



## U.S. Customs and Border Protection

### **PUBLIC VERSION**

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RE: Notice of Initiation of Investigation and Interim Measures - EAPA Case 7743

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To the Representatives and Counsel of the above-referenced Entities:

The purpose of this notice 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). CBP is investigating whether LTT International Trading Co. (LTT or the importer) evaded antidumping duty (AD) and countervailing duty (CVD) orders A-570-084 and C-570-085<sup>1</sup> on quartz surface products (QSP) from the People's Republic of China (China), by means of transshipment through Taiwan, when importing QSP into the United States. CBP has determined that there is reasonable suspicion of evasion of AD/CVD duties by LTT and, therefore, CBP is issuing a formal notice of initiation of investigation (NOI) and imposing interim measures.<sup>2</sup>

### **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 "the entry, or withdrawal from warehouse for consumption, of merchandise in the customs territory of the United States."<sup>3</sup> CBP acknowledged receipt of the properly filed

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<sup>1</sup> See *Certain Quartz Surface Products from the People's Republic of China: Antidumping and Countervailing Duty Orders*, 84 FR 33053 (July 11, 2019) (*AD/CVD Orders*).

<sup>2</sup> See 19 USC 1517(e); see also 19 CFR 165.24.

<sup>3</sup> See 19 USC 1517(a)(4); see also 19 CFR 165.2.

allegation against LTT on October 17, 2022.<sup>4</sup> Therefore, the entries covered by this investigation are those entered for consumption, or withdrawn from warehouse for consumption, from October 17, 2021, through the pendency of this investigation.<sup>5</sup>

## **Initiation**

On November 07, 2022, the Trade Remedy Law Enforcement Directorate (TRLED), within CBP's Office of Trade, initiated this investigation under EAPA after evaluating the allegation<sup>6</sup> submitted by Cambria Company LLC (the Alleger)<sup>7</sup> regarding evasion of the applicable *AD/CVD Orders*.<sup>8</sup> In its Allegation, the Alleger asserts that available information reasonably suggests LTT evaded the *AD/CVD Orders* by transshipment through Taiwan and failed to declare the subject QSP as originating in China. The basis for this Allegation is as follows:

The Alleger contends that according to [ [source](#) ] data, LTT acted as the importer of record for numerous shipments from Taiwan with Cheng Jug Enterprise Co. Ltd. (Cheng Jug) reported as the manufacturer.<sup>9</sup> A Google Maps view of the address listed for Cheng Jug on its website shows an apartment building with a commercial storefront on the first level, rather than a building that could serve as a QSP production facility.<sup>10</sup> As explained below, Cheng Jug purports to engage in both the production of QSP and the purchasing of QSP from other manufacturers. The Alleger asserts Cheng Jug is involved in transshipment schemes of other Chinese merchandise covered by AD/CVD orders as well. In particular, the [ [source](#) ] data shows that Cheng Jug also exports mattresses and diamond sawblades to the United States.<sup>11</sup> Both of these types of merchandise are covered by Chinese AD/CVD orders.<sup>12</sup> Because of these vastly different product categories, the Alleger argues, it is highly unlikely that any one facility is capable of manufacturing QSP, mattresses, and diamond sawblades together.<sup>13</sup> The Alleger asserts that as all of these goods are subject to Chinese AD/CVD orders, it is likely the goods are sourced in China and transshipped through Taiwan.<sup>14</sup>

The Alleger further contends that LTT transshipped Chinese-origin QSP via Taiwan to import it into the United States.<sup>15</sup> To support its Allegation, the Alleger submitted U.S. import data for February through June 2022 for HTSUS number 6810.99.00.<sup>16</sup> This HTSUS classification, and

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<sup>4</sup> See October 17, 2022, email entitled "EAPA 7743 – Quartz Surface Products – LTT International Trading Co."

<sup>5</sup> See 19 CFR 165.2.

<sup>6</sup> See "Quartz Surface Products from the People's Republic of China: Request for an Investigation under the Enforce and Protect Act of LTT International Trading Co." (Allegation), dated July 29, 2022.

<sup>7</sup> The Alleger is a domestic producer of QSP and the petitioner before the U.S. Department of Commerce (Commerce) and the U.S. International Trade Commission (ITC) in the original AD/CVD investigations; therefore, it qualifies for interested party status pursuant to 19 USC 1517(a)(6) and 19 CFR 165.1.

<sup>8</sup> See CBP Memorandum, "Initiation of Investigation for EAPA Case Number 7743 – LTT International Trading Co.," dated November 7, 2022.

<sup>9</sup> See Allegation at Exhibit 3.

<sup>10</sup> *Id.* at Exhibit 9. Cheng Jug's registered address is No. 12, Ln. 1, Zhongzheng Rd., Yuanlin City, Changhua County 51045, Taiwan. See discussion of claimed manufacturers' addresses below.

<sup>11</sup> *Id.* at 7 and Exhibit 7.

<sup>12</sup> *Id.* at 7 and Exhibits 14 and 15.

<sup>13</sup> *Id.* See also discussion below of QSP imports from China and Taiwan sourced from U.S. International Trade Commission trade data.

<sup>14</sup> See Allegation.

<sup>15</sup> *Id.* at Exhibit 3.

<sup>16</sup> *Id.* at Exhibits 3, 7, and 10. HTS 6810.99.00 covers agglomerated quartz slabs of the type used for countertops.

the shipments' product descriptions, correspond to the product description and HTSUS classification contained in the *AD/CVD Orders* for QSP. Specifically, the scope of the *AD/CVD Orders* states that QSP "may also generally be referred to as engineered stone or quartz, {or} artificial stone or quartz..."<sup>17</sup> It also states that "{i}n addition to slabs, the scope of the orders includes, but is not limited to, other surfaces such as countertops..."<sup>18</sup> Furthermore, the scope of the *AD/CVD Orders* states that "{t}he products subject to the scope are currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under the following subheading: 6810.99.0010."<sup>19</sup> [ [source](#) ] data provided in the Allegation demonstrates that LTT imported into the United States QSP from September 2021 through June 2022.<sup>20</sup> The *AD/CVD Orders* also state that third country further processing would not remove the merchandise from the scope of the orders and does not change the country of origin.<sup>21</sup> Collectively, these facts indicate that the artificial quartz stone countertops that LTT imported during the POI were QSP as described by the *AD/CVD Orders*. Therefore, the evidence present in the Allegation reasonably suggests that LTT evaded the *AD/CVD Orders* on QSP from China by transshipping the merchandise through its Taiwanese supplier, Cheng Jug.<sup>22</sup>

### *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..."<sup>23</sup> 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."<sup>24</sup> Thus, the allegation must reasonably suggest not only that merchandise subject to an AD and/or CVD order was entered into the United States by the importer through evasion, but that such entry was made by a material false statement or act, or material omission, which resulted in the reduction or avoidance of applicable AD and/or CVD cash deposits or other security.

In assessing the evidence provided in the Allegation, TRLED finds that the Allegation reasonably suggests that LTT may have entered covered merchandise into the United States and evaded the *AD/CVD Orders* by declaring entries of Chinese-origin QSP as having a country of origin of Taiwan.<sup>25</sup> Specifically, the Allegation provided evidence that LTT imported what appears to be covered merchandise during the year prior to filing the Allegation, and provided documents to support its Allegation. This evidence reasonably suggests that merchandise may have been entered through evasion by material false statement or act, or material omission that resulted in the reduction or avoidance of applicable AD/CVD cash deposits or security.

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<sup>17</sup> See *AD/CVD Orders*.

<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> See Allegation at Exhibit 3.

<sup>21</sup> See *AD/CVD Orders*.

<sup>22</sup> See also discussion below of QSP imports from China and Taiwan sourced from U.S. International Trade Commission trade data.

<sup>23</sup> See 19 CFR 165.15(b)(2); see also 19 USC 1517(b)(1).

<sup>24</sup> See 19 USC 1517(a)(5)(A); see also 19 CFR 165.1 (setting forth the definition of "evasion").

<sup>25</sup> See 19 CFR 165.11; see also 19 CFR 165.15(2).

## Interim Measures

Not later than 90 calendar days after initiating an investigation under EAPA, 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.<sup>26</sup> 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 materially false statement or act, or material omission that resulted in the reduction or avoidance of applicable AD or CVD cash deposits or other security.<sup>27</sup> 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 LTT entered covered merchandise into the United States through evasion by transshipment and failure to declare the Chinese-origin QSP subject to the *AD/CVD Orders*.<sup>28</sup>

### *CBP Form 28 (CF-28) Responses*

On November 30, 2022, CBP issued CBP Form 28 (CF-28) requests for information (RFI) to LTT for entry numbers [ # ]6861 (entry 6861), [ # ]9070 (entry 9070), and [ # ]9016 (entry 9016).<sup>29</sup> CBP requested supporting documentation, *i.e.*, commercial invoices, purchase orders for raw materials, proof of payment, production records, and transportation documents, to substantiate the manufacturer of the QSP.<sup>30</sup> On December 29, 2022, and January 5, 2023, CBP received timely CF-28 responses for entries 6861, 9070, and 9016 from LTT's broker.<sup>31</sup> LTT provided timely responses, however the responses were not all translated into English.

The CF-28 requests specifically stated that all documents should be clear, legible and in English; therefore, CBP only took into consideration information that was provided in English and did not review documents that were untranslated.<sup>32</sup> On January 10, 2023, CBP reminded LTT through their broker that the CF-28 responses must be translated into English.<sup>33</sup> LTT requested an extension to provide the English translation, and CBP granted an extension until close of business, January 23, 2023.<sup>34</sup> As of this notice, LTT has failed to provide the requested translations despite being granted an extension.

The reported manufacturer of entry 6861 is [ **company name** ] (Supplier 1). LTT provided a sales confirmation from "seller" (Supplier 1) for [ # ] kgs of QSP dated November 8, 2011, with an agreed shipment date of December 1, 2022.<sup>35</sup> This document was supposedly issued 11 years before the actual entry date, January 17, 2022, which is highly suspicious because it is an unusually long lead time for the contracted quantity of [ # ] kgs of QSP versus the actual shipped gross quantity of [ # ] kgs of QSP.<sup>36</sup> Multi-year contracts are not unusual;

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<sup>26</sup> See 19 CFR 165.24(a).

<sup>27</sup> See 19 USC 1517(e); *see also* 19 CFR 165.24.

<sup>28</sup> See 19 CFR 165.24(a).

<sup>29</sup> See November 30, 2022, CF-28 Request for Information on entries 6861, 9070, and 9016.

<sup>30</sup> *Id.*

<sup>31</sup> See CF-28 Responses.

<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

however, in such a contract, normally a buyer will purchase significantly larger total quantities, and the manufacturer will then produce and invoice smaller quantities over the set time period. For example, a sales contract can be for 100,000 metric tons (MT) of QSP, and the manufacturer will produce and invoice 10,000 MT each year over a 10-year period. Here, the sales confirmation was for one set quantity of approximately [ # ] MT, which was fulfilled completely in one shipment over 11 years after the sales confirmation was issued.

On the sales confirmation provided, Supplier 1's address is listed as [ address ].<sup>37</sup> According to Google Maps, the location is a commercial building and not a manufacturing facility in Taiwan.<sup>38</sup> LTT provided the arrival notice/freight invoice, dated February 28, 2022, which lists the "shipper" as Cheng Jug and is for [ # ] kgs of quartz countertops.<sup>39</sup> The container numbers are [ # ] and [ # ].<sup>40</sup> The document that the importer claims is the certificate of origin states that the "exporter" is Cheng Jug for container numbers [ # ] and [ # ] and it has a stamp from the Taipei Chamber of Commerce dated February 18, 2022 (which is dated after the actual U.S. entry date of January 17, 2022).<sup>41</sup> CBP attempted to authenticate the certificate of origin by entering the certificate number, EC22KC00115, and verification code, 18952595A01, into the online certificate of origin verification system operated by Taiwan's Ministry of Economic Affairs, Bureau of Foreign Trade, at <https://cocp.trade.gov.tw/tbmc/public/coe0160.jsp>; however, "{n}o records were found matching {the} search criteria."<sup>42</sup>

For the same entry, LTT provided a document titled "Cheng Jug" with a narrative description of the quartz production process and photos of the production; however, none of the photos identify the facilities as Cheng Jug's or Supplier 1's.<sup>43</sup> The commercial invoice is titled "Cheng Jug," and lists the address as No.12, Ln. 1, Zhongzheng Rd., Yuanlin City, Changhua County 510005, Taiwan.<sup>44</sup> The commercial invoice is dated December 18, 2021, for [ # ] kgs of quartz countertops.<sup>45</sup> The Allegation explains and includes evidence that a manufacturing facility does not exist at this address as the address appears to be of an apartment building with a commercial storefront on the first level.<sup>46</sup>

In addition to providing potentially unreliable information described above, LTT failed to provide several crucial details in response to CBP's request for information. LTT failed to provide full production records demonstrating the production process from start to finish. LTT also failed to provide raw material purchasing invoices and production records, such as documentation of raw material usage, packing costs, and factory production records including stamped timecards, payroll, and work orders. LTT failed to describe and account for all the equipment used in the production of the merchandise and the capacity of the equipment on site. LTT also failed to provide the manufacturer's corporate information, such as how long the

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<sup>37</sup> *Id.*

<sup>38</sup> See Memorandum to the File, "Additional Information," dated February 13, 2023 (Additional Information Memo).

<sup>39</sup> See CF-28 Responses.

<sup>40</sup> *Id.*

<sup>41</sup> *Id.*

<sup>42</sup> See Additional Information Memo.

<sup>43</sup> See CF-28 Responses.

<sup>44</sup> *Id.*

<sup>45</sup> *Id.*

<sup>46</sup> See Allegation at Exhibit 9.

factory has been opened for business, the name of the factory owner and all corporate officers, and whether the manufacturer is related to the importer.

The reported manufacturer of entry 9070 is Cheng Jug.<sup>47</sup> For this entry, LTT provided contradictory information: the sales contract is dated December 18, 2018, and it lists the “seller” as Cheng Jug located at No. 12, Ln. 1, Zhongzheng Rd, Yuanlin City, Changhua County, 510005, selling [ # ] kgs of quartz countertops.<sup>48</sup> However the discrepancy is that the bill of lading, arrival notice, certificate of origin, and narrative description of production processes indicates Supplier 1 is the manufacturer.<sup>49</sup> Similar to the previous entry, the location of the manufacturer, Supplier 1, is a commercial building.<sup>50</sup> LTT imported the gross quantity, [ # ] kgs of quartz according to the bill of lading, four years after the sales contract was signed.<sup>51</sup> The actual entry date is March 04, 2022.<sup>52</sup>

For entry 9070, LTT submitted the bill of lading dated December 3, 2021, for container numbers [ # ] and [ # ], and it states the “shipper” is Supplier 1, located at [ address ].<sup>53</sup> As stated above, the location is a commercial office building rather than a manufacturing facility.<sup>54</sup> The document which LTT claims is the certificate of origin states the “exporter” is Supplier 1 for container numbers [ # ] and [ # ], and it has a stamp from the Taipei Chamber of Commerce dated January 03, 2022. CBP attempted to authenticate the certificate of origin by entering the certificate number, EC22YC00017, and verification code, 16851903A01, into the online certificate of origin verification system; however, “{n}o records were found matching {the} search criteria.”<sup>55</sup> The commercial invoice provided for this entry is not from Cheng Jug but is rather from Supplier 1 and is dated August 11, 2021, for [ # ] kgs.<sup>56</sup> The importer provided a written description and photos of the production process for QSP and indicates Supplier 1 is the “producer.” Nevertheless, the photos do not have any signage that clearly identifies Supplier 1 as the manufacturer. Similar to entry 6861, LTT failed to substantiate the production process with accounting and factory records. LTT failed to provide raw material purchasing invoices and production records, such as documentation of raw material usage, packing costs, and factory production records including stamped timecards, payroll, and work orders. LTT failed to describe and account for all the equipment used in the production of the merchandise and the capacity of the equipment on site. LTT also failed to provide the manufacturer’s corporate information such as how long the factory has been opened for business, the name of the factory owner and all corporate officers, and whether the manufacturer is related to the importer.

The reported manufacturer of entry 9016 is Pan Yang Enterprise Co. Ltd. (Pan Yang). The sales confirmation is dated April 5, 2022, for [ # ] kgs of quartz countertops, and the agreed shipment date was May 30, 2022.<sup>57</sup> The address on the packing list and bill of lading for Pan

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<sup>47</sup> See CF-28 Responses.

<sup>48</sup> *Id.*

<sup>49</sup> *Id.*

<sup>50</sup> See Allegation at Exhibit 12 and Additional Information Memo.

<sup>51</sup> See CF-28 Responses.

<sup>52</sup> See CBP data.

<sup>53</sup> See CF-28 Responses.

<sup>54</sup> See Additional Information Memo.

<sup>55</sup> *Id.*

<sup>56</sup> See CF-28 Responses.

<sup>57</sup> See CF-28 Responses.



Yang is 3f.-13, No. 36, Dexing W. Rd., Shilin Dist., Taipei City 11158, Taiwan, which is the exact same address as Supplier 1.<sup>58</sup> LTT provided a narrative description of the production process and stated the address for Pan Yang as No. 151, Mingde Rd., Shigang Dist., Taichung City 42265, which is a different location than listed on the sales documentation.<sup>59</sup> According to Google Maps, the address provided by LTT for Pan Yang is a commercial building that does not appear to be suitable for QSP production.<sup>60</sup> Similar to the other CF-28 responses, the photos in the description of the production process did not clearly identify Pan Yang as the manufacturer.<sup>61</sup> As was the case with the previous entries, LTT failed to substantiate the production process with accounting and factory records. LTT failed to provide raw material purchasing invoices and production records, such as, documentation of raw material usage, packing costs, and factory production records including stamped timecards, payroll, and work orders. LTT failed to describe and account for all the equipment used in the production of the merchandise and the capacity of the equipment on site. LTT also failed to provide the manufacturer's corporate information such as how long the factory has been opened for business, the name of the factory owner and all corporate officers, and whether the manufacturer is related to the importer.

### *Other Information*

An analysis of U.S. import data sourced from the U.S. International Trade Commission for HTS 6810.99.0010 - Agglomerated quartz slabs of the type used for countertops – (an HTS subheading listed in the *AD/CVD Orders*) from 2017 to 2021<sup>62</sup> shows a dramatic trade pattern shift during the AD/CVD investigation of QSP by Commerce starting in 2018 when the preliminary results published, and continuing when the *AD/CVD Orders* went into effect in 2019.<sup>63</sup> In 2017, the United States imported \$464,557,065 of QSP from China and \$156,042 of QSP from Taiwan.<sup>64</sup> In 2018, the United States imported \$579,813,368 of QSP from China and \$2,901,286 of QSP from Taiwan, which is a 1,759.30% increase from the previous year.<sup>65</sup> In 2019, the effects of Commerce's preliminary results and the *AD/CVD Orders* published on July 11, 2019, sees U.S. imports shifting from China to other countries such as Taiwan. That year, U.S. imports from China drastically dropped 91.45 % to \$49,578,482 and imports from Taiwan skyrocketed 875.46 % to \$28,300,774.<sup>66</sup> The downward shift continues with falling U.S. imports from China in 2020 and 2021, at \$6,820,032 and \$3,066,249, respectively, accounting for 86.24% and 55.04% declines from the prior year.<sup>67</sup> At the same time, the United States saw imports from Taiwan increase 51.31% and 25.34%, with \$42,821,359 in 2020 and \$53,671,628 in 2021.<sup>68</sup>

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<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

<sup>60</sup> See Additional Information Memo.

<sup>61</sup> See CF-28 Responses.

<sup>62</sup> *Id.*

<sup>63</sup> See *Certain Quartz Surface Products from the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination*, 83 FR 47881 (September 21, 2018); see also *Certain Quartz Surface Products from the People's Republic of China: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination*, 83 FR 58540 (November 20, 2018). See *AD/CVD Orders*.

<sup>64</sup> See Additional Information Memo.

<sup>65</sup> *Id.*

<sup>66</sup> *Id.*

<sup>67</sup> *Id.*

<sup>68</sup> See Additional Information Memo.

## *Conclusion*

In summary, CBP was unable to corroborate the Importer's claim that its imports of QSP were manufactured in Taiwan. As discussed above, the Importer submitted documents with multiple discrepancies, *e.g.*, the certificates of origin could not be validated on the Ministry of Economic Affairs, Bureau of Foreign Trade website; Pan Yang and Supplier 1 have the same address that is a commercial building and not a factory location; Pan Yang's second location (provided by LTT) is also a commercial building and not a factory location; and the sales contracts of Supplier 1 and Cheng Jug were signed several years earlier—as much as 11 years before the commercial invoices were issued and merchandise delivered. These discrepancies call into question the reliability of these documents. Further, the Importer failed to provide the requested accounting and production documentation, such as raw material purchasing invoices, raw material payments, timecards, pay roll records, *etc.*, to support the claim that the QSP was manufactured by Cheng Jug, Supplier 1 or Pan Yang in Taiwan. Finally, the analysis of the international trade data shows a drastic decline in QSP imports from China to the United States and a sharp growth spike of QSP imports from Taiwan to the United States in 2018 when the AD/CVD investigation at Commerce took place. All of this information, combined with the fact noted in the Allegation that Cheng Jug is exporting to the United States several other goods subject to Chinese AD/CVD orders (which generally would not be produced at a singular factory location given their dissimilarity), suggests that the QSP Cheng Jug is importing and then exporting to LTT likely comes from China; therefore, the QSP merchandise being imported by LTT should be subject to AD/CVD duties.

## *Enactment of Interim Measures*

Based on the reasons discussed above, TRLED finds that there is reasonable suspicion that the Importer imported covered merchandise, Chinese-origin QSP, into the United States through evasion by means of transshipping the merchandise through Taiwan. Therefore, CBP is imposing interim measures on the Importer's imports of QSP into the United States.<sup>69</sup> Specifically, in accordance with 19 USC 1517(e)(1)-(3), CBP will:

- (1) suspend the liquidation of each unliquidated entry of such covered merchandise that entered on or after November 7, 2022, the date of the initiation of the investigation;
- (2) pursuant to the Commissioner's authority under section 1504(b), extend the period for liquidating each unliquidated entry of such covered merchandise that entered before the date of the initiation of the investigation; and
- (3) pursuant to the Commissioner's authority under section 1623, 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.<sup>70</sup>

In addition, CBP will require live entry for future shipments of QSP imported by the Importer and will reject any entry summaries that do not comply with live entry. CBP will require refileing of entries that are within the entry summary rejection period. CBP will also evaluate the

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<sup>69</sup> See 19 USC 1517(e); *see also* 19 CFR 165.24.

<sup>70</sup> *See also* 19 CFR 165.24(b)(1)(i)-(iii).



Importer's continuous bonds to determine their sufficiency. Finally, CBP may pursue additional enforcement actions, as provided by law, consistent with 19 USC 1517(h).

Any future submissions or factual information that you submit to CBP pursuant to this EAPA investigation must be made electronically using EAPA's case management system (CMS) at <https://eapallegations.cbp.gov/>. Please provide a business confidential and public version to CBP and serve the public version on the parties to this investigation (*i.e.*, to the parties identified at the top of this notice). Public versions of administrative record documents will be available via the EAPA Portal at <https://eapallegations.cbp.gov/>.<sup>71</sup> Please note that CBP is requiring that all documents submitted via the CMS are made text searchable, especially if those documents are submitted as PDFs.

Should you have any questions regarding this investigation, you may contact us at [eapallegations@cbp.dhs.gov](mailto:eapallegations@cbp.dhs.gov) and cc: [patricia.tran@cbp.dhs.gov](mailto:patricia.tran@cbp.dhs.gov) and [paul.j.walker@cbp.dhs.gov](mailto:paul.j.walker@cbp.dhs.gov) with "EAPA Case 7743" 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,



Kristina Horgan  
Acting Director, Enforcement Operations Division  
Trade Remedy Law Enforcement Directorate  
CBP Office of Trade

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<sup>71</sup> See 19 CFR 165.4; *see also* 19 CFR 165.23(c); and 19 CFR 165.26.