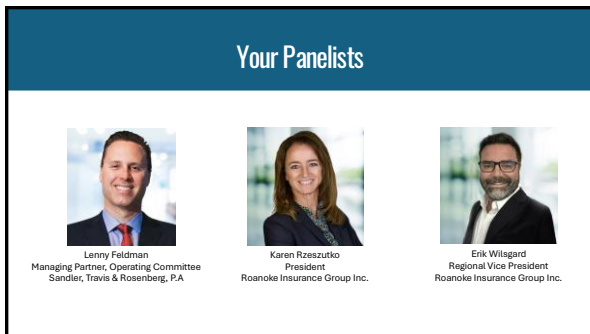




1




2




3


IMPORTER VETTING
Red Flag Categories 02




Documentation




Financial



Regulatory




Behavioral



High Risk
Commodities

4

Documentation




IMPORTER VETTING 03

WATCH FOR:

- Missing Details on Applications, Forms etc.
- Conflicting Information across forms/documents
- Unwilling to provide documents or claims they do not exist
- Inconsistent Addresses and/or Business Names
- POA - Errors and Validation List

5

Financial




IMPORTER VETTING 04

WATCH FOR:

- Unwilling to share financial information
- D&B Report, Credit Reports, S&P
- Multiple banks/financial institutions used
- Request for payment extensions
- Request to bill unrelated third parties
- Evasive payment methods or arrangements
- Trade-based money laundering warning indicators

6

Regulatory & Compliance



IMPORTER VETTING


WATCH FOR:

- Prior CBP Violations, Fines, Claims, Unpaid Duties
- Non-Compliance Violations
- Prior misclassifications
- License revocation, e.g. FMC/FMCSA
- Under Valuation (DDP/NRI/Related Parties?)
- Transshipment

05

7

Behavioral



IMPORTER VETTING


WATCH FOR:

- Frequent broker hopping
- Evasive communication
- Pushback on values, classification, COO, manufacturer details
- Pressure to clear entries quickly and/or with missing details
- Withholds details of supply chain
- 19 CFR 111.32 false information/reporting
- 19 CFR 111.39 advice to client/corrective action

06

8

High Risk Commodities








IMPORTER VETTING

WATCH FOR:

- Goods with high security risks, pose safety threats, or tend to be misclassified
- High-Value Goods imported, with little to no prior experience
- Unusual volumes for new importers
- CBP Priority Trade Issues
- Trade Remedies & AD/CVD
- Partner Government Agencies

EXAMPLES

Solar Power, Textiles, Foods, Pharmaceuticals, Footwear

07

9

Q & A



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IMPORTER VETTING

08

THANK YOU FOR ATTENDING!

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