



U.S. Customs and  
Border Protection

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**PUBLIC VERSION**

EAPA Cons. Case Number: 7250

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On behalf of Lyke Industrial Tool, LLC  
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Re: Notice of initiation of investigation and interim measures taken as to Lyke Industrial Tool, LLC concerning evasion of the antidumping duty order on diamond sawblades from the People's Republic of China

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Dear Ms. Liang and Mr. Pickard:

This letter is to inform you that U.S. Customs and Border Protection ("CBP") has commenced a formal investigation under Title IV, Section 421 of the Trade Facilitation and Trade Enforcement Act of 2015, commonly referred to as the Enforce and Protect Act ("EAPA"), for Lyke Industrial Tool, LLC. ("Lyke"). Specifically, CBP is investigating whether Lyke has evaded antidumping duty ("AD") order A-570-900<sup>1</sup> on finished diamond sawblades ("covered merchandise") and parts thereof from the People's Republic of China ("China") by (1) misclassifying and transshipping covered merchandise through Thailand, and (2) misclassifying covered merchandise shipped directly from China. Because evidence establishes a reasonable suspicion that Lyke has entered merchandise into the United States through evasion, CBP has imposed interim measures.

Period of Investigation

Pursuant to 19 C.F.R. § 165.2, entries covered by an EAPA investigation are those "entries of allegedly covered merchandise made within one year before the receipt of an allegation ...." Entry is defined as an "entry for consumption, or withdrawal from warehouse for

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<sup>1</sup> See *Diamond Sawblades and Parts Thereof from the People's Republic of China and the Republic of Korea: Antidumping Duty Orders*, 74 FR 57,145 (Nov. 4, 2009).

consumption, of merchandise in the customs territory of the United States.” 19 C.F.R. § 165.1. Diamond Sawblades Manufacturers’ Coalition (“DSMC”) filed the allegation on July 2, 2018.<sup>2</sup> CBP acknowledged receipt of the properly filed allegation against Lyke on July 3, 2018.<sup>3</sup> As such, the entries covered by the investigation are those entered for consumption, or withdrawn from warehouse for consumption, from July 3, 2017, through the pendency of this investigation. *See* 19C.F.R. § 165.2.

#### Initiation:

On July 25, 2018, the Trade Remedy Law Enforcement Directorate (“TRLED”), within CBP’s Office of Trade, initiated an investigation under EAPA as the result of an allegation submitted by DSMC as to evasion of antidumping duties.<sup>4</sup> DSMC alleges that Lyke evaded AD order A-570-900<sup>5</sup> on finished diamond sawblades and parts thereof from China by: (1) misclassifying and transshipping covered merchandise through Thailand; and (2) misclassifying covered merchandise shipped directly from China. Specifically, DSMC alleges that Lyke transshipped Chinese-origin diamond sawblades through Thailand and, upon entry into the United States, declared the merchandise as a product of Thailand. DSMC further alleges that Lyke misclassified these transshipped entries of diamond sawblades to avoid review by CBP when entered into the United States and declared the merchandise as not subject to the AD order. DSMC also alleges that Lyke misclassified entries of diamond sawblades shipped directly from China to avoid review by CBP when entered into the United States and declared the merchandise as not subject to the AD order. A more detailed description of both allegations is described below.

DSMC’s allegation regarding an evasion scheme of misclassification and transshipment of covered merchandise through Thailand is predicated on four main claims. First, a company named Life Tools/Like Tools Co., located in Thailand, began exporting merchandise described as “circ saw blds bse mtl w wrking pt of Steel”<sup>6</sup> to Lyke in 2018, with no history of prior exportation. Second, a diamond sawblades industry expert with ties to the Thai diamond sawblades industry was unable to verify that Life Tools/Like Tools Co., Ltd. exists in Thailand. Third, the merchandise in these alleged shipments of diamond sawblades from Thailand is likely misclassified as sawblades with a working part of *steel*, not diamonds. Fourth, Lyke has historically imported diamond sawblades from China, as evidenced in the record of EAPA Case Number 7205.<sup>7</sup> Each of these claims is described in more detail below.

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<sup>2</sup> *See* EAPA Allegation, at Parts 1-3 (July 2, 2018) (“Allegation”).

<sup>3</sup> *See* Receipt Notification Email from EAPA Investigations to Dan Pickard, Wiley Rein LLP (July 3, 2018).

<sup>4</sup> *See* Memorandum to Carrie L. Owens, Director, Enforcement Operations Division, “Initiation of Investigation for EAPA Case Number 7250” (July 25, 2018).

<sup>5</sup> *See Diamond Sawblades and Parts Thereof from the People’s Republic of China and the Republic of Korea: Antidumping Duty Orders*, 74 FR 57,145 (Nov. 4, 2009).

<sup>6</sup> *See* Allegation, at 5.

<sup>7</sup> *See id.*

With respect to transshipment, DSMC asserts that there is no evidence that a legitimate manufacturer of diamond sawblades by the name of “Life Tools” or “Like Tools Co, Ltd.” exists in Thailand or has otherwise exported diamond sawblades from Thailand prior to these 2018 shipments to Lyke. To support this argument, DSMC submitted an affidavit from a source familiar with the diamond sawblades manufacturing industry in Thailand, stating that its source has never heard of either company conducting any diamond sawblades operations in Thailand.<sup>8</sup> In addition, DSMC’s source consulted with another Thai company familiar with the diamond sawblades industry in Thailand, which also confirmed that it was unaware of an active diamond sawblades manufacturer named “Life Tools” or “Like Tools Co., Ltd.” DSMC also draws parallels between the names of the purported Thai supplier to that of Lyke, the importer, and its parent company, Danyang Like Tools Manufacturing of China (“Danyang Like”). DSMC surmises that the similarity in names further suggests the likelihood of a coordinated attempt by Lyke and Danyang Like to transship covered merchandise. DSMC alleges that this information reasonably suggests that covered merchandise was transshipped through Thailand and presented as Thai-origin merchandise upon entry into the United States.

DSMC further alleges that the transshipped merchandise is also likely misclassified. DSMC submitted trade data reflecting the two shipments of circular sawblades identified in the allegation. The data shows that these shipments were exported by Life Tools/Like Tools Co., Ltd. located at 521 3 Moo 3 Tambol Prakasa Muang District Samutprakarn, Thailand, 10280, and consigned to Lyke.<sup>9</sup> DSMC states that the description of merchandise included in these entries indicates that the merchandise is sawblades with a working part of steel.<sup>10</sup> DSMC argues that the record from EAPA Case 7205<sup>11</sup> shows that Lyke historically imports diamond sawblades - *i.e.*, sawblades with a working part of *diamonds*, not sawblades with a working part of *steel*. DSMC alleges that the classification for steel would not be listed as one relevant for this AD order. Thus, DSMC alleges that this information reasonably suggests that Lyke engaged in evasion by improperly describing and misclassifying the merchandise in a manner that it would not be subject to the AD order to avoid review by CBP.

DSMC’s allegation regarding Lyke’s misclassification of merchandise shipped directly from China is premised on alleged changes in the classification of imported cup wheels from China. Historically, Lyke entered diamond cup wheels classified under heading 6804 of the Harmonized Tariff Schedule of the United States (“HTSUS”), which provides for, *inter alia*, millstones.<sup>12</sup> However, trade data reflects the identification of merchandise in [ ] of [ ] recent shipments consigned to Lyke as “millstone cup wheels” classified under either of the following headings of

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<sup>8</sup> See *id.* at 5 and Exh. 15.

<sup>9</sup> *Id.* at 5 and Exhs. 12 and 13 (providing trade data from [ ]).

<sup>10</sup> *Id.* at 6 and Exhs. 12 and 13.

<sup>11</sup> See Updated Confidential version of EAPA Allegation – BC (“Supplement to Allegation”), July 5, 2018, at 3-4 and Exhs. 8 and 10, at 2. Exhibit 8 includes a submission from Lyke to CBP, wherein Lyke discloses and affirms that it imports diamond sawblades. Exhibit 10 is factual information submitted by Lyke, again stating that it has previously entered diamond sawblades into the customs territory of the United States.

<sup>12</sup> *Id.* at Exh. 2, at 5.

the HTSUS: 8302, which provides for various articles of base metal; or, 3926, which provides for various articles of plastic.<sup>13</sup>

DSMC argues that the trade data reasonably suggests that the change in classification from heading 6804, HTSUS, to headings 8302 or 3926, HTSUS, is similar to the pattern of evasion previously engaged in by Lyke. This pattern was investigated in EAPA Consolidated Case 7205. Specifically, DSMC argues that the record of EAPA Consolidated Case 7205 shows that Lyke repeatedly shifted its HTSUS classifications and importing behavior to avoid payment of AD duties.<sup>14</sup> The purpose of such misclassification would be to avoid review by CBP when the merchandise was entered into the United States and declared as not subject to the AD order.

On July 3, 2018, CBP acknowledged receipt of DSMC's properly filed EAPA allegation concerning evasion by Lyke. CBP will initiate an investigation if it determines that "{t}he information provided in the allegation ... reasonably suggests that the covered merchandise has been entered for consumption into the customs territory of the United States through evasion." 19 C.F.R. §165.15(b). Evasion is defined as "the entry of covered merchandise into the customs territory of the United States for consumption by means of any document or electronically transmitted data or information, written or oral statement, or act that is material and false, or any omission that is material, and that results in any cash deposit or other security or any amount of applicable antidumping or countervailing duties being reduced or not being applied with respect to the covered merchandise." 19 C.F.R. §165.1. Thus, the allegation must reasonably suggest not only that merchandise subject to an AD order was entered into the United States by the importer alleged to be evading, but that such entry was made by a material false statement or act, or material omission, that resulted in the reduction or avoidance of applicable AD cash deposits or other security.

In assessing the totality of circumstances and evidence provided in the allegation, we find that the allegation reasonably suggests that Lyke has entered merchandise through evasion of AD order A-570-900 by importing goods that were likely transshipped from China through Thailand. Additionally, information reasonably suggests misclassification of covered merchandise transshipped through Thailand and misclassification of covered merchandise shipped directly from China. Specifically, DSMC submitted trade data reflecting a new pattern of shipments to Lyke of circular sawblades with a working part of steel, not diamonds, from Life Tools/Like Tools Co., Ltd., a Thai entity unknown to industry experts. Furthermore, DSMC also submitted trade data regarding shipments from China that reasonably suggest misclassification of merchandise subject to the AD order, as the trend follows a similar pattern of evasion discovered in EAPA Consolidated Case 7205. For the forgoing reasons, TRLED determined on July 25, 2018,

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<sup>13</sup> *Id.* at 7 and Exh. 16 (providing public trade data from [      ]).

<sup>14</sup> *See generally* Allegation; and Supplement to Allegation, at 6 and Exh. 2, at 2-3 and 5-6 (wherein Lyke indicates the dates and changes in classification made by Lyke throughout the period of investigation of EAPA Case Number 7205). *See also* Allegation at Exh. 1, at 5 (providing the notice of initiation of an investigation and interim measures taken as to Power Tek Tool, Inc. and Lyke Industrial Tool, LLC concerning evasion of the antidumping duty order on Diamond Sawblades from the People's Republic of China, (Sept. 22, 2017)). The notice describes CBP's cargo examination on August 11, 2017, of a shipment imported by Lyke, in which CBP determined that diamond sawblades were misclassified.

that the allegation reasonably suggests that Lyke entered covered merchandise into the United States through evasion by a material false statement or act, or material omission, and initiated an investigation pursuant to 19 U.S.C. §1517(b)(1).

### Interim Measures

Not later than 90 calendar days after initiating an investigation under EAPA, CBP will decide based upon the record of the investigation if there is reasonable suspicion that such covered merchandise was entered into the United States through evasion. Therefore, CBP need only have sufficient evidence to support a reasonable suspicion that merchandise subject to an AD or countervailing duty order was entered into the United States by the importer alleged to be evading by a material false statement or act, or material omission, that resulted in the reduction or avoidance of applicable AD or countervailing duty cash deposits or other security. If reasonable suspicion exists, CBP will impose interim measures pursuant to 19 U.S.C. § 1517(e) and 19 C.F.R. § 165.24. As explained below, CBP is imposing interim measures because there is a reasonable suspicion that Lyke entered covered merchandise into the United States through evasion by means of transshipment through Thailand. *See* 19 C.F.R. § 165.24(a).

### *Examinations of Entries from Thailand*

CBP conducted cargo examinations on six separate entries of potentially covered merchandise entered by Lyke during our period of investigation. CBP determined that a portion of one entry of possibly Chinese-origin diamond sawblades with Made in China markings altered or obscured with Made in Thailand labels was transshipped through Thailand and bore false country of origin labels. CBP found no discrepancies in the remaining five entries.

On May 18, 2018, CBP examined entry [ ]6457, imported by Lyke with a bill of conveyance departure date of April 26, 2018.<sup>15</sup> The entry documents declared the merchandise as HTSUS number [ ],” with a country of origin of [ ], and identified the shipper as [ ]

.<sup>16</sup> Upon examination of the entry, declared as type 01, CBP discovered that the shipment contained plain, brown cartons of circular sawblades with diamond ceramic segments attached. Each diamond sawblade was packaged within a plain, white paper sleeve with [ ] sawblades packed within each carton. The cartons were packed on pallets. The condition of the brown cartons varied.

Of particular interest was one pallet that contained well-worn brown cartons which, upon further examination, exhibited evidence of repacking in a third country. Those cartons still bore fully intact or partially torn-off “Made in China” markings, on top of which “Made in Thailand” labels on white paper was affixed. In all, CBP discovered [ ] cartons of possible Chinese-origin diamond sawblades, likely repackaged in Thailand, bearing false country of origin labels. The

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<sup>15</sup> *See* MCEE – EAPA 7250 - Cargo Examination Memorandum, Sept. 27, 2018 (“Cargo Exam Memo”).

<sup>16</sup> *See id.*; *see also* Lyke – EAPA 7250 – CF28 Response Part 1, at 13 and 15-18 (June 4, 2018) (“Lyke CF28 Response Part 1”).

diamond sawblades sampled from this entry all bore a “Made in Thailand” sticker on one tooth of each blade.

To further investigate the country of origin at issue in this examination, on May 28, 2018, CBP issued Lyke a Customs Form (“CF”) 28. CBP requested, in part, submission of a factory profile, employee information, and production records to substantiate the operations of Like Tools and that the diamond sawblades contained in this entry were produced on-site in [

] facility. Upon review of Lyke’s CF28 response,<sup>17</sup> CBP determined that the submitted documentation did not substantiate that the diamond sawblades contained in the entry were produced at Like Tools’ facility. In particular, while document analysis presented product manufacturing steps with [ ] summary totals utilized by Like Tools, the traceability of specified blade types was not verifiable because the records did not indicate specific [ ] or other identifying information as the materials moved through the manufacturing process. Therefore, production of the certain diamond sawblades in entry [ ]6457 could not be substantiated.

On June 26, 2018 and September 25, 2018, CBP examined three additional entries ([ ]4345, [ ]6969, and [ ]1298) made by Lyke with bill conveyance departure dates of May 24, June 2, and August 25, 2018, respectively. The three entries contained diamond sawblades with Thailand as declared country of origin.<sup>18</sup> The shipments, declared as type 01 under HTSUS classification 6804.21.0080, were presented for examination in plain unmarked, brown cartons with small glued-on white labels. The glued-on labels included the style number and stated “Made in Thailand.” Within each identical plain brown carton were [ ] white paper envelopes, each containing a circular diamond sawblade with no permanent label or marking. Each blank sawblade had a small “Made in Thailand” sticker appearing on a single tooth of the sawblade. While country of origin remained a concern, CBP did not obtain any evidence of misclassification for these entries.

### *Foreign Site Visit to Like Tools*

On September 18, 2018, CBP conducted a site visit to Like Tools to address the discrepancy in the facts presented in the allegation versus those presented by Lyke in its CF28 response.<sup>19</sup> Prior to arriving at the facility, CBP observed that the telephone numbers for Like Tools, as submitted in Lyke’s CF28 Response, were inoperable.<sup>20</sup> CBP also learned prior to the onsite visit that Like Tools’ address noted on entry documents, [ ],<sup>21</sup> is not the physical location of Like Tools; rather, a company named [ ] operates at that address. CBP discovered that the

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<sup>17</sup> See Lyke CF28 Response Part 1, at 21-81.

<sup>18</sup> See Cargo Exam Memo.

<sup>19</sup> See CBP Attaché – Like Tools Site Visit Memo and Photographs – BC.pdf (“Site Visit Memo”)

<sup>20</sup> See Lyke CF28 Response Part 1, at 17 and 24.

<sup>21</sup> See Site Visit Memo, at 1.

actual physical location of Like Tools facility is Bodiphat Alley, Muang District Samutprakarn, Thailand.<sup>22</sup>

Upon gaining access to Like Tools' facility, CBP observed that it consisted of two floors – the first floor held production operations and the second floor, accessible by a stepladder and elevator, held a packaging operation. CBP further observed that Like Tools runs [ ] operations utilizing saw blanks and other raw materials sourced from China. Like Tools has [ ] stations for [ ] processing for slotted, diamond tipped sawblades, reportedly operational since February 2018 with a claimed capacity of over [ ] diamond sawblades per day per day for [ ].<sup>23</sup> Like Tools officials stated that they only sell to the United States. Only one [ ] station was operational on the date of CBP's visit. Like Tools officials noted that the [ ] station had been inactive for three months. Like Tools also has [ ] station for [ ], reportedly operational since August 2018 with a claimed capacity of [ ] diamond sawblades per day.<sup>24</sup> Like Tools officials stated that it runs [ ]-hour shift per day, [ ] days a week. CBP observed approximately [ ] employees on the production floor which, as claimed by Like Tools officials, is the total amount of workers employed at the facility. CBP also observed that the employees present during the onsite visit were wearing company uniforms.<sup>25</sup> We note that in the employee pictures submitted to CBP in Lyke's CF28 response, which were also purportedly of employees on the company floor, the employees were not wearing company uniforms.<sup>26</sup>

We note that Like Tools officials claimed that each [ ] operation had a capacity of over [ ] sawblades per day, which appeared to be consistent with CBP's observations while onsite. In Lyke's CF28 Response, Lyke stated that each [ ] operation at Like Tools had a capacity of [ ] sawblades [ ] wide by [ ] in thickness per day.<sup>27</sup> Furthermore, upon reviewing production sheets stored in new and clean binders onsite, CBP found that Like Tools produced the final product [ ], where on [ ] days they only showed consumption of [ ] and other days [ ] was listed. As such, the finished production quantities were not consistent for [ ] diamond sawblades. Upon review, onsite production records did not indicate the production of [ ] every day.<sup>28</sup> CBP attempted to review other documents while onsite, including invoices for raw materials and shipping records in an attempt to confirm production. Like Tools' Administrative Officer indicated that in the past month, all accounting records were moved off-site to an accountant's office in Bangkok, and this accountant maintains all of Like Tools' accounting records.

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<sup>22</sup> See *id.*

<sup>23</sup> See *id.*

<sup>24</sup> See *id.*

<sup>25</sup> See Site Visit Memo, at 5, 8 and 16.

<sup>26</sup> See Lyke CF 28 Response Part 2, at 111-138.

<sup>27</sup> See Lyke CF28 Response, at 104, production capacity chart for diamond sawblades [ ] wide by [ ] in thickness.

<sup>28</sup> See Site Visit Memo.

Given the difference between the claimed capacity of each [ ] operation presented by Like Tools and Lyke, the insufficiency of the production records regarding the output of finished diamond sawblades, and the lack of accounting documents onsite, it is not possible to confirm operations at the facility or corroborate claimed capacity with actual output to ascertain whether Like Tools actually produced the finished diamond sawblades that it shipped to the United States. Furthermore, even if Like Tools is able to substantiate its production capacity of merchandise shipped to the United States, CBP is unable at this time to determine that finished diamond sawblades assembled in Thailand from [ ]-origin raw materials would not be subject to the AD order.

Furthermore, while onsite at Like Tools, CBP observed areas of concern regarding testing, country of origin marking, and packaging. First, CBP observed limited [ ] testing being conducted during the onsite visit. The only activity undertaken in the area Like Tools officials stated was the [ ] area of the facility was the [ ] on diamond sawblades to indicate to the user [ ] for installation purposes. The only activity that could potentially qualify as [ ] observed onsite was at the production station where [ ] were noted on the blades. The lack of [ ] onsite in Thailand supports a reasonable suspicion that the sawblades were produced and [ ] at another production facility and are merely shipped through Like Tools to the United States.

Second, diamond sawblades at the facility were not permanently marked with a country of origin or in a manner that allows the ultimate purchaser to know the true country of origin. Rather, the diamond sawblades being produced by Like Tools have a small plastic sticker affixed with adhesive indicating "MADE IN THAILAND." Furthermore, Like Tools' packaging materials consisted of individual, unmarked, white cardboard sleeves and brown cardboard boxes with small white labels indicating "MADE IN THAILAND," quantity, and product codes, none of which bore the name "Like Tools Co., Ltd." or address. Like Tools officials indicated that they did not know the reason for the lack of company information on the product or packaging. We note that Section 304, Tariff Act of 1930, as amended (19 U.S.C. § 1304), provides that, unless excepted, every article of foreign origin (or its container) imported into the United States "shall be marked in a conspicuous place as legibly, indelibly and permanently as the nature of the article (or container) will permit in such a manner as to indicate to the ultimate purchaser in the United States the English name of the country of origin of the article." CBP observes that the majority of diamond sawblades entered into the United States have the country of origin etched, painted, or printed onto the blade itself, which is consistent with the marking requirements set out in 19 U.S.C. §1304. The "Made in Thailand" sticker observed on the sawblades entered by Lyke and seen onsite at Like Tools is not considered to be a permanent marking that is likely to remain affixed to the diamond sawblades through to the final customer. As such, the lack of permanent country of origin marking on diamond sawblades easily allows for the type of transshipment scheme alleged by DSMC.

Third, CBP observed that Like Tools stored [ ] diamond sawblades, with no country of origin marking and labeled with the brand "[ ]," in a cage on the production floor. Like Tools officials stated that these diamond sawblades were not produced at

Like Tools; rather, they stated that the sawblades in question belonged to another company and that Like Tools was storing the sawblades for that company. Like Tools officials did not divulge the name of the other company.<sup>29</sup> Like Tools stated during the site visit that they [ ] sell to the United States. To date, Lyke is Like Tools' [ ]. As such, the presence of another company's packaged, finished diamond sawblades with no country of origin markings on Like Tools' production floor, coupled with the fact that Like Tools has only shipped merchandise to [ ], is further evidence of transshipment.

The observations made by CBP during the foreign site visit to Like Tools, together with Lyke's inability to substantiate Like Tools' production of a portion of entry [ ]6457, gives CBP reasonable suspicion that Lyke is evading the AD order on diamond sawblades from China by transshipment through the Like Tools facility in Thailand. Notably, CBP determined that, upon examination of the merchandise packaging and lack of traceability of the merchandise through the production records submitted in the CF28 response, certain merchandise from entry [ ]6457 bore evidence of transshipment from China. Furthermore, the lack of permanent country of origin markings on merchandise imported by Lyke from Thailand, as CBP observed in the aforementioned cargo examination and onsite at Like Tools, allows for the merchandise to be more easily transshipped from China through Thailand to the United States, as alleged by DSMC. Lastly, CBP observations made during the onsite visit at Like Tools regarding the lack of observed [ ] testing, inaccessibility of accounting records, and inconsistent production reports. All of which impeded confirmation of production of merchandise exported to the United States during the period of investigation and together with information provided in the allegation, further supports the reasonable suspicion that Lyke is evading the AD order on diamond sawblades from China.

#### *Examinations of entries from China*

DSMC had alleged a pattern of evasion through misclassification of the entries that were imported directly from China. On May 18, 2018, CBP examined entry [ ]5772 with an entry filing date of May 9, 2018. The examination revealed that the shipment contained diamond cup wheels, a "rescue" wheel, paper insert cards, and plastic clam shell packages imported from Danyang Like, all of which were correctly classified and none of which were subject to the AD order.

On August 20, 2018, CBP examined entry [ ]7883, with an entry filing date of July 26, 2018. The examination revealed [ ] cartons of clear plastic clamshell packaging shipped by Danyang Like. The shipment was classified correctly under HTSUS 3923.90.0080 and not subject to the AD order.

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As CBP is undertaking interim measures, unliquidated entries of diamond sawblades under this investigation that entered the United States as not subject to antidumping duties will be rate-

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<sup>29</sup> See Site Visit Memo.

adjusted to reflect that they are subject to the AD order on diamond sawblades from China and cash deposits are owed. Additionally, “live entry” is required for all future imports for Lyke, meaning that all entry documents and duties must be provided before cargo is released by CBP into the U.S. commerce. CBP will reject any entry summaries that do not comply with live entry, and require refile of entries that are within the entry summary rejection period; suspend the liquidation for any entry that has entered on or after July 25, 2018, the date of initiation of this investigation; as well as extend the period for liquidation for all unliquidated entries that entered before that date. *See* 19 C.F.R. § 165.24(b)(1)(i) and (ii). For any entries that have liquidated and for which CBP’s reliquidation authority has not yet lapsed, CBP will reliquidate those entries accordingly. CBP will also evaluate Lyke’s continuous bond to determine its sufficiency, among other measures, as needed.

For any future submissions or factual information that you submit to CBP pursuant to this EAPA investigation, please provide a public version to CBP, as well as to Mr. Pickard, counsel for DSMC, at DPickard@wileyrein.com. *See* 19 C.F.R. §§ 165.4, 165.23(c), and 165.26. Should you have any questions regarding this investigation, please feel free to contact us at eapallegations@cbp.dhs.gov. Please include “EAPA Case Number 7250” in the subject line of your email. Additional information on this investigation, including the applicable statute and regulations, may be found on CBP’s website at: <https://www.cbp.gov/trade/tradeenforcement/tftea/enforce-and-protect-act-eapa>.

Sincerely,



Carrie L. Owens  
Director of Enforcement Operations  
Trade Remedy & Law Enforcement Directorate  
Office of Trade