA member Kristine Quick). It's hard to believe but the obstacles in Recon's journey weren't quite done yet. He still had to make it to Georgia and eventually his forever home.

Just as one of the worst snowstorms in history hit the east coast, ICPA member, Rick Miller picked up the intrepid traveler and they began the next leg of the journey. Through the snow and many miles Rick and Recon finally arrived in Georgia. Recon was met by a member of the army unit who had been wounded in an attack while in Afghanistan. He was home recovering and would give Recon a place to stay until his "Dad" made it home..

In late February the unit finally made it home to a reunion with their families and friends. To the surprise of most of them - the Sgt. and his Dad had kept it a secret - there was Recon waiting to greet his soldiers.

Now Recon was home.

As all of you who attended the Orlando conference know, Recon is now living happily ever after with his family. I know he must have been very happy to have met all of the unsung ICPA members who, behind the scenes, donated time, money, services ( Earthcare) and their prayers to make his epic journey possible. In the end it was the ICPA team who gave this story a happy ending.

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## BOOK REVIEWS



“A Peace to  
End All Peace  
by David  
Fromkin

As specialists in international trade, we should also be interested in the workings of the international world around us. This includes not only the commercial and regulatory world but also the geopolitical, cultural and social world. These factors all influence and are influenced by the dynamics of religion, nationalism, ideologies and dynasties that interplay in any nation or region.

As much of what we see and hear today revolves around the Middle East and the problems there, a better understanding of the history is necessary to a clear understanding of the issues, how they developed and what, if anything, can be done to resolve them. One of the most enlightening books on this subject is *A Peace to End All Peace*. In it, author David Fromkin analyzes the current conflict in the Middle East and traces its roots to the struggles between the “super powers” of the late 1800’s and early 1900’s and their desire to dominate and control the various regions in the Middle East from Egypt and the Arabian Peninsula in the south to Turkey and eastward to Persia (now Iran). Mr. Fromkin points out that much of this struggle revolved around controlling sea access, or preventing Russia from having a warm-water port as far as the British were concerned. Another significant consideration was in protecting access to those colonies that European nations already claimed in south Asia to assure they could be adequately protected. Also, this was the period when it was just beginning to be recognized that access to the oil potential of the Middle East would become a strategic issue.

Mr. Fromkin traces the political intrigue, treaties and promises made and broken, lack of understanding of various and diverse cultures and how this resulted in many miscalculations by powerful individuals and nations. In many cases, so-called experts had never visited the region and had little knowledge of the geopolitical issues other than hearsay or materials which were frequently written by other “experts.” As a consequence, many decisions were made strictly on the basis of what the European politicians felt was best for their countries, resources they needed or areas they wanted to control. One of the results of these decisions was the eventual existence of countries we recognize today but that had not existed previously, including Iraq, Israel, Jordan and Lebanon. Little or no regard was given to the various indigenous population tribes, cultures, religions or ideologies as the “super powers” attempted to impose their control and expand their areas of influence.

The author posits that these actions are the cause of many, if not most, of the problems that exist in the Middle East today. He points out that many of the new geopolitical divisions disrupted long-standing historical relationships. In the process, historical antagonists were suddenly thrown together in a new political subdivision with no cultural support on which to draw, and frequently with disparate and conflicting religions and ideologies. Mr. Fromkin, in identifying these changes, provides an explanation for the current tensions, wars and terrorism that exists in the Middle East today and that is being exported to other countries. (contributed by Don Niece)



“Half the Sky”  
by Nicholas D.  
Kristof and  
Sheryl WuDunn

This book examines the oppression of women and girls in the developing world. While it can be very shocking to read about the brutality, abuse, and primitive practices that women in other parts of the world endure, it is eye-opening and I would recommend that anyone read this book to have a deeper understanding of how important it is to empower women and girls in developing nations. The accounts of individual women are very touching as the authors really got to know their subjects, and shared their stories with compassion and respect.

While some may think it depressing to read such a book, the authors do an excellent job of sharing the various ways, small and large, that people can get involved in providing support to women and girls, and how much difference even small things can make in a community. The book also examines such issues as sweatshops, and how they have helped in some ways by providing jobs to women who otherwise would not find work outside the home. A totally different take on that type of work from what we have in the developed world, and the U.S. (contributed by Kathryn Terry)

## ICPA Family Album

Jim Wickstead's son graduated from UU Navy bootcamp last weekend. His division earned more flags during training than any other division, beating everyone but the Seal division. He is now at ATO training in Pensacola, Florida and will soon receive his assignment aboard a ship. Go Navy!!



We wish Aasha (Desloge) Wanless well as she pursues her new career as a stay at home mom to her 16 month old and little one due in September. Aasha's last day at General Mills will be May 27th. Per personal e-mail is [Aasha.wanless@yahoo.com](mailto:Aasha.wanless@yahoo.com) and number is 952-836-6621. She says she'll miss working in compliance but mostly will miss her ICPA friends!

Congratulations to Matt Beck and family on their newest arrival:

**Graham Matthew Beck**

**Born February 16, 2010**

**8 pounds, 20.5 inches**



Congratulations to Stacey Krause and family on their newest arrival:

**James William Krause**

**Born February 2, 2010**

**7 pounds 6 oz, 20.5 inches**

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## **Congratulations to Greg Hodge—2009 ICPA Founders Award Winner** **By Lynda Westerfield**



Congratulations to Greg Hodge – the 2009 winner of the ICPA Founders Award! The Founders Award is presented to the ICPA member who has the most membership referrals in a year.

Greg has been with TRG since 2006 and is currently a Senior Account Executive. TRG provides Customs bonds and marine cargo insurance to companies that import into the United States. TRG also has TRG Direct, an importer direct-filing service for U.S. Customs entries and 10+2/ISF (Importer Security Filing.) Greg says, “Traditionally, these services have been provided by customs brokers, but now they can be provided directly, resulting in lower prices and higher levels of expert customer service.”

Greg has been an ICPA member since 2008. He lives in gorgeous Big Sky, Montana, which is about 10 miles from Yellowstone National park, and works out of his office in Big Sky. Greg enjoys hunting, hiking, backcountry packing and riding, fishing, skiing, camping and snowmobiling. He has 2 children, Cody (5) and Haley (2).

Dear ICPA Member,

Welcome to the inaugural edition of the ICPA newsletter. I hope you will find it informative and useful to you as we strive to continue to provide our members with another tool for your compliance needs.

We have just completed our annual conference held this year at the Contemporary Resort in Orlando, Florida and again I would like to thank all the ICPA member volunteers for a job well done. Even in tough economic times our membership philanthropy never fails to give back to people in need. This year we have donated to the Red Cross for the Haiti relief effort and if you were at the conference you saw Recon the charismatic dog that was imported in from Afghanistan to reunite with his U.S. soldier family. During the conference members brought gifts to be raffled off for the Make a Wish foundation which also proved to be a rousing success.

I would like to stress that ICPA is a result of its members! Without dedicated volunteers led by our board of directors and officers ICPA would not exist. Get involved, during the year we will ask for volunteers through the “ask the membership” e-mail forum to help with the different projects. It is a great way to give back to our compliance family and support the true nature of an all volunteer organization like ICPA.

The remainder of the year will prove to be a year of change as the President of the United States supports the nation’s efforts to increase exports from the U.S. This effort will add an additional challenge to our compliance colleagues as we continue to protect and guide our companies through the complexity of trade compliance.

Best Regards,

Mario V. Aleman Jr.

President

International Compliance Professionals Association

## **“Brokering” Under the International Traffic in Arms Regulations**

**By Bruce Leeds, Braumiller Schulz LLP**

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Those who come from an import or Customs background would probably think of brokering in terms of a customs broker, who clears shipments through Customs on behalf of an importer. In the world of export controls it has a much different meaning.

First – the regulatory stuff. The International Traffic in Arms Regulations (ITAR) are found in 22 CFR Parts 120-130. The ITAR contains the regulations applicable to export of defense articles, defense services and related technical data. “Defense articles” include any articles or technical data described in the US Munitions List in Part 121.1 of the ITAR, including articles made, modified or adapted for a military purpose. The term also covers many articles used in space applications. “Defense services” are defined in Part 120.9 and include the “furnishing of assistance (including training) to foreign persons, whether in the United States or abroad in the design, development, engineering, production, assembly, testing, repair, maintenance, modification, operation, demilitarization, destruction, processing or use of defense articles.”

“Broker” is defined in Part 129.2 as “any person who acts as an agent for other in negotiating or arranging contracts, purchases, sales or transfers of defense articles or defense services in return for a fee, commission or other consideration.” The same section defines “brokering activities” as including the financing, transportation, freight forwarding, or taking of any other actions that facilitates the manufacture, export, or import of a defense article or defense service, irrespective of its origin.”

Thus a foreign sales representative employed by a US company to arrange the sale of military articles would be a broker under this definition.

Brokering itself is not prohibited; however brokers (as defined in Part 129) must be registered with the Directorate of Defense Trade Controls (DDTC) of the Department of State. The registration requirement applies to any US person (wherever located) or any foreign person located in the US or otherwise subject to the jurisdiction of the US who engages in brokering activities. “Subject to the jurisdiction of the US” is not defined; however DDTC tends to take a broad view of this term. A foreign sales representative engaging in the sale of articles subject to the ITAR would be interpreted to be subject to the US, no matter where in the world the representative was located.

The registration requirement includes completion of the DS-2032 registration statement, execution of a transmittal letter signed by an officer of the company, and payment of a registration fee. See Part 122 of the ITAR for details. A company falling under the brokering rules and already registered with DDTC as a manufacturer or exporter of defense articles can have the brokering activity included in its DDTC registration, but may have to pay additional fees.

There are some exceptions to the registration requirement. They include:

- Employees of the US or foreign governments or international organizations acting in their official capacity.

- Companies exclusively in the banking, carrier or freight forwarding business who merely arrange transportation or financing and do not otherwise engage in brokering activities.

And now the bad stuff. Failure to register as a broker or making false or misleading statements in the registration are violations of the ITAR. Violators are subject to civil or criminal penalties. The party can also be suspended or debarred from participating in export transactions. A party that has participated in non-registered brokering activity can also file a voluntary self-disclosure under Part 127.12 of the ITAR.

In November, 2009, DDTC proposed new Part 129 brokering regulations to the Defense Trade Advisory Group. The proposed regulations would, amongst other things:

- Expand the definition of brokering and provide more detail on what is considered brokering under the ITAR.

- Provide more detail on the registration requirement.

- Provide more detail the requirement for brokers to obtain prior approval for certain transactions.

- Explain how parties can obtain further guidance from DDTC on whether certain activities constitute brokering.

As of this writing these proposed regulations have not been adopted; however they do give some insight on DDTC’s thinking on the subject.

### **Some Takeaways**

- “Brokering” has a unique definition under the ITAR for activities involving the negotiation, sale and other services by an agent in return for consideration.

- Any party interpreted to be a broker under the ITAR must register with DDTC and pay the required fees. Failure to do so may result in penalties and sanctions.

- The US Government has taken a broad interpretation of brokering and has prosecuted offenders.

- DDTC has proposed new regulations that may expand the definition of brokering and the parties that must register.

This may sound like an esoteric subject but is a real life responsibility and potential issue for companies involved with exporting under the ITAR.



# ICCPA

International Compliance Professionals Association

## Trade Winds—Pacific/Mountain Team

Ann Lister

Erin Barclay

Linda Mills

Cindy Hazlett

Karen Wilder

Bruce Leeds

Don Niece

Kathryn Terry

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Z R U I B L F X A E L D W K D I  
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 License  
 Penalty  
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 Warehouse