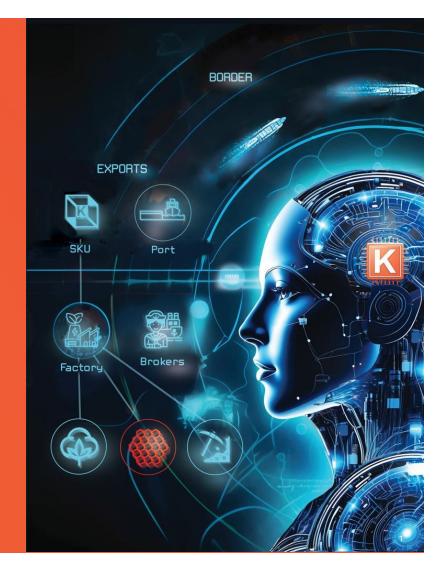


KYG Trade Master Class

Advanced Topics in Customs Compliance

February 2025

U.S. Patent # 17/512,223 Notice of Allowance Received Confidential — Unauthorized use and disclosure prohibited. © 2025 KYG Trade, Inc. All rights reserved



Today's Topics

Al "Assisted"...

1) Data Detection and Accuracy

2) Classification

3) Non-Preferential/Preferential Origin & UFLPA Compliance

4) Additional Configurations& Data Storage





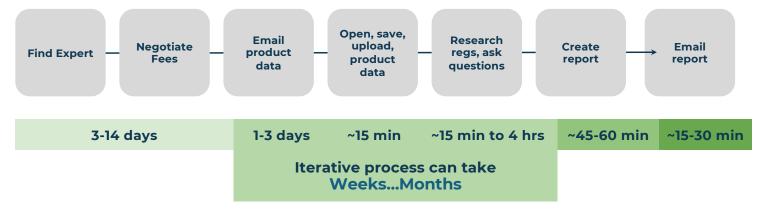
Data Detection and Accuracy

3

Current state

"Help! My shipment was flagged and detained for <u>forced</u> <u>labor</u> risk. I have 30 days to rebut the presumption and submit a detention notice response to customs."



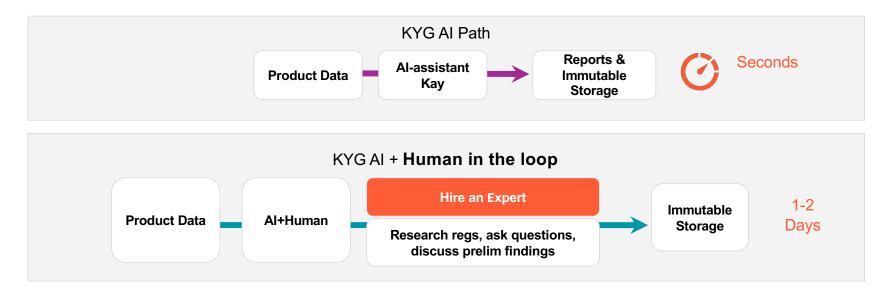


KYG Trade can do this at scale within seconds at a fraction of the cost.

The future is now



Forced Labor, Traceability, Sanctions, Toxic Substances, ESG, HTS, Export Controls, FTAs, Tier-N Mapping, others...

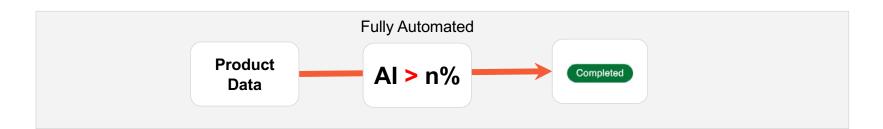


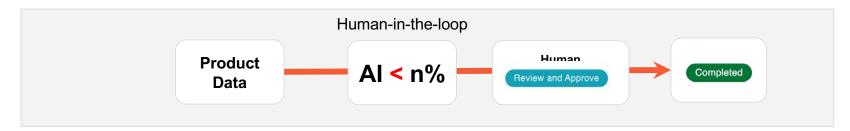
Significant Time Savings, Cost Reduction and ROI.

AI + Human in the loop



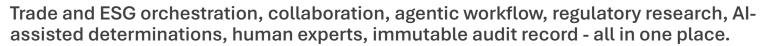
Product data, attributes, and attestations are optionally reviewed and approved by a human

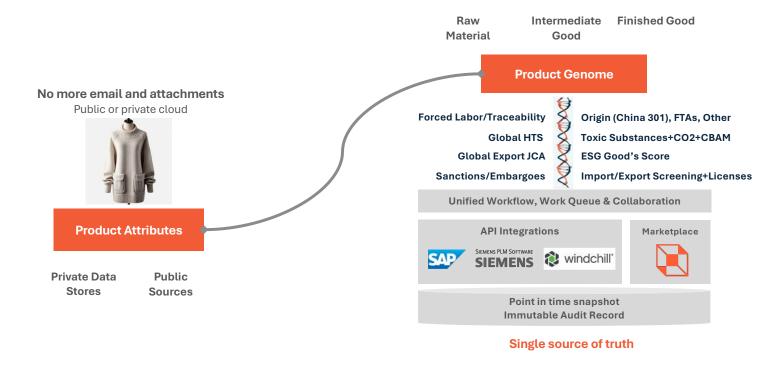




n% = user specific confidence score

SKU Centric





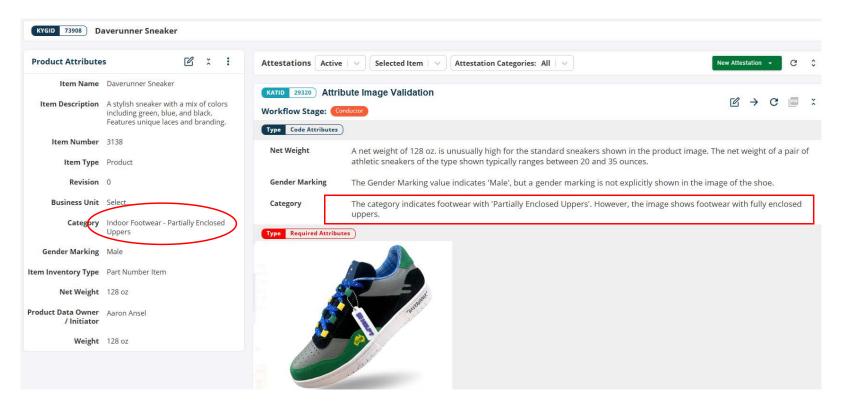
AI Object + Image Classification



Product Facts Chat	TRADE.AI™	Summary		
2	USER		l description of the product from the highlighted text and other the same website.	9:31 AM
M	KAY	Field	Information	
		Item Name	Bologna Double Strap Sandal	-
		Item Number	Not Specified	-
		Item Description	Brand Owner: Bruno Magli. Material of the Outer Sole: The outer sole is likely made of rubber for durability and traction. Material of the Inner Sole: The inner sole is made of leather wrapped around an anatomical footbed, which provides both luxury and support. Material of the Upper Straps: The upper straps are made of genuine Italian leather. Gender: These sandals are designed for men. Price: The price of these sandals is approximately \$225, which is well above USD \$100.00.	
		Classification Description	Men's leather sandals with rubber sole	
		Item URL	https://www.brunomagli.com/products/empoli-dark-brown-empoli-lea ther-slide-sandal-dark-brown	
		Importer of Record	Bruno Magli	

Anchoring the pro	oduct description	Q
Selected Oracle ChatHTS.AI HS Classification: Jurisdict	Selected Oracle ChatHTS.AI) HS Classification: Jurisdiction: United States	c x :
QUESTION HISTORY	QUESTION AUESTION HISTORY	Submit Answer
Question / Answer	Question / Answer	×
Question [QID:12694] Overed by Al Answer	Question [QID:12700] Sourced by Al Answer	
Let's start by confirming your item's description and clarifying whether I made any incorrect assumptions. Is the label self-adhesive, and is it primarily made of paper or a similar material?	The product details do not provide enough information to draft a product description. The item is simply described as a 'shirt' with the item number 'shirt', which is too vague to determine the specific type, style, or purpose of the shirt. While additional online information suggests various types of shirts, such as a DIY oversized button-down shirt, a Hanro cotton seamless short sleeve shirt, and a Hawaiian shirt, these details do not directly relate to the product context provided. Without specific attributes or characteristics of the shirt in question, it is impossible to create a comprehensive product description.	
	We tried looking for additional information online, but were unable to find any relevant details that could help us draft a product description. Please try again, providing more details about the item itself, and / or specific identifiers that could help us find the item online.	

Al assisted Discrepancy Detection





AI-Assisted Post Entry Reviews

							1	Form Approv	ed OMB No. 1651-0022	
	J.S. Customs	and Bor	der Pro		1. Filer Code/Entry Add: 013784		2. fintry T		1. Summary Date 03/19/21	
	ENTRY	SUMMA	AKY	Tean il 680	 Burnity No. 8. Bo 054 	ind Type R	8. Post da 5 2 0 1	de .	 broy bata 03/10/23 	
8. imp 7963	COM CARLSTOP		B. Mode	out Transport	10. Country of Day	çin			15. import Dete 03/11/21	
12.00	Lin AND No. DCROED00119	100 1000m		MACLUW ID	Tel. Reporting Court	diry.			6. Export Date 01/17/21	
18.17		17.1.7.04	The second rest of the second	18. Maarog Soan	18. Foreign Part of 57935	Lading		30. U.B 92/01	Part of Dishiding	
	earlien of Goods 76.4. N. RONTEN PLONES		22. Comig RAME	pase No.	25. importantio. 65 - 0120 034	.00			rance his-	
	rimata Consignae Nam				DE INDONE OF RE- COULEA USA 1195 DE 97 DORAL FL 3	ENC AVEN		1968		
av	1			79	Chy		9.0	ŧ.,	79	
Uma Max	28. A HTSUE Na. BLADA/CYCl Case N			31. Met Casentity in HTSUS Units	30. A.Entaned Value B.CHOB C.Falationahip	B A D	ikora. Ne	- D Hol	e <u>r alif. P. Ton.</u> an Canta	
491	1563 TC INVOICE 031/J AMTICLE OF CP 9933.88.15	PIRL CIN ENV BO. (INA, US 84.74	83,33581	a and a second	43401 C1473	7.59			3-28.8 . 08	
	LOUDSPERKERS 8518.29.8030	01188. 8470	HSPP	4013 30	43401 C1473	PREF			0.00	
					· · · · · · · · · · · · · · · · · · ·					
Qty			Drice	Invoice Price	Invoice Reconci with ACE Data?		Commen			
αιγ	100	100	10		Yes			-	difference, quantity matc	ies.
	150	145	12					00 10 19 W	AN A A PARTICIPATION OF A PARTY AND A PARTY AND	y due to discount adjustment
	200	220	15		No					· Contraction of the second

Product Intake Form & Custom Oracle



Compliance Risk Assessment Questionnaire

1 Introduction

This template contains the short risk definition, risk likelihood questions and risk drivers & risk indicators to assess compliance risk. If you answer 4 or 5 to any of the questions, you should take action to learn more and fix the area you

If you answer 4 or 5 to any of the questions, you should take action to learn more and fix the area you have identified. The best approach is take with those engingees involved in the identified areastatisthiles. By consulting your employees they take connecting and more readily implement the changes required.

Note: Not all sections in this checklist may apply to your business – if this is the case, leave the section blank. If you can only partly answer yes, then you should tick no.

2 Short definition

Non-compliance with customer requirements, prescribed organisational policies and procedures or laws and regulations may result in lower quality, higher production costs, lost revenues, unnecessary delays, penalities, firse, etc.

	Low	Risk	iikeli	hood	
QUESTIONS	LOW 1	2	3	4	High 6
 Are products and services subject to regulation or are they likely to become regulated? 					
Evaluation - High- risk likelihood is indicated if the company's products or services are subject to several laws and regulations.					
 Are company polices and procedures clearly described in writing, regularly updated, communicated, and operating effectively? 					
Evaluation - High-risk likelihood is indicated if polices and procedures are not clearly described in writing, regularly updated or operating ineffectively.					
 Are employees trained for key job activities before they are placed into production, testing or quality control positions? Are they provide with regular training to update the initial training? 					
Evaluation - High-risk likelihood is indicated if employees do not receive appropriate training and do not clearly understand what is expected of them.					
4. Does the company have an executive or oversight committee to insure enforcement of policy and procedure and compliance with legal and regulatory requirements?					
Evaluation - Lack of an oversight executive or committee indicates a high-risk likelihood.					
Is quality control a pervasive part of every process so that no production or distribution errors persist for long?					

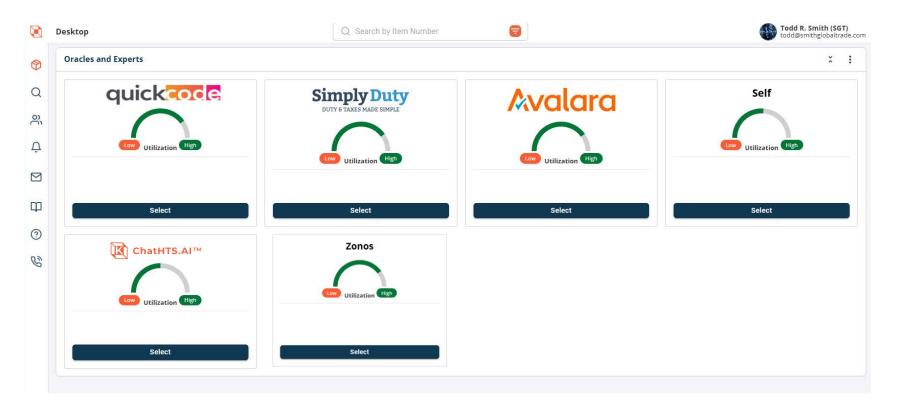
8	Cashmere Sweater	New Non-Par Questionnair		rt Questionnaire	
	Select	Utilization Select	High	Select	
Prod	uct Oracle OLRF Exe	ecution ID eef190cc			ž
	uct Oracle OLRF Exe	Question History		A	
			Answer	A Modification Date	
Que	estions References	Question History	Answer Womens		sk Kay Ask Someo
Que	Austions References Question What is the gender	Question History Questionnaire Name		Modification Date	sk Kay Ask Someo
Que ID 1	Auestions References Question What is the gender marking?	Question History Questionnaire Name Cashmere Sweater	Womens	Modification Date	sk Kay Ask Someo
Que ID 1	estions References Question What is the gender marking? What is the material?	Question History Questionnaire Name Cashmere Sweater Cashmere Sweater	Womens Cashmere 7 stitches per two	Modification Date Nov 18, 2024 3:42 PM Nov 18, 2024 3:42 PM	sk Kay



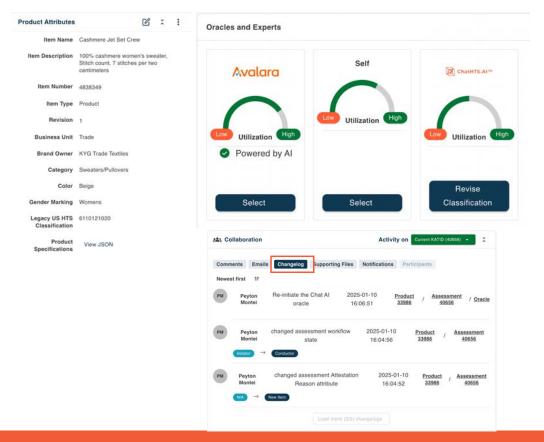
Classification

Single Window HS Orchestration





AI-Assisted HS Classification



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Based on the information provided, the most likely HS code for the women's cashmere sweater is 6110121020. This item is a women's sweater known as the Cashmere Jet Set Crew, constructed from 100% cashmere material. It features a stitch count of 7 stitches per two centimeters, indicating a fine gauge knit. The sweater is designed with extended, ribbed cuffs, wide sleeves, and shoulder panels, contributing to its relaxed fit. The color of the item is beige, and it is categorized under sweaters/pullovers. The sweater also includes two large, ribbed pockets on the front, enhancing its casual look. The legacy country of origin for this product is Jordan, and it falls under the business unit of Trade, with a legacy US HTS classification of 6110121020. The item number is 4838349, and it is specifically marked for women's wear.

The selected classification code, 6110121020, applies to articles of apparel and clothing accessories, knitted or crocheted, specifically sweaters, pullovers, sweatshirts, waistcoats (vests), and similar articles made wholly of cashmere. The rationale for applying this code induces several factors, including the item's construction from 100% cashmere, which aligns with the description under HS Subheading 611012. The stitch count of 7 stitches per 2 centimeters confirms it as a sweater according to the defined term for 'sweaters' in the HS notes. The presence of ribbed pockets does not exclude it from this classification, as per the WCO Explanatory Notes. Previous rulings, such as Ruling J85014, have classified similar items under this subheading, supporting this classification choice.

The General Rule of Interpretation applied in this classification is GRI 1, which states that classification shall be determined according to the terms of the headings and any relative section or chapter notes. GRI 1 applies because the item description matches the specific language of the classification code 6110121020, which covers women's or girls' sweaters made wholly of cashmere.

During the classification process, key questions focused on the material composition and design features of the sweater, such as the stitch count and presence of ribbed pockets. The answers confirmed that the sweater is made entirely of cashmere and fits the description of a sweater under the HS notes, leading to the selection of the appropriate code.

At the six-digit level, we considered other codes such as 611090 and 611011, which might have been appropriate if the item was made of a blend of cashmere and another textile material, such as silk, or if it was made of wool instead of cashmere. At the full code level, we also considered 6110121060, 6110122030, and 6110122080, but these were not selected because they pertain to garments not wholly made of cashmere or not classified as sweaters. In summary, 6110121020 was the most appropriate choice for a women's cashmere sweater.

--Comparison to Existing Classification--The selected code matches the existing code, 6110121020, provided by the client.

Search CROSS rulings using natural language



ChatKy	G.AI™		×	NY L85776 Open in new tab
roduct Facts	ChatTRADE.AI™	Summary		July 7, 2005
earch Chat				CLA-2: 64:RR:NC:247 L85776
				CATEGORY: Classification
		 Value: The declare classification and du 	ed value of the sandals f ity rates.	TARIFF NO.: 6403.99.60, 6403.99.90, 6404.19.35
		· · · · · · · · · · · · · · · · · · ·	Marking: Confirmation ent for legal importatior	Ms. Sara K. Bowersox Dr. Martens AirWair USA, LLC. 3627 N. Anchor Street Portland, OR 97217
		By providing this info	ormation, one can accur	RE: The tariff classification of footwear from China.
		Harmonized Tariff Sc	hedule (HTS) subheadi	Dear Ms. Bowersox:
		Sources: Ruling K80	030 Ruling L85776 F	In your letter dated June 22, 2005 you requested a tariff classification ruling for five
		Ruling F88438		footwear styles from China. You have submitted samples that you identify as item numbers 8C33 and 8C35, men's sandals with outer soles of rubber/plastics and uppers of
	USER USER	What is the HS code	for mens leather sand:	predominantly leather. 8C34, a man's sandal with an outer sole of rubber/plastics and an upper of predominantly textile material 8C29 and 8C26, men's below the ankle casual shoes with outer soles of rubber/plastics and uppers of predominantly leather.
	KAY	The HS code for mer	s leather sandals is 64(Although you indicate that the samples are men's, they are the type of footwear commonly worn by both sexes. Without a corresponding style for females, the footwear is
		sandals have uppers predominantly made o		considered unises for classification purposes. You have provided a value of over \$2.50/pair for all five styles.
	What is the HS of does this HS co	ode for my product and why de apply?	Summarize the rulings analyze their key differ	The applicable subheading for item numbers 8C33, 8C35, 8C29 and 8C26 in sizes up to and including American men's size 8 will be 6403.99.90. Harmonized Tariff Schedule of
	Ask me questions	about bookmarked topics here.		the United States, (HTS), which provides for footwear with outer soles of rubber or plastics and uppers of leather, other, for other persons, valued over \$2.50/pair. The

ChatKYG, AI & Trade Korpus[™]

		-
III 🔯 Trade Korpus**		Search Chat Q HPE server rack
		Date: [Insert Date]
		Subject: Request for Tariff Classification Ruling for HPE Server Rack
		Introduction:
com	Welcome to Trade Korpus TM onts most comprehensive knowledge base of import, export and product plance laws, regulations rulings, control law, and tariffs for deep trade compliance research with Trade Korpus	This submission requests a tariff classification ruling for the HPE Server Rack, which is designed to securely house and organize computer server equipment. The server rack is a floor-standing unit made of metal, specifically designed for use in data centers and IT environments.
		Product Description:
III Trade Korpus™ Search	Chat Q HPE server rack	The HPE Server Rack is a modular, metal structure that provides support for various server components. It is designed to accommodate standard 19-inch rack-mounted equipment and includes features such as adjustable mounting depths, lockable doors, and ventilation for stifler. The set is imported increasement of and includes all preserver bedrease for exceeding.
3 USER	Draft a Customs Ruling Submission for an HPE Server Rack	for airflow. The rack is imported unassembled and includes all necessary hardware for assembly.
KAY	Customs Ruling Submission for HPE Server Rack	Tariff Classification:
	To:	Based on the Harmonized Tariff Schedule of the United States (HTSUS), the HPE Server Rack is classified under subheading 9403.20.0086, which covers "Other furniture and parts thereof: Other metal furniture: Other: Counters, lockers, racks, display cases, shelves, partitions and similar fixtures: Other." This classification is supported by previous rulings, including:
	U.S. Customs and Border Protection Office of Trade	- N333727: Classification of computer server relay racks under HTSUS 9403.20.0086, indicating that such racks are considered furniture used for securing computer server equipment.
	Washington, D.C. 20229	- N304033: Classification of modular server racks under HTSUS 940310.0040, which also supports the classification of similar
	From:	products as metal furniture used in offices.
	[Your Name]	Conclusion:
	[Your Title]	

AI-Assisted ECCN Classification



Powered by Al

Product Attributes C : : **Oracles and Experts** Item Name Helicopter Main Rotor Sel Item Description Helicopter main rotor features KYG Trade" ChatECN.AI* Advanced Composite Rotor Blades for reduced weight and improved efficiency, a Robust Rotor Hub Design for precise control, and a Precisi Bearing System for minimal maintenance. It also includes an Utilizati Integrated Swashplate Assembly. Impact of 7.62mm or larger projectiles Powered by AI Item Number 5549 Engines **Decision Tree Business Rule** Item Type Product Revision Test Select Select Business Unit Trade Item Inventory Type Part Number Item : Collaboration Activity on Current KATID (40656) - X Comments Email Supporting Files Notifications Participants Newest first Re-initiate the Chat AI 2025-01-10 Peyton Product Assessment / Oracle Montei 16:06:51 33986 40656 oracle changed assessment workflow 2025-01-10 Peyton Product Assessment 1 Montei 16:04:56 33986 40656 state changed assessment Attestation 2025-01-10 Peyton Product Assessment Monte Reason attribute 16:04:52 33986 40656 New Item

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Question [QID:12697]

We determined the export classification code (ECN) for the Helicopter Main Rotor, with an item number of 5549, designed for advanced performance in aviation, is 08.h.18. This classification was meticulously chosen to reflect the rotor's specialized design and its critical role in military aviation. The rotor is not just a component; it is a sophisticated piece of engineering that embodies advanced composite rotor blades, which significantly reduce weight and enhance efficiency. Its robust rotor hub design ensures precise control during operation, while the precision bearing system minimizes maintenance, making it an indispensable part of the helicopter's flight control system.

The rotor's integrated swashplate assembly is pivotal in controlling the pitch of the rotor blades, a feature that underscores its importance in the helicopter's drive system. However, what truly sets this rotor apart is its optimization for performance under ballistic impact. It is engineered to withstand impacts from projectiles of 7.62mm or larger, a testament to its suitability for military applications where durability and resilience are paramount.

The classification under 08.h.18 is not arbitrary but a deliberate decision based on the rotor's ability to function after the impact of such projectiles. This aligns perfectly with the requirements of USML 08.h.18, which pertains to drive systems, flight control systems, and parts and components specially designed for such conditions. The rotor's military-grade design and its critical function in controlling rotor blade pitch further affirm its classification under this category.

Alternative classifications were considered, such as 08.h.2, 08.h.3, 9A610.w.1, and 9A619.c, each with specific conditions that did not align with the rotor's design and intended use. For instance, 08.h.2 would apply if the rotor were part of a gearbox with specific performance criteria, while 08.h.3 would be relevant if it were part of an automatic rotor blade folding system. Similarly, 9A610.w.1 and 9A619.c were considered for UAV applications and military gas turbine engines, respectively. However, none of these alternatives matched the rotor's unique characteristics and military application.

Furthermore, an assessment was conducted to determine if a "commercial equivalent" exception could apply, which would necessitate a different classification. However, no commercial equivalent was found, as the web results did not provide a clear connection to a rotor with the same advanced performance and ballistic impact resistance. This lack of commercial availability reinforced the decision to classify the rotor under 08.h.18.

In conclusion, the classification of the Helicopter Main Rotor under ECN 08.h.18 is a reflection of its specialized design, military application, and the absence of a commercial equivalent. This decision ensures that the rotor is appropriately categorized, acknowledging its critical role in military aviation and its ability to withstand the rigors of combat environments.



Global Jurisdiction Classification & Qualification

KATID	Туре	Value	Jurisdiction	Workflow Stage	Assignee	Status	Last Modified	Actions
ළ <u>ි 120922</u>	ECN		Japan	Conductor		Active V	2024-12-09 12:32 EST	
C ² <u>120920</u>	ECN		United States	Conductor		Active V	2024-12-09 12:30 EST	
C ² <u>117809</u>	FTA	Qualified	Belgium	Conductor		Active V	2024-12-09 11:37 EST	
<u> </u>	FTA	Qualified	United States	Conductor		Active V	2024-12-09 11:37 EST	
C ² <u>117778</u>	HS	6101302010 / 6 101300000	United States	Completed	Peyton Montei	O Active V	2024-11-29 16:08 EST	ⓐ ⊡ [→]
ළ <u> 117777</u>	HS		Belgium	Conductor		Active V	2024-12-06 13:36 EST	
<u> </u>	HS		Canada	Conductor		Active V	2024-12-06 13:45 EST	

Ψ	축 Tradesh								
	KYGID	Level	Item Name	•		ζ Workflow Stage	>	Oracles and Experts *	Question Overed by
	ළු <u>33992</u>	Item	5 Heat Transfer Label	ð	đ	Conductor	>	ChatHTS.AI 🗇 🗸	Based on the information provided, the most likely HS code for the Heat Transfer Label is 4908900000. This item is a specialized label
	<i>ි</i> <u>33991</u>	Item	4 THREAD	đ	đ	Conductor	>	ChatHTS.AI 🗇 🗸	Based on the information provided, the most likely HS code for the needlework thread is 5402620000. This item is a 4-thread
	ළු <u>33990</u>	Item	9 100% Cashmere Yarn	đ	ð	Conductor	>	ChatHTS.AI 🗇 🗸	Based on the information provided, the most likely HS code for the cashmere yarn is 5109109000. This item is 100% cashmere yarn,
	ළු <u>33988</u>	Item	6 TAG PIN	ð	ð	Conductor	>	ChatHTS.AI 🗇 🗸	Based on the information provided, the most likely HS code for the 6 TAG PIN is 7317005519. This item is a fastener
כ	<i>ි</i> <u>33995</u>	Item	10 NECK TAPE	đ	Ð	Conductor	>	ChatHTS.AI 🗇 🗸	Based on the information provided, the most likely HS code for the neck tape is 5806321060. This item is a narrow woven fabric, specifically
	ළු <u>33989</u>	Item	2 Carton Sticker	đ	ð	Conductor	>	ChatHTS.AI 🗇 🗸	Based on the information provided, the most likely HS code for the carton sticker is 3919905060. This item is a set of two
	ළු <u>33993</u>	ltem	7 Care Label	đ	ð	Conductor	>	ChatHTS.AI 🗇 🗸	Based on the information provided, the most likely HS code for the care label is 5807100520. This item is a woven textile label designed to
כ	ළු <u>33996</u>	ltem	8 Hangtag	ð	ð	Conductor	>	ChatHTS.AI 🗇 🗸	Based on the information provided, the most likely HS code for the hangtag is 4821102000. This item is a printed hangtag, categorized
-	C 33994	Item	1 Carton	đ	đ	Conductor	>	ChatHTS.AI	Based on the information provided, the most likely HS code for the postal packaging carton

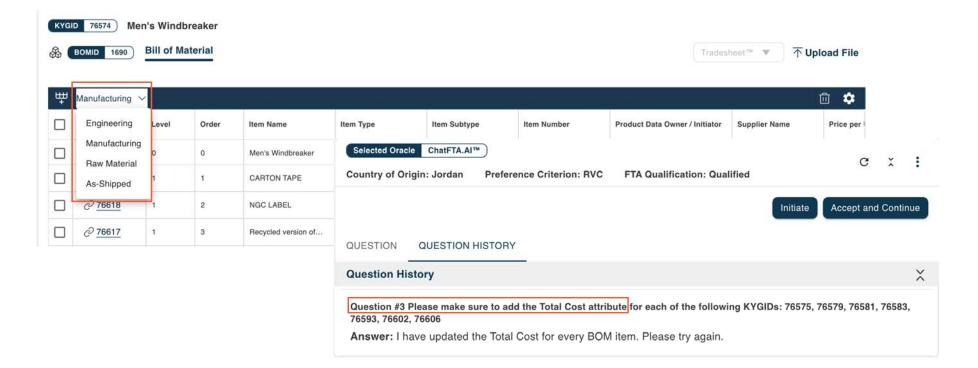
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Tradesheet[™]



FTA Qualification

BOM Data Verification



AI-Assisted Identification of Missing Documents

Selected Oracle ChatFTA.AI™	C X I
Country of Origin: Preference Criterion: FTA C	Qualification:
	← Re-initiate Submit Answer
QUESTION QUESTION HISTORY	
Question / Answer	×
Question [QID:4b4c40ed-466b- 492d-a8fd-f192277776c4]	Answer
I was not able to find a Purchase Order	Yes, continue without the Purchase Order.
supporting document for this KYGID. Would you like to continue without this supporting file?	No, I have a Purchase Order supporting document.

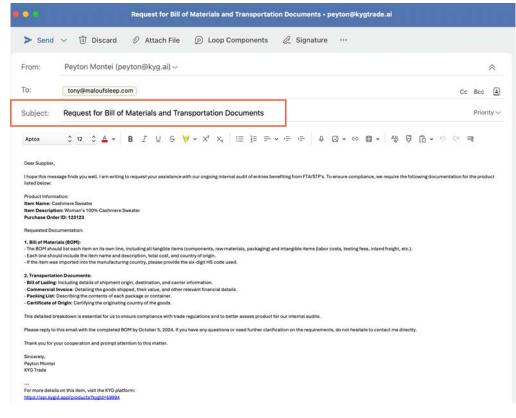
AI-Assisted Supplier Solicitation



 KYG identifies the documents you will need to defend an FTA qualification or UFLPA detention notice and identify the data gaps you currently have

Supplier Solicitation Workflow

 Generative AI can assist is solicitating necessary documents from your supply chain, reducing the human burden of corresponding with multiple parties



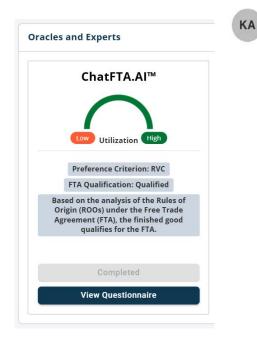
COO Validation

KYGID 73908 Da	verunner Sneaker				
Product Attributes	Ľ × :	Attestations Active	✓ Selected Item ✓ Attestation Categories: All ✓	New Attestation 🔸 C	9
	Daverunner Sneaker A stylish sneaker with a mix of colors including green, blue, and black. Features unique laces and branding.	KATID 29320 Attribut Workflow Stage: Condu	te Image Validation متم	Ľ→ C ⊡	01
Item Number		Type Code Attributes			
Item Type	Product	Country of Origin (COO)	Vietnam		
Revision	1	Commodity Description	The item description, selected tariff, and manufacturer do not comport with documentation.	h the information in shipping	
Business Unit	Trade			ant was 2025	
Category	Indoor Footwear - Partially Enclosed Uppers	Shipment Type Required Attributes	Certificate of origin date covers shipments for 2025, whereas actual shipme	ant was 2025.	
Gender Marking	Male	A closed wateries of the structure is not closed with the structure is a structure in the structure in the structure is a structure in the structure in the structure is a structure in the structure in the structure is a structure in the structure in the structure in the structure is a structure in the structure in the structure is a structure in the structure in			
Item Inventory Type	Part Number Item	A finance developed automatic provide			
Legacy Country of Origin (CoO)	Vietnam	The second sec			
Net Weight	128 oz	Hannin a Hannin a Hannin a			
roduct Data Owner / Initiator	Aaron Ansel	1. Armen Arean			
Weight	128 oz	The second secon			

AI-Assisted FTA Qualification



RVC, non-originating goods, and transshipment analysis



Kay Al 9 days ago Product 33986 / Assessment 29598 / Oracle

The finished good, Cashmere Jet Set Crew, with Item Number 4838349 and KYGID 33986, qualifies for special treatment under the FTA, Jordan-United States treaty.

The rules of origin applicable to the Cashmere Jet Set Crew under the FTA require a Regional Value Content (RVC) of 35% or higher. Upon thorough evaluation, the product was found to have an RVC of 61.0%, significantly exceeding the required threshold. This high percentage confirms that the majority of the product's value is derived from materials and labor originating within the partner countries, thereby meeting the FTA's criteria for preferential treatment.

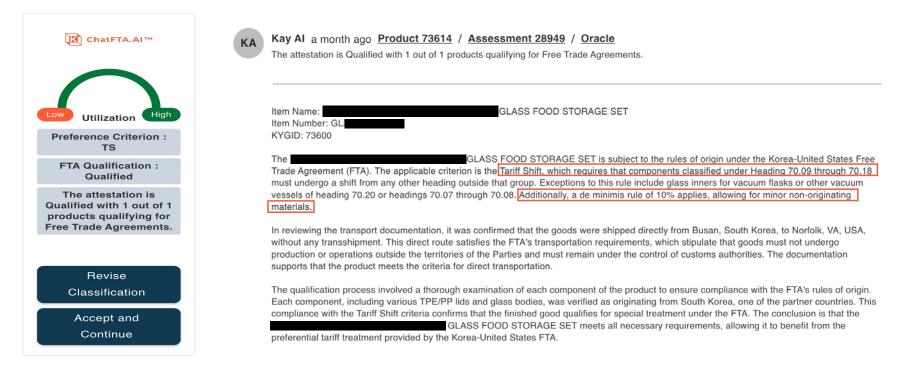
The transport documentation was meticulously reviewed to ensure compliance with the FTA's direct transport rules. The goods were shipped from Irbid, Jordan, to Haifa, Israel, before reaching their final destination in Los Angeles, USA. Despite passing through Israel, the product qualifies under the direct transport criteria as outlined in Article 8 of the FTA. The goods did not enter into the commerce of Israel and remained under the control of customs authorities, with no operations performed other than those necessary to preserve the product's condition. The shipping documents clearly indicate the USA as the final destination, supporting the product's eligibility for special treatment.

The qualification process involved a detailed examination of each component of the Cashmere Jet Set Crew to determine its origin status. Components such as the heat transfer label, thread, cashmere yarn, hangtag, carton, polybag, and sizer were identified as originating materials from Jordan, thus contributing to the product's RVC. Conversely, items like the tag pin, neck tape, carton sticker, care label, and hanger-padded natura were not considered originating materials, as they did not meet the FTA's criteria for indirect materials. Despite these non-originating components, the overall RVC calculation confirmed the product's qualification.

In conclusion, the Cashmere Jet Set Crew meets the necessary requirements for special treatment under the FTA, Jordan-United States treaty, due to its substantial regional value content and adherence to direct transport rules. This qualification allows for preferential tariff treatment, facilitating smoother trade between Jordan and the USA.

AI-Assisted FTA Qualification

Tariff Shift, De minimis, and transshipment analysis





Non-Preferential Origin

UFLPA Compliance

AI-Assisted 301, UFLPA & FTA Analysis



SKU Specific Analysis

• Leveraging AI and OCR to analyze and understand product data and documents in real time

Identifying & Organizing Relevant Information

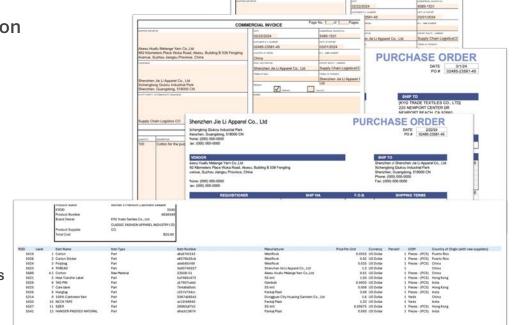
- Supply Chain Mapping
- Counterparties & Roles
- Risk Levels (Sayari, Kharon, Descartes)
- Exhibits and Documentation

Accelerated Reporting

- Leveraging generative AI capabilities to draft reports quickly and effortlessly
- Customizable templates and use cases

Emails, PDFs, Excel, Images, or via API

COMMERCIAL INVOIC



Section 301 & AD/CVD Evasion

We use AI to assist with visibility into 301 duty rates, PGA/OGA flags, AD/CVD cases, applicable rulings, and section and chapter notes.

KYG Trade		HTS Code Notes and Rulings ADD	/CVD PGA Chapter 98/99
MyQueue		Jurisdiction: United Status	Country of Origin: Select 🗸
KY00 14440	Laptop HP	64 Footwear, gaiters and the like, parts of suc	narticles.
Product Attri	butes 🖉 🎄 🛈 🗘 E		and uppers of rubber or plastics, the uppers of which are neither fixed to the ing, nailing, screwing, plugging or similar processes:
Item Descripti		6401.99.10.00 Covering 1	The Knee
Item Number Revision Business Unit	tspoes-en/F35ETWRRG VT Select	Unit Of Quantity	Pairs (prs.)
Responsible D Owner (RDO)	esign 0606 - Infoteinment Cable Asses - HS Electrical	Rates Of Duty	
Created at	2022/10/25 22 38	Ceneral	37.5% () Panama Special Rate
Modified at	2022/10/25 22 38	Special	Free (AU, BH, CL, CO, D, IL, JO, KR, MA, OM, P, BA, PE, R, S, SG) 75%
		Penalty Penalty	62.5% (Chinese Origin Goods)
		Chapter 98/99	
		Special HTS Code	9903.8815
		HTB Description	Temporary legislation, temporary modifications proclaimed pursuant to trade agreements legislation; additional import restrictions proclaimed pursuant to section 22 of the View more
		Rate	*25%
		ADD/CVD Flags	
		ADD	⊙ No
		CVD	⊙ №
		PGA Flags	
		AMB	USDA/Agriculture Marketing Service Data related to organics is required
		FD4	FDA Prior Notice Data is required 801(m)

Non-preferential Origin + 301 Analysis



Searching rulings >1/1/2018 for origin and vacuum cleaners

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20 origin and 4 HS related hits

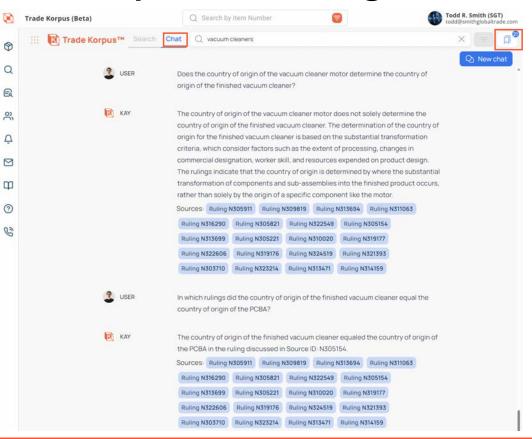
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14 origin related hits

AI-Assisted Non-preferential Origin + 301 Analysis

								•	dd@smithglobaltrad
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2	Search Filters	î 🛛	Date	Ruling	Category	Subject	Kay's reason	Bookshelf (21)	Clear a
CA.	Number of results ^		19/05/2021	NY N319177	Origin	The country of origin of vacuum cleaners	Discusses The Substantia Transformation Of Vacuur Vietnam.	Ruling: NY N323214 Rulings reference: Th of vacuum cleaners	Date: 09/01/202 he country of origin
7 V	30	R	22/03/2022	NY N324519	Origin	The country of origin of vacuum cleaners	Explains The Manufacturi Of Vacuum Cleaners In Ch Vietnam.	Category: Origin Ruling: NY N319177	Date: 19/05/202
3	Date range ^ Start date End date 01/01/2018 11/15/2024	R	24/08/2020	NY N313694	Origin	The country of origin of vacuum cleaners	Addresses The Assembly Cleaners In Vietnam From Sourced From China And V	Rulings reference: Th of vacuum cleaners	
2	Select all		09/01/2022	NY N323214	Origin	The country of origin of vacuum cleaners	Mentions The Manufactur Processes Of Dyson V8 Va Cleaners In Mexico.	Category: Origin Ruling: NY N313471	Date: 17/08/202
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	Admissibility(0)		25/04/2019	NY N303710	Origin	The country of origin and Section 301 trade remedy of vacuum cleaners from Vietnam		Ruling: NY N303710	Date: 25/04/201
	Bond(0) Broker(0)	R	18/05/2021	NY N319176	Origin	The country of origin of vacuum cleaners		Rulings reference: Th and Section 301 trade cleaners from Vietnan	remedy of vacuum
	Carrier(0) Classification(0)		20/04/2020	NY N311063	Origin	The country of origin of upright vacuum cleaners		Category: Origin	
	Conditionally Free Merchandise(0) Drawback(0) Entry Procedures(0)		06/08/2019	NY N305221	Origin	The Country of Origin of Vacuum Cleaners from Vietnam and Applicability of Section 301 Trade Remedies		Ruling: NY N313694 Rulings reference: Th of vacuum cleaners	Date: 24/08/202 ne country of origin
	Free Trade Agreements(0)	R	04/11/2021	NY N322549	Origin	The country of origin of vacuum cleaners		Category: Origin	R
	Marking(0) Origin(30)		08/03/2020	NY N309819	Origin	The country of origin of vacuum cleaners		Ruling: NY N313699 Rulings reference: Th of vacuum cleaners	Date: 20/08/202 ne country of origin
	Protest(0)							Category: Origin	

AI-Assisted Non-preferential Origin + 301 Analysis



Al-generated "draft" 301 origin analysis



Indexperiments of the set of the

The approach above and provide internet states account orange minite above income much provides for Vacuum cleaners; parts thereof: With self-contained electric motor: Of a power not exceeding US00 W and having a dust bag or other receptacle capacity not exceeding 201. The rate of duty will be final.

Example of a 3-page draft 301 origin analysis, which took 5 seconds to create

5 seconds to crea

Products of Chrun classified under aufbracking \$55(11):05, 11105, unities specifically excided, a singless to the address 22 present a singless rate of day, Art there is of importance property report the Chapter BP analysatiog, San \$952,855, in audition to inderwarding \$55(11):05, 11105, third advance. The train clapset to predict amendment, up your hould exercise reasonable care monitoring the status of grouds covered by the Nobies class above and the applicable Chapter 98 analysation.

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Unlimited user-specific customizable 301 analysis templates

country of manufacture, production, or growth of any article of foreign origin entering the I States. Further work or material added to an article in another country must effect a substat transformation in order to render such other country the "country of origin."

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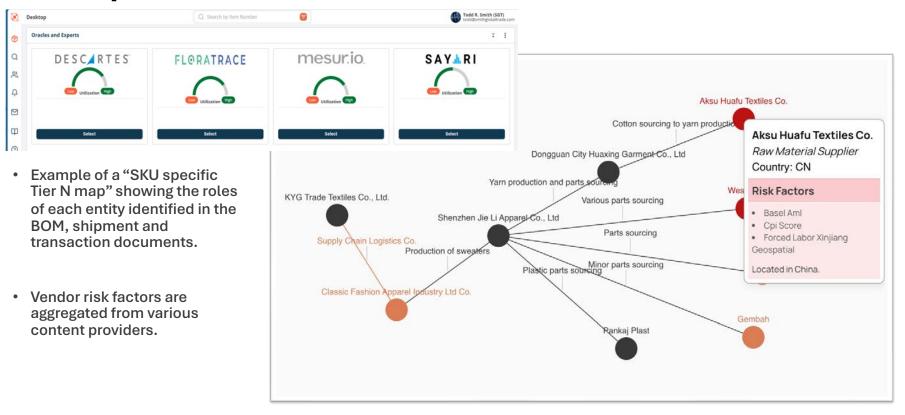
Country of Origin Determination

Section 134.1(b), Customs Regulations (19 C.F.R. § 134.1(b)), defines "country of origin" as the country of manufacture, production, or growth of any article of foreign origin entering the United States. Further work or material added to an article in another country must effect a substantial transformation in order to render such other country the "country of origin."

Based on the information provided, the materials/components and subassemblies imported into Thailand from China are manufactured into different subassemblies and ultimately assembled into the subject NextWave vacuum cleaner. The processing performed in Thailand constitutes a substantial transformation of the imported materials/components into "products of" Thailand. The manufacturing process in Thailand transforms the Chinese-origin components to produce the finished product. It creates a new and different article of commerce with a distinct character and use that is not inherent in the components imported into Thailand. Therefore, the "product of" requirement has been satisfied. For tariff purposes, we conclude that the country of origin for the NextWave vacuum cleaner and its accessories, when imported together, will be Thailand.

AI-Assisted SKU-based UFLPA/Traceability Compliance





Al-generated UFLPA Vendor Risk Assessment



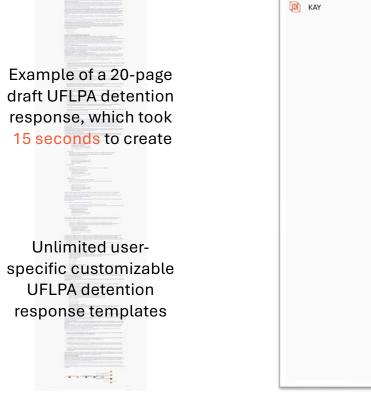
We use AI to assist with aggregating and rationalizing data from multiple content providers for specific SKU-level analysis.

Supplier Risk		Q: Search by Item Number		MU Microsoft User user@microsoft.co
Rails India Limited Vinh	Long Footwear Co. HUAJ	U FASHION		
RYGID 65901) Rails Indi	a Limited			
Supplier Background		Direct Forced Labor Risk		
industry	Chemical industry	Direct Forced Labor Risk Level	Law	
Supply Chain Roles	Chemical Supplier. Examples o products provided include pes	icides,	N/A	
	disinfectants, detergents, and inorganic acids, esters, and sal			
Expected Customer Profile	Expected to sell primarily to en the chemical industry, includin manufacturiers of agricultural		Rep	
Expected Vendor Profile	chemicais, industriai cleaners, laboratories. Upstream vendors primarily sc		Ralis India Limited's vendors, such as Limin Holdings Group Co., U Ltd. (県原仁太宗孫伯多和聞之君)。 and Hubei Xingla Chemicals Group risks associated with forced labor, especially in regions Me Xinjian chemicals and pesticides, may be tained by forced labor practices	Co., Ltd. (建北戶发化工集团股份有限公司), have notable g. The products from these wendors, including various
Expected vendor Pronie	inorganic esters, acids, deterge pesticides.			
		Associate Entity / Customer Risk Level	Low	
		Associated Entity Risk Description	N/A	
		Owner Risk Level	(Hgs)	
		Owner Risk Description	Tata Chemicals Limited, a significant owner, has been linked to mu products sourced from high-risk regions like Xinjiang. The ownersh Limited indicate a potential for these risks to manifest in Italiis Ind	ip ties between Tata Chemicals Limited and Rallis India
		Other Risk Information		
		Direct Other Risk Description	The entity has identified Basel AML risk, CPI score risk, and a high	isk associated with exporting to SOEs.
		Transactional Red Flags	High risks related to exporting to sanctioned entities and state-ow associations with entities flagged for forced labor and regulatory is specific transactional red flags.	
		Top 5 HTS Codes	3808 - Insecticides, redenticides, fungicides, herbicides, antisprout and similar products, put up in forms or packings for retail sale or bands, wicks and candles, and Rypapers	
			2933 - Heterocyclic compounds with nitrogen hetero-atom(s) only	
			3402 - Organic surface-active agents (other than soap); surface-act auxiliary washing preparations) and cleaning preparations, whether	
			3401 - Soap; organic surface-active products and preparations for shapes, whether or not containing soap; organic surface-active pro- of liquid or cream and put up for retail safe, whether or not contain impregnated, coated or covered with soap or detergent.	iducts and preparations for washing the skin, in the for
			2920 - Esters of other inorganic acids of nonmetals (excluding este halogenated, sufforated, nitrated or nitrosated derivatives:	rs of hydrogen halides) and their salts; their
			9027 - Instruments and apparatus for physical or chemical analysis spectrometers, gas or smoke analysis apparatus); instruments and expansion, surface tension or the like instruments and apparatus light (Including exposure meters); microtand accessor	apparatus for measuring or checking viscosity, porosit for measuring or checking quantities of heat, sound or
		Sources	Sayari, Descartes, Supply Trace	

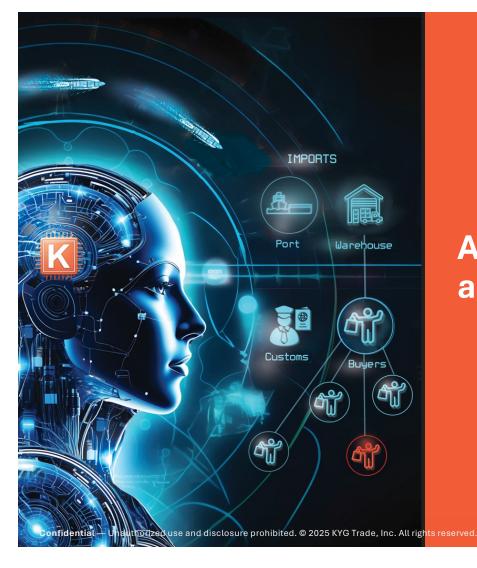
Al-generated "draft" UFLPA Detention Response

Detention Notice Response Letter





Section 1: INTRODUCTION To Whom It May Concern,
In response to the Detention Notice issued by the U.S. Customs and Border Protection (CBP) concerning our
shipment of Women's Cashmere Sweaters, we hereby submit this comprehensive documentation to
demonstrate our compliance with the Tariff Act of 1930, specifically Section 307, and the Uyghur Forced Labor
Prevention Act (UFLPA), Public Law 117-78, codified at 22 U.S.C. § 6901. These statutes collectively prohibit the
importation of merchandise produced wholly or in part by forced labor, including convict labor, forced child
labor, and indentured labor.
The UFLPA establishes a rebuttable presumption that goods produced in the Xinjiang Uyghur Autonomous
Region or by entities on the UFLPA Entity List are made with forced labor and are, therefore, prohibited from
entry into the United States. As importers, we understand our obligations under the UFLPA to conduct due
diligence, trace, and manage our supply chains to ensure compliance, particularly concerning goods
potentially originating from the Xinjiang region.
In response to the detention of our merchandise, we have several options, including demonstrating that the
merchandise was not produced in the Xinjiang region or by a listed entity, rebutting the forced labor
presumption with clear evidence, or opting to re-export the merchandise. This submission aims to clarify our
compliance with the relevant laws and regulations and request the release of the detained merchandise. It
includes transaction records, supply chain information, and other business-generated evidence to support
our case.
We are committed to ensuring clarity and compliance with all applicable laws and regulations and request the
release of our detained merchandise based on the comprehensive documentation provided herein.
Section 2: STATEMENT OF FACTS
KYG Trade Textiles Co., Ltd., the importer of the detained Women's Cashmere Sweaters, is committed to
ethical sourcing and vehemently opposes the use of forced labor in any part of our supply chain. The goods in
question were not sourced, produced, or manufactured in the Xinjiang region of China, nor have they been
associated with any entities on the UFLPA Entity List.



Additional Configurations and Data Storage

Confidence scores

Kay's Question	Result Re	sources Can	didate List			
andidate	Confidence	Subheading	Description		General	Spe
5102.11.10.00 Of Kashmir (cashmere)	95% goats.11	5102.11.10.00	Not processed in any manner be carbonized condition	eyond the degreased or	5.1¢/clean kg null/	Free (AU R, M
5104.31.00.00 Of Kashmir (cashmere)	94% goats (4	5102.11.90.00	Other		4.9¢/kg + 4% null/	Free (AU R, M
5105.31.00.00 Of Kashmir (cashmere)	87% goats (4	5102.19	Other		10	
5106.31.00.00 Of Kashmir (cashmere) 5107.31.00.00	78%	5102.19.20.00	Hair of the camel		5¢/clean kg null/	Free (AU R, M
Of Kashmir (cashmere) 5108.31.00.00 Of Kashmir (cashmere)	70%	5102.19.60	Other	a.	0.4% null/	Free (AU R. N
5109.31.00.00	66%	510219.60.30	Hair of the Angora goat	cy kg	38	

Tribal Knowledge-Base

--Comparison to Existing Classification--

The selected code 8414596560 matches the existing code provided by the client, confirming the accuracy of the classification.

--Comparison to Existing Classification--

The selected code does not match the existing classification, 8504409580, as previously determined by the client. The client-provided code is defined for static converters not intended for telecommunication apparatus or power supplies used with automatic data processing machines of heading 8471, among other exclusions. The differences between the two codes lie in the specific functions and intended uses of the items they cover. The selected code, 8504314065, is more appropriate for the item described because it accurately reflects the power supply's function as a transformer with a specific power handling capacity, aligning with the item's technical specifications and intended use with ADP machines. The rationale for selecting this code is based on the General Rule of Interpretation (GRI) 1, which applies because the item description 'HARNESS FORCED AIR BLOWER 5M' matches the specific language of the heading 841459. This heading includes various types of fans and blowers not classified under other specific subheadings. The item 'HARNESS FORCED AIR BLOWER 5M' is best classified under HS code 8414596560 because it is a part of a forced air blower,

which falls under the scope of this subheading. Historical classification of similar items, such as the '

These items are also parts of blowers and have been classified under 841459. The item description does not indicate that it is excluded by any specific subheading exclusions, such as those for microprocessors, telecommunications equipment, or motor vehicles.

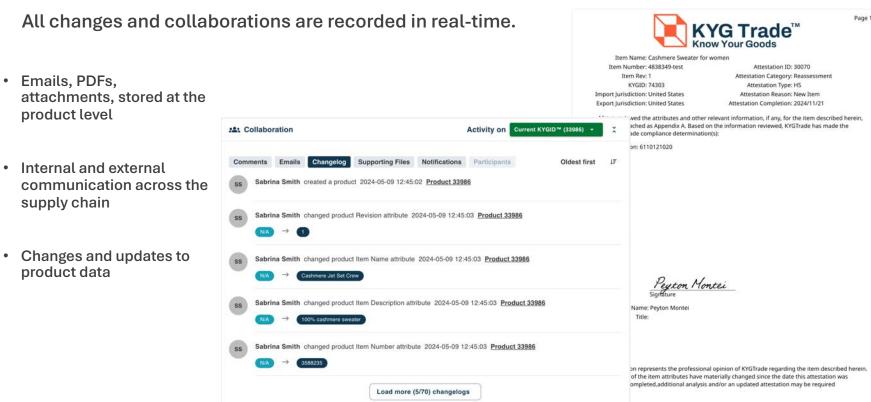
Several alternative codes were considered during the classification process. These include 8414596595, which would apply if the item were not a part of a forced air blower but rather a different type of fan not specifically excluded by the subheading; 8414596590, if the item were an axial fan component rather than a centrifugal fan component; 8414591000, if the item were a general fan part not specifically excluded by the subheading; 8414591500, if the item were specifically designed for cooling microprocessors, telecommunications equipment, or computers; 8414593000, if the item were a general fan part not specifically excluded by the subheading; and 8414596540, if the item were suitable for use with motor vehicles.

Collaboration

Streamline communication and data storage with internal compliance teams and external parties.

·		Collaboration	Activity on Curre	ity on Current KYGID™ (33986) → X		
		Comments Emails Changelog	g Supporting Files Notification	ons Participants	Newest first 17	
:at Collaboration	Activity on Current KYGID [™] (3	Emails	Q Search		Search C	
Comments Emails Changelog Supporting Files Notifications	Participants Ne	+ Compose		Emails per page 10 👻	1–1 of 1 < >	
PM Add a comment		Inbox				
PM Peyton Montei a few seconds ago Product 33986 @Sabrina Smith can you review the HTS and ECCN classification? Edit KA Kay AI 16 hours ago Assessment 29800	🏨 Collaboratio	Sent				
Based on the information provided, the most likely HS code for the women's cashmere known as the Cashmere Jet Set Crew, made from 100% cashmere yarn. It features a fi centimeters, indicating high-quality craftsmanship. The swater is designed with a high two large, ribbed pockets on the front, contributing to a relaxed, oversized fit. The code sweaters/pullovers. The legacy country of origin for this product is 4838349, and it is sp classification of 6110121020. The litem number for this product is 4838349, and it is sp classification code, 6110121020, applies to articles of apparel and clothing accessories sweatshirs, waistocats (vests), and similar articles made entirely of cashmere. The ratio of the section of a strict set of apparel and clothing accessories and the similar articles made entirely of cashmere. The ratio of the section of the section of the section of the section of the similar articles of apparel and clothing accessories and the section of the se	ne gaug , nibed of the i , kinited Comments Ema	ails Changelog Supporting	g Files Notifications Pa	rticipants	Newest first 1≆	
as the item's composition of 100% cashmere yarn, which aligns with the description un per two centimeters is consistent with the definition of a sweater, which allows for fewe this subheading include similar items, such as women's pullovers and sweaters made (like J88995 (2003-10-30) and J87263 (2003-09-04) have classified similar items under	der HS t r than 10 miles Shipping D	locs				
classification is GRI 1, which states that classification shall be determined according to chapter notes. This rule is fundamental in ensuring that the classification is based on th nomenclature. During the classification process, key questions included whether the lit	e precis 📷 Cashmere	sweater BOM.pdf				
definition of a sweater based on stitch count. The answers confirmed that the item was with sweater definitions, leading to the selection of the appropriate HS code. Other pot 611020, and 611090. However, these were not selected as they did not specifically cov the defining characteristic of the item in questionComparison to Existing Classificatil 6110121020, provided by the client.	ential six er wome 📷 Cashmere	Sweater Document Package_	Redacted.pdf			

Record-keeping & Immutable Storage



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Real-time Monitoring



Changes and updates to trade regulations and requirements are flagged in the KYG Trade[™] Platform.

Ρ	KATID	Document Type	Jurisdiction	KYGID™	Item Name	Item Number	Workflow Stage Assignee	Attestation Modification Date	Status	Actions		
•	C ² <u>24864</u>	HS	United States	ල <u>ි 33986</u>	Cashmere Jet Set Crew	4838349	Conductor	2024-07-16 13:47 PDT	🛕 Suspect 🗸	±		
•	HTS Code	Updates										
•	Duty Rate Modifications											
•	Export Control List Updates											
•	License Requirements											
•	Rules of C	Drigin										
•	Forced labor laws											
•	Sustainability and Environmental Requirements											
•	Sanctions and Restricted Party Screening											
•	Free Trade Agreement (FTA) Updates											
•	Anti-Dumping and Countervailing Duties (ADD/CVD)											

Product Safety and Regulatory Standards





Todd R. Smith Founder CEO <u>todd@kyg.ai</u> +1 (949) 903-0338

Contact Us

Thank You

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