



WELCOME

March 10, 2026

Trade policy and tariff update

- **We will begin at the top of the hour**
- **Please have your computer speakers turned on**
All audio is streamed directly through the console and heard through your computer speakers. There is not a dial-in number.
- **For technical support, please use the Q&A window**



Interested in exploring a potential IEEPA refund opportunity?

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Presenters



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Agenda

01

Court decision and
procedural status

02

Liquidation authority
and extensions

03

Operational and
financial impact

04

Q&A



Court of International Trade (CIT) decision

- The CIT ordered CBP to process all unliquidated entries without applying IEEPA tariffs.
- Entries that have already liquidated but are not yet final must be reliquidated without IEEPA duties.
- Entries that are already finally liquidated are not automatically reopened, meaning importers may still need to file protests or pursue litigation to recover those duties.
- The court is centralizing management of the refund process to avoid inconsistent rulings across different judges.



Refund implementation process

- The government has been ordered to explain how Customs and Border Protection (CBP) will operationally process the refunds, including the mechanics of liquidation and reliquidation.
- A conference is scheduled for March 6, where the government must outline its plan for implementing the refunds.
- Any validated refunds of IEEPA duties would include interest, but CBP still intends to review entries to ensure no other duties or violations apply before issuing refunds.
- For importers, this signals that administrative refunds through the liquidation process are now likely for many entries, but protest strategy will still matter for entries that have already become final.



Court question and CBP response

Court question

- “Is it Customs’ position that, with respect to entries that are liquidated without IEEPA duties, the importers of record will be sent a refund in an amount equal to the IEEPA duties plus interest?”

Government/CBP response

- “There are several factors that inform the answer to this question, including but not limited to entry type. In accordance with applicable law, any validated refund of IEEPA duties would include interest. Regardless of entry type and liquidation cycle, CBP still requires a review period to ensure no violation of other Customs laws and no other duties, taxes or fees are owed (e.g., anti-dumping duties, Section 301 duties, Section 232 duties, etc.).”



CBP liquidation timeline and authority

- CBP normally has one year from the date of entry to liquidate an entry.
- CBP can extend liquidation for one year at a time, up to three additional years, meaning an entry can remain open for up to four years total without any court involvement.
- CBP does not need permission from the CIT to extend liquidation.
- Extensions are an administrative authority exercised by CBP.



Extensions vs. suspension

- Extensions must cite one of three statutory reasons:
 - CBP needs additional information to determine the correct duties.
 - The importer requests the extension.
 - The issue is under review by CBP headquarters.
- An extension is different from suspension.
- Extensions are administrative and still subject to the four-year cap.
- Suspensions usually occur due to litigation or anti-dumping and countervailing duty (AD/CVD) proceedings and can pause liquidation indefinitely.



Potential extension of liquidation during refunds

In the current IEEPA refund situation, CBP could legally extend liquidation on entries to give itself time to review and process refunds.

- CBP is not legally required to audit every entry before issuing refunds, but it does have a statutory obligation to ensure the correct duties are assessed before liquidation.

The justification CBP will likely give for reviewing entries includes:

- Ensuring **no other duties apply** (301, 232, AD/CVD, etc.).
- Verifying **classification, valuation and compliance**.
- **Protecting the revenue of the United States**.
- Managing the **operational workload** associated with millions of entries.



Operational impact of extended liquidation

CBP has already indicated to the court that it needs a **review period before issuing refunds** to confirm that no other duties or violations exist.

- If liquidation is extended, **refunds are delayed** because refunds generally follow liquidation.
- As long as entries remain **unliquidated**, the importer's **customs bond exposure remains active**.
- Large numbers of open entries with high duty deposits could **affect bond sufficiency calculations**, potentially leading to **bond increases** or **scrutiny from sureties**.

What this means in practice:

- From the government's perspective, this is risk management and workload control.
- From the importer's perspective, it looks like their refund check is sitting in bureaucratic purgatory while everyone double-checks the paperwork.

How Baker Tilly can help

We deliver an audit-ready approach that covers every pathway to recovery. We structure documentation and prepare recovery filings to strengthen defensible claims and mitigate regulatory risk, while coordinating trade, tax and finance considerations to support the broader business impact of recovery.

**Administrative
refunds**

**Litigation
support**

**Hybrid
approach**

**Transfer pricing
support**

**Audit-ready
documentation**

**Tax and financial
impact advisory**



Why Baker Tilly is the right choice

Recovering IEEPA tariffs is complex, but our approach makes it simple, strategic and transparent. Here's what sets us apart:

1

Our tariff refund dashboard

Our proprietary dashboard gives you real-time insight into every refund claim. It consolidates ACE data, broker entries and payment records into a single secure platform.

2

End-to-end expertise

From administrative filings to litigation support, we manage the entire process under one integrated plan. No fragmented efforts, no missed opportunities.

3

Specialized knowledge

Our team includes licensed customs brokers, tax advisors and global trade specialists. This blend of skills ensures we understand compliance requirements and financial impacts and know how to prepare for CBP scrutiny.

4

Confidence and control

You stay focused on your business while we handle the technical details. With our dashboard and structured process, you always know where things stand.

[Learn more about our tariff solutions.](#)



Connect with us



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Have non-IEEPA or other
global trade questions?

*Scan to connect with our
global trade team.*



Questions?

- **Submit your questions via the Q&A function.**
- **We will answer as many as possible.**
- **Presentation recording will be sent to registrants within 24 hours.**
- **Please take a moment to complete the post-event survey.**

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