

STAFF REPORT

DUTY EVASION:

HARMING U.S. INDUSTRY AND AMERICAN WORKERS

Prepared for Senator Ron Wyden

November 8, 2010

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Introduction

U.S. antidumping and countervailing duty (AD/CVD) laws form U.S. industry's protective backbone against injury from unfair trade. These laws provide American producers the ability to counter injurious unfair trade practices and ultimately allow for the imposition of additional duties on unfair imports.

Each year, U.S. companies collectively spend millions of dollars to initiate and litigate AD/CVD cases to keep illegally dumped or subsidized imports from entering the U.S. market and injuring them. Unfortunately, many U.S. producers believe that the evasion of America's unfair trade laws is increasingly pervasive. The circumvention of U.S. AD/CVD laws, either by foreign producers or importers, negatively affects industries throughout the United States, resulting in continued injury to U.S. industry, the loss of American jobs, and the loss of federal revenue.

Foreign suppliers subject to AD/CVD orders and their U.S. importers avoid paying AD/CV duties by a number of unscrupulous schemes, including illegal transshipment and falsified country of origin markings, undervalued invoices to pay less duty, and misclassification of goods. In sum, they cheat.

Staff set out to determine just how easy it is to find these trade cheats and determine the ease at which an importer could identify a foreign supplier willing to engage in circumvention schemes. In August 2010, staff created a fictitious company called AvisOne Traders, Inc. and set up a company profile on China's largest business-to-business e-commerce website, Alibaba.com, in order to find companies willing to cheat and evade AD/CVD orders. (AvisOne is an anagram for "evasion.")

The results are alarming and illustrative of how widespread the problem of duty evasion appears to be. In under two weeks and for as little as 30 minutes a day, one staff person, acting as a "purchasing manager" for AvisOne Traders, Inc., contacted roughly 120 companies through Alibaba.com and received 47 responses. Of these 47, this staff person received written confirmation from 10 Chinese companies that were willing to evade duties on five different products subject to U.S. AD/CVD orders. These products include uncovered innersprings units, lined paper school supplies, steel nails, natural bristle paint brushes, and light-walled rectangular pipe and tube. The AD/CVD orders on this merchandise, which represents just a small fraction of all AD/CVD orders currently in place, were put in place to protect over 120 businesses and 12,000 workers from unfairly traded imports.

This report is a compilation of information obtained by staff over a two-week period, and is organized into three parts. Part I presents e-mail correspondence between staff, acting under the auspices of AvisOne Traders, and Chinese producers. In a couple of additional examples, staff obtained from the counsel of U.S. industry non-solicited e-mails from Chinese producers offering to facilitate the evasion of AD/CVD orders. Part II presents a list of publically identified Chinese companies that advertise—in English—their ability to facilitate the evasion of AD/CVD laws. Part III includes snap shots of company websites that offer services designed to evade AD/CVD laws (in one instance, a website operated by the Chinese government itself and which advertises the services of a Chinese firm that facilitates evasion).

In the event that staff corresponded with a Chinese firm that is of interest to U.S. law enforcement, two versions of this report were prepared. A confidential version containing comprehensive information about the firms with which staff corresponded was provided to U.S. Customs and Border Patrol and Immigration and Customs Enforcement. This version, a public redacted version, was prepared in order to be shared with Members of Congress and their staff.

Part I: Email Correspondence Showcasing Companies' Willingness to Evade AD/CVD Orders

Certain Steel Nails from China

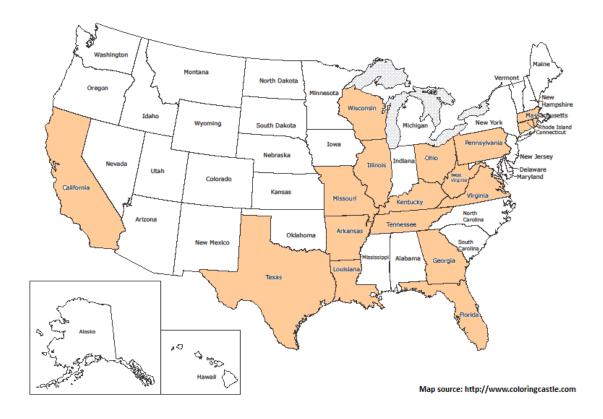
(DOC Case No. A-570-909)

Steel nails have a shaft length up to 12 inches, and include steel nails made of round wire and nails that are cut. They may be made of any type of steel, and have a variety of finishes. Nails are used in the construction of houses and used to make furniture and cabinets, among other applications.

Industry at a Glance:

- \Rightarrow Subject to AD order since August 1, 2008 (DOC)
- \Rightarrow Number of U.S. producers in 2007: 17
- \Rightarrow U.S. producers' U.S. shipments in 2007: \$220 million
- \Rightarrow U.S. employment of production and related workers in 2007: 791
- ⇒ U.S. production locations: Arkansas, California, Connecticut, Florida, Georgia, Illinois, Kentucky, Louisiana, Massachusetts, Missouri, Ohio, Pennsylvania, Rhode Island, Tennessee, Texas, Virginia, Wisconsin, West Virginia
- ⇒ Leading sources of U.S. imports (by value) in 2007: China, Korea, United Arab Emirates (USITCa, USITCb)

U.S. Production Locations of Steel Nails



Companies Willing to Evade U.S. AD/CV Duties on Steel Nails

Staff, posing as a U.S. trading company, contacted these three Chinese steel nail producers/traders via Alibaba.com to inquire whether these companies could avoid paying duties on steel nails by illegal transshipment. In the first instance, Company A offered to transship when it was proposed by staff. In the second and third instances, Companies B and C directly proposed to illegally transship as a way to avoid paying duties. Below are transcripts of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company A

Product: Steel Nails Country of origin: China Means to evade duties: Illegal transshipment

From: feedback@service.alibaba.com

To: *** Sent: Tues, August 31, 2010 5:12 AM Subject: [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com

Dear ***,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: I want to buy the product you are selling on Alibaba.com.

Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your concrete steel nails? Also, are your steel nails subject to any U.S. antidumping duties?

Thank you, Paul Union, Purchasing Manager AvisOne Trading Company, Ltd. Tel: (503) 583-4237 Email: AvisOneTraders@gmail.com

Explanation:

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company A via Alibaba.com, China's largest ecommerce platform.

AvisOne Traders—Providing the Highest Quality Product at the Most Competitive Prices

Company A (cont'd)

From: ***

Sent: Tues, August 31, 2010 10:57 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: Concrete nail

Hi, dear sirs:

Thanks for your enquiry about nails

To take this opportunity, we are very glad to introduce our company to you. We are the professional manufacturer and exporter with high reputation in TianJin city China, handling of nail products etc. Pls let us know the concrete nails specification of you required, we will quote you our lowest price on based of that.

We are looking forward to your early reply.

Best regards.,

From: "Paul Union" <avisonetraders@gmail.com> Sent: Fri, September 3, 2010 8:36 AM To: *** Subject: Re: Concrete nail

Explanation:

Company A describes its business and products. In the second email, staff asks if it is possible to avoid paying duties.

Dear ***,

Thanks for your reply. Are you nails subject to any U.S. anti-dumping duties? If so, in your experience is there any way to avoid paying the duties?

Regards, Paul

Company A (cont'd)

From: ***

Sent: Sun, September 5, 2010 10:47 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: Concrete nail

Hi, dear Paul:

Thanks for your email.

We have exported our products to U.S but the customer avoid the duties by themselve. So we do not know how can they avoid the duties. Sorry about that. But we can promise our products quality can meet your requirement.

Best regards., ***

Explanation:

When asked if there is a way to avoid paying duties, Company A initially says no. However, when illegal transshipment is proposed as a way to avoid paying duties, Company A agrees, demonstrating at the very least that it is aware of the method. In this instance, Company A offers to ship product through a third country.

Dear ***,

To: ***

Thanks for your reply. <u>Would it be possible to transship the product through a third country and change the country of origin in order to avoid paying the duties</u>?

Best regards, Paul Union

From: ***

Sent: Wed, September 8, 2010 11:12 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: Concrete nail

From: <avisonetraders@gmail.com>

Subject: Re: Concrete nail

Sent: Wed, September 8, 2010 7:48 AM

Dear Paul Union:

Thanks for your email.

As you said, we can arrange the container shiping from Xingang to Malaysia ,Bangladesh or Singapore. And the shiping agent can help us to issue the original certification, it will increase the cost but i think it must be lower than duties.

Best regards.,

Company B

Product: Steel Nails Country of origin: China Means to evade duties: Illegal transshipment

Explanation:

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company B via Alibaba.com, China's largest ecommerce platform.

 From: feedback@service.alibaba.com
 Comme

 To: ***
 Sent: Tues, August 31, 2010

 Subject: [avisonetraders@gmail.com]Inquiry about your product

Dear ***,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message Subject: Inquiry about your product Dear sir: We are a small trading company base customers in the U.S. Pacific Northwe

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your concrete nails? Also, are your steel nails subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager AvisOne Trading Company, Ltd. Tel: (503) 583-4237 Email: AvisOneTraders@gmail.com

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Company B (cont'd)

From: ***

Sent: Wed, September 1, 2010 3:02 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: [avisonetraders@gmail.com]inquiry about your product

Dear Mr Paul Union,

How are you?

Our factory have produce the steel nail for 46years.

If you need the quotation, pls inform me the exact information include the diameter of the wire nail, length of the nail, surface treatment and also the packing demand.

Sincerely thanks and best regards!~ Yours ***

Explanation:

In the first email, Company B describes its business and products. In the second email, staff asks if it is possible to avoid paying duties. Company B responds that it already engages in illegal transshipment.

From: "Paul Union" <avisonetraders@gmail.com>

Sent: Fri, September 3, 2010 8:33 AM To: *** Subject: [avisonetraders@gmail.com]inquiry about your product

Dear ***

Thanks for your response. Are your concrete nails subject to any U.S. anti-dumping duties? If so, in your experience is there any way to avoid paying the duties?

Regards, Paul

From: ***

Sent: Sat, September 4, 2010 1:29 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: [avisonetraders@gmail.com]inquiry about your product

Dear Paul, How are you? Thank you for your e-mail. <u>we have export the concrete nails to Canada then to U.S. or other country</u> <u>then to U.S.</u> Our coil nail to U.S. do not need pay the duties. If you have any other company in Canada or Singapore? Maybe it is better way to avoid paying the duties. Sincerely thanks and best regards! Yours ***

Company C

Product: Steel Nails Country of origin: China Means to evade duties: Illegal transshipment

Explanation:

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company C via Alibaba.com, China's largest ecommerce platform.

From: feedback@service.alibaba.comcommeTo: ***Sent: Tues, August 31, 2010 5:13 AMSubject: [avisonetraders@gmail.com]Inquiry about your product

Dear ***,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message Subject: Inquiry about your product Dear sir: We are a small trading company base

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your concrete nails? Also, are your steel nails subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager AvisOne Trading Company, Ltd. Tel: (503) 583-4237 Email: AvisOneTraders@gmail.com

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Company C (cont'd)

From: ***

Sent: Tue, August 31, 2010 10:23 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: concrete steel nails

Dear sir,

Good day ! I am *** ,from *** . I got your message on alibaba . so if you have any need ,please contact me .

Best regard . ***

From: "Paul Union" <avisonetraders@gmail.com> Sent: Fri, September 3, 2010 8:37 AM To: *** Subject: Re: concrete steel nails

Explanation:

In this series of emails, staff ask Company C whether their nails are subject to U.S. antidumping duties and whether there is a way to avoid paying the duties. Company C proposes shipping product to Malaysia, changing containers, and then sending the new container with a different country of origin certificate to the United States.

Thanks for your reply. I'm looking for concrete steel nails. Are these products subject to U.S. antidumping duties? If so, is there any way to avoid paying the duties? Regards, Paul

From: ***

Sent: Tue, August 31, 2010 10:23 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: concrete steel nails

Dear sir ,

Yes . you want concrete steel nails?

if you want to avoid paying the duties ,there is the way is send the goods to Malaysia and change a box ,then send to U.S

so what do you think about it .

Best regard .

Company C (cont'd)

From: "Paul Union" <avisonetraders@gmail.com> Sent: Wed, September 8, 2010 7:19 AM To: *** Subject: Re: concrete steel nails

Thank you for your reply. So you can transship through Malaysia and change the country of origin to avoid paying the anti-dumping duties? Can your company do that?

Regards, Paul

From: *** Sent: Wed, September 8, 2010 8:43 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: concrete steel nails

Dear sir,

Thanks for your reply .

Yes .our company can do this .but in this way ,the cost will increase .

and just tell me your details product information .

Best regard .

Explanation:

Staff respond to Company C to confirm that it can transship product through Malaysia and change the country of origin of the product. Company C confirms its ability to illegally transship.

Certain Lined Paper School Supplies from China

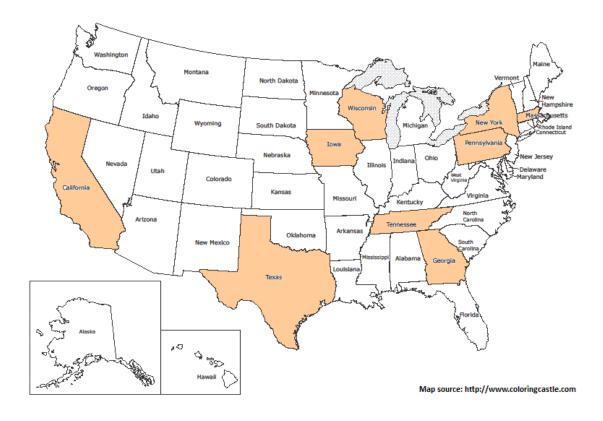
(DOC Case No. A-570-901)

Lined paper school supplies include spiral-bound and wireless notebooks, hole-punched filled paper, and composition books. The paper is typically white and wide-ruled or college-ruled.

Industry at a Glance:

- \Rightarrow Subject to AD order since September 28, 2006 (DOC)
- \Rightarrow Number of U.S. producers in 2005: 13
- \Rightarrow U.S. producers' U.S. shipments in 2005: \$260 million
- \Rightarrow U.S. employment of production and related workers in 2005: 942
- ⇒ U.S. production locations: California, Georgia, Iowa, Massachusetts, New York, Pennsylvania, Tennessee, Texas, Wisconsin (USITCc, USITCd)

U.S. Production Locations of Lined Paper School Supplies



Companies Willing to Evade U.S. AD/CV Duties on Paper Products

Staff, posing as a U.S. trading company, contacted Companies D and E via Alibaba.com to inquire whether they could avoid paying duties on paper school supplies. In the first instance, Company D proposes illegal transshipment through Malaysia to avoid paying duties. In the second instance, Company E professes that it does not know how to avoid paying antidumping duties. However, it states that it deliberately undervalues the value of its products, which is another form of duty evasion. Below are transcripts of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company D

Product: Paper school supplies Country of origin: China Means to evade duties: Illegal transshipment through Malaysia

From: feedback@service.alibaba.com

To: *** Sent: Wed, September 1, 2010 Subject: [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com

Dear ***,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this send. Mr. Paul Union is interested in your company.

Buyer's Message Subject: Inquiry about your product

Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customs in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your lined paper products? Also, are your lined paper products subject to any U.S. antidumping duties?

Thank you, Paul Union, Purchasing Manager AvisOne Trading Company, Ltd. Tel: (503) 583-4237 Email: AvisOneTraders@gmail.com

Explanation:

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company D via Alibaba.com, China's largest ecommerce platform.

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Company D (cont'd)

From: ***

Sent: Tue, August 31, 2010 10:04 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: Inquiry about your product

Dear Paul,

It's please to get your enquiry from alibaba. Our factory ***, specializing in paper printing products, stationery notepad is our main product.

Herely I sending you our catalogue, pls check it, hop to meet your interesting. And customed item welcome.

Actually, paper notebook is subjected to U.S. antidumping duties, because the our price is lower much than US market.

Looking forward to your soonly response.

Best regards, ***

From: "Paul Union" <avisonetraders@gmail.com> Sent: Fri, September 3, 2010 To: *** Subject: Re: Inquiry about your product

Explanation:

In the first email, Company D describes its business and products. In the second email, staff asks if it is possible to avoid paying duties.

Dear ***,

Thank you for your response. <u>Is there any way to avoid paying the anti-dumping duties in your experi-</u><u>ence?</u>

Regards, Paul

Company D (cont'd)

From: ***

Sent: Wed., September 8, 2010 5:44 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: Inquiry about your product

Dear Paul,

Notebook of A4, A5, A6 size subjected to U.S. antidumping duties, other size no problem. <u>Solution is</u> <u>Shipping goods to Malaysia, transship to America to avoid paying the anti-dumping duties.</u>

How do you think about this solution? Looking forward to hearing from you soon. Thanks & Best regards, ***	Explanation: In the first email, Company D offers to illegally ship product through Ma- laysia to avoid paying duties. Com- pany D confirms that it can change
From: "Paul Union" <avisonetraders@gmail.com. Sent: Wed., September 8, 2010 7:20 AM Subject: Re: Inquiry about your product</avisonetraders@gmail.com. 	the country of origin when asked by staff.

Dear ***

Thank you for your reply. <u>Can your company transship through Malaysia and change the country of</u> <u>origin in order to evade the anti-dumping duties?</u>

Best regards,

Paul Union

From: ***

Sent: Wed., September 8, 2010 7:31 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: Inquiry about your product

Dear Paul,

Thanks for your quick reply.

<u>yes, we can do that</u>. but first of all, you should tell me what kind of notebook are you seeking for your market, then I give you the CNF or CIF price, if price is suitable for your market, let's talk over further more.

Looking forward to your early reply with your inquiry.

Thanks & best regards, ***

Company E

Product: Paper school supplies Country of origin: China Means to evade duties: Undervaluation of invoice to pay less duty

From: feedback@service.alibaba.com To: *** Sent: Wed, September 1, 2010 Subject: [avisonetraders@gmail.com]Inquiry about your product(AdminGenerate)

Dear ***,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this send.

Mr. Paul Union is interested in your company.

Buyer's Message Subject: Inquiry about your product Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customs in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your lined paper products? Also, are your lined paper products subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager AvisOne Trading Company, Ltd. Tel: (503) 583-4237 Email: AvisOneTraders@gmail.com

Explanation:

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company E via Alibaba.com, China's largest ecommerce platform.

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Company E (cont'd)

From: ***

Sent: Wed, September 1, 2010 1:39 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: Our product

Dear paul,

Let me introduce my company to you ,my company—*** is specialized in the manufacturer of various color printed paper cards, paper handbags, packing boxes, gift boxes, labels, tags, brochures, posters, packing materials and other related products for 20 years.Providing 'Quality Products, Excellent Service, Competitive Prices and Prompt Delivery', pls kindly browse our website:*** for free! we can not only design and produce unique and fashion style products but also can make products according to your requirements, and your design is welcome

Attachment is our catalogue about some paper bags and boxes ,pls check it !

If you have some new inquiry ,pls contact us for free !

Await for your prompt reply !

Best regard ! ***

Explanation:

In the first email, Company E describes its business and products. In the second email, staff asks if Company E's products are subject to antidumping duties and whether it is possible to avoid paying duties.

From: "Paul Union" <avisonetraders@gmail.com> Sent: Fri, September 3, 2010 8:00 PM To: *** Subject: Re: Our product

Dear ***,

Thank you for your message. Are your paper notebooks subject to U.S. anti-dumping duties? In your experience, is there any way to avoid paying the anti-dumping duties?

Regards, Paul

Company E (cont'd)

From: ***

Sent: Wed, September 15, 2010 4:26 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: Our product

Dear Paul,

Thank you for your reply ! I am sorry so late reply you ! we have no experience to avoid paying the anti-dumping duties ,besides we make the commerical invoice , we write that the value of products is less than the factual cost .

Await for your prompt reply ! Best regard ! ***

Explanation:

In this email, Company E states that it does not know how to avoid paying antidumping duties, but professes that it undervalues products on commercial invoices, which is a form of duty evasion.

Light-Walled Rectangular Pipe and Tube from China

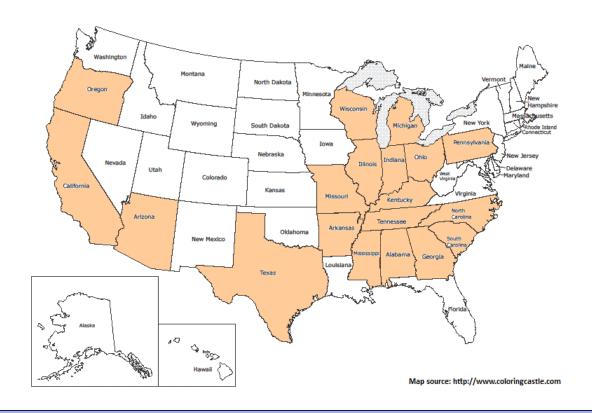
(DOC Case No. A-570-501)

Carbon-quality welded light-walled rectangular pipe and tube is often referred to as ornamental or mechanical tubing. Principal uses include ornamental fencing, window guards and framing, and railings for construction and agricultural applications. It is also used in metal furniture, athletic equipment, and store display shelves.



- \Rightarrow Subject to AD/CVD orders since August 5, 2008 (DOC)
- \Rightarrow Number of U.S. producers in 2007: 28
- \Rightarrow U.S. producers' total shipments in 2007: \$513 million
- $\Rightarrow~$ U.S. employment of production and related workers in 2007: 973
- ⇒ U.S. production locations: Alabama, Arizona, Arkansas, California, Georgia, Illinois, Indiana, Kentucky, Michigan, Missouri, Mississippi, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Wisconsin (USITCe, USITCf)

U.S. Production Locations of Light-Walled Rectangular Pipe and Tube



Companies Willing to Evade U.S. AD/CV Duties on Light-Walled Rectangular Pipe and Tube from China

Staff, posing as a U.S. trading company, contacted Company F via Alibaba.com to inquire whether its rectangular pipe and tube products are subject to U.S. antidumping duties and whether it could avoid paying such duties. Below is a transcript of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company F

Product: Pipe and tubular products Country of origin: China Means to evade duties: Illegal transshipment, also known as "entrepot" trade

From: feedback@service.alibaba.com

To: *** Sent: Tues, August 31, 2010 5:52 AM Subject: [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com

Dear ***:

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: I want to buy the product you are selling on Alibaba.com. Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your rectangular tubular products? Also, are your light-walled rectangular tubular products subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager AvisOne Trading Company, Ltd. Tel: (503) 583-4237 Email: AvisOneTraders@gmail.com

Explanation:

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company F via Alibaba.com, China's largest ecommerce platform.

Company F (cont'd)

From: ***

Sent: Fri, September 3, 2010 4:42 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: To Paul Union

Dear Paul Union

HAPPY WEEKEND. and hope you received my qoutation of *** rectangular pipes .

About the antidumping duties .I check up alots of information on the net .I still can't sure if rectangular tubular products subject to any U.S. antidumping duties. Many informations said that On May 3rd, the InternationalTradeCommission voted for Chinese steel 99.14% at the tax antidumping tariffs on imports. Are you clear about this ??

Hope you can tell me more about .

Sent: Fri, September 3, 2010 7:37 AM

Subject: Re: To Paul Union

From: "Paul Union" <avisonetraders@gmail.com>

Yours

Explanation:

In the first email, Company F is not sure whether rectangular pipe and tube is subject to antidumping duties. In the second email, staff ask if it is possible to change the country of origin to avoid paying duties.

***.

To: ***

Thank you for your message. I am not sure if rectangular tubing is subject to U.S. anti-dumping duties. Is there any way to avoid paying the anti-dumping duties? Would it be possible to modify the country of origin certificate?

Regards, Paul

Company F (cont'd)

From: ***

Sent: Sat, September 4, 2010 6:38 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: To Paul Union

Dear Paul Union:

Thanks for your e-mail and have a good day .

I search a lot. Yes ,there has a way to avoid paying the antidumping duties .It's entrepot trade. Export documents issued by the third countries so that facilitate you in yours customs clearance, avoid "a nti-dumping duties" customs clearance.

<u>Can you accept the export file as payment terms, at the same time to third countries as its export docu ments, can reduce clearance documents tariffs?</u>

And i've make certain about that rectangular tubular products subject to any U.S. antidumping duties. Do you have any questions?

Yours Sincerly

Explanation:

Company F offers proposes "entrepot trade" another name for illegal transshipment. Company F states that it will help find a logistics company that can illegally transship.

From: "Paul Union" <avisonetraders@gmail.com> Sent: Wed, September 8, 2010 7:45 AM To: *** Subject: Re: To Paul Union

Dear ***,

My apologies for my late reply. If I understand correctly, entrepot trade would involve transshipping the rectangular tubular products to another country in order to change the country of origin to avoid paying the anti-dumping duties on Chinese product? <u>Can your company do this?</u>

Best regards, Paul

From: ***

Sent: Thur, September 9, 2010 6:02 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: To Paul Union

Dear Paul Union:

How are you recently?

Yes you are right .entrepot trade would involve transshipping the rectangular tubular products to another country in order to change the country of origin to avoid paying the anti-dumping duties on Chinese product. I find a company can do this .But the products's price would be a little higher.

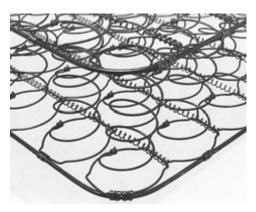
Uncovered Innersprings Units from China

(DOC Case No. A-570-928)

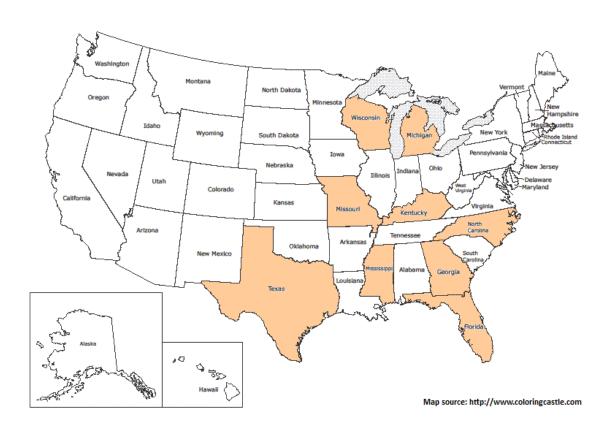
Uncovered innerspring units are composed of a series of individual metal springs joined together and used as the innerspring component in the manufacture of innerspring mattresses.

Industry at a Glance:

- \Rightarrow Subject to AD order since February 19, 2009 (DOC)
- \Rightarrow Number of U.S. producers in 2008: 8
- \Rightarrow U.S. producers' total shipments in 2007: \$539 million
- $\Rightarrow~$ U.S. employment of production and related workers in 2007: 2,970
- ⇒ U.S. production locations: Florida, Georgia, Kentucky, Michigan, Missouri, Mississippi, North Carolina, Texas, Wisconsin (USITCg, USITCh)



U.S. Production Locations of Uncovered Innerspring Units



Companies Willing to Evade U.S. AD/CV Duties on Uncovered Innersprings Units

Staff, posing as a U.S. trading company, contacted Company G via Alibaba.com to inquire whether it could avoid paying duties on uncovered innersprings units. Company G proposed illegally transshipping product through a third country, or undertaking minor assembly in the United States to avoid paying duties. Below is a transcript of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company G

Product: Uncovered innersprings units Country of origin: China Means to evade duties: Illegal transshipment or minor assembly in United States

From: feedback@service.alibaba.com

To: *** Sent: Tues, August 31, 2010 Subject: [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com

Dear ***

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: I want to buy the product you are selling on Alibaba.com. Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customs in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your innersprings units? Also, are your innersprings units subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager AvisOne Trading Company, Ltd. Tel: (503) 583-4237 Email: AvisOneTraders@gmail.com

Explanation:

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company G via Alibaba.com, China's largest ecommerce platform.

Company G (cont'd)

From: ***

Sent: Wed, September 1, 2010 3:17 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: RE:FW [avisonetraders@gmail.com]I want to buy the product you are sel

Dear Paul

Thanks for your letter, and thanks for you are interested in our company.

We offer our price, as follows: Wire :13g,(2.3mm). helical wire:17g (1.4mm) border 6g(4.88mm) T type 36.5"*73.5"*6" 9*24 10.7Kgs FOB Tianjin US\$11.07/pc F type 51.5"*73.5"*6" 13*24 14.9kgs FOB Tianjin US\$15.4/pc Q type 58.5"*78.5"*6"15*26 18.3kgs FOB Tianjin US\$18.92/pc K type 74.5"*78.5"*6" 18*26 22kgs FOB Tianjin US\$22.75/pc

Loading about 1250pcs in one 40' container. Gross weight 24Mt, Net weight :20Mt.

Yes ,our innerspring units is under U.S. antidumping duty, so we have two ways to export to your contry: 1) Transit from the third part country, but would add about US\$3000/40'container fee for the third part country.

2) We could export the springs and the helical wire to your country, then you could make up them together by yourself.

What do you think, please let me know without any hesitation.

Thanks & Best Regards

Explanation:

In response to staff's inquiry, Company G proposes illegally transshipping innersprings through a third market to avoid paying duties, or proposes that the U.S. importer undertake minor assembly of the product in the United States.

Natural Bristle Paint Brushes from China

(DOC Case No. A-570-501)

Natural bristle paint brushes are made with natural (hog) bristle or other types of animal hair, and are used primarily to apply paint, stain, or varnish. Paint brushes come in several quality ranges and in a wide variety of widths and lengths.

Industry at a Glance:

- ⇒ Subject to AD order since February 14, 1986 (order terminated July 30, 2010 due to lack of interest) (DOC)
- \Rightarrow Number of U.S. producers in 2003: 12
- \Rightarrow U.S. producers' U.S. shipments in 2003: \$33 million
- ⇒ U.S. production locations: Florida, Illinois, Maryland, New Jersey, New York, Ohio, Oregon, Penn-sylvania, Wisconsin (USITCi)

U.S. Production Locations of Natural Bristle Paint Brushes



Companies Willing to Evade U.S. AD/CV Duties on Natural Bristle Paint Brushes from China

Staff, posing as a U.S. trading company, contacted Company H via Alibaba.com. Although the product is no longer subject to antidumping duties, Company H offered to ship product under a different company's name to avoid paying duties. The company stated that it could not directly change the country of origin, although it proposed illegally transshipping goods through Taiwan or Hong Kong as a way to avoid paying duties. Below is a transcript of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company H

Product: Natural Bristle Paint Brushes Country of origin: China Means to evade duties: Exporting under a different company name (e.g., shipping agent)

From: feedback@service.alibaba.com

To: *** Sent: Tues, August 31, 2010 5:34 AM Subject: [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com

Dear ***:

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: I want to buy the product you are selling on Alibaba.com. ear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your natural bristle paint brushes? Also, are your paint brushes subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager AvisOne Trading Company, Ltd. Tel: (503) 583-4237 Email: AvisOneTraders@gmail.com

Explanation:

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company H via Alibaba.com, China's largest ecommerce platform.

Company H (cont'd)

From: ***

Sent: Tue, August 31, 2010 9:06 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: Info of Natural bristle brush to Mr. Paul Union from China

Dear Mr Paul Union,

We are pleased to receive your following inquiry of natural bristle paint brush dated 31 August. Many thanks for it.

Yes, there has antidumping duties if we export to US market with natural bristle brush. Most of our US customers import paint roller and polyester brush from us. If you can use polyester brush instead of the bristle brush? Our polyester brush can hold much paints too as its split top end and the price is economic too.

Please let us know your comments about it and we will send you the details within one workday if we get your confirmation.

Best regards, ***

From: "Paul Union" <avisonetraders@gmail.com> Sent: Fri, September 3, 2010 8:27 AM To: *** Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear ***,

Thanks for your response. In your experience, is there any way to avoid paying the anti-dumping duties?

Regards,

Paul

Explanation:

Company H acknowledges that its natural bristle paint brushes are subject to antidumping duties and asks if AvisOne is willing to purchase a different kind of paint brush. In the second email, staff ask Company H if it is possible to avoid paying duties.

Company H (cont'd)

From: ***

Sent: Fri, September 3, 2010 9:27 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear Paul,

Thanks for your message, maybe we can export in the name of agent's company that can aviod paying the anti-dumping duties.

Best regards, ***

Explanation:

Company H proposes exporting its products under a different name—in this case, the name of the shipping agent. Staff respond by asking if it possible also to change the country of origin certificate. Company H says that this is not possible, and proposes that AvisOne purchase brushes not subject to AD duties.

From: "Paul Union" <avisonetraders@gmail.com> Sent: Fri, September 3, 2010 8:27 AM To: *** Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear ***

My apologies for responding late to your email. <u>As your describe it, your company can ship product</u> <u>under a different name (in this case, the shipping agent) in order to avoid paying the anti-dumping du-</u> <u>ties? Is it possible that your company can change the country of origin as well</u>?

Looking forward to your thoughts on this. Best regards, Paul

From: ***

Sent: Wed, September 8, 2010 9:36 PM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear Paul Union,

Thanks for reply. <u>I checked with the Exit Inseption and Quarantine, but the answer is "no" to change the origin country to other</u>.

Now we don't have any better good thoughts about it, our most customers in America used the polyester material instead or just purchased the rollers. Can you use the polyester to instead the bristle?

Looking forward to your comments.

Best regards, ***

Company H (cont'd)

From: ***

Sent: Thur, September 9, 2010 2:00 AM To: "Paul Union" <avisonetraders@gmail.com> Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear Paul Union,

Do you know any companies in Taiwan or HK who can help you to export the brushes to your company? We send the brushes to them and then they export to you with their name.

Explanation:

In this last email, Company H proposes exporting its brushes to companies in Taiwan or Hong Kong that can then re-export the brushes under those companies' names.

Oil Country Tubular Goods (OCTG) from China

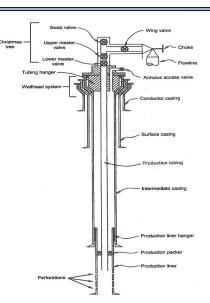
(DOC Case No. C-570-944)

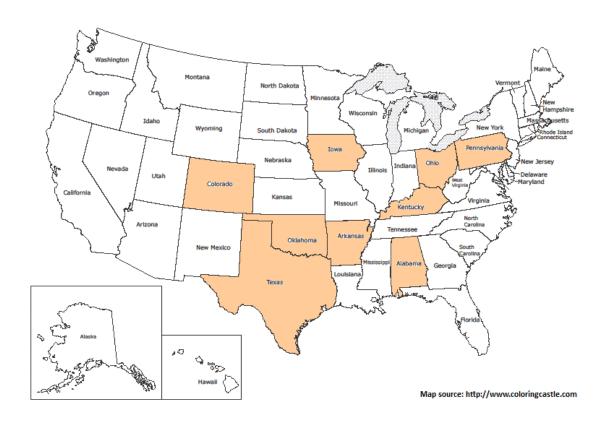
OCTG include carbon and alloy steel casing and tubing used in oil and gas wells. Casing is a circular pipe that serves as a structural retainer for the walls of the well. Tubing is installed inside the casing and is used to conduct the oil and gas to the surface.

Industry at a Glance:

- \Rightarrow Subject to AD/CVD orders since May 21, 2010 (DOC)
- \Rightarrow Number of U.S. producers in 2009: 7
- \Rightarrow U.S. producers' U.S. shipments in 2008: \$6.2 billion
- $\Rightarrow~$ U.S. employment of production and related workers in 2008: 5,819
- ⇒ U.S. production locations: Alabama, Arkansas, Colorado, Iowa, Kentucky, Ohio, Oklahoma, Pennsylvania, Texas (USITCj, USITCk)

U.S. Production Locations of OCTG





Companies Willing to Evade U.S. AD/CV Duties on OCTG from China

Company I is a trading company based in Turkey. It buys and sells Chinese-origin pipe products and changes the country of origin certificate to non-Chinese product. Below is a transcript of email correspondence provided to staff that document a willingness to evade AD/CVD orders on OCTG (highlighted in red). Textboxes provide an explanation of the correspondence.

Company I

Product: Oil Country Tubular Goods Country of origin: China Means to evade duties: Changing country of origin certificate

From: ***

Sent: Wed, August 11, 2010 3:45 AM To: *** Subject: DEAR *** PIPES FOR USA

DEAR ***

JUST MY BIG SPANISH PARTNER WHICH WE MADE WITH THEM OVER 10 MILLION USD PIPE ORDERS BEFORE SAID ,<u>THEY CAN SHIP GOODS FROM VALENCIA SPAIN WITH EU ORIGIN CERTIFICATE .GOODS</u> <u>WILL BE PRODUCED IN CHINA& THEY WILL CHANGE ORIGIN IN SPAIN AND REEXPORT .THIS ONE OK?</u> ALSO OUR SPAIN SELLER CAN OFFER UKRAIN OR EU ORIGIN .BUT SUGGEST ME TARGET PRICE . 4-YOUR MSN OR SKYPE ID ? MY SKYPE ID *** MY MSN *** MY MP ***

BEST REGARDS ***

From: ***

Sent: Wed, August 11, 2010 5:32 PM To: *** Subject: RE: DEAR *** PIPES FOR USA

Explanation:

In this example, Company I, working with its business partners, is offering a U.S. importer Chinese-origin pipe with a false country of origin certificate. The U.S importer recognizes that this is illegal, and ceases communication with Company I.

***.

THIS IS ILLEGAL! It is called "circumvention" and is subject to firm prison time.

We will end all discussion at this stage.

Company I (cont'd)

From: *** Sent: Wed, August 11, 2010 9:46 AM To: *** Subject: DEAR *** PIPES FOR USA

DEAR ***

YOU ARE VEYR HARDWORKING PERSON. IT MEANS IF THEY CHANGE ORIGIN WITH COATING, PAINTING, BEVELLING ETC FORMALLY, <u>ACCORDING</u> <u>TO EU LAW ALSO NOT POSSIBBLE TO USE CHINESE RAW MATERIAL ? SO I IGNORE IT.</u> 2-ANY TARGET PRICE AS 0 ANTIDUMPING TAX ORIGINS ?

BEST REGARDS

Explanation:

Company I acknowledges that Chinese-origin pipe is subject to antidumping duties, but "ignores it."

Diamond Sawblades from China

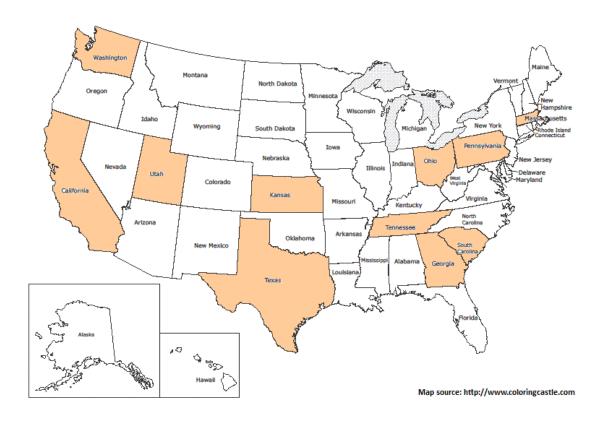
(DOC Case No. 570-900)

Diamond sawblades are circular cutting tools that have numerous functions and applications for cutting, ranging from cement, asphalt, marble, and tile, to masonry work such as brick and stone.

Industry at a Glance:

- \Rightarrow Subject to AD/CVD orders since January 23, 2009 (DOC)
- \Rightarrow Number of U.S. producers in 2005: 22
- \Rightarrow U.S. producers' U.S. shipments in 2004: \$121 million
- \Rightarrow U.S. employment of production and related workers: 480 (finished diamond sawblades only)
- ⇒ U.S. production locations: California, Georgia, Kansas, Massachusetts, Ohio, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Washington (USITCI, USITCm)

U.S. Production Locations of Diamond Sawblades





Companies Willing to Evade U.S. AD/CV Duties on Diamond Sawblades from China

Companies J and K are Chinese trading companies that import and export diamond sawblades. Company J characterizes antidumping duties as a "political game," while Company K admits that it engages in illegal transshipment to avoid paying antidumping duties. Below are transcripts of email correspondence documenting a willing to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company J

Product: Diamond sawblades Country of origin: China Means to evade duties: Undervaluing invoices and misclassifying goods to avoid paying duties

From: ***

Sent: Thur, December 10, 2009 6:54 AM To: Sales email account Subject: Diamond tools and cutting machineries **Explanation:** In this email, Company J describes its business and products.

Dear Sir or Madam,

We are a Chinese company specialized in manufacturing various diamond tools which are widely used in Europe and USA.

Best ratio of quality to price could be achieved with the help of our diamond tools.

I'd like to offer you below tools for a reference in hope that we could be your competent and reliable partner in China.

Once got your requests, I'd like to send you our whole catalogue and pricelist.

Your prompt reply would be mostly appreciated.

Regards

Company J (cont'd)

From: ***

Sent: Thur, December 10, 2009 9:47 PM To: *** Subject: Re: Diamond tools and cutting machineries

Are your saw blades subject to antidumping duties?

From: *** Sent: Thur, December 10, 2009 To: *** Subject: Diamond tools and cutting machineries

Hi Sir,

Thanks for your prompt reply.

I don't think it's a big problem for us. We have 3 solutions to help you out of this high duty---it's just a political game: anti-dumping duty.

- 1. We can change the actual value of products in the Invoice a little bit.(as for small quantity such as trial order)
- 2. Our factory has responded to the lawsuit and will only be charged with 20% duty. When you order large quantity, it's no big deal.
- 3. We could ship the blades as the category of core.

Moreover, if you have any solutions, we would like to cooperate your actions from our side.

Regards

Explanation:

The U.S. importers asks if Company J's sawblades are subject to antidumping duties. Company J responds that antidumping is a "political game." Company J offers to undervalue the company invoice or misclassify the goods to avoid paying duties.

<u>Company K</u>

Product: Diamond sawblades Country of origin: China Means to evade duties: Illegal transshipment

From: *** Sent: Thur, August 5, 2010 9:28 PM To: *** Subject: Re: Diamond Blades **Explanation:** Company K engages in illegal trans-

shipment to avoid paying duties.

Hi ***,

Thanks for getting back to me.

No, we are not affected by the anti-dumping as we can do trans-shipment.

Regards,

Steel Wire Garment Hangers from China

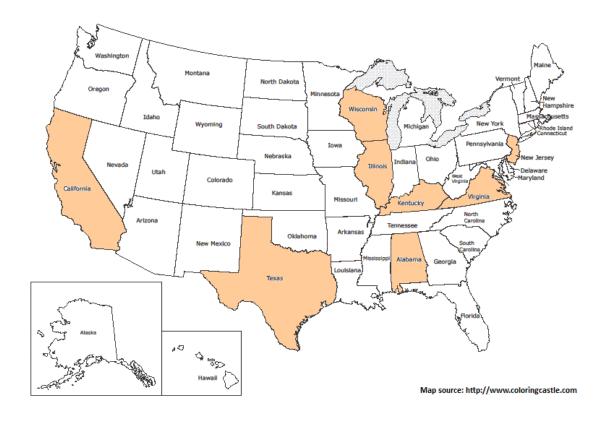
(DOC Case No. A-570-918)

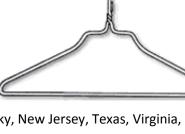
Steel wire garment hangers are produced primarily for use by the dry cleaning, industrial laundry, textile, and uniform rental industries.

Industry at a Glance:

- \Rightarrow Subject to AD order since October 6, 2008 (DOC)
- \Rightarrow Number of U.S. producers in 2007: 7
- \Rightarrow U.S. producers' U.S. shipments in 2007: \$12 million
- \Rightarrow U.S. employment of production and related workers: 139
- ⇒ U.S. production locations: Alabama, California, Illinois, Kentucky, New Jersey, Texas, Virginia, Wisconsin (USITCn, USITCo)

U.S. Production Locations of Steel Wire Garment Hangers





Companies Willing to Evade U.S. AD/CV Duties on Steel Wire Garment Hangers from China

Companies L and M are Chinese metal hanger producers. In the first instance, Company L states that it can illegally transship through either Taiwan or Malaysia. In the second instance, Company M states that it can illegally transship via a third country for its "friends." Below are transcripts of email correspondence provided to staff that document a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company L

Product: Steel wire garment hangers Country of origin: China Means to evade duties: Illegal transshipment

From: *** Sent: Thu, January 14, 2010 11:57:59 PM To: *** Subject: Re: ***

Attachment is our price list (FOB Shanghai), please find it. <u>We have two ways to ship containers to US.</u> <u>One is from Taiwan, the transport charge is \$4200.00 per container. Another is from Malaysia</u>, the transport charge is \$3200 per container, but the shipping date will be much longer than from Taiwan.

Please check the price, if it's ok, please let me know.

Best regards,

Explanation:

Company L offers to ship containers to the United States via Taiwan or Malaysia. Although not explicitly stated in this email, the motive for shipping through a third country is to avoid paying duties.

Company M

Product: Steel wire garment hangers Country of origin: China Means to evade duties: Illegal transshipment

From: *** Sent: Friday, April 09, 2010 9:27 PM To: *** Subject: Re: RE: RE: Re: Hanger Business

Yes, the tariff rate is high. However, we are not extinct because of it. We keep a solution for our friends. It is benefit for us and our client. Both have made profit from it.

We do not know how much profit you can make from working with wells. In China, yes, wells' tariff rate is the lowest in china.

It is about 16%. He is the only one company for the first rank. Our factory is of the second rank. However, we still alive. "Fact speaks louder." Our clients also make profit working with us.

For this kind of client, we usually ship via another country, through which you only need to pay about 3.5% or lower rate. So for this, usually, CIF, DDU or DDP is suitable for you.

If you do not know it properly, we can do DDP for you. That is, door to door service. Its procedure is very easy for you, just like we send a package through courier. Through it, we will send the hangers directly to your warehouse. In a word, it will save you much energy, and most important, a lot of money.

A trial order may make you know much about us.

We look forward to your reply, and hope we can cooperate with each in the near future.

Explanation:

Company M offers to illegally ship product through a third country to avoid paying duties. As stated by Company M, this service is offered to "our friends" and that illegal transshipment "is a benefit for us and our client."

Steel Grating from China

(DOC Case Nos. A-570-947 and C-570-948)

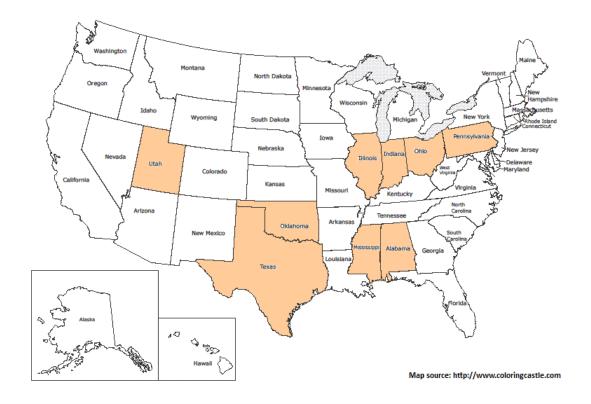
Steel grating (commonly referred to as bar grating), consists of two or more pieces of steel, including load-bearing pieces and cross pieces, joined by any assembly process, regardless of: (1) size or shape; (2) method of manufacture; (3) metallurgy (carbon, alloy, or stainless); (4) the profile of pieces; and (5) whether or not they are galvanized, painted, coated, clad or plated. Excluded from the scope are expanded metal grating, which is a single sheet or thin plate that has been slit and pulled; and safety plank grating, which is a single sheet or this plate that has been pierced or cold formed.

Steel grating is designed to support and distribute the weight of objects. Common end uses include walkways, mezzanines, catwalks, fire escapes, stairways, and flooring.

Industry at a Glance:

- \Rightarrow Subject to AD/CVD orders since July 23, 2010 (DOC)
- \Rightarrow Number of U.S. producers in 2009: 7
- \Rightarrow U.S. producers' U.S. shipments in 2009: \$162 million
- \Rightarrow U.S. employment of production and related workers in 2009: 518
- ⇒ U.S. production locations: Alabama, Illinois, Indiana, Ohio, Oklahoma, Mississippi, Pennsylvania, Texas, Utah (USITCp, USITCq)

U.S. Production Locations of Steel Grating





Companies Willing to Evade U.S. AD/CV Duties on Steel Grating

Company N is a Chinese steel grating producer. Below is an email provided to staff that documents the company's disregard for antidumping duty orders (highlighted in red).

Company N

Product: Steel grating Country of origin: China Means to evade duties: Illegal transshipment

From: *** Sent: Mon, August 30, 2010 1:01 AM Subject: ***

Below is the result of your feedback form. It was submitted by () on Monday, August 30, 2010 at 01:01:13

Name: *** Company: *** Address: *** City: Ningbo State: Zhejiang ZIP: 315195 Country: China Phone: *** Email: *** Comments: Dear Sir,

If you need the best steel grating with low-cost, why not contact us directly here?

FYI, Antidumping duty is no problem for us.

Submit: Send!

Part II: Foreign Logistics Companies Willing to Evade U.S. AD/CV Duties

The following foreign logistics companies publically advertise services to avoid paying AD/CV duties and other import restrictions like import quotas. These firms advertise their services in both English and Chinese on websites like alibaba.com, China's largest e-commerce website that links buyers and sellers. Most evasion schemes involve illegal transshipment through a third country and falsified country of origin certificates for Chinese-origin product destined to the United States and other export markets. Many firms work with factories located in third countries to obtain authentic country of origin certificates for Chinese-origin product.

Everyony meetination	
Address:	No. 455, Zhong Shan East Road, Ningbo, Zhejiang, China, 315400
	Tel: +(86) 0574 2790 3558
Web:	http://www.everskyline.com/special1.php?id=6
	http://www.alibaba.com/member/cn109650969.html
	http://www.made-in-china.com/showroom/infism/companyinfo/Eversky-
	International-Forwarding-Agency-Co-Ltdhtml
Company representative:	Mr. Zhao Hui
	Customer service representative: Mr. Cheng
	Tel: +(86) 0574 2787 9775
	Email: jeffningbo@163.com
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Prepares false country of origin certificates for
	Indonesia and Malaysia. Principal transit ports are Singapore and Port Klang,
	Malaysia.

Everysky International Forwarding Agency

H&T International Logistics Ningbo Ltd.

(subsidiary of Hualianton International Logistics Co., Ltd.)

Address:	Room 10-1, Yinyi Time Square, No. 8, Lengjing Street, Haishu District,
	Ningbo, China
	Tel: +(86) 574 8785 2330
Web:	http://www.hltnb.com
	http://blog.china.alibaba.com/blog/nb75520859/article/b0-i7726014.html
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Prepares and provides false country of origin
	certificates and re-exports products through Port Klang, Malaysia. Company
	stipulates that domestic (Chinese) exporters must reach an understanding
	with the foreign importers regarding export documents (i.e. falsified
	country of origin certificates) and payment terms. Products illegally
	transshipped include fasteners, steel pipe, steel wire rope, steel wire
	hangers, aluminum products, clothing, shoes, candles, bearings, and citric
	acid.

Ningbo Star International Freight Forwarding Co., Ltd

Address:	Also known as:
	Ningbo Richstar Freight Forwarding Agent Co., Ltd.
	High Storm International Freight Forwarding Co., Ltd.
	Win-Win International Freight Forwarding Co., Ltd.
	Sharp Gate Street, Ningbo City, Zhejiang Province, No. 58, City Renhe
	Center, 16-1, China
	Tel: +(86) 0574 8768 6088
Web:	http://www.richstarfreight.com
	http://www.sweiphone.eb80.com
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Company uses different names when advertising
	transshipment services. Obtains authentic country of origin certificates from
	foreign factories despite product being of Chinese origin. Ships product
	from the Chinese ports of Dalian, Tianjin, Qingdao, Ningbo, Xiamen, and
	Shenzhen to Port Klang, Malaysia.
Illegal export procedures:	(1) Company's Malaysian branch acts as consignee in Malaysia. Removes
	first leg transportation manifest from China.
	(2) After cargo leaves China, customers provide copy of release of export
	documentation (e.g., first leg transportation, packing list, and invoice).
	(3) Malaysian branch in charge of procedures for changing containers and
	arranging booking for second leg transportation.
	(4) Before departure, Malaysia factories apply for certificates of origin for
	use for shipment of Chinese origin.
L	

Pulinktrans China, Ltd.

Address:	Room 206, Goldenland Building, No. 773 Siping Road, Shanghai, China,
	200092
	Tel: +(86) 21 6107 6102
Web:	http://pulinktranschina-3141826.en.gongchang.com/
	http://www.hifob.com/redirect.php?tid=22211&goto=lastpost
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Provides authentic third-country country of origin
	certificates to clients, and can provide official authentication (by foreign
	country embassy) and notarized inspection report. Reportedly has
	cooperated closely with Ministries of Trade and Industry and Chambers of
	Commerce in Singapore, Malaysia, Indonesia, Thailand, Hong Kong, and the
	United Arab Emirates. Ports include Shanghai, Ningbo, Qingdao, Tianjin,
	Zhapu, Wenzhou, Shenzhen, and Hong Kong. Transshipment hubs include
	Malaysia and Thailand. Products illegally transshipped include fasteners,
	steel pipes, steel wire hangers, and clothing.

Shenzen Sunpower Interntional Logistics, Ltd.

Address:	Room 2207, Gonglu Building, Block C, Yitai Centre, Dongmembei Road,
	Luohu District, Shenzhen, China, 518003
	Tel: +(86) 0755 2519 1363
	Email: sunpower@szsuperior.com
Web:	http://www.szsuperior.com/cn/home/index.asp
	http://www.ilazhu.cn/search/sell-service-9.html
Other info:	Company based in Shenzhen, China, but headquartered in Ipoh, Malaysia.
	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Provides various country of origin certificates
	depending on degree of customs inspection, production subject to AD/CV
	duties, and country of destination. Third-country certificates of origin
	provided include Taiwan, Malaysia, Indonesia, Bangladesh, Thailand,
	Vietnam, and Sri Lanka. All certificates of origin are provided by in-country
	factories. Company provides all documentation, customs declarations,
	factory inspection, and other relevant procedures.

Wintrans Logistics and Investment & Management Co., Ltd

Addresses:	Room 26A-D, Ocean Building, 268 Lujian Road, Xiamen, Fujian, China Tel: +(86) 592 806 5305
	Email: info@wintrans.com.cm
	Shenzhen Wintrans Logistics Co., Ltd.
	Luohu District, Shenzhen City, Pacific Business Building, B1402, Shenzhen, Guangdong, China
	Shanghai Wintrans Branch
Web:	Siping Road, 188 2108, Shanghai China
web:	http://www.wintrans.com.cn/en/info/detail.asp?ID=5
	http://cn.made-in-
	china.com/showroom/wintransalice/companyinfo/%E5%8E%A6%E9%97%A
	<u>8%E9%80%9A%E6%B4%B2%E7%89%A9%E6%B5%81%E6%8A%95%E8%B5%</u>
	84%E7%AE%A1%E7%90%86%E6%9C%89%E9%99%90%E5%85%AC%E5%8F
	<u>%B8.html</u>
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Claims to work with business partners in
	Indonesia, Myanmar, and Malaysia that provide certificates of origin issued
	by factories located in those countries. Directs payment through Malaysia
	or Hong Kong. Products include steel pipes, apparel, shoes, ceramics, and
	furniture. Export markets include the United States, Canada, Mexico,
	Turkey, and Latin America.

Gateway Container Line Co., Ltd.

Addresses:	Gateway Container Line Co., Ltd. (Qingdao)
, laar essest	B-1022, Yu Yuan Mansion, No. 75 West Hong Kong Road, Qingdao, China,
	266071
	Tel: +(86) 532 8197 8801
	Gateway Container Line Co., Ltd. (Tianjin)
	Room 2602, Twain building, Hanggua Plaza, Dagunan Road, Hexi District,
	Tianjin, China, 300000
	Gateway Container Line Co., Ltd. (Shanghai)
	Room 2201, No. 1, Alley 258, Dongbaoxing Road, Shanghai, China, 200080
	Tel: +(86) 21 6356 0173
	Room 612, Hesen Building, No. 1600 Yan'an Road (W), Shanghai, China,
	200052
	Tel: +(86) 21 5258 5515
	Gateway Container Line Co., Ltd. (Ningbo)
	19 Floor, Unit B, Century Square, No. 118 Daliang Street, Ningbo, China,
	315000
	Tel: +(86) 574 8717 5858
	Gateway Container Line Co., Ltd. (Shenzhen)
	Room 1705, Building A, Huaguoshan Building, South Garden Road, Shekou,
	Shenzhen, China, 518067
	Tel: +(86) 755 2680 5586
Web:	http://www.gateway-group.cn/en/index.htm
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Claims to provide services to both domestic
	(Chinese) exporters and foreign importers.

Global Success International Transportation (Shenzhen) Ltd.

Address:	18F, Overseas Friendship Building, No. 12, Ying Chun Road, Luohu,
	Shenzhen, China, 510800
	+(86) 755 8214 5368
	Email: info@globalsourcing.com.cn
Web:	http://www.globesuccess.com.cn/en/index.asp
	http://www.ecplaza.net/tradeleads/seller/5605380/transhipment_project.
	<u>html</u>
Registration no:	Certified by China's Ministry of Commerce as a licensed non-vessel
	operating common carrier (NVOCC) (NVOCC#MOCNV 01254).
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Transshipment hubs include Malaysia, Singapore,
	Indonesia, Bangladesh, the Philippines, and India. Third-country certificates
	of origin are issued for Chinese-origin product. Provides illegal
	transshipment services for the following products subject to U.S. AD/CVD
	orders: fasteners, threaded rod, steel hangers, locks, and wooden bedroom
	furniture. Also provides transshipment services for products subject to
	AD/CV duties in Europe, South America, and Turkey.

Dyna International Shipping Ltd.

Address:	Room 01-02, 16/F, Ginza International Building, Shennan Road, Shenzhen,
	Guangdong, China
	Tel: +(86) 755 2151 7557
	Email: Shenzhen@dynaprc.com
	Other offices located in: Hong Kong, Guangzhou, Shanghai, Beihai,
	Huangpu, Nanhai, Foshan, Zhongshan, Wuhan, Kunming, Ningbo
Web:	http://www.dynaprc.com/english/index.asp
	http://www.hardware-wholesale.com/d-p115413722755560100-
	service_to_avoid_the_anti_dump_tax_import_from_china/
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Transshipment hubs include Malaysia, Singapore,
	Thailand, and Indonesia with third-country certificates of origin. Advertises
	illegal transshipment services for Chinese products subject to AD/CV duties
	in the United States, Mexico, Colombia, Egypt, Turkey, and Europe.

Hanhen Shipping (China) Co., Ltd.

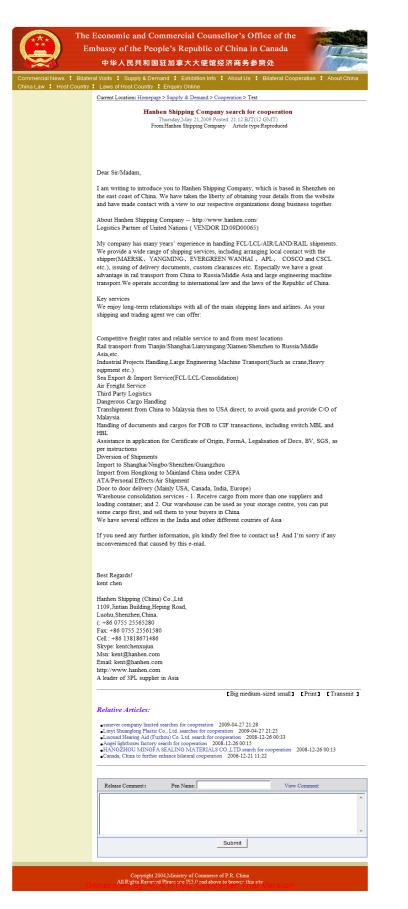
A-1109, Jintian Building, Heping Road, Luohu, Shenzhen, China
Tel: +(86) 0755 2556 5280
http://www.hanhen.com
http://ca2.mofcom.gov.cn/aarticle/supplydemandofchina/supply/200905/2
0090506267440.html
China Tax ID: 440300769195249
United Nations Procurement Division Vendor ID: 09D00065 (Logistic
Supplier)
Advertises illegal transshipment services to avoid paying AD/CV duties and
other import restrictions. Transshipment hubs include Singapore and Dubai.
Country of origin certificates from Malaysia, Vietnam, Indonesia, and
Bangladesh are issued for Chinese-origin products subject to AD/CVD
orders. Advertises illegal transshipment services on the website of the
Embassy of China in Canada.

Suzhou Yuncheng Ex/Im Co., Ltd.	
Address:	No. 8-7 Shop, Shuixiang West Road, Meili Street, Songling Town, Wujiang,
	Jiangsu, China, 215200
Web:	http://yuncheng.en.alibaba.com/trustpass_profile.html
	http://www.alibaba.com/product-
	gs/269042075/Third_country_re_exports_seamless_steel.html
Company representative:	Mr. Yucheng Zhou
Business registration no.:	320584000113121
Issuing authority:	Suzhou City Wujiang Administration for Industry and Commerce
Issue date:	10/18/2007
Expiration date:	10/17/2017
Registered capital:	RMB 3,000,000
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and
	other import restrictions. Advertises illegal transshipment services for
	seamless steel pipe and carbon steel fasteners, among other products.

L'Assurex International Logistic Ltd.

Address:	Room 1207, Logistics Center, No. 1, Haitian Road, Huli, Xiamen, Fujian,
	China, 361000
Web:	http://www.lassurex.com
	http://www.alibaba.com/product-gs/282892965/sea_freight.html
	http://lassurex.en.alibaba.com/product/283189523-
	209769395/shipping_agency_in_china.html?tracelog=cgsotherproduct1
Company representative:	Mr. Liming Zheng
Registration no.:	350200200006505
Issuing authority:	Xiamen City Administration for Industry and Commerce
Issue date:	10/11/2007
Expiration date:	10/10/2027
Registered capital:	RMB 10,000,000
Other info:	Advertises illegal transshipment services on alibaba.com to avoid paying
	AD/CV duties and other import restrictions. Provides certificates of origin
	from Malaysia, Indonesia, and India for Chinese-origin product. Export
	markets include the United States, Venezuela, Brazil, Argentina, Europe,
	Jordan, Egypt.

Part III: Examples of Companies Advertising Illegal Transshipment Services on the Internet



Source: http://ca2.mofcom.gov.cn/aarticle/supplydemandofchina/cooperation/200905/20090506267416.html

Hanhen Shipping

http://www.hanhen.com/13.asp?Id=247



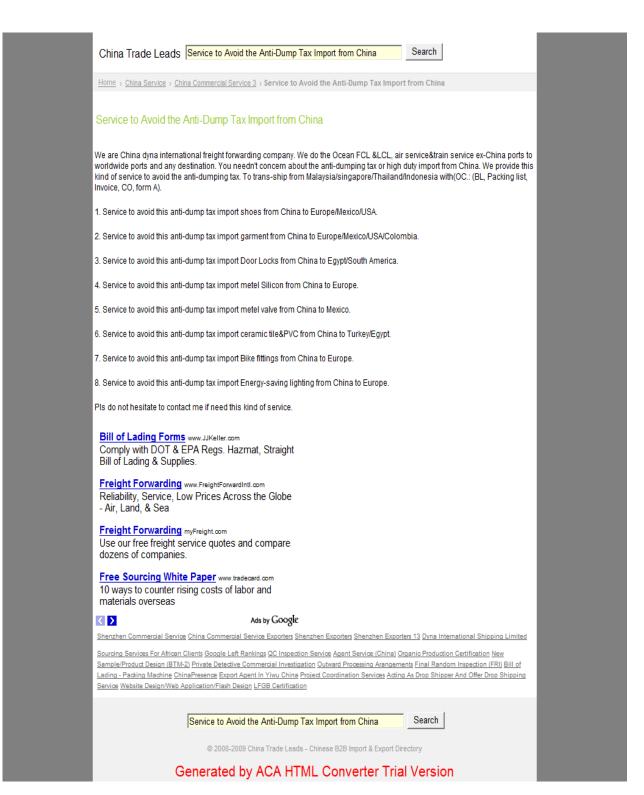
l of l

3/25/2010 3:12 PM

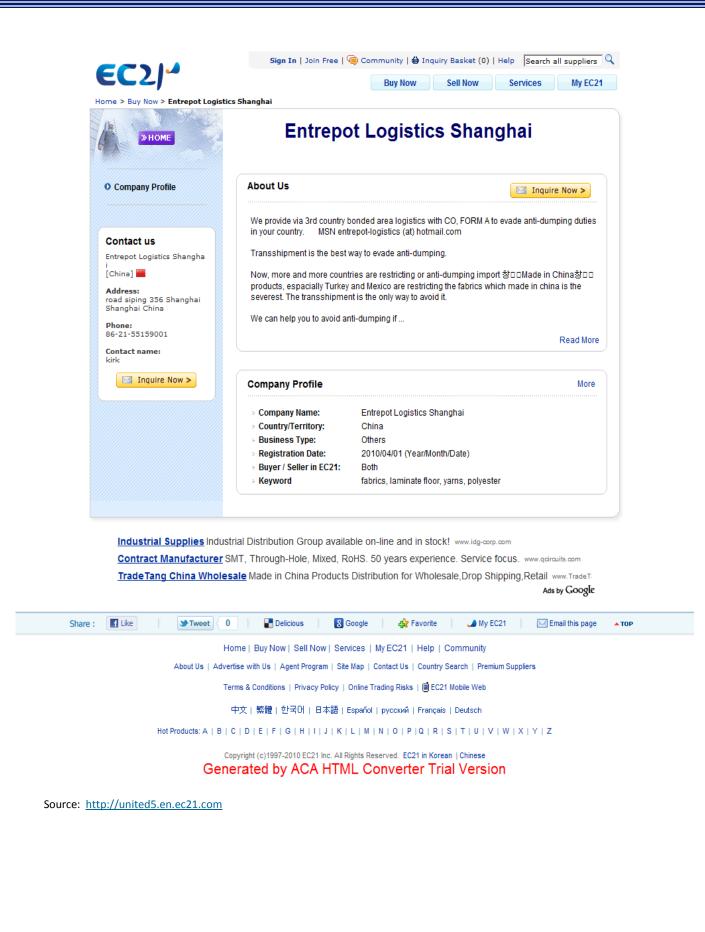
Source: <u>http://www.hanhen.com/I3.asp?Id=247</u> (company has since removed "re-export trade" diagram from website)

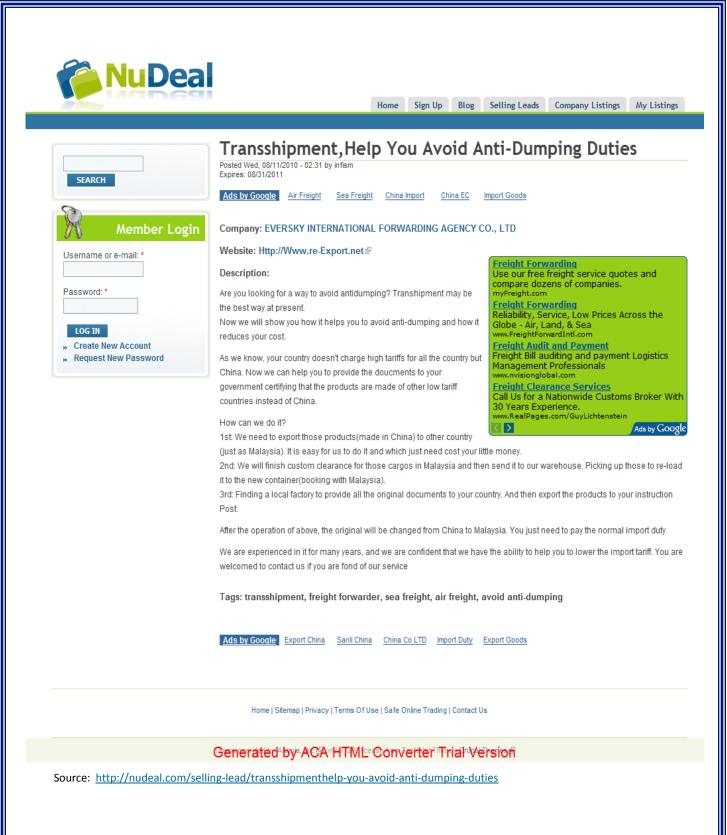
Alibaba.com [®]	Products Suppliers Buyers	Buy on Aligxpress.co
Global trade starts here."		Search Products
	About 909 results: Sea Freight (706)	Advanced Sea
Home > Products > Business Services >	Logistics Services > Sea Freight (95839)	
		Language Options
Related Searches: transshipment, Whole	from 115 <u>suppliers</u> on Alibaba.com esale transshipment	
	transshipment, the best way to avoid anti-	Supplier Details
	dumping Other products by Shipment Type: FCL and LCL	Asavvy Furniture Co., Ltd.
		[Jiangsu, China (Mainland)] 🕘 Business Type:
	FOB Price: US \$2,000 - 8,000 / Carton Negotiable Port: china	Manufacturer, Trading Company, Distributor/Wholesaler
	Minimum Order Quantity: 1 Carton/Cartons	 Contact Details Gold Supplier [1st Year]
	Supply Ability: 100 Carton/Cartons per Day Payment Terms: L/C,D/A,D/P,Western Union,MoneyGram	A&V Checked
		Online Showroom: 247 Products Other Similar Products from this Supplier
See larger image: transshipment, the b way to avoid anti-dumping		View this Supplier's Website
📸 Add to My Favorites 💌	Send a Message to this Supplier	
Product Details Company P	rofile	🃁 Report item 🦳 Share 🔄 📲
Quick Details Place of Origin: Zhejiang China (Mainla	and) Brand Name: eversky Model N	lumber: transshipment
Departure: china	Destination: all over the world Route:	EU
Carrier: Everysky international freight fo Shipment Type: FCL and LCL	nward Departure Day: Monday Transit	Time (Days): 35
Specifications Are you looking for a way to avoid antidur	npina?	
Transhipment may be the best way at pro		
Nowadays, Transshipment is the best w	ay to avoid anti-dumping duties.Now, we will tell you how it helps you to avoid anti-	dumping and how it reduces your cost.
As we know, your country doesn't charge products are made of other low tariff cou	high tariffs for all the country but China. Now we can help you to provide the doucn ntries instead of China	ments to your government certifying that the
How cap we do it?		
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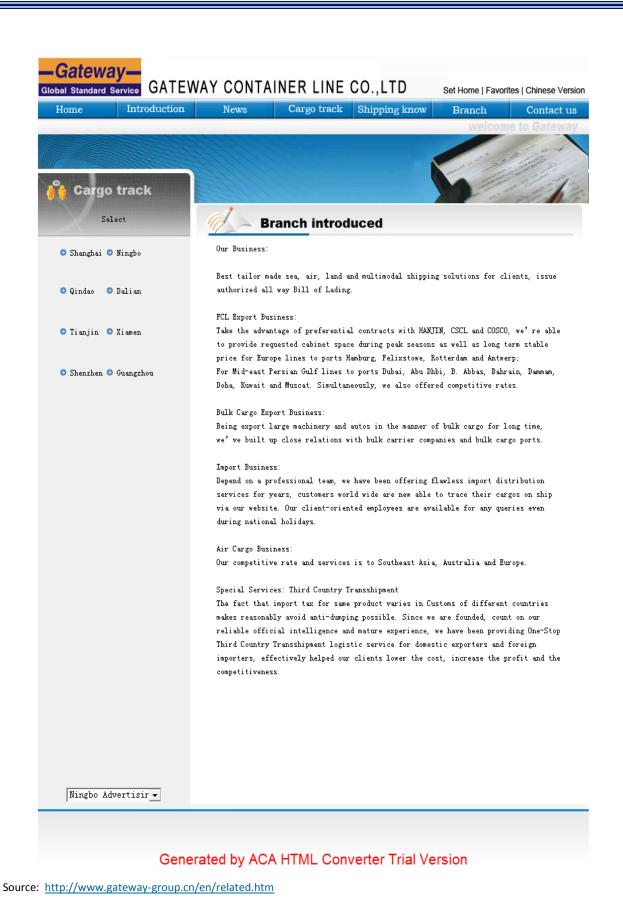
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Contact Information			
Ms. ANNA LEE (transhipment dept.)	act Now		
Company : Globe Success Intern	ational Transportation	(Shenzhen) LTD	
Address : 18FL.,Oversea Friends		chun Road, Luohu, shenzhen, Guangdong, China	
Zip/Postal : 510800 Telephone : 86-755-8214-5702			
Fax: 86-755-8230-7954			
Fax : 86-755-8230-7954 Mobile : 86-1371-4045-400			

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