

# \$166Bn of Tariff Refunds: Is Your Business Eligible?

US Customs and Border Protection launched CAPE for the IEEPA duties struck down by the Supreme Court. Here's what you need to know:



THE KEYSTONE GROUP  
ATLANTA • CHICAGO • LOS ANGELES

**\$166Bn**

Total Refund Pool

**330K**

Eligible Importers

**63% of \$**

Refunds in Phase 1

**60-90 Days**

ACH Received

## Four Questions to Determine Eligibility

### 01 - IOR Status

#### Are You The Importer On Record (IOR)?

Only the IOR or their broker can submit the claim. Refunds go to the IOR, unless a Form 4811 names a different payee.

### 02 - Duties Paid

#### Did You Pay IEEPA Duties?

Entries must carry Chapter 99 HTS codes tied to IEEPA duties struck down by the Supreme Court.

### 03 - Liquidation Status

#### What's The Entry Status?

Unliquidated (entry not yet finalized by CBP) and recently (<80 days) liquidated entries qualify for Phase 1.

### 04 - Complexity

#### Any Complications?

AD/CVD, drawback, and warehouse entries may defer to later phases or litigation.

## What's Refundable Now Vs. Later?

Phase 1 covers roughly 63% of the pool, the remainder will come later or through litigation

### PHASE 1 • COVERED NOW

- Unliquidated entries with IEEPA duties
- Recently liquidated entries in the reliquidation window
- Standard consumption entries without complications
- Entries filed directly by the IOR, or by a broker with a Form 4811 on file

### LATER • DEFERRED OR COMPLEX

- Entries liquidated past the reliquidation window
- AD/CVD entries (later phase or litigation)
- Drawback claims requiring reconciliation
- Warehouse and foreign trade zone entries

## From Claim To Cash, The Refund Timeline

Day 0

### File CAPE Claim

Upload CSV of entry numbers to the ACE Portal

Day 1

### Bulk Processing

IEEPA duties stripped, interest calculated per 19 CFR 24.36

~Day 45

### Reliquidation

Refund amount formally fixed by CBP

Day 60-90

### ACH Receipt

ACH disbursed to IOR based on liquidation date

## Getting Started

Most of the upfront work is data collection and validation

### Data Checklist

- Entry summary data from ACE
- Broker duty payment statements
- Chapter 99 HTS codes paid
- IOR documentation or 4811 designation
- Prior AD/CVD or drawback history
- ACE Portal access credentials

### Next Steps

1. Inventory IEEPA entries
2. Validate account information in ACE (specifically ACH)
3. Confirm IOR status and broker alignment
4. Split entries into Phase 1 vs. deferred
5. Quantify expected refund and interest
6. File CAPE claim and plan for cash timing
7. Address contract pass-throughs and tax treatment

Keystone is actively helping clients recover once-lost tariff costs through IEEPA refunds.