



## **CHARLES L. ANDERSON**

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### **EDUCATION**

1981 M.A. Philosophy, Politics, and Economics, Oxford University, England (Moody Scholar)

1979 B.A., (Summa Cum Laude), with Highest Honors, History and Political Science, Williams College, Williamstown, Massachusetts (Phi Beta Kappa)

### **EXPERIENCE**

Mr. Anderson is a principal with Capital Trade, Incorporated. His background is in international business and trade regulation, with specific expertise in U.S., and other national antidumping and countervailing duty proceedings. Mr. Anderson also has experience in U.S. Customs, and export control matters, bilateral and multilateral trade agreements and trade policy initiatives, foreign investment, and international market research, and general business litigation matters.

#### **International Trade Regulatory Analysis**

Mr. Anderson has direct experience in the following areas involving international trade regulatory analysis:

#### **Functional Experience**

##### **Antidumping (AD)**

- Pre-petition assessments
- General questionnaire response preparation
- Non-market economy (NME) surrogate and factor of production analysis
- Forensic analysis of business documents and data
- Differential pricing and targeting analysis
- Circumvention and duty evasion research
- Construction of sampling methodologies
- Cost of production calculations
- Adjustment calculations
- Further manufacturing calculations
- Particular market situation (PMS) allegations

### **Antidumping Functional Experience (Contd.)**

- General preparation of computerized sales listings
- Design of complex model matching methodology
- Hyperinflationary economy cases
- Review of U.S. Department of Commerce (DOC) disclosure documents
- Design of product-specific cost of production systems
- Representation at verification, and verification report review
- Expert testimony at DOC
- Level of trade analysis

### **Countervailing Duties**

- Pre-petition subsidy analysis
- Research on commercial benchmarks for loan, equity calculations
- Analysis of creditworthiness and equityworthiness
- Analysis of impact of privatization on past subsidies
- Estimation of pass-through for upstream subsidies
- Representation at verification, and verification report review
- Calculation of benefits from grants, loans, equity infusions and tax subsidies
- Expert testimony at DOC

### **Economic Analysis of Injury Functional Experience**

- Comments on draft questionnaires
- Aggregation of questionnaire response data and analysis
- Pre-petition injury assessments
- Market segmentation and like product analysis
- Research into U.S. industry and markets
- Research into foreign industry make-up and capacity
- Detailed pricing comparison assessments
- Preparation of detailed critiques on financial performance and causation
- Expert testimony at the U.S. International Trade Commission (ITC)
- Preparing technical and economic arguments for case briefs

**AD/CVD/ITC/201 Case Experience**

- PET Sheet from Oman (AD)
- Super-Absorbant Polymers from Korea (AD)
- Urea Ammonium Nitrate from Russia and Trinidad & Tobago (AD/CVD)
- Extruded Ribbons and Bows from China (AD)
- Fresh and Frozen Blueberries (ITC/201)
- Corrosion Inhibitors from China (AD)
- Alloy Aluminum Sheet from Various Countries (AD)
- Ultra-High Molecular Weight Polyethylene from Korea (ITC)
- Small Air-cooled Gasoline Engines from China (AD)
- Large Air-cooled Gasoline Engines from China (AD)
- Olives from Spain (AD)
- Acetone from Belgium, Korea, South Africa, Spain, and Saudi Arabia (AD/ITC)
- Ribbons from China (AD)
- Fabricated Steel Structures from Canada, Mexico, and China (AD/CVD)
- Wind Towers from Canada, China and Mexico (AD/CVD)
- 100 to 150 Seat Large Civil Aircraft from Canada (AD/CVD/ITC)
- Uncoated Groundwood Paper from Canada (AD/CVD/ITC)
- Certain Plastic Decorative Ribbon from China (AD/CVD)
- Forged Steel Fitting from Italy (AD/ITC)
- Silicon Metal from Australia, Brazil, and Norway (AD/CVD)
- Cut-to-length Plate from Germany, Italy, Belgium and France (AD)
- Uncoated Free Sheet from China and Brazil (AD)
- Supercalendered Paper from Canada (CVD)
- Silicomanganese from Australia (AD)
- Tapered Roller Bearings from China (AD)
- Xanthan Gum from China and Austria (AD/CVD/ITC)
- Large Residential Washers from Korea and China (AD/CVD/ITC/201)
- Stainless Steel Sinks from China (AD/CVD)
- Wind Towers from China (AD/CVD)
- Solar Modules and Panels from China (AD/CVD)
- Solar Modules and Panels from Taiwan (AD)
- Oil Country Tubular Goods from China (AD/CVD)
- Steel Grating from China (AD/CVD)
- Citric Acid from Canada and China (AD/CVD/ITC)
- Citric Acid from Belgium, Colombia, and Thailand (AD/CVD/ITC)
- Carbon Quality Pipe from China (AD/CVD)
- Lightweight Thermal Paper from China (AD/CVD)
- Certain Off-the-Road Tires from China (AD/CVD/ITC)
- Various Carbon Steel Products from China (AD/CVD)
- Carbon Steel Wire Rod/Variou Countries (AD/CVD)
- Stainless Steel Bar/India (AD)

**AD/CVD/ITC/201 Case Experience (cont.)**

- Stainless Steel Wire Rod/Korea (AD)
- Fresh Tomatoes from Mexico (AD)
- Hardwood Flooring from Canada (CVD)
- Supercomputers from Japan (AD)
- Large Newspaper Printing Presses from Japan and Germany (AD)
- Polyvinyl Alcohol/Various Countries (AD)
- Roses from Colombia (AD)
- Color Negative Photographic Paper from Japan and Netherlands (AD)
- Ethanol from Brazil (AD/CVD)
- Fresh Cut Flowers from Colombia, Mexico, and Peru (AD)
- Kiwifruit from New Zealand (AD)
- Antifriction Bearings/Various Countries (AD/ITC)
- Cement from Korea and Greece (AD/ITC)
- Cement from Japan (AD)
- Float Glass from Italy (CVD)
- Mirrors from Belgium (AD)
- Radial Tires from Canada (CVD)
- Industrial Nitrocellulose/Various Countries (AD)
- PET Film from Korea (AD)
- Potassium Permanganate from PRC and Spain (AD, ITC)
- Color Televisions from Korea (AD)
- Televisions from Japan (AD)
- Codfish from Canada (AD)
- Barbed Wire from Brazil & Argentina (AD)
- Cased Pencils from China (AD)
- Fresh and Chilled Atlantic Salmon from Norway (AD/CVD)
- Oil Country Tubular Goods/Various Countries (AD/CVD)
- Man-made Fiber Sweaters from Korea (AD)
- Cotton Apparel from Peru (CVD)
- Cotton Sheeting and Sateen from Peru (CVD)
- Coated Groundwood Paper from France (AD)
- Flat Panel Displays from Japan (AD)
- DRAMs from Korea (AD)
- Non-alloy Carbon Steel Pipe/Various Countries (AD)
- Leaded and Bismuth Bar/Various Countries (AD)
- Flat-Rolled Carbon Steel Products/Various Countries (AD/CVD)
- Carbon Steel Pipe from Thailand (AD)
- Large Vector Supercomputers from Japan (AD)
- Rebar from Turkey, Ukraine, Latvia, Moldova, China, Belarus and Poland (AD)
- Color Picture Tubes from Korea (ITC sunset)
- Aerospace Bearings from Germany and U.K. (ITC sunset)
- Uranium from Russia, Kazakhstan and Ukraine (ITC sunset)
- Softwood Lumber from Canada (CVD)

**AD/CVD/ITC/201 Case Experience (cont.)**

- Greenhouse Tomatoes from Canada (AD)
- Gift Boxes from China (AD, ITC)
- Live Swine from Canada (AD)
- Outboard Motors from Japan (AD)
- Gift Tissue from China (ITC)
- Purified Carboxymethylcellulose/Variou Countries (AD)
- Thermal Transfer Ribbons from Korea and Japan (AD)
- Color Televisions from China (AD)
- Diamond Sawblades from Korea (AD/ITC)
- Certain Lined Paper Products from India, Indonesia, and China (AD/CVD)
- Ball Bearings from Various Countries (ITC)

### **Support for Trade Negotiations and Trade Policy Initiatives**

- Analyzed subsidies received by Chinese primary aluminum industry, in support of industry request for a WTO investigation.
- Authored two reports on subsidies received by state-owned Gulf airlines (Etihad Airways, Qatar Airways, and Emirates Airline). Assessed state contributions using WTO subsidy/countervailing duty methodologies. Quantified the level of benefits.
- Assisted in a study for a Middle Eastern government on ranking potential economic benefits of alternative Free Trade Agreements. Analyzed tariff rates and trade flows and researched economic objectives of various potential FTA partners. Created system for grading the economic benefits of various possible FTAs.
- Assisted in a study of alternative government incentive programs for green energy.
- Assisted in a study for a Middle Eastern government to assess the economic impact of various types of investment incentive programs. Built models to calculate the magnitude of incentives needed to attract investment; researched the design and implementation of incentive programs in other countries; and calculated costs of incentives to government and local industry.
- For a major study, researched and analyzed subsidies received by Chinese steel industry. Reviewed financial statements of Chinese steel producers, tracked ownership, and documented assistance programs offered by national, provincial and local governments.
- Manager of a project involving technical and strategic assistance for an important trade issue of the U.S. civil aircraft industry. Researched subsidies provided to the European civil aircraft industry through extensive review of financial statements, government reports, and other documents, and drafted suggested technical language on the phased elimination of government support.
- Directed a study of subsidies provided to the European aero engine industry. Assessed the competitive benefit of subsidization, impact on U.S. industry, and calculated magnitude of subsidies.

## Expert Witness

- Expert in a case involving alleged underpayment of IT royalties. Analyzed customs documents, bill of lading data, and shipment documentation to determine types of products being imported into the U.S. Drafted report demonstrating that imports were of products that did not contain the technology covered by the royalty agreement.
- Expert witness in a class action lawsuit involving independent truck owner operators and a major U.S. carrier. Tasks included: assistance in formulating discovery request, design and review of computer programs to compare company chargebacks to actual costs, calculation of damages, including interest, preparation of expert report, and rebuttals of expert report filed by defendants, and preparation for trial.
- Expert witness in litigation involving an antidumping claim against supercomputers from Japan. Tasks included: assistance in drafting discovery requests, analysis of documents, preparation of affidavits related to Department of Commerce decision-making procedures, and undergoing deposition by the Justice Department and defendant interveners.
- Consulting expert in an antidumping proceeding brought under the 1916 Act involving large newspaper printing presses from Germany and Japan. Tasks included: assistance in drafting discovery requests, onsite discovery, electronic analysis of sales and cost data, preparation of dumping calculations; assistance in the drafting of expert witness reports; review of reports prepared by defendants' experts, drafting of exhibits for presentation at trial, preparation of attorneys and expert witnesses for depositions and testimony.

## Customs

- Consultant for a major multinational for multiple projects related to valuation of assists. Analyzed level of expenses related to product research and development, design, software development, and other intellectual property. Researched invoicing methods and accounting practices related to IP. Prepared audit traces of expenses and calculated assist "up-lifts" for exports to various markets, including the EU, UK, Japan, Canada, and Australia. Drafted procedures manuals for ongoing assist valuations.
- Manager of a project involving tracking inputs for purposes of NAFTA country-of-origin classification. Reviewed company record-keeping procedures, developed database, and designed FIFO inventory system to track key components to shipments of finished products.
- Consultant in a matter involving U.S. customs tariff classification. Researched tariff classification of wire cloth, and obtained a reclassification which resulted in substantial recurring savings to the client.
- Consultant in a matter involving FTZ inventory tracking procedures. Analyzed inventory tracking system of client and recommended changes to ensure accuracy in reporting of country of origin, entered value, tariff classification, and applicable dumping duties.

- Also advised client on how to apply for special tariff treatment ("section 807" treatment) or a good exported from the U.S. that is transformed abroad and later reimported.
- Advised a major Japanese auto manufacturer on foreign trade subzone regulations.
- Assisted a major Korean consumer electronics manufacturer in monitoring large volume liquidation of customs entries. Developed entry database, calculated interest under-payments and over-payments, and identified short falls in refunds due company.
- Analyzed and calculated computed value for a large piece of capital equipment.

### **Export Controls**

- Director of a study which assessed the impact of export controls on U.S. business strategies. Researched three key U.S. high-tech industries, developed models of strategic decision making among global high-tech firms, and conducted lengthy interviews to assess the impact of export controls on strategic behavior.

### **Antitrust/Competitive Analysis**

- Analyzed average variable costs for a large piece of capital equipment.
- Designed a computer methodology for analyzing orders for evidence of collusion.



## Prior Employment History

Prior to joining Capital Trade, Incorporated, Mr. Anderson held the following positions.

- Senior Vice President, ICF Consulting Associates (1989-1992). Mr. Anderson was responsible for numerous international trade consulting assignments while at ICF, including Man-made Fiber Sweaters from Korea, Kiwifruit from New Zealand, and Salmon from Norway.
- Director, Trade Policy and Regulations Group, Coopers & Lybrand (1984-1989). Worked on a large number of international trade proceedings, including antidumping and countervailing duty investigations, custom issues, bilateral and multilateral trade negotiations, and export controls. Mr. Anderson also served as the liaison person for the firm's global Europe '92 strategy services.
- Policy Advisor to Import Administration, (1984) Department of Commerce's International Trade Administration, Washington, D.C. Advised Deputy Assistant Secretary for Import Administration on novel, politically sensitive, and complex issues which arose in unfair trade investigations. Performed major role in revising methodology for calculating subsidies. Represented Department of Commerce at semiannual U.S. - Brazilian trade negotiations. Participated in U.S. Customs seminars in Chicago and Seattle on U.S. trade laws. Assisted in drafting of trade laws and regulations. Monitored developments in trade activities and U.S. international competitiveness. Analyzed economic and financial performance of steel companies in Argentina, Brazil, Mexico, and South Africa.
- International Trade Analyst, (1982-1983) for Import Administration, ITA. Prepared questionnaires, analyzed responses, and calculated subsidy rates. Consulted with officials from foreign governments, attorneys, and industry and financial representatives regarding statutory requirements and analytical methods. Conducted on-site inspection of financial, sales, and production accounts in Spain, Italy, and South Africa. Worked on cases involving products from U.S., Italy, Spain, Taiwan, Korea, Canada, Brazil, and South Africa.
- Legislative Information Specialist, (1981) Office of Legislative Information, House of Representatives. Answered inquiries from Congressional staff, lobbyists, press, and the general public on pending legislation and parliamentary procedure. Researched legislative issues and kept tract of pending bills. Edited an in-house news summary of proposed legislation.

## AWARDS

- Named “*Global Elite Thought Leader*,” antidumping/economic consultants, in *Who's Who Legal, Trade and Customs*, 2018, 2019, 2020, 2021, 2022.
- Named a “*leading trade economist/antidumping consultant*” in *Who's Who Legal, Trade and Customs*, 2016, 2017

**SELECTED PUBLICATIONS/PRESENTATIONS**

- Anderson, Charles L., “Response to the Gulf Airlines Comments on Subsidies Valuations,” August 2015. Report prepared for the Partnership for Fair and Open Skies.
- Anderson, Charles L., “Evidence of Actionable Subsidies Received by Etihad Airways, Qatar Airways, and Emirates Airline,” January 2015. Report prepared for the Partnership for Fair and Open Skies.
- Anderson, Charles L., “Surviving Verification,” Presentation for International Law Institute, August 2007.
- Anderson, Charles L., “The Complete Guide to Completeness: Reconciling Reported Sales and Cost Data from the Outset of Antidumping Questionnaire Response Preparation,” International Trade Update, Georgetown University Law Center, February 2006
- Anderson, Charles L., “An Outline of Current U.S. Department of Commerce Computerized Antidumping Analysis,” International Trade Update, Georgetown University Law Center, November 1997
- Anderson, Charles L., “On Average: Pricing Comparisons Under the Revised Antidumping Law,” in The 10th Annual International Trade Update, Georgetown University Law Center, November 1995.
- Anderson, Charles L., “Revisiting Cost Analysis Under The Antidumping Law,” in Annual International Trade Update, Georgetown University Law Center, June 1994.
- Anderson, Charles L., and Sorrels, Chris, “Recent Developments in U.S. Further Manufacturing Analysis,” in Annual International Trade Update, Georgetown University Law Center, June, 1994.
- Anderson, Charles L., and Klett, Daniel W., "Apples and Oranges: The Use of Commerce Department Dumping Margins in International Trade Commission Injury Determinations" (Unpublished).
- Anderson, Charles L., and Rogers, Thomas L., "Preparing the Computerized Portions of an Antidumping Questionnaire Response," The Litigation of an Antidumping Case, Georgetown University Law Center, June, 1992.
- Anderson, Charles L., "Strategies for Minimizing Exposure to Antidumping and Countervailing Duties", U.S. Antidumping and Countervailing Duty Laws Seminar World Trade Institute, November 1988.
- Anderson, Charles L., "Using Computers in Antidumping Proceedings: "The Practitioner's Viewpoint", Seminar on the Use of Computers in Dumping Cases, Washington Bar Association, International Section, May 1988.