



PUBLIC VERSION

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Little Fireflies International Co.
NO F108 Ground Floor St Fourtune
Phnom Penh, KH

Granite Plumbing Products LLC
98 Stuyvesant Ave
Brooklyn, NY 11221

Nicholas J. Birch
On behalf of the Cast Iron Soil Pipe Institute
Schagrin Associates
900 Seventh Street, NW, Suite 500
Washington, DC 20001
NBirch@SchagrinAssociates.com

Re: Notice of Initiation of Investigation and Interim Measures - EAPA Cons. Case 7621

To Mr. Birch and the Representatives of Little Fireflies International Co. and Granite Plumbing Products LLC:

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), of Little Fireflies International Co. (Little Fireflies) and Granite Plumbing Products LLC (Granite Plumbing). CBP is investigating whether Little Fireflies and Granite Plumbing evaded antidumping (AD) and countervailing duty (CVD) orders A-570-079 and C-570-080 on cast iron soil pipe (CISP) from the People's Republic of China (China) when importing CISP into the United States.¹ CBP has imposed interim measures because evidence supports a reasonable suspicion that Little Fireflies and Granite Plumbing entered merchandise covered by the AD/CVD orders into the customs territory of the United States through evasion.²

¹ See *Cast Iron Soil Pipe from the People's Republic of China: Antidumping Duty Order*, 84 FR 19035 (May 3, 2019); see also *Cast Iron Soil Pipe from the People's Republic of China: Countervailing Duty Order*, 84 FR 19039 (May 3, 2019) (collectively, the AD/CVD orders).

² See 19 USC 1517(e); see also 19 CFR 165.24.

Period of Investigation

Pursuant to 19 CFR 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, or withdrawal from warehouse for consumption, of merchandise in the customs territory of the United States.”³ CBP acknowledged receipt⁴ of the properly filed allegations against Little Fireflies and Granite Plumbing on August 13, 2021.⁵ Thus, the entries covered by this investigation are those entered for consumption, or withdrawn from warehouse for consumption, from August 13, 2020, through the pendency of this investigation.⁶

Initiation

The Allegor claims that Granite Plumbing is an importer of CISP covered by the AD/CVD orders. The scope of the AD/CVD orders covers finished or unfinished hubless and hub and spigot cast iron soil pipe, regardless of industry or proprietary specifications or size, so long as it meets the physical description set forth in the order.⁷ According to the order, covered cast iron soil pipe can be distinguished from other kinds of nonmalleable cast iron pipe based on how the pipe is connected to cast iron soil pipe fittings.⁸ Hubless cast iron soil pipe is manufactured without a hub, typically in accordance with Cast Iron Soil Pipe Institute (CISPI) specification 301 and/or American Society for Testing and Materials (ASTM) specification A888, although compliance with those standards is not required.⁹ Hub and spigot cast iron soil pipe has at least one hub into which the spigot (plain end) of a fitting is inserted.¹⁰ To demonstrate that Granite Plumbing imports CISP meeting these criteria, the Allegor provided [Source] shipment information indicating Granite Plumbing sources covered merchandise from a Cambodian company named Little Fireflies.¹¹ Specifically, the [Source] shipment information indicates that Granite Plumbing imported a total of 74 metric tons of “no hub pipe” from Little Fireflies on February [#] and [#], 2021, and June [#], 2021.¹² The Allegor stated that these shipments were

³ See 19 USC 1517(a)(4); see also 19 CFR 165.1.

⁴ See Email from CBP, “Receipt of Properly Filed Allegation,” dated August 13, 2021; see also Email from CBP, “Receipt of Properly Filed Allegation (Little Fireflies International Co.),” dated August 13, 2021; see also Email from CBP, “Receipt of Properly Filed Allegation (Little Fireflies International Co.),” dated August 27, 2021.

⁵ The Allegor, the Cast Iron Soil Pipe Institute, is a trade association of domestic producers of cast iron soil pipe and, as such, has standing to submit these Allegations pursuant to 19 USC 1517(a)(6)(A)(iv), 19 CFR 165.1(4), and 19 CFR 165.11(a). See Letter from the Allegor, “Cast Iron Soil Pipe: Request for an Investigation under the Enforce and Protect Act,” dated July 14, 2021 (Little Fireflies Allegation); see also Letter from the Allegor, “Cast Iron Soil Pipe: Request for an Investigation under the Enforce and Protect Act,” dated July 14, 2021 (Granite Plumbing Allegation) (collectively, the Allegations) at 3 and Exhibit 9.

⁶ See 19 CFR 165.2.

⁷ See *Cast Iron Soil Pipe from the People’s Republic of China: Antidumping Duty Order*, 84 FR 19035 (May 3, 2019); see also *Cast Iron Soil Pipe from the People’s Republic of China: Countervailing Duty Order*, 84 FR 19039 (May 3, 2019).

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ See Granite Plumbing Allegation at 6 and Exhibit 1.

¹² *Id.*

reported to originate in Cambodia.¹³ Additionally, the Allegor noted that CBP determined in a previous investigation that the term “no hub pipe” is used to describe covered merchandise.¹⁴

The Allegor also claims that Little Fireflies acted as the importer of record for certain shipments of covered merchandise on behalf of Allstar Mechanical USA (Allstar). The Allegor provided [Source] shipment information to support this.¹⁵ Specifically, the [Source] shipment information indicates that Little Fireflies shipped a total of 42 metric tons of “no hub pipe” on behalf of Allstar on January [#], 2021, and May [#], 2021.¹⁶ The Allegor stated that these shipments were reported to originate in Cambodia and that CBP determined in a previous investigation that the term “no hub pipe” is used to describe covered merchandise.¹⁷

The Allegor provided Little Fireflies’ business registration, which indicates that Little Fireflies was incorporated in Cambodia on October 1, 2020.¹⁸ Little Fireflies’ business registration lists its director and chairman of the board as Zhang Yuanshou (or Yuanshou Zhang).¹⁹ The Allegor provided screenshots of an archived 2019 website and current website for Dalian Metal I/E Co., Ltd. (Dalian Metal). The 2019 archived website listed Yuanshou Zhang as a sales contact,²⁰ and the current website lists “Ryan Zhang” as the current Dalian Metal sales contact.²¹

The Allegor notes that U.S. importer Lino International Inc. of New York (Lino) was the subject of a previous EAPA investigation and was found to have evaded the AD/CVD orders by transshipping covered merchandise through Cambodia.²² In that same investigation, CBP found that Lino acted as a trade arm for Dalian Metal.²³ The Allegor stated that CBP determined in a prior investigation that Dalian Metal and Dalian Lino FTZ Co. Ltd. (Dalian Lino) are affiliates in China.²⁴ The Allegor provided 2017 screenshots that list Yuanshou Zhang as the sales contact for Dalian Metal and Dalian Lino.²⁵ The Allegor indicated that Dalian Metal and its affiliates were assigned a 235.93 percent AD rate in Commerce’s AD/CVD investigations.²⁶

During the EAPA Lino investigation, the Cambodian exporter was a company named HiCreek Plumbing Co., Ltd. (HiCreek).²⁷ The Allegor indicated that in March 2019 HiCreek had been

¹³ *Id.*

¹⁴ *Id.* at 5 and Exhibit 4 (containing *Notice of Determination as to Evasion*, EAPA Consolidated Case: 7454 (CBP Feb. 8, 2021) (“*NOD EAPA 7454*”) at 15).

¹⁵ See Little Fireflies Allegation at 5 and Exhibit 1.

¹⁶ *Id.*

¹⁷ *Id.* at 5-6 and Exhibit 4 (containing *NOD EAPA 7454* at 15).

¹⁸ See Allegations at 6 and Exhibit 3.

¹⁹ *Id.*

²⁰ See Granite Plumbing Allegation at 7 and Exhibit 6; see also Little Fireflies Allegation at 6 and Exhibit 6.

²¹ See Granite Plumbing Allegation at 7 and Exhibit 7; see also Little Fireflies Allegation at 6 and Exhibit 7.

²² See Allegations at 6-7 and Exhibit 4 (containing *NOD EAPA 7454* at 6-7, and 16).

²³ *Id.*

²⁴ *Id.* at 7 and Exhibit 4 (containing *NOD EAPA 7454* at 7) and Exhibit 5.

²⁵ The Allegor indicated that this information was also provided during AD/CVD investigations at the Department of Commerce (Commerce). See Granite Plumbing Allegation at 6-7 and Exhibit 5; see also Little Fireflies Allegation at 6 and Exhibit 5.

²⁶ *Id.* at 6-7 and Exhibit 4 (containing *NOD EAPA 7454* at 16).

²⁷ *Id.* at 6-7 and Exhibit 4 (containing *NOD EAPA 7454* at 6-7).

registered in Cambodia to an individual named “Qian Zhang.”²⁸ The Allegor noted that CBP found during that investigation that Qian Zhang was also the manager of Qingdao H.R. International Trading Co., Ltd. (Qingdao H.R.), a Chinese exporter of the instant covered merchandise.²⁹ The allegor notes that CBP further determined in that investigation that Qingdao H.R. had multiple connections to HiCreek and likely established HiCreek to avoid paying AD/CVD duties on Chinese CISP.³⁰

The Allegor claims that Lino and Dalian Metal are active participants in evading the AD/CVD orders. Specifically, the Allegor indicated that in the previous EAPA Lino investigation, CBP determined that Lino registered a company, DLNL Trading Inc. (DLNL), in the United States to import covered merchandise from HiCreek and to evade CBP’s interim measures.³¹ The Allegor also noted that CBP determined that Dalian Metal and Dalian Lino coordinated between HiCreek and Lino.³² The Allegor claims that Dalian Metal and Lino copied the previous HiCreek evasion scheme and had a sales representative register the Little Fireflies company in Cambodia to continue to transship covered merchandise to the United States.³³

Initiation Assessment

TRLED 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.”³⁴ 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.”³⁵ Thus, the allegation must reasonably suggest not only that the importer alleged to be evading entered merchandise subject to an AD and/or CVD order into the United States, but also 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 and/or CVD cash deposits or other security.

In assessing the allegor’s claims and evidence provided in its allegations, TRLED found that the allegations reasonably suggested that Little Fireflies and Granite Plumbing entered covered merchandise into the customs territory of the United States and evaded AD/CVD orders A-570-079 and C-570-080 through transshipment. Specifically, the reasonably available evidence the Allegor presented—including [Source] data showing shipments of CISP from Little Fireflies in Cambodia to the United States by the importers, indications of a connection between Little Fireflies’ director and chairman of its board to Dalian Metal, and evidence from past EAPA investigations of attempts by Dalian Metal to avoid payment of AD/CVD duties in a similar way

²⁸ *Id.* at 7-8 and Exhibit 4 (containing *NOD EAPA 7454* at 7 and 9).

²⁹ *Id.* at 7-8 and Exhibit 4 (containing *NOD EAPA 7454* at 10).

³⁰ *Id.* at 7-8 and Exhibit 4 (containing *NOD EAPA 7454* at 9-10).

³¹ *Id.* at 7-8 and Exhibit 4 (containing *NOD EAPA 7454* at 15 and 18).

³² *Id.* at 6-7 and Exhibit 4 (containing *NOD EAPA 7454* at 17).

³³ *Id.* at 8.

³⁴ See 19 CFR 165.15(b); see also 19 USC 1517(b)(1).

³⁵ See 19 CFR 165.1; see also 19 USC 1517(a)(5)(A).

to what is alleged here—reasonably suggests that the Chinese CISP producer Dalian Metal may be using the Cambodian exporter Little Fireflies to facilitate the transshipment of covered merchandise through Cambodia.³⁶

Interim Measures

Not later than 90 calendar days after initiating an investigation under EAPA,³⁷ TRLED will decide based on the record of the investigation if there is reasonable suspicion that merchandise covered by the AD/CVD orders was entered into the United States through evasion.³⁸ CBP need only have sufficient evidence to support a reasonable suspicion that the importer alleged to be evading entered merchandise covered by an AD or CVD order into the United States by a material false statement or act, or material omission, that resulted in the reduction or avoidance of applicable AD or CVD cash deposits or other security. If reasonable suspicion exists, CBP will impose interim measures pursuant to 19 USC 1517(e) and 19 CFR 165.24. As explained below, CBP is imposing interim measures because there is reasonable suspicion that Little Fireflies and Granite Plumbing entered covered merchandise into the United States through evasion by means of transshipment.³⁹

CF-28 Responses and Analysis

On September 21, 2021, CBP issued a CBP Form – 28 (CF-28) request for information to Little Fireflies on one entry of CISP.⁴⁰ In response to the CF-28, Little Fireflies provided one document, a CBP 3461 form for “Entry/Immediate Delivery.”⁴¹ On October 28, 2021, CBP issued CBP Form – 29 (CF-29) to Little Fireflies, advising the importer to respond to the CF-28 within 20 days, *i.e.*, by November 17, 2021, otherwise CBP would change the entry to a type 03 entry and charge AD/CVD duties.⁴² Little Fireflies failed to respond to the CF-29. Little Fireflies failed to provide the following requested items by the established deadlines or explain its failure to do so:

1. Purchase orders, commercial invoices, and proof of payment for all raw materials used to produce the merchandise
2. Dated transportation documents and container load plans from the manufacturer of the raw materials
3. Foreign customs documentation (if imported) for all raw materials
4. Complete factory production records, including stamped timecards, and work orders
5. Production capabilities and packaging costs
6. Entry transaction information including the original commercial invoice(s), proof of payment(s), and purchase order
7. Whether Little Fireflies was related to the seller of the merchandise

³⁶ See Allegations at 5-8 and Exhibits 3,4, 6 and 7.

³⁷ See CBP Memorandum, “Initiation of Consolidated Investigation for EAPA Case 7621,” dated September 3, 2021 (Initiation Memo).

³⁸ See 19 CFR 165.24(a).

³⁹ *Id.*

⁴⁰ See CF-28 sent to Little Fireflies, dated April 22, 2021. The entry is [#]8840.

⁴¹ See Little Fireflies’ Response to the CF-28, dated September 22, 2021 (Little Fireflies CF-28 Response).

⁴² See CF-29 sent to Little Fireflies, dated October 28, 2021. The entry is [#]8840.

8. The names of their corporate officers
9. The names of all forwarding agents, subcontractors, and intermediaries involved and their contact information

Although Little Fireflies, in its CF-28 response, omitted most information that CBP requested and failed to submit a CF-29 response, CBP learned certain information about the company via communication with its broker and online research. Little Fireflies' broker indicated that contact information for Little Fireflies included [name] (email address [email address]) and [name] (no email address given).⁴³ Per CBP research, the official company registration for Cambodia identifies Little Fireflies as a wholesaler of construction materials and tools and lists Little Fireflies' Chairman of the Board of Directors as Zhang Yuanshou with an address in Dalian City, China.⁴⁴ Therefore, the correspondence with the broker confirms the Allegor's claim that Little Fireflies is affiliated with [company name] and its [position].

Because Little Fireflies provided no information to contradict record evidence, as detailed in the Little Fireflies Allegation, CBP finds that there is reasonable suspicion that Little Fireflies is transshipping covered merchandise through Cambodia to the United States.

On September 15, 2021, CBP issued a CF-28 request for information to Granite Plumbing on two entries from 2021.⁴⁵ CBP requested manufacturer information, production documentation, purchase orders, commercial invoices, bills of lading, transportation documents, and proof of payment for each entry. CBP received Granite Plumbing's response to the CF-28 on October 29, 2021.⁴⁶

In its CF-28 response, Granite Plumbing indicated that it ordered CISP from Lino International Inc. (Lino) and that Lino claimed that the CISP was produced in Cambodia by HiCreek.⁴⁷ Granite Plumbing also indicated that it worked with both Lino and HiCreek to submit its CF-28 response. Granite Plumbing submitted two order invoices, two freight invoices and one payment record. These submissions indicate that Little Fireflies is the shipper for both CISP entries. Both commercial invoices and the payment record show that Lino issued the order invoices and received payment.⁴⁸

Granite Plumbing's documentation states that HiCreek purchases raw materials for manufacturing plumbing accessories in Cambodia. Specifically, Granite Plumbing provided a sales contract, dated August 20, 2019, for [#] kg of pig iron between HiCreek and a Cambodian supplier named [company name]. Granite Plumbing also provided a HiCreek mill test certificate

⁴³ See Memorandum to the File "Adding Information to the Administrative Record," dated December 1, 2021 (December 1 Memorandum) at Attachment 1.

⁴⁴ See December 1 Memorandum at Attachment 2. CBP previously found that [name], also known as [name], was a salesperson for Lino affiliate [company name] and that [name] was involved in previous evasion schemes. See also December 1 Memorandum at Attachment 3 at 4, 6, 9, and 16.

⁴⁵ See CBP Form 28 (CF-28) sent to Granite Plumbing, dated September 15, 2021. These two entries are [#]8647 and [#]0556.

⁴⁶ See Granite Plumbing's Response to the CF-28, dated October 29, 2021 (Granite Plumbing CF-28 Response).

⁴⁷ *Id.* Per Granite Plumbing's CBP Form 7501, the manufacturer/exporter is listed as Little Fireflies.

⁴⁸ *Id.*

for the [#] kg of pig iron, dated September 20, 2019.⁴⁹ However, these documents are the same documents submitted as proof of raw material purchases in EAPA consolidated investigation 7454 for the two importers of record subject to that investigation.⁵⁰ Reuse of these same documents in this case creates significant doubt as to their applicability to Granite Plumbing's entries and significant doubt as to their applicability regarding HiCreek's ability to actually produce merchandise in Cambodia as this would suggest that one raw materials purchase in 2019 was still being used two years later for multiple importers.

Granite Plumbing also provided documentation indicating that HiCreek's facility covers [#] square meters and employs [#] workers. Granite Plumbing provided a HiCreek labor attendance sheet that indicated HiCreek had [#] employees.⁵¹ However, Granite Plumbing did not account for the [#] additional employees not listed on the attendance sheet. Granite Plumbing also provided photos of what it claims is HiCreek's CISP production process, indicating that production started in November 2019.⁵² However, in previous EAPA investigations, officials from the U.S. Department of Homeland Security (DHS) and Cambodian Customs performed a site inspection of HiCreek's facility in Cambodia and found that HiCreek was not producing CISP as of July 2020.⁵³

Previous Determinations

CBP may obtain information necessary to carry out its functions and duties related to EAPA and may obtain information from its own files and from other agencies of the U.S. Government pursuant to 19 CFR 165.5. As such, on December 1, 2021, CBP added a memorandum to the administrative record containing previous EAPA determinations as to evasion involving CISP and CISP products supplied by HiCreek.⁵⁴ In those determinations, CBP found:

- A Chinese company named Qingdao H.R. International Trading Co., Ltd. (Qingdao H.R.) likely established HiCreek (one month after Commerce initiated AD/CVD investigations on CISP) to avoid paying AD/CVD duties on Chinese soil pipe and fittings.⁵⁵
- Record evidence showed that Chinese citizen Qian Zhang incorporated HiCreek in Cambodia and worked as manager of both HiCreek and Qingdao H.R.⁵⁶
- DHS and Cambodian officials made a site visit to HiCreek in Cambodia in July 2020, during which 1) DHS officials did not observe production or signs of recent production;⁵⁷ 2) DHS officials observed pallets containing CISP fittings that HiCreek admitted to importing from China with the intention of exporting.⁵⁸

⁴⁹ See Granite Plumbing CF-28 Response.

⁵⁰ See December 1 Memorandum at Attachment 3.

⁵¹ See Granite Plumbing CF-28 Response.

⁵² *Id.*

⁵³ See December 1 Memorandum at Attachment 3 at 3-4.

⁵⁴ See December 1 Memorandum at Attachment 3.

⁵⁵ *Id.* at Attachment 3 at 9-10.

⁵⁶ *Id.* at Attachment 3 at 10.

⁵⁷ *Id.* at Attachment 3 at 10.

⁵⁸ *Id.* at Attachment 3 at 10-11.

- Record evidence showed that HiCreek imported machinery and equipment essential to produce CISP from China between [date] and [date], which was after HiCreek began exporting soil pipe to the United States on [date].⁵⁹
- Record evidence showed that HiCreek continued to import [product] from China from [company name] after it received the equipment from China.⁶⁰ Record evidence demonstrated that the only kind of pipe HiCreek sells is soil pipe. HiCreek imported shipments of [product] from China that it then exported to the United States only a few days later; these shipments subsequently entered the United States as soil pipe.⁶¹

Overall, multiple facts on the record in EAPA cases 7454 and 7455 established that HiCreek transshipped Chinese-origin soil pipe through its facility in Cambodia and, when combined with the evidence described in the above sections, this information provides reasonable suspicion in this case that the transshipment of CISP and CISP products from China through Cambodia into the United States is still occurring.

Enactment of Interim Measures

Based on the record evidence described above, CBP determines that reasonable suspicion exists that Little Fireflies and Granite Plumbing imported CISP into the United States from Cambodia that was, in fact, from China and should have been subject to AD/CVD orders A-570-079 and C-570-080. Therefore, CBP is imposing interim measures pursuant to this investigation.⁶² Specifically, in accordance with 19 USC 1517(e)(1-3), CBP shall:

- (1) suspend the liquidation of each unliquidated entry of such covered merchandise that entered on or after September 3, 2021, the date of the initiation of the investigation;
- (2) pursuant to the Commissioner's authority under section 504(b), extend the period for liquidating each unliquidated entry of such covered merchandise that entered before the date of the initiation of the investigation September 3, 2021; and
- (3) pursuant to the Commissioner's authority under section 623, take such additional measures as the Commissioner determines necessary to protect the revenue of the United States, including requiring a single transaction bond or additional security or the posting of a cash deposit with respect to such covered merchandise.⁶³

In addition, CBP will require live entry and reject any entry summaries that do not comply with live entry and require refiling of entries that are within the entry summary rejection period. CBP will also evaluate Little Fireflies and Granite Plumbing continuous bonds to determine their sufficiency. Finally, CBP may pursue additional enforcement actions, as provided by law, consistent with 19 USC 1517(h).

⁵⁹ *Id.* at Attachment 3 at 11.

⁶⁰ *Id.*

⁶¹ *Id.* at Attachment 3 at 12 -14.

⁶² See 19 USC 1517(e); see also 19 CFR 165.24.

⁶³ See also 19 CFR 165.24(b)(1)(i-iii).

Consolidation of the Investigations

CBP consolidated EAPA investigations 7621 and 7623 on Little Fireflies and Granite Plumbing, respectively, into a single investigation.⁶⁴ The new consolidated case number is EAPA Consolidated Case 7621 and CBP is maintaining a single administrative record. At its discretion, CBP may consolidate multiple allegations against one or more importers into a single investigation, pursuant to 19 CFR 165.13(b). This regulation stipulates that the factors that CBP may consider in consolidating multiple allegations include, but are not limited to, whether the multiple allegations involve: 1) relationships between the importers; 2) similarity of covered merchandise; 3) similarity of AD/CVD orders; and 4) overlap in time periods of entries of covered merchandise.⁶⁵ In these investigations, the two importers are alleged to be entering merchandise that is subject to the AD/CVD orders on CISP from China.⁶⁶ In addition, the entries of both importers fall within a similar period of investigation.⁶⁷ Moreover, both importers are alleged to import CISP produced in China and then transshipped through Cambodia via Little Fireflies.⁶⁸ Because factors warranting consolidation are present, CBP consolidated these investigations and is providing notice pursuant to 19 CFR 165.13(c). We note that the deadlines for the consolidated investigation have been set from the date of initiation for both of the allegations, which is September 3, 2021.⁶⁹

For future submissions or factual information that you submit to CBP pursuant to this EAPA investigation, please provide a business confidential version and public version to CBP and serve the public versions on the parties to this investigation.⁷⁰ Public versions of administrative record documents will be available via the EAPA Portal: <https://eapallegations.cbp.gov>.

Should you have any questions regarding this investigation, you may contact us at eapallegations@cbp.dhs.gov with “EAPA Cons. Case 7621” 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/trade-enforcement/tftea/eapa>.

Sincerely,



Brian M. Hoxie
Director, Enforcement Operations Division
Trade Remedy Law Enforcement Directorate
CBP Office of Trade

⁶⁴ See Initiation Memo at 4-5.

⁶⁵ See also 19 USC 1517(b)(5).

⁶⁶ See Allegations at 5-6 and Exhibit 1.

⁶⁷ *Id.* at Exhibit 1.

⁶⁸ *Id.* at 5-8 and Exhibits 3,4, 6 and 7.

⁶⁹ See 19 CFR 165.13(a); see also 19 USC 1517(b)(5)(B).

⁷⁰ See 19 CFR 165.4; see also 19 CFR 165.23(c); see also 19 CFR 165.26.