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### Slipup With Licenses for Animal Pathogens Brings \$54K Fine, Audits in Rare Export Case

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Generally speaking, compliance-related training programs help prevent lapses by educating employees on how to handle a situation, including what not to do under given circumstances. But on occasion, they may also prompt an individual to realize—and, ideally, to acknowledge—that a mistake has already been made.

That eureka moment appears to have been behind the recent settlement between Princeton University and the Bureau of Industry and Security (BIS), part of the Department of Commerce, involving animal pathogens that were shipped—or in legal terms, exported—without licenses.

Sometime during a 2018 training session on export control regulations, “Princeton independently identified this issue and brought it to the attention of [BIS] in a voluntary disclosure,” spokesman Michael Hotchkiss told RRC in an email.

BIS and Princeton were involved in resolving the violations until earlier this year. On Feb. 2, BIS announced<sup>[1]</sup> that Princeton had potentially violated the Export Administration Regulations (EAR), and had “cooperated with the investigation that was conducted by the New York Field Office of BIS’s Office of Export Enforcement.” The settlement documents<sup>[2]</sup> were signed by Pablo Debenedetti, Princeton dean for research, and Ramona Romero, vice president and general counsel, in January.

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