



## Client Interview

Client:

Date:

### A. ( \_\_\_\_\_ ) **History:**

1. List all ports of importation?
2. List all ports of U.S. Customs and Border Protection (**CBP**) clearances?
3. List all countries of exportations?
4. List all of ( \_\_\_\_\_ ) receipt of any CBP Forms 28 (Request for information), CF 29 (Notice of Action) and/or prior conferences with CBP?  
Please enclose any CF 28 and CF29 received from CBP.
5. List any prior US Custom's penalties or liquidated damages cases?
6. List any prior CBP audits?
7. List any prior voluntary disclosures?
8. Does ( \_\_\_\_\_ ) operate its own Public Bonded Warehouse?
9. Does ( \_\_\_\_\_ ) utilize any Public Bonded Warehouse?
10. What other brokers represents(ed) ( \_\_\_\_\_ )?
11. Does ( \_\_\_\_\_ ) belong to any Trade Organization?
12. How does ( \_\_\_\_\_ ) acquire information regarding changes in the Law or Federal Regulations?



**B. Classification:**

1. Does ( \_\_\_\_\_ ) review samples of the merchandise being imported with?
  - a – Purchasing Department
  - b – Broker
  - c – CBP
2. Does ( \_\_\_\_\_ ) compare invoice descriptions to samples of the Merchandise imported?
3. Has ( \_\_\_\_\_ ) obtained any classification binding rulings?
4. Does NWI have participated in a “Pre-Classification Review program” offered by CBP?
5. Is there a corporate employee assigned to classification reviews?
6. Is ( \_\_\_\_\_ ) aware of binding rulings’ modules? If yes, do you use one?
7. If not, what is ( \_\_\_\_\_ ) basis for its merchandise classifications?
8. Is any merchandise being entered in conflict with advice received from CBP?
9. Is any merchandise eligible for duty reduction program(s) listed below?
  - A. Generalized Systems of Preferences, (GSP).
  - B. US – Australia Free Trade Agreement
  - C. Automotive Products Trade Act.
  - D. United States-Bahrain Free Trade Agreement
  - E. Agreement on Trade in Civil Aircraft.



- F. North American Free Trade Agreement, (NAFTA).
  - G. US – Chile Free Trade Agreement
  - H. African Growth and Opportunity Act
  - I. Caribbean Basin Economic Recovery Act, (CEBERA).
  - J. US - Israel Free Trade Area
  - K. Andean Trade Preference Act
  - L. US – Jordan Free Trade Area Implantation Act
  - M. Agreement on Trade in Pharmaceutical Products
  - N. Dominican Republic-central America – US Free Trade Agreement
  - O. Uruguay Round Concessions on Intermediate chemicals for Dyes
  - P. US – Caribbean Basin Trade Partnership Act
  - Q. US – Morocco Free Basin Trade Agreement Implementation Act
  - R. US – Singapore Free Trade Agreement
10. Is there any merchandise imported subject to quota?
11. Who makes the agreement to obtain quota?
12. If textiles quota shipments, how does ( \_\_\_\_\_ ) verify country of origin to ensure against transshipments?
13. Is any merchandise imported by ( \_\_\_\_\_ ) subject to Anti-Dumping or Countervailing Duty investigation?



### **C. Country of Origin Marking:**

1. Does ( \_\_\_\_\_ ) review merchandise samples to determine Labeling Requirements and country of origin Marking of the imported merchandise?
2. Has ( \_\_\_\_\_ ) received a biding ruling or advice from CBP regarding country of origin Marking?
3. Does ( \_\_\_\_\_ ) re-sell any of the merchandise imported?
4. Does ( \_\_\_\_\_ ) further manufacture and/or repack any of the imported merchandise?
5. Is the imported merchandise properly marked at the time of resale in the US?
6. How is the merchandise marked?
7. Is there more than one country involved in the production, (i.e. fabric from Taiwan and merchandise assembled in China)?
8. If yes, what is done and where?



## **D. Valuation:**

1. Does ( \_\_\_\_\_ ) provide any kind of assist to manufacturers, (for example, research and development, materials, components, parts, tools, molds, dies, machines, production drawings, etc.)?
2. Does the cost of the assist appear on manufacturer invoice?
3. How the assist value is derived on the invoice and is the transportation cost included?
4. Does ( \_\_\_\_\_ ) pay any royalty or licensing fee on imported merchandise?
5. If yes, to whom does ( \_\_\_\_\_ ) pay the fee and for what?
6. Are the royalty and licensing fee written agreements and payments disclosed to CBP?
7. Does ( \_\_\_\_\_ ) have overseas offices?
8. Does ( \_\_\_\_\_ ) employ Buying Agents?
9. If yes, what are the Buying Agents duties?
10. How are the Buying Agents compensated for services rendered?
11. Are there any written agreements between ( \_\_\_\_\_ ) and the Buying Agents?
12. If yes, have these agreements been filed with CBP?
13. Is there any Buying Agent related to ( \_\_\_\_\_ ) vendors?



14. Are ( \_\_\_\_\_ ) purchases at “Arm’s Length,” (related or unrelated)?
15. Does ( \_\_\_\_\_ ) act as a buyer or agent to the seller?
16. Are there any goods imported by ( \_\_\_\_\_ ) shipped on consignment?
17. Are any separate payments, over and above the invoice price remitted to the seller and/or a third party by ( \_\_\_\_\_ ) at any time?
18. If yes, how are these remittances disclosed to CBP?
19. In cases where the merchandise is purchased from a Middleman, are duties paid on manufacturer’s or middleman’s invoice price?
20. Is any invoice price reduced by reason of credits from the seller due to an earlier transaction(s)?
21. Are the terms of purchase clearly reflected on the invoice?



**E. Record Keeping:**

1. Is ( \_\_\_\_\_ ) aware of Custom's record keeping requirements?
2. Are ( \_\_\_\_\_ ) records computerized?
3. Does ( \_\_\_\_\_ ) have an import manual – standard operating procedures?
4. Who, how and where does ( \_\_\_\_\_ ) maintain its import records?
5. What coordination takes place between the import (CBP) department and purchasing, accounting and traffic departments relating to verification of invoice details and merchandise received?
6. Is there an in-house “Post Entry” review process?
7. If goods are subject to textile quota, who tracks the quota and verifies that the proper visas are obtained?
8. Who maintains any records required under the Federal Regulation (a)(1)(A) list?
9. Is ( \_\_\_\_\_ ) aware of Custom's audit programs and the files that will be reviewed?



**INTERNATIONAL  
BROKERAGE  
INC**

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**F. Drawback:**

1. Does ( \_\_\_\_\_ ) export any imported merchandise in unused or manufactured condition?
2. Is ( \_\_\_\_\_ ) aware of record keeping requirements?



## **G. Other Agency Requirements:**

1. Are there any other governmental agencies involved with the merchandise imported, (i.e. FDA, USDA, Fish and Wildlife, EPA, DOT, etc.)?
2. Is any merchandise imported subjected to Anti-Dumping or Countervailing Duty Investigation?
3. Is the importation subject to Licensing, (Fish and Wildlife licensing permit, FDA, medical devices registration and listing requirements)?
4. Is the merchandise subject to any quota requirements, (peanut butter, sugar, etc.)?
5. Is the merchandise subject to any Intellectual Property Rights (IPR)?
6. Are the IPR owned by ( \_\_\_\_\_ ) and/or are they registered with CBP?



**H. ( \_\_\_\_\_ ) knowledge based on CBP  
Trade Programs and Informed Compliance tools:**

1. Are you familiar with the following CPB Programs?
  - ACE: Modernization Information Systems
  - Automated Export System
  - Import Security Filing – 10+2
  - C-TPAT: Customs-Trade Partnership Against Terrorism
  - CROSS: Customs Ruling Online Search System
  - CSI: Container Security Initiative
  - Directives and Handbooks Publications
  - Focused Assessment Program (FA) CBP's risk based approach to audit
  - Harmonized Tariff Schedule
  - Importer Self-Assessment Program (ISA)
  - Informed Compliance Publications
  - Reconciliation
  - Report Trade Allegations (e-Allegations)



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For additional information go to: <http://www.cbp.gov/xp/cgov/trade/quicklinks/>

**Please notify International Brokerage Inc. in writing of any changes and/or additions to the completed information in the ( \_\_\_\_\_ ) client interview.**

International Brokerage Inc. interview completed by:

( \_\_\_\_\_ ) employee name and title

Signature

Date