

Torres Trade Trump Table

Last Updated: September 4, 2025

Summary:

The table below presents a structured timeline of executive actions, policy directives, and trade-related decisions issued by President Trump's administration from January 2025 to the present. It focuses on critical areas such as tariffs, economic sanctions (OFAC), the priorities of the Department of Justice, customs regulations, and broader trade and economic policies.

The table captures significant policy shifts, including the imposition and threats of tariffs on imports from Canada, Mexico, China, and other countries; sanctions targeting individuals, international organizations, and foreign entities; and efforts to align federal agencies with an "America First" economic and diplomatic agenda. As a whole, the actions summarized below illustrate the administration's approach to trade protectionism, economic nationalism, and regulatory intervention, which has far-reaching implications for global trade relationships, U.S. businesses, and international law enforcement efforts.

TRACKER

| Date | Source | Category | Summary |
|-------------|----------------------------|-----------------|----------------------------|
| 9/2/25 | Federal Register | National | Consistent with the |
| 712123 | <u>r ederar Register</u> | Security/Export | administration's relaxing |
| | Relaxing Export Controls | Controls | of trade restrictions on |
| | for Syria | Controls | Syria, the Bureau of |
| | ioi Syma | | Industry and Security |
| | | | (BIS) has implemented |
| | | | changes to export control |
| | | | measures related to Syria |
| | | | listed in section 746.9 of |
| | | | the EAR. Since 2013, |
| | | | most items subject to the |
| | | | EAR (including EAR99 |
| | | | items) were restricted |
| | | | from export to Syria. |
| | | | BIS's final rule adds new |
| | | | or expanded license |
| | | | exception eligibility for |
| | | | exports and reexports to |
| | | | Syria and adopts more |
| | | | permissive license review |
| | | | policies for exports and |
| | | | reexports to Syria (which |
| | | | were previously subject to |
| | | | a presumption of denial). |
| 9/2/25 | Federal Register | Tariffs | The United States Trade |
| | | | Representative (USTR) |
| | Notice of Product | | announced the extension |
| | Exclusion Extensions: | | of exclusions from |
| | China's Acts, Policies, | | Section 301 tariffs for |
| | and Practices Related to | | certain products from |
| | Technology Transfer, | | China through November |
| | Intellectual Property, and | | 29, 2025. The exclusions |
| | Innovation | | were previously set to |
| | | | expire on August 31, |
| | | | 2025, pursuant to a prior |
| | | | exclusion extension |
| | | | announcement issued on |
| | | | May 31, 2025. Under the |
| | | | Section 301 action related |
| | | | to China, most Chinese- |
| | | | origin imports are subject |

| | | | to an additional tariff ranging from 7.5%-100%. |
|---------|--|-----------------------------------|---|
| 9/2/25 | Public Hearing Regarding Section 301 Investigation into Certain Acts, Policies, and Practices of Brazil | National Security/Economic Policy | The USTR announced a public hearing on September 3, 2025, for the Section 301 investigation of Brazil's acts, policies, and practices related to digital trade and electronic payment services; unfair, preferential tariffs; anticorruption enforcement; intellectual property protection; ethanol market access; and illegal deforestation. The hearing took place in Washington, D.C., and a full transcript of the hearing will be posted on ustr.gov. |
| 8/29/25 | Department of Justice Departments of Justice and Homeland Security Partnering on Cross- Agency Trade Fraud Task Force | Enforcement | The DOJ announced its implementation of a Trade Fraud Task Force to pursue enforcement actions against parties that seek to evade U.S. tariffs and import duties and that engage in smuggling activities.* The Task Force will involve personnel from the DOJ's Civil and Criminal divisions as well as the Department of Homeland Security (DHS). The Task Force will focus on investigating and prosecuting violations of U.S. customs laws and may pursue civil actions under the Tariff Act of 1930 or False Claims Act (FCA) as well as criminal |

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| | | | actions under federal |
| | | | statutes. |
| | | | |
| | | | *A Trade Fraud Task |
| | | | Force previously existed |
| | | | under the Biden |
| | | | Administration and was |
| | | | involved in several |
| | | | customs-related |
| | | | enforcement actions |
| | | | including the Ford Motor |
| | | | |
| | | | Company settlement |
| | | | announced on March 11, |
| 0 /5 0 /5 7 | 77.1.1.7 | | 2024. |
| 8/29/25 | <u>United States Court of</u> | Tariffs | On August 29, 2025, the |
| | Appeals for the Federal | | Court of Appeals for the |
| | <u>Circuit</u> | | Federal Circuit (CAFC) |
| | | | issued a decision in one of |
| | Case No. 25-1812 | | the leading cases |
| | | | challenging the validity of |
| | V.O.S. Selections, Inc. v. | | President Trump's tariffs. |
| | Trump | | The CAFC affirmed the |
| | _ | | Court of International |
| | | | Trade's (CIT) previous |
| | | | decision finding that the |
| | | | President's reciprocal and |
| | | | fentanyl tariff actions |
| | | | exceeded his authority |
| | | | under the International |
| | | | Emergency Economic |
| | | | Powers Act (IEEPA). The |
| | | | CAFC has remanded the |
| | | | case back to the CIT to |
| | | | |
| | | | decide whether a |
| | | | nationwide injunction of |
| | | | the tariff actions is lawful |
| | | | and whether only parties |
| | | | to the case (as opposed to |
| | | | all importers) may receive |
| | | | refunds for tariff |
| | | | payments. The CAFC |
| | | | paused any action to be |
| | | | taken pursuant to its |
| | | | invalidation of the tariffs |
| | | | until October 14, 2025. |
| | | | Therefore, tariffs under |

| | | | the subject actions will continue to be collected by CBP. On September 3, 2025, the government submitted a petition to the Supreme Court requesting expedited review of the case. As such, it is possible for the tariff actions to remain in effect even after the CAFC's October 14 deadline. |
|---------|---|-------------------------|--|
| 8/25/25 | Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Wind Turbines and Their Parts and Components | Economic Policy/Tariffs | On August 13, 2025, the Secretary of Commerce initiated an investigation under Section 232 of the Trade Expansion Act of 1962 to determine the national security impact of imports of wind turbines and their parts and components. Interested parties may submit comments to the Department of Commerce Bureau of Industry and Security (BIS) for consideration in the investigation. The deadline to submit comments is September 9, 2025. This investigation may result in the implementation of new tariffs on wind turbine products from all countries. |
| 8/21/25 | White House Joint Statement on a United States-European Union Framework on an Agreement on Reciprocal, Fair, and Balanced Trade | Economic Policy/Tariffs | The U.S. and EU announced a framework agreement on trade relations that sets forth tariff rate expectations and terms to be considered by the two countries in future negotiations. The |

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| | | | framework agreement |
| | | | states the U.S. will apply |
| | | | the higher of the U.S. |
| | | | Most Favored Nation |
| | | | (MFN) rate or a 15% |
| | | | tariff rate on most EU- |
| | | | |
| | | | origin imports. |
| | | | Additionally, the U.S. will |
| | | | only apply the MFN tariff |
| | | | rate to certain unavailable |
| | | | natural resources, aircraft |
| | | | and aircraft parts, and |
| | | | pharmaceutical products. |
| | | | In addition, EU-origin |
| | | | products that are subject |
| | | | to certain Section 232 |
| | | | tariffs including |
| | | | pharmaceuticals, lumber, |
| | | | semiconductors, and |
| | | | |
| | | | automobiles, will be |
| | | | subject to a 15% total |
| | | | tariff rate. The framework |
| | | | suggests that the two |
| | | | countries will engage in |
| | | | future negotiations |
| | | | regarding additional |
| | | | products that are or may |
| | | | become subject to Section |
| | | | 232 tariffs including steel, |
| | | | aluminum, and derivative |
| | | | products. |
| 8/19/25 | USTR | Forced Labor | The United States Trade |
| 0/13/43 | <u>USIK</u> | roiceu Laudi | Representative (USTR) |
| | Fanca d Laban | | |
| | Forced Labor | | published annual updates |
| | Enforcement Task Force | | to the "Strategy to Prevent |
| | Release of the 2025 | | the Importation of Goods |
| | Update to the UFLPA | | Mined, Produced, or |
| | Strategy | | Manufactured with |
| | | | Forced Labor in the |
| | | | People's Republic of |
| | | | China." This strategy |
| | | | details the inter-agency |
| | | | efforts to support and |
| | | | pursue enforcement of the |
| | | | Uyghur Forced Labor |
| | | | Prevention Act (UFLPA). |
| <u> </u> | | | I Tevention Act (OTLFA). |

| The 2025 and atom | |
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| The 2025 updates | |
| highlight the addition | of |
| 78 new entities to the | |
| UFLPA Entity List si | nce |
| 2024, effectively | |
| expanding the numbe | r of |
| Chinese parties whose | |
| goods are subject to the | |
| forced labor rebuttabl | |
| presumption and | |
| prohibited from entry | into |
| the U.S. In addition, t | |
| | |
| updates highlight new | |
| priority sectors for for | rcea |
| labor enforcement | |
| including in steel, cop | |
| and lithium industries | • |
| 8/19/25 White House Export Controls The White House | |
| announced the signing | - |
| Congressional Bill H.R. Congressional Bill H.R. 1216 Of interior | <u>K.</u> |
| 1316 Signed into Law 1316 (Maintaining | 1 |
| American Superiority | - |
| Improving Export Co | |
| Transparency Act) in | |
| law. The Act amends | |
| Export Control Refor | |
| Act of 2018 to require | |
| Secretary of Commer | ce to |
| report annually to | |
| Congress on license | |
| applications received | for |
| the export of dual-use | ; |
| items. | |
| 8/15/25 White House Economic Policy On August 15, 2025, | the |
| Office of Managemer | ıt |
| The Office of Federal and Budget's Office of | of |
| Procurement Policy Federal Procurement | |
| Launches Landmark Policy launched an up | date |
| Update to FAR, Ushering to the Federal Acquis | ition |
| in a New Era for Regulation (FAR) in | |
| Commercial Buying pursuance of the | |
| Revolutionary FAR | |
| Overhaul (RFO), whi | ch is |
| meant to return the FA | |
| to its statutory roots. | |
| action authorizes agei | |

to immediately begin deleting one-third of requirements from their future contracts not required by statute or executive orders and having little to do with contract outcomes in order to better leverage commercially-available solutions. The Office of Federal Procurement Policy (OFPP) and the FAR Council are releasing the FAR Companion Guide, Practitioner's Albums, and Category Guide to provide tips and tools regarding the FAR. OFPP is now also directing agencies to use government-wide contracts for common commercial products and services including "bestin-class" and "preferred" contracts, rather than maintaining their own contracts, and OFPP will create the criteria to qualify contracts as "bestin-class" for mandatory use. OFPP also has eliminated outdated procedures and consolidated key procedures under a modernized FAR Part 8, retired FAR parts 38 and 51, centralized information and supply chain security policies into a single FAR part, and imposed changes to make sign up and

| | | | maintenance of |
|---------|-------------------------|-------------------|---|
| | | | |
| | | | registration easier for |
| 0/10/07 | **** | 37 10 | contractors. |
| 8/13/25 | White House | National Security | President Trump issued an |
| | | | executive order to |
| | Enabling Competition in | | enhance America's space |
| | the Commercial Space | | industry by streamlining |
| | Industry | | commercial license and |
| | | | permit approval processes |
| | | | for U.S. operators. It |
| | | | directs the Secretary of |
| | | | Transportation to use all |
| | | | available authorities to |
| | | | eliminate and expedite the |
| | | | Department of |
| | | | Transportation's |
| | | | environmental reviews |
| | | | and other obstacles to the |
| | | | granting of launch and |
| | | | reentry licenses and |
| | | | permits. The Secretary of |
| | | | Transportation will |
| | | | reevaluate, amend, or |
| | | | rescind the regulations at |
| | | | Part 450 of title 14, Code |
| | | | of Federal Regulations as |
| | | | appropriate and will |
| | | | report a description of |
| | | | actions taken within 120 |
| | | | days of this order. The |
| | | | Secretary of Defense, the |
| | | | Secretary of the Interior, |
| | | | the Secretary of |
| | | | Transportation, and the |
| | | | Administrator of NASA |
| | | | will also expedite |
| | | | environmental and |
| | | | administrative review |
| | | | activity relevant to |
| | | | |
| | | | spaceport infrastructure development. The Chair |
| | | | of the Council on |
| | | | |
| | | | Environmental Quality |
| | | | will also establish new |
| | | | categorical exclusions |
| | | | under the National |

| | | | Environmental Policy Act |
|---------|-----------------------|--------------------------|-----------------------------|
| | | | (NEPA) for spaceport |
| | | | development actions that |
| | | | do not typically have a |
| | | | significant effect on the |
| | | | quality of the human |
| | | | environment. |
| | | | Additionally, the |
| | | | Secretary of Commerce |
| | | | will propose a process for |
| | | | individualized mission |
| | | | authorizations for |
| | | | activities covered by |
| | | | Article VI of the Outer |
| | | | |
| | | | Space Treaty of 1967. The |
| | | | Secretary of |
| | | | Transportation will create |
| | | | a position in the Office of |
| | | | the Secretary to advise the |
| | | | Secretary of |
| | | | Transportation on |
| | | | fostering innovation and |
| | | | deregulation in the |
| | | | commercial space |
| 0/12/25 | XX71 *. XX | | transportation industry. |
| 8/13/25 | White House | Economic | President Trump issued an |
| | | Policy/National Security | executive order focused |
| | Ensuring American | | on restocking the |
| | Pharmaceutical Supply | | domestic reserve of |
| | Chain Resilience by | | Active Pharmaceutical |
| | Filling the Strategic | | Ingredients (APIs). It |
| | Active Pharmaceutical | | directs the Office of the |
| | Ingredients Reserve | | Assistant Secretary for |
| | | | Preparedness and |
| | | | Response (ASPR) to |
| | | | develop a list of |
| | | | approximately 26 drugs |
| | | | critical to national health |
| | | | and security (the "critical |
| | | | drugs") and an accounting |
| | | | of funds that can be used |
| | | | to prepare and open the |
| | | | Strategic Active |
| | | | Pharmaceutical |
| | | | Ingredients Reserve |
| 1 | | | (SAPIR) within 30 days. |

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| | | | The order also directs the |
| | | | ASPR to obtain and |
| | | | maintain a six-month |
| | | | supply of the critical |
| | | | drugs. Within 120 days, |
| | | | ASPR should ready the |
| | | | existing SAPIR repository |
| | | | to be able to receive and |
| | | | maintain APIs, and ASPR |
| | | | |
| | | | will obtain the six-month |
| | | | supply of APIs when the |
| | | | funds are available and |
| | | | place them in the |
| | | | repository no later than 30 |
| | | | days after the repository is |
| | | | ready. Within 90 days, the |
| | | | ASPR will provide certain |
| | | | offices and officials with |
| | | | an update to 2022 list of |
| | | | 86 essential medicines |
| | | | and medical |
| | | | countermeasures and a |
| | | | plan to obtain (from |
| | | | domestic manufacturing |
| | | | when possible), store, and |
| | | | maintain a six-month |
| | | | supply of APIs for the |
| | | | |
| | | | updated medicine list |
| | | | when necessary. The plan |
| | | | should also include a cost |
| | | | estimate and a proposal |
| | | | for a second SAPIR |
| | | | repository within a year. |
| 8/11/25 | White House | Economic Policy/Tariffs | President Trump issued an |
| | | | executive order extending |
| | Further Modifying | | the suspension of |
| | Reciprocal Tariff Rates | | heightened tariffs on |
| | to Reflect Ongoing | | Chinese-origin imports. |
| | Discussions With the | | The Order states that the |
| | People's Republic of | | continuing pause on the |
| | China | | heightened tariffs is due |
| | | | to China's ongoing |
| | | | participation in trade |
| | | | negotiations with the U.S. |
| | | | during which China has |
| | | | taken "significant steps" |
| | | | taken signineant steps |

| 015/05 | | | to remedy economic and national security concerns of the U.S. Pursuant to this Order, the reciprocal tariff rate for Chinese-origin imports will remain at 10% until November 10, 2025. For more information, visit the White House Fact Sheet here. |
|--------|--|-------------------------|--|
| 8/6/25 | White House Addressing Threats to the United States by the Government of the Russian Federation | Economic Policy/Tariffs | President Trump issued an executive order implementing a 25% tariff on Indian-origin imports to go into effect on August 27, 2025. The new tariff is a response to India's continued importation of Russian oil, both directly and indirectly. The order cites the Russia-Ukraine conflict as the source of concern and emphasizes the continued threat Russia poses to U.S. national security and foreign policy objectives. The 25% tariff on Indianorigin products imposed under this order will stack with the other applicable duties, unless the subject products are subject to tariffs under Section 232 of the Trade Expansion Act (e.g., product-specific tariffs on automobiles, auto parts, steel and aluminum, and copper, etc.) in which case the 25% additional tariff will not apply. The Secretary of State will recommend additional necessary |

| | | | action to be taken in |
|--------|---------------------------|-----------------|-----------------------------|
| | | | |
| | | | response to any retaliation |
| | | | from Russia or other |
| | | | countries. The Secretary |
| | | | of Commerce will lead |
| | | | continuous monitoring |
| | | | efforts to determine |
| | | | whether other countries |
| | | | are similarly importing |
| | | | Russian oil and |
| | | | recommend imposition of |
| | | | a 25% tariff on articles of |
| | | | such countries. A White |
| | | | House Fact Sheet on this |
| | | | topic is available here. |
| 8/4/25 | White House | Economic Policy | President Trump has |
| | | j | released more information |
| | President Trump | | on the demands the |
| | Demands America First | | administration has for |
| | Prescription Drug Pricing | | pharmaceutical companies |
| | Trescription Brug Triemg | | and the subsequent letters |
| | | | sent to the 17 leading |
| | | | pharmaceutical |
| | | | companies. This follows |
| | | | the fact sheet here |
| | | | outlining the President's |
| | | | _ |
| | | | plan to bring down |
| | | | prescription drug prices |
| | | | for American consumers |
| | | | to match the lowest price |
| | | | offered in other developed |
| | | | countries (the most- |
| | | | favored-nation or MFN |
| | | | price). The letters outline |
| | | | demands to complete in |
| | | | 60 days, including |
| | | | lowering drug prices to |
| | | | match MFN pricing, |
| | | | raising prices |
| | | | internationally, and |
| | | | reinvesting any increased |
| | | | revenue into lowering |
| | | | prices for American |
| | | | consumers. The letters ask |
| | | | for binding commitments |
| | | | by the recipient countries |

| | | | to align with the |
|---------|--|-------------------------|---|
| | | | to align with the administration's |
| | | | |
| | | | prescription drug pricing |
| | | | goals by September 29, |
| 7/21/25 | | T. : CC | 2025. |
| 7/31/25 | U.S. Court of Appeals for | Tariffs | On July 31, 2025, the U.S. |
| | the Federal Circuit | | Court of Appeals for the |
| | | | Federal Circuit heard oral |
| | Case No. 25-1812 | | arguments in one of the |
| | | | major cases challenging |
| | V.O.S. Selections, Inc. v. | | the validity of President |
| | Trump | | <u> </u> |
| | | | under IEEPA. This case is |
| | | | currently on appeal |
| | | | following a decision by |
| | | | the Court of International |
| | | | Trade (CIT) to enjoin the |
| | | | tariff actions. The |
| | | | government quickly |
| | | | appealed the CIT's |
| | | | decision and requested a |
| | | | stay to halt the enjoinment |
| | | | of the tariffs while the |
| | | | appeal is pending. The |
| | | | Court of Appeals is |
| | | | expected to issue a |
| | | | decision in this case in the |
| | | | coming weeks which is |
| | | | likely to be followed by |
| | | | an appeal and eventual |
| | | | escalation to the U.S. |
| | | | Supreme Court. |
| 7/31/25 | White House | Economic Policy/Tariffs | President Trump issued an |
| | | | executive order increasing |
| | Amendment to Duties to | | duties on Canadian-origin |
| | Address the Flow of | | _ |
| | Illicit Drugs Across Our | | under Executive Order |
| | Northern Border | | 14193 of February 1, |
| | | | 2025, to address the |
| | | | declared national |
| | | | |
| | | | |
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| 7/31/25 | White House Amendment to Duties to Address the Flow of Illicit Drugs Across Our | Economic Policy/Tariffs | following a decision by the Court of International Trade (CIT) to enjoin the tariff actions. The government quickly appealed the CIT's decision and requested a stay to halt the enjoinmen of the tariffs while the appeal is pending. The Court of Appeals is expected to issue a decision in this case in the coming weeks which is likely to be followed by an appeal and eventual escalation to the U.S. Supreme Court. President Trump issued ar executive order increasing duties on Canadian-origin imports initially imposed under Executive Order 14193 of February 1, 2025, to address the |

| | | I | |
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| | | | Canadian-origin products |
| | | | from 25% to 35%, while |
| | | | specified Canadian-origin |
| | | | energy products remain |
| | | | subject to a 10% tariff |
| | | | rate. The order cites |
| | | | several reasons for the |
| | | | tariff increase including |
| | | | Canada's failure to |
| | | | |
| | | | cooperate with efforts to |
| | | | stem the flow of fentanyl |
| | | | across the northern |
| | | | border, it's failure to |
| | | | adequately devote |
| | | | resources to address drug |
| | | | trafficking and other |
| | | | criminal activity, and |
| | | | Canada's implementation |
| | | | of retaliatory measures |
| | | | against the U.S. following |
| | | | the President's tariff |
| | | | actions. Any goods |
| | | | transshipped to evade the |
| | | | application of duties |
| | | | under this order will be |
| | | | subject to a 40% tariff rate |
| | | | in addition to other |
| | | | applicable duties, fines, or |
| | | | penalties. The increased |
| | | | tariff rates under this |
| | | | |
| | | | order will go into effect |
| | | | on August 1, 2025. For |
| | | | more information, see the |
| | | | White House Fact Sheet |
| 5/21/25 | **** | . D 1: /D :00 | on this topic <u>here</u> . |
| 7/31/25 | White House | Economic Policy/Tariffs | President Trump issued an |
| | | | executive order revising |
| | Further Modifying the | | reciprocal tariff rates first |
| | Reciprocal Tariff Rates | | announced on April 2, |
| | | | Liberation Day. Annex I |
| | | | of the order provides |
| | | | country-specific tariff |
| | | | rates that go into effect |
| | | | August 7, 2025. Notably, |
| | | | EU-origin products will |
| | | | only face up to a 15% |
| | | <u>l</u> | J 1855 ap 30 a 10 / 0 |

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| | | | total tariff rate under the |
| | | | new order. Other |
| | | | countries listed in Annex I |
| | | | will be subject to |
| | | | additional tariff rates |
| | | | ranging from 10%- 41%. |
| | | | Countries not listed in |
| | | | Annex I of the order |
| | | | remain subject to a |
| | | | baseline 10% tariff rate. |
| | | | Importantly, this order |
| | | | does not modify the |
| | | | reciprocal tariff rate for |
| | | | Chinese-origin goods set |
| | | | forth in E.O. 14298 from |
| | | | May 12, 2025. Items |
| | | | determined by CBP to be |
| | | | transshipped through third |
| | | | countries to avoid |
| | | | application of tariffs will |
| | | | face an additional 40% |
| | | | tariff as well other |
| | | | applicable duties and |
| | | | appropriate fines or |
| | | | penalties. CBP will not |
| | | | permit mitigation or |
| | | | remission of the penalties. |
| | | | The Secretaries of |
| | | | Homeland Security and |
| | | | Commerce through the |
| | | | Commissioner of CBP |
| | | | will issue a list of |
| | | | countries and facilities |
| | | | used in circumvention |
| | | | schemes and update this |
| | | | list every 6 months to |
| | | | assist with commercial |
| | | | due diligence efforts. |
| 7/30/25 | White House | Economic Policy/Tariffs | President Trump issued an |
| | | | executive order raising the |
| | Addressing Threats to | | tariff rate on Brazil to a |
| | The United States by | | total of 50% starting |
| | The Government of | | August 7. The order cites |
| | Brazil | | the trial of former |
| | | | Brazilian president |
| | | | Bolsonaro as a cause, |

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| | | | calling it unjust political |
| | | | persecution. The order |
| | | | also cites the treatment of |
| | | | U.S. online platforms as a |
| | | | cause, stating that actions |
| | | | by Brazilian officials |
| | | | facilitate persecution of |
| | | | political critics and |
| | | | censorship of U.S. |
| | | | persons. The order |
| | | | specifically brings up |
| | | | Judge Alexandre de |
| | | | Moraes as an authority |
| | | | figure abusing his power |
| | | | in Brazil. The order states |
| | | | that the rate will be raised |
| | | | should Brazil retaliate. |
| | | | The tariff will stack and |
| | | | won't apply to imports |
| | | | excepted by 50 U.S.C. |
| | | | 1702(b) or set forth in |
| | | | Annex I to this order |
| | | | |
| | | | including precious metals and civil aircraft and its |
| | | | |
| | | | parts and components. For |
| | | | more information, visit |
| 7/20/25 | W/leita Hanna | Essentia Daliary/Taviffa | here. |
| 7/30/25 | White House | Economic Policy/Tariffs | President Trump issued an |
| | Communa 1: una Donton France | | executive order revising |
| | Suspending Duty Free | | previous executive orders |
| | De Minimis Treatment | | on the suspension of de |
| | for All Countries | | minimis treatment for |
| | | | imports from Canada, |
| | | | Mexico, and China and |
| | | | suspending de minimis |
| | | | treatment for imports |
| | | | from all foreign countries. |
| | | | Effective August 29, |
| | | | 2025, all shipments, even |
| | | | those that would have |
| | | | previously qualified for |
| | | | duty-free <i>de minimis</i> |
| | | | treatment will be subject |
| | | | to a tariff equal to the |
| | | | IEEPA tariff rate |
| | | | (reciprocal tariff) |

| | | | applicable to items |
|---------|------------------------|-------------------------|----------------------------------|
| | | | originating from the |
| | | | respective country. For 6 |
| | | | months after the |
| | | | implementation of the de |
| | | | <i>minimis</i> suspension, items |
| | | | shipped via the |
| | | | international postal |
| | | | system may alternatively |
| | | | be subject to specific duty |
| | | | rates based on the country |
| | | | - |
| | | | of origin of the subject |
| | | | items. Under this method, |
| | | | a package shipped from a |
| | | | country with an IEEPA |
| | | | duty rate of less than 16% |
| | | | will be subject to an \$80 |
| | | | duty per item, a package |
| | | | shipped from a country |
| | | | with an IEEPA duty rate |
| | | | between 16-25% will be |
| | | | subject to a \$160 duty per |
| | | | item, and a package |
| | | | shipped from a country |
| | | | with an IEEPA duty rate |
| | | | above 25% will be subject |
| | | | to a \$200 duty per item. |
| | | | After 6 months, all items |
| | | | will be subject to the |
| | | | IEEPA tariff rate |
| | | | associated with the |
| | | | subject country of origin. |
| 7/30/25 | White House | Economic Policy/Tariffs | The White House has |
| | | | issued a proclamation |
| | Adjusting Imports of | | implementing tariffs on |
| | Copper Into The United | | copper imports. This |
| | States | | follows a Section 232 |
| | | | investigation and report |
| | | | on the impacts of imports |
| | | | of all copper, which found |
| | | | that such imports and its |
| | | | quantities impact national |
| | | | security and weaken the |
| | | | U.S. economy and |
| | | | domestic production. |
| | | | Semi-finished copper and |
| | | | senii-misneu copper and |

intensive copper imports will face a 50% tariff rate when being imported to the U.S. This tariff rate goes into effect on August 1 and will stack. The Secretary of Commerce ("the Secretary") will determine if modifications to the HTSUS are necessary and within 90 days will create an inclusion process for additional copper derivatives. This tariff will only apply to the copper content in an import, and non-copper content will instead face tariffs it would normally be subject to. The CBP will issue authoritative guidance to mandate strict compliance with declaration requirements for copper content. This guidance will also outline the maximum penalties for noncompliance, which can include criminal liability, loss of import privileges, and large monetary penalties. The proclamation notes that importers with underreported declarations may face severe consequences. Imports subject to both this tariff and the tariff on automobiles and auto parts will only be subject to the tariffs on automobiles and auto parts. Additionally, the Secretary will implement

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| | | | the domestic sales |
| | | | requirements for copper |
| | | | input materials and high- |
| | | | quality copper scrap |
| | | | material that the Secretary |
| | | | recommended in the |
| | | | report. |
| 7/28/25 | White House | Economic Policy/Tariffs | The White House issued a |
| 1120123 | winte House | Leonomic Toney/Tarms | statement on the details of |
| | East Chast. The United | | the U.SEU trade deal. |
| | Fact Sheet: The United | | |
| | States and European | | Under the agreement, the |
| | Union Reach Massive | | EU will be subject to a |
| | Trade Deal | | 15% tariff rate, including |
| | | | on certain products |
| | | | covered by Section 232 |
| | | | tariffs like |
| | | | semiconductors, |
| | | | pharmaceuticals, |
| | | | automobiles, and auto |
| | | | parts. The White House |
| | | | = |
| | | | statement also provides |
| | | | that the EU is to invest in |
| | | | certain U.S. industries and |
| | | | negotiate with the U.S. to |
| | | | secure supply chains for |
| | | | other products covered by |
| | | | Section 232 tariffs |
| | | | including copper and |
| | | | derivative products. The |
| | | | EU is set to address U.S. |
| | | | concerns over access to |
| | | | certain UK markets by |
| | | | reducing non-tariff |
| | | | S |
| | | | barriers impacting U.S. |
| | | | industrial and agricultural |
| | | | exports. The U.S. and the |
| | | | E.U. will work together to |
| | | | strengthen national |
| | | | security to protect supply |
| | | | chains, establish strong |
| | | | rules of origin to address |
| | | | transshipping concerns, |
| | | | and to address unjustified |
| | | | digital service barriers. In |
| | | | regards to digital trade, |
| | | | |
| | | | the White House |

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| | | | statement indicates that |
| | | | the EU will not adopt or |
| | | | maintain network usage |
| | | | fees, and neither country |
| | | | will impose duties on |
| | | | electronic transmissions. |
| | | | |
| | | | Notably, this agreement is |
| | | | not final and must be |
| | | | approved by EU member |
| | | | states. |
| 7/23/25 | White House | Economic Policy | President Trump issued an |
| | | | executive order focused |
| | Promoting The Export of | | on supporting the |
| | The American | | development and |
| | AI Technology Stack | | deployment of American |
| | | | full-stack AI support |
| | | | packages by directing the |
| | | | Secretary of Commerce to |
| | | | <u> </u> |
| | | | establish and implement |
| | | | the American AI Exports |
| | | | Program (Program) within |
| | | | 90 days. Commerce will |
| | | | issue a public call for |
| | | | proposals from industry |
| | | | groups for inclusion in the |
| | | | program. Each proposal is |
| | | | required to include a full- |
| | | | stack AI technology |
| | | | package, identification of |
| | | | target regions for export, a |
| | | | |
| | | | description of the business |
| | | | and operation plan for the |
| | | | AI data centers and |
| | | | associated infrastructure, |
| | | | and certification of |
| | | | compliance with U.S. |
| | | | export control and |
| | | | outbound investment |
| | | | laws. Additionally, the |
| | | | Economic Diplomacy |
| | | | Action Group (EDAG) |
| | | | will mobilize federal |
| | | | financing tools to support |
| | | | |
| | | | the prioritization of AI |
| | | | export packages. The |
| | | | Secretary of State, in |

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| | | | consultation with EDAG, will also be responsible for activities to aid in the advancement of U.S. AI exports including by developing and executing a unified federal strategy on AI exports and reviewing market access and trade barriers that |
| | | | may impact U.S. exports. |
| 7/23/25 | Fact Sheet: President Donald J. Trump Secures Unprecedented U.S.— Japan Strategic Trade and Investment Agreement | Economic Policy/Tariffs | Following an announcement by President Trump, the White House issued a Fact Sheet providing an overview of key aspects of a new trade agreement reached between the U.S. and Japan. Under this agreement, imports of Japanese-origin products will be subject to a "baseline" 15% tariff rate. The Fact Sheet states that Japan will invest \$550 billion to help with the rebuilding and expansion of key American industry sectors including in the energy infrastructure, semiconductor manufacturing and research, pharmaceutical and medical production, shipbuilding, and critical mineral mining, processing, and refining. The framework also provides that Japan will increase its purchase and import of certain U.Sorigin products, commercial aircraft and |

| | | | defense equipment, ant |
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| | | | automobiles. |
| 7/22/25 | White House | Economic Policy/Tariffs | The White House issued a |
| 1122123 | willte House | Economic Foney/ Furing | formal statement |
| | Joint Statement on | | announcing a new |
| | Framework for United | | _ |
| | | | preliminary trade |
| | States-Indonesia | | agreement between the |
| | Agreement on Reciprocal | | U.S. and Indonesia. The |
| | Trade | | announcement provides |
| | | | an overview of the |
| | | | "Framework" the two |
| | | | countries have agreed |
| | | | upon to serve as the |
| | | | foundation for future |
| | | | negotiations and trade |
| | | | relations. Importantly, the |
| | | | Framework provides that |
| | | | imports of Indonesian- |
| | | | origin products into the |
| | | | U.S. will be subject to a |
| | | | 19% tariff rate that may |
| | | | be further reduced for |
| | | | certain commodities not |
| | | | naturally available in the |
| | | | U.S. Indonesia is also set |
| | | | to eliminate |
| | | | "approximately 99 percent |
| | | | of tariff barriers" that |
| | | | impact a wide-range of |
| | | | U.S. exports. Indonesia |
| | | | and the U.S. will continue |
| | | | |
| | | | to work together to further |
| | | | decrease non-tariff trade |
| | | | barriers in Indonesia that |
| | | | impact bilateral trade and |
| | | | investment between the |
| | | | two countries such as |
| | | | Indonesian. These efforts |
| | | | may include amending |
| | | | Indonesian requirements |
| | | | related to local content |
| | | | standards for imports, |
| | | | motor vehicle safety and |
| | | | emissions standards, |
| | | | labeling requirements, and |
| | | | pharmaceutical marketing |

| | | | authorization requirements. The Framework also states that Indonesia will work to address concerns related to intellectual property protections detailed in the USTR's Special 301 Report. Other |
|---------|--|-----------------------------------|--|
| | | | key areas addressed in the Framework include the lowering of Indonesian barriers to digital trade, services, and investment; the strengthening of environmental protections and labor rights in Indonesia; and the removal of Indonesian restrictions impacting U.S. exports of industrial products and critical minerals. To see the accompanying White House Fact Sheet on this topic, visit here. |
| 7/16/25 | Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Polysilicon and its Derivatives | National Security/Economic Policy | The Department of Commerce has issued a notice of request for public comments on the Section 232 investigation into the national security impacts of imports of polysilicon and derivative products. This investigation was initiated on July 1, 2025, pursuant to Section 232 of the Trade Expansion Act of 1962. Commerce is seeking public comments on a variety of topics related to polysilicon imports including the |

| 7/16/25 | Federal Register Section 232 National Security Investigation of Imports of Unmanned Aircraft Systems and Their Parts and Components | National Security/Economic Policy | these products, domestic production capacities, the role of foreign supply chains in meeting U.S. demand, the concentration of U.S. imports from a small number of polysilicon suppliers and associated risks, and the impact of predatory trade practices and foreign government subsidies on competition. Interested parties may now submit comments to BIS's Office of Strategic Industries and Economic Security for consideration until August 6, 2025. The Department of Commerce has issued a notice of request for public comments on the Section 232 investigation into imports of unmanned aircraft systems (UAS) and their parts and components. This investigation was initiated on July 1, 2025, pursuant |
|---------|--|---|---|
| | Imports of Unmanned Aircraft Systems and Their Parts and | | into imports of unmanned aircraft systems (UAS) and their parts and components. This |
| | | | relevant departments to take actions to assist with the promotion of the U.S. drone industry. Commerce seeks commentary on a variety of topics related to UAS imports including the |

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| | | | current and projected |
| | | | demand in the U.S., |
| | | | domestic production |
| | | | capacities for UAS, the |
| | | | role of foreign supply |
| | | | chains in meeting U.S. |
| | | | demand, the concentration |
| | | | of U.S. imports from a |
| | | | small number of suppliers |
| | | | or foreign nations and |
| | | | associated risks, the |
| | | | feasibility of increasing |
| | | | domestic production |
| | | | capacity for UAS, the |
| | | | impact of predatory trade |
| | | | practices and foreign |
| | | | government subsidies on |
| | | | trade competition, and the |
| | | | impact of current |
| | | | domestic policies on |
| | | | domestic UAS |
| | | | production. Interested |
| | | | parties have until August |
| | | | 6, 2025, to submit their |
| | | | comments to BIS's Office |
| | | | of Strategic Industries and |
| | | | Economic for |
| | | | consideration. |
| 7/15/25 | Federal Register | Economic Policy | The USTR has announced |
| 7/13/23 | rederar Register | Leononne i oney | a Section 301 |
| | Initiation of Section 301 | | investigation, following |
| | Investigation: Brazil's | | President Trump's |
| | Acts, Policies, and | | direction, of the acts, |
| | Practices Related to | | - |
| | | | policies, and practices of |
| | Digital Trade and | | Brazil in relation to digital trade and electronic |
| | Electronic Payment Services; Unfair, | | |
| | | | payment services |
| | Preferential Tariffs; Anti- | | undermining the |
| | Corruption Enforcement; | | competitiveness of U.S. |
| | Intellectual Property | | companies, preferential |
| | Protection; Ethanol | | tariffs leading to unfair |
| | Market Access; and | | treatment of U.S. exports |
| | Illegal Deforestation; | | to Brazil, IP protections, |
| | Hearing; and Request for | | the anti-corruption |
| | Public Comments | | enforcement, ethanol |
| | | | market policies that |

| 7/9/25 | Federal Register | U.S. Economic | disadvantage the U.S., and illegal deforestation impacting U.S. lumber exports. Interested parties are invited to submit comments on the topics listed above to the USTR for consideration by August 18, 2025. At the conclusion of the USTR's investigation, which includes consideration of public comments and completion of public hearing procedures, the USTR may determine that certain actions, such as the implementation of additional tariffs, must be taken to address the negative impacts of Brazil's acts, policies, and practices. OFAC has published a list |
|--------|-------------------------|---------------|---|
| | Publication of Global | Sanctions | of General Licenses (GLs) regarding transactions |
| | Terrorism Sanctions | | involving Ansarallah |
| | Regulations and Foreign | | (otherwise known as the |
| | Terrorist Organizations | | Houthis), which has been |
| | Sanctions Regulations | | designated as a foreign |
| | Web General Licenses | | terrorist organization |
| | 22A, 23A, 24A, 25A, | | since January 22, 2025. |
| | 26A, and 28A | | Several GLs are detailed and provide authorization |
| | | | for transactions involving |
| | | | the following: agriculture, |
| | | | medical care, technology, |
| | | | communication, personal |
| | | | and noncommercial |
| | | | remittances, refined petroleum, necessary |
| | | | airport and port |
| | | | operations, and third party |
| | | | diplomatic and consular |
| | | | missions. Outside of these |
| | | | authorizations, such |

| 7/7/05 | White Have | Tariff | transactions are prohibited by the Foreign Terrorist Organizations Sanctions Regulations and the Global Terrorism Sanctions Regulations. Financial transfers involving Ansarallah, or any entity in which Ansarallah owns, directly or indirectly, a 50% or greater interest, remain prohibited. |
|--------|---|---------|--|
| 7/7/25 | Extending The Modification of the Reciprocal Tariff Rates | Tariffs | President Trump issued an Executive Order delaying the date country-specific tariff rates are to go into effect until August 1, 2025. The country-specific tariff rates originally announced on April 2, 2025, were previously delayed for 90 days and set to go into effect on July 9, 2025, under Executive Order 14266 ("Modifying Reciprocal Tariff Rates to Reflect Trading Partner Retaliation and Alignment"). Under this most recent Order, a 10% baseline reciprocal tariff rate will remain in place for all countries other than China until August 1, 2025, when specific rates are implemented. This Order does not impact the 10% reciprocal tariff on China which remains in effect under Executive Order 14298 until August 12, 2025, or the 20% tariff on Chinese goods implemented in response |

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| | | | to China's synthetic |
| | | | opioid supply chain. In |
| | | | the meantime, the |
| | | | President is issuing letters |
| | | | to countries previewing |
| | | | what their tariff rate will |
| | | | become on August 1. For |
| | | | more information, visit |
| | | | the White House Fact |
| | | | Sheet here. |
| 7/1/25 | Federal Register | U.S. Economic | OFAC has issued |
| //1/23 | rederar Register | Sanctions | |
| | International Criminal | Sanctions | regulations to implement the International Criminal |
| | | | |
| | Court-Related Sanctions | | Court-Related sanctions |
| | Regulations | | authorized under |
| | | | Executive Order 14203 |
| | | | issued on February 6, |
| | | | 2025. The regulations |
| | | | formalize restrictions on |
| | | | parties connected to the |
| | | | ICC that are identified as |
| | | | blocked parties on |
| | | | OFAC's Specially |
| | | | Designated Nationals |
| | | | (SDN) List. Importantly, |
| | | | the regulations |
| | | | incorporate 6 previously |
| | | | issued general licenses |
| | | | (GLs) authorizing the |
| | | | provision of certain legal |
| | | | services, receipt of |
| | | | payments for legal |
| | | | services, provision of |
| | | | emergency medical |
| | | | services, collection of |
| | | | account service charges, |
| | | | transactions related to the |
| | | | provision of agricultural |
| | | | commodities, medicine, |
| | | | medical devices and |
| | | | certain non-commercial |
| | | | software updates, as well |
| | | | as U.S. government |
| | | | business dealings |
| | | | involving individuals or |
| | | | myorving marviduals of |

| | | | entities blocked nursuant |
|---------|---|----------------------------|---|
| | | | |
| 6/30/25 | White House National Security Presidential Memorandum/NSPM-5 | U.S. Economic Sanctions | entities blocked pursuant to E.O. 14203. President Trump issued a Memorandum continuing restrictive policies toward Cuba that were implemented under a similar memorandum during his first administration and mostly maintained throughout the Biden Administration. The policy objectives include ending economic practices that disproportionately benefit the Cuban government at the expense of its people and supporting the economic embargo against the nation. Notably, the new Memorandum orders the Secretary of State to publish a list of entities controlled by or acting on behalf of the Cuban government with which direct and indirect financial transactions would be prohibited. The Memorandum also directs the Secretaries of Commerce, State, and Transportation to initiate a process to adjust current |
| | | | regulations related to transactions with Cuba |
| | | | within 30 days. |
| 6/30/25 | White House | U.S. Economic Sanctions | President Trump issued an executive order revoking |
| | Providing For the Revocation of Syria Sanctions | | the declared national emergency regarding Syria and the related sanctions imposed under 6 executive orders issued |

| | | | between 2004-2011. To |
|---------|-------------------|---------|--|
| | | | implement this E.O., |
| | | | OFAC has removed 518 |
| | | | previously sanctioned |
| | | | parties from its Specially |
| | | | Designated Nationals |
| | | | (SDN) List. As such, a |
| | | | wide range of previously |
| | | | prohibited transactions |
| | | | with Syrian parties are |
| | | | now permissible. The |
| | | | E.O. Maintains sanctions |
| | | | against the Bashar al- |
| | | | Assad regime and |
| | | | associated parties that |
| | | | undermine the peace and |
| | | | security of Syria. The |
| | | | order also authorizes the |
| | | | Secretary of State to |
| | | | sanction foreign |
| | | | individuals, and their |
| | | | adult family members, |
| | | | who harm or attempt to |
| | | | harm or prevent efforts to |
| | | | promote a stable, unified, |
| | | | and peaceful Syria. In |
| | | | addition, certain |
| | | | remaining sanctions |
| | | | provisions, such as those |
| | | | enacted under the Ceasar |
| | | | Act, require congressional |
| | | | action to be removed or |
| | | | |
| | | | modified. Accordingly, the E.O. directs relevant |
| | | | |
| | | | agencies to review and |
| | | | submit briefings to |
| | | | appropriate congressional |
| | | | committees as necessary |
| | | | to suspend these |
| 6/20/25 | Cymran Ct | T:- | measures. |
| 0/20/23 | Supreme Court | Tariffs | The U.S. Supreme Court |
| | Onder No. 24 1297 | | has issued an Order |
| | Order No. 24-1287 | | denying the Petitioner's |
| | | | request for an expedited |
| | | | review of a case |
| | | | challenging President |

| | Learning Resources, Inc., Et Al. v. Trump, President of U.S., Et Al. | | Trump's implementation of tariffs under the International Emergency Economic Powers Act (IEEPA). As a result, the subject case will proceed through the typical appeals process and will not be immediately heard by the Supreme Court. |
|---------|--|-------------------------|--|
| 6/16/25 | Implementing The General Terms of The United States of America-United Kingdom Economic Prosperity Deal | Economic Policy/Tariffs | President Trump issued an executive order to implement terms from the U.SUK trade deal originally announced on May 8, 2025. The Order establishes an annual tariff-rate quota of 100,000 automobiles to enter from the UK with a combined tariff rate of 10%. Automobiles imported in excess of this quota will be subject to the full Proclamation 10908 tariffs (25%). In addition, certain automative parts that are UK-origin, and for use in UK-origin vehicles will be subject to a combined 10% tariff rate. UK-origin aerospace products that fall under the WTO Agreement on Trade in Civil Aircraft will not be subject to tariffs from (all as amended) E.O. 14257, Proclamation 9704, and Proclamation 9705. No tariff scheme has currently been set for steel and aluminum (and the derivatives), but the Order authorizes the Secretary of Commerce to develop a |

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| | | | tariff rate quota for these |
| | | | products in consultation |
| | | | with the USTR. For more |
| | | | information visit <u>here</u> . |
| 6/13/25 | White House | National | President Trump has |
| | | Security/Economic | issued an executive order |
| | Regarding The Proposed | Policy | on the Nippon Steel |
| | Acquisition of United | • | acquisition of United |
| | States Steel Corporation | | States Steel Corporation |
| | by Nippon Steel | | following a review by the |
| | Corporation | | Committee on Foreign |
| | 1 | | Investment in the United |
| | | | States (CFIUS), which |
| | | | found that the deal could |
| | | | pose threats to U.S. |
| | | | national security. |
| | | | President Biden issued a |
| | | | prior Executive Order on |
| | | | January 3, 2025, |
| | | | prohibiting the subject |
| | | | acquisition. President |
| | | | Trump has now modified |
| | | | the prior Order to allow |
| | | | _ = |
| | | | the subject transaction to |
| | | | proceed contingent on the |
| | | | involved parties executing |
| | | | a National Security |
| | | | Agreement (NSA) with |
| | | | the Department of the |
| | | | Treasury, as well as other |
| | | | necessary CFIUS member |
| | | | agencies. Until the NSA |
| | | | has been executed or both |
| | | | parties abandon the |
| | | | transaction, CFIUS is to |
| | | | monitor the proposed |
| | | | transaction and to act as |
| | | | necessary to protect U.S. |
| | | | national security. While |
| | | | there has been no official |
| | | | statement, public sources |
| | | | indicate that the parties |
| | | | involved plan to move |
| | | | forward with the deal. |

| 6/12/25 | Federal Register | National | The USTR issued a |
|---------|---|-----------------------|---------------------------------------|
| 0 | | Security/Maritime and | Notice detailing proposed |
| | Notice of Proposed | Logistics | modifications to actions |
| | Modification of Action in | S | originally announced on |
| | Section 301 Investigation | | April 17, 2025, pursuant |
| | of China's Targeting the | | to the USTR's |
| | Maritime, Logistics, and | | investigation into China's |
| | Shipbuilding Sectors for | | targeting of the maritime, |
| | Dominance | | logistics, and shipbuilding |
| | | | sectors. The proposed |
| | | | modifications include a |
| | | | change in the fee basis |
| | | | under Annex III for |
| | | | certain vessels to net tons |
| | | | and eliminating the term |
| | | | providing for the |
| | | | suspension of export |
| | | | licenses set forth in |
| | | | Annex IV. Importantly, |
| | | | the USTR has requested |
| | | | public comments on these |
| | | | proposed modifications. |
| | | | Interested parties may |
| | | | submit comments to the |
| | | | USTR for consideration |
| 6/10/25 | IIS Court of Annuals for | Tariffs | up to July 7, 2025. The U.S. Court of |
| 0/10/23 | U.S. Court of Appeals for the Federal Circuit | 1 at tits | Appeals for the Federal |
| | the rederar Circuit | | Circuit issued an Order |
| | Order in Case # 2025- | | confirming that President |
| | 1812 & Case #2025-1813 | | Trump's IEEPA tariffs |
| | 1012 & Case #2023 1013 | | will remain in place until |
| | | | the subject consolidated |
| | | | cases challenging the |
| | | | validity of the tariff |
| | | | actions are decided on |
| | | | their merits. The Order |
| | | | proposes that oral |
| | | | arguments for the |
| | | | consolidated cases shall |
| | | | be heard en banc by the |
| | | | full court on an expedited |
| | | | basis (an uncommon |
| | | | occurrence). As of date, |
| | | | the oral arguments are |

| | | | expected to be heard on |
|--------|---|--|--|
| 6/9/25 | Guidelines for Investigations and Enforcement of the Foreign Corrupt Practices Act (FCPA) | Corporate Enforcement /Department of Justice | July 31, 2025. On June 9, 2025, the U.S. Deputy Attorney General issued much-anticipated new guidelines on FCPA investigations and enforcement. The new guidelines follow a pause in FCPA enforcement pursuant to an Executive Order issued by President Trump on February 10, 2025. The guidelines align DOJ enforcement and investigations of FCPA violations with the policy objectives outlined in President Trump's earlier Executive Order that focused on tailoring FCPA enforcement to address conduct that directly undermines certain U.S. national interests and limiting burdens on American companies operating abroad. As such, one primary consideration prosecutors must now take into account when pursuing a potential new FCPA action is whether the alleged misconduct relates to activities of Cartels or TCOs. In addition, prosecutors are directed to focus enforcement on individual conduct rather than conduct at the corporation level that is related to routine business practices, and to consider potential disruption of corporate |

| | | | activities throughout an FCPA investigation. Initiation of all new FCPA investigations and enforcement actions are required to be authorized by the Assistant Attorney General for the Criminal Division. |
|--------|--|---------|---|
| 6/9/25 | Customs and Border Protection Updated Guidance for Imports of Steel, Aluminum, and Derivative Products | Tariffs | CBP has issued guidance through the Cargo Systems Messaging Service (CSMS) to update the list of HTSUS codes subject to steel and aluminum tariffs pursuant to Section 232 of the Trade Expansion Act of 1962. The product list updates are based on the recently published annexes to the June 3, 2025, tariff action that increased the tariff rate for steel aluminum products from 25% to 50%. |
| 6/6/25 | White House Sustaining Select Efforts to Strengthen the Nation's Cybersecurity and Amending Executive Order 13694 and Executive Order 14144 | | President Trump issued an executive order amending prior executive actions related to combating cybersecurity threats and bolstering the U.S.'s cyber defenses. The new amendments include a policy statement highlighting China as the primary threat to U.S. cybersecurity, directives to Secretary of Commerce to lead efforts to update NIST publications, and steps to push the federal government towards a transition to cryptographic algorithms that mitigate risks presented by |

| | | 1 | |
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| | | | quantum computers |
| | | | capable of breaking |
| | | | public-key cryptography |
| | | | used in U.S. (and global) |
| | | | digital systems. |
| 6/6/25 | White House | Economic | President Trump has |
| | | Policy/National Security | issued an executive order |
| | Unleashing American | | focused on promoting the |
| | Drone Dominance | | U.S.'s drone industry. |
| | | | This includes directing the |
| | | | Secretary of |
| | | | Transportation to look to |
| | | | solutions to ensure that |
| | | | flights solely in the U.S., |
| | | | or those that begin in the |
| | | | U.S. and reach U.S |
| | | | owned facilities overseas |
| | | | will not be subject to |
| | | | certain requirements for |
| | | | aircraft completing |
| | | | international navigation. |
| | | | The Order also focuses on |
| | | | prioritizing the |
| | | | commercialization and |
| | | | innovation of the U.S. |
| | | | drone industry, directing |
| | | | relevant government |
| | | | agencies to prioritize |
| | | | U.Sorigin UAS over |
| | | | foreign-produced aircrafts |
| | | | and requiring the Federal |
| | | | Acquisition Security |
| | | | Council to publish a list |
| | | | identifying companies |
| | | | that could present risks to |
| | | | the UAS supply chain in |
| | | | the U.S. The Order also |
| | | | directs the Secretary of |
| | | | Commerce to promulgate |
| | | | rules and complete |
| | | | investigations to protect |
| | | | the U.S. supply chain |
| | | | from foreign threats |
| | | | related to UAS. The |
| | | | Secretaries of Commerce, |
| | | | State, Defense, and |
| | | 1 | State, Deteller, alla |

| | | | Energy are directed to |
|--------|----------------------|--------------------------|---|
| | | | review and amend export |
| | | | regulations to permit |
| | | | efficient export of civil |
| | | | UAS to foreign countries |
| | | | and promote the U.S. |
| | | | UAS industry commercial |
| | | | growth. The Order was |
| | | | issued in tandem with |
| | | | another Executive Order, |
| | | | "Restoring American |
| | | | Airspace Sovereignty" |
| | | | that focuses on bolstering |
| | | | the regulation drone flight |
| | | | to protect public safety |
| | | | and address risks |
| | | | |
| | | | presented by the |
| | | | weaponization of UAS by hostile actors. |
| 6/6/25 | Wile to House | Economic | |
| 6/6/25 | White House | | President Trump issued an |
| | I 1: T1 W/ 1 1: | Policy/National Security | executive order aimed at |
| | Leading The World in | | bolstering U.S. |
| | Supersonic Flight | | dominance in high-speed |
| | | | aviation. The Order |
| | | | directs the Administrator |
| | | | of the Federal Aviation |
| | | | Administration (FAA) to |
| | | | work towards repealing |
| | | | multiple regulations and |
| | | | barriers to promote the |
| | | | development of |
| | | | supersonic flight and |
| | | | domestic advancement of |
| | | | aviation technology. The |
| | | | Director of the Office of |
| | | | Science and Technology |
| | | | Policy (OSTP), aided by |
| | | | other relevant parties, is |
| | | | directed to coordinate |
| | | | research and development |
| | | | to aid research, |
| | | | development, testing, and |
| | | | evaluation (RDT&E) and |
| | | | it's sharing through the |
| | | | National Science and |
| | | | Technology Council. The |

| | | | Administrator of the FAA |
|---------|------------------------------|-------------------|-----------------------------|
| | | | |
| | | | is also directed to |
| | | | collaborate with foreign |
| | | | aviation entities to obtain |
| | | | bilateral aviation safety |
| | | | agreements. |
| 6/3/25 | White House | Tariffs | President Trump has |
| | | | issued a proclamation |
| | Adjusting Imports of | | raising tariffs from 25% |
| | Aluminum And | | to 50% for imports of |
| | Steel Into the United | | certain aluminum and |
| | | | |
| | States | | steel products and their |
| | | | derivatives pursuant to |
| | | | Section 232 of the Trade |
| | | | Expansion Act of 1962. |
| | | | The increased tariff rates |
| | | | go into effect on June 4, |
| | | | 2025. However, imports |
| | | | of UK-origin steel and |
| | | | aluminum products will |
| | | | remain subject to 25% |
| | | | |
| | | | tariffs, though that is |
| | | | subject to change on or |
| | | | after July 9, 2025, |
| | | | pursuant to the U.SUK |
| | | | Economic Prosperity |
| | | | Deal. More details on the |
| | | | application of the |
| | | | increased tariff rates for |
| | | | aluminum and steel |
| | | | imports can be found in |
| | | | CBP's Cargo Systems |
| | | | Messages issued on June |
| | | | 3, 2025, available here |
| | | | - |
| 5/21/25 | T 1 1D 1 | T 'CCE 1 ' | and here. |
| 5/31/25 | Federal Register | Tariff Exclusions | The USTR announced the |
| | | | extension of certain |
| | Notice of Product | | exclusions from tariffs |
| | Exclusion Extensions: | | imposed on imports of |
| | China's Acts, Policies, | | Chinese-origin goods |
| | and Practices | | pursuant to the USTR's |
| | Related to Technology | | investigation into |
| | Transfer, Intellectual | | "China's Acts, Policies, |
| | Property, and Innovation | | and Practices Related to |
| | 1 1 5 porty, and mino varion | | Technology Transfer, |
| | | | |
| | | | Intellectual Property, and |

| | | | Innovation" under Section 301 of the Trade Act of 1974. The tariff exclusions originally set to expire on May 31, 2025, will continue to apply through August 31, 2025. This exclusion extension follows several prior extensions granted for certain products during the Biden Administration and the USTR's findings during four-year review of the Section 301 actions |
|---------|---|---------|--|
| 5/28/25 | Court of International Trade Slip Opinion 25-66 *Update: On May 29th, the U.S. Court of Appeals for the Federal Circuit in Washington, DC granted the United States' request for an administrative stay of the Court of International Trade's injunction until further notice. | Tariffs | published on May 14, 2024. The Court of International Trade (CIT) issued an opinion based on two lawsuits, one brought by a group of small businesses and one brought by a coalition of 12 states, ruling that President Trump's tariff actions implemented pursuant to the International Emergency Economic Powers Act (IEEPA) are unconstitutional. Accordingly, the opinion implements an injunction barring operation of the tariff actions and required the Trump Administration to issue orders stopping the tariff actions within 10 days. The CIT's decision does not impact the validity of tariff actions based on authorities other than the IEEPA, such as tariffs imposed under Section 301 tariffs |

| | | | . 1 |
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| | | | imposed on a wide-range |
| | | | of Chinese-origin goods |
| | | | and Section 232 tariffs |
| | | | imposed on aluminum, |
| | | | steel, automobile, and |
| | | | automobile part imports. |
| 5/28/25 | OFAC | U.S. Economic | On May 13, 2025, |
| 0120120 | Frequently Asked | Sanctions | President Trump |
| | Questions (FAQs) for | Sanctions | announced his intent to |
| | | | |
| | Syria General License 25 | | ease sanctions imposed on |
| | | | Syria to support the new |
| | | | government and help |
| | | | stabilize Syria. OFAC, in |
| | | | concurrence with this new |
| | | | policy, has issued General |
| | | | License 25 (GL 25) |
| | | | authorizing a wide range |
| | | | of transactions previously |
| | | | prohibited under the |
| | | | Syrian Sanctions |
| | | | Regulations. The new |
| | | | general license authorizes |
| | | | activities such as new |
| | | | |
| | | | investment Syria, the |
| | | | provision of services to |
| | | | companies and people |
| | | | within Syria, dealing in |
| | | | petroleum or petroleum |
| | | | products from Syria, and |
| | | | transacting with the |
| | | | current Syrian |
| | | | government as well as |
| | | | blocked parties listed in |
| | | | in the Annex to GL 25. |
| | | | U.S. financial institutions |
| | | | can process transactions |
| | | | with the Central Bank of |
| | | | Syria, but property of that |
| | | | bank remains blocked. |
| | | | |
| | | | Importantly, the general |
| | | | license does not authorize |
| | | | transactions involving any |
| | | | parties, including Bashar |
| | | | al-Assad and associates, |
| | | | on OFAC's SDN list or |
| | | | that involve an entity |

| | | | owned 50% or more by |
|---------|---|------------------------|--|
| | | | |
| | | | SDNs (other than those listed in the Annex). |
| 5/22/25 | White Henry | National Committee and | , |
| 5/23/25 | White House Fact Sheet: President | National Security and | President Trump has issued 4 Executive Orders |
| | | Energy Policy | |
| | Donald J. Trump Directs Reform of the Nuclear | | focused on nuclear power and the Nuclear |
| | | | |
| | Regulatory Commission | | Regulatory Commission |
| | | | (NRC). The orders reform |
| | | | NRC nuclear policies to |
| | | | promote the expansion of |
| | | | U.S. nuclear energy |
| | | | capacity and establish |
| | | | new expedited timeframes |
| | | | for related licensing and |
| | | | approval procedures. The orders also focus on |
| | | | |
| | | | strengthening the |
| | | | domestic nuclear industry through expansion of the |
| | | | domestic workforce to |
| | | | decrease reliance on |
| | | | foreign energy and |
| | | | highlight the role nuclear |
| | | | energy infrastructure |
| | | | plays in enhancing |
| | | | domestic AI computing |
| | | | and advanced |
| | | | technologies. Notably, the |
| | | | President has also directed |
| | | | the Secretary of State to |
| | | | focus on agreements and |
| | | | other necessary activities |
| | | | to support American |
| | | | nuclear exports. |
| 5/16/25 | White House | Economic | Following President |
| | What They Are Saying: | Policy/Foreign | Trump's Middle East visit, |
| | Trillions in Great Deals | Investment | several countries within |
| | Secured for America | | the region announced |
| | Thanks to President | | investment deals in the |
| | Trump | | U.S. and multiple deals |
| | | | with U.Sbased |
| | | | aerospace, defense, and |
| | | | technology companies. |
| | | | The total value reaches |
| | | | over \$200 trillion, with a |

| \$1.2 trillion econor | nic |
|--|---------|
| | |
| exchange agreemen | |
| Qatar and an additi | onai |
| \$243.5 billion for | c |
| commercial and de | |
| deals between the U | |
| and Qatar, \$200 bil | |
| commercial deals b | |
| the U.S. and U.A.E | |
| \$600 billion invest | |
| commitment from | |
| Arabia. The White | |
| announcement high | _ |
| that these deals are | |
| to strengthen the U | |
| economy as well as | |
| security and safety | within |
| the Middle East. | |
| 5/12/25 <u>Department of</u> Export Controls The Department of | • |
| <u>Commerce</u> Commerce (DOC) | |
| Department of announced the reci | ssion |
| Commerce Rescinds of the "AI Diffusio | n |
| Biden-Era Artificial Rule" set to begin 1 | being |
| Intelligence Diffusion enforced on May 1 | - |
| Rule, Strengthens Chip- 2025. The AI Diffu | ision |
| Related Export Controls Rule, issued by Pre | esident |
| Biden on January 1 | 5, |
| 2025, included new | V |
| controls on advanc | ed |
| computing technological comput | ogy |
| and ICs and on cert | tain |
| advanced closed-w | eight |
| AI models. It also a | added |
| new license except | ions |
| and introduced a ne | |
| authorization proce | |
| building data cente | |
| abroad. Based on the | |
| recission announce | |
| BIS has been direct | - |
| not enforce the AI | |
| Diffusion Rule and | will |
| likely issue a replace | |
| rule in its place in t | |
| coming weeks. | = |

| 5/12/25 | Department of Justice | Corporate Enforcement | The Head of the DOJ's |
|---------|-----------------------------------|-----------------------|--|
| 3/12/23 | - | Corporate Emorcement | |
| | Memorandum: Focus, | | Criminal Division, |
| | Fairness, and Efficiency | | Matthew Galeotti, issued |
| | in the Fight Against | | a division-wide |
| | White-Collar Crime | | memorandum announcing |
| | | | new investigative and |
| | | | policy priorities related |
| | | | white collar enforcement. |
| | | | The Memo directs the |
| | | | Criminal Division to |
| | | | focus investigations and |
| | | | prosecutions on 10 key |
| | | | areas including tariff |
| | | | evasion and other forms |
| | | | of trade and customs |
| | | | fraud, threats to U.S. |
| | | | national security such as |
| | | | violations of economic |
| | | | sanctions and conduct that |
| | | | supports Cartels, hostile |
| | | | nation-states, and other |
| | | | foreign terrorist |
| | | | organizations, and bribery |
| | | | and money-laundering |
| | | | activities related to the |
| | | | manufacturing of illegal |
| | | | drugs. The Memo also |
| | | | announced modifications |
| | | | to the DOJ's Corporate |
| | | | Whistleblower Awards |
| | | | Pilot Program to align |
| | | | with the updated priority |
| | | | enforcement areas and |
| | | | highlighted revisions to |
| | | | the Criminal Division's |
| | | | Corporate Enforcement |
| | | | and Voluntary Self- |
| | | | Disclosure Policy to |
| | | | clarify additional benefits |
| | | | , |
| | | | of self-reporting misconduct to the DOJ. |
| 5/12/25 | White House | Tariffs | |
| 3/12/23 | White House Modifying Posiprocel | 1 arilis | Following the |
| | Modifying Reciprocal | | announcement of a trade |
| | Tariff Rates to Reflect | | agreement with China, |
| | Discussions with the | | President Trump issued an |
| | | | Executive Order |

| | People's Republic of China | | modifying the reciprocal tariffs originally imposed on China under Executive Order 14257 and subsequent orders. Effective May 14, 2025, for a period of 90 days the reciprocal tariff rate on Chinese-origin imports will be 10%. In addition, the <i>ad valorem</i> tariff rate for low-value <i>de minimis</i> shipments from China is reduced from 120% to 54%, or a \$100 fixed duty per postal item. Importantly, other tariffs on imports from China such as the Section 301, Section 232, and fentanyl tariff actions remain in place and are not impacted by the May 12th Executive Order. |
|---------|---|-------------------------|--|
| 5/12/25 | White House Joint Statement on U.S China Economic and Trade Meeting in Geneva | Economic Policy/Tariffs | Following a May 11, 2025, initial announcement of a new trade deal with China, the U.S. and China published a joint statement outlining key aspects of the new agreement, including the implementation of tariff reductions by 115% by both countries. The tariff reductions will remain in place for a period of 90 days during which both countries will continue to discuss trade relations. The Joint Statement highlights that both the U.S. and China intend to work toward a mutual |

| | | | opening of their markets |
|--------|----------------------|-------------------------|---|
| | | | and that China is also |
| | | | expected to remove non- |
| | | | tariff barriers to U.S. trade |
| | | | as part of the agreement. |
| 5/8/25 | White House | Economic Policy/Tariffs | President Trump |
| | Fact Sheet: U.SUK | | announced a much- |
| | Reach Historic Trade | | anticipated agreement |
| | Deal | | between the U.S. and UK |
| | | | outlining new reciprocal |
| | | | tariff developments. |
| | | | Notably, President |
| | | | Trump's 10% reciprocal |
| | | | tariff on imports of UK- |
| | | | origin goods will remain |
| | | | in place under the trade |
| | | | deal. However, the 25% |
| | | | tariffs imposed on steel |
| | | | and aluminum products |
| | | | from all countries will be |
| | | | reduced to 0% for UK- |
| | | | origin steel and aluminum |
| | | | _ |
| | | | imports. In addition, the Section 232 tariffs |
| | | | |
| | | | imposed on automotive |
| | | | imports will be reduced to |
| | | | 10% for the first 100,000 |
| | | | vehicles imported by UK |
| | | | car manufacturers each |
| | | | year, with additional |
| | | | vehicle imports subject to |
| | | | a 25% tariff rate. See |
| | | | general terms of the trade |
| | | | agreement <u>here</u> . |
| 5/5/25 | White House | Economic Policy | President Trump issued an |
| | Regulatory Relief to | | Executive Order focused |
| | Promote Domestic | | on the advancement of |
| | Production of | | U.S. manufacturing of |
| | Critical Medicines | | pharmaceuticals. The E.O. |
| | | | directs the Food and Drug |
| | | | Administration to take |
| | | | steps to amend relevant |
| | | | regulations in order to |
| | | | reduce the amount of time |
| | | | required for approval of |
| | | | |
| | | | domestic manufacturing |

| 4/29/25 | White House Trump Effect: A Running List of New U.S. Investment in President Trump's Second Term | Foreign Investment | activities and streamline regulatory reviews of pharmaceutical manufacturing. In addition, the Environmental Protection Agency is directed to take steps to expedite regulatory approval processes related to domestic manufacturing facilities for pharmaceuticals. Overall, the E.O. aims to further the Trump Administration's policy of restoring "a robust domestic pharmaceutical manufacturing base." The White House published an article highlighting new investments made in the U.S., primarily with respect to AI and manufacturing development, made by multinational corporations and foreign governments since the start of President Trump's second term. The article includes a running list of investment announcements from notable companies including Amazon, Taiwan Semiconductor Manufacturing Company, and Hyundai |
|---------|--|--------------------|---|
| 4/29/25 | White House | Tariffs | and Hyundai. President Trump issued a |
| | Amendments To Adjusting Imports of Automobiles and Automobile Parts into the United States | | Proclamation amending Proclamation 10908, dated March 26, 2025, which originally imposed a 25% tariff on imports of automobiles and certain |

| | T | 1 | |
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| | | | auto parts. The new |
| | | | Proclamation creates an |
| | | | "import adjustment |
| | | | offset" enabling certain |
| | | | qualifying manufacturers |
| | | | of automobiles that |
| | | | undergo final assembly in |
| | | | the U.S. to receive a |
| | | | specified import |
| | | | adjustment offset amount |
| | | | applicable to Section 232 |
| | | | |
| | | | duties on automobile parts |
| | | | through April 2027. The |
| | | | Secretary of Commerce is |
| | | | directed to establish an |
| | | | application process within |
| | | | 30 days of the |
| | | | Proclamation where |
| | | | manufacturers seeking an |
| | | | import adjustment offset |
| | | | amount may submit |
| | | | applications to the |
| | | | Secretary. Applications |
| | | | for the import adjustment |
| | | | offset amount shall |
| | | | include documentation |
| | | | related to the |
| | | | manufacturer's import |
| | | | data and statistics, |
| | | | manufacturing projects in |
| | | | the U.S., projected tariff |
| | | | costs, and other |
| | | | information related to |
| | | | auto part imports. |
| 4/29/25 | White House | Tariffs | President Trump issued an |
| 1127123 | Addressing Certain | 1 (1111) | Executive Order |
| | Tariffs on Imported | | confirming that certain |
| | Articles | | previously implemented |
| | Articles | | tariff measures will not be |
| | | | |
| | | | cumulatively assessed on |
| | | | certain imports (i.e., |
| | | | certain tariff measures |
| | | | will not "stack" on top of |
| | | | each other). The E.O. |
| | | | provides clarification on |
| | | | the interplay of tariffs |

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| | | | imposed on Mexico and |
| | | | Canada under the |
| | | | International Emergency |
| | | | Economic Powers Act |
| | | | (IEEPA), tariffs imposed |
| | | | on all imports of steel, |
| | | | aluminum, automobiles, |
| | | | and automobile parts |
| | | | under Section 232 of the |
| | | | Trade Expansion Act of |
| | | | 1962, and other tariff |
| | | | actions implemented over |
| | | | the past months. |
| | | | Importantly, the E.O. |
| | | | applies retroactively to all |
| | | | entries made on or after |
| | | | March 4, 2025, meaning |
| | | | some importers may be |
| | | | able to request refunds for |
| | | | overpaid duties based on |
| | | | the E.O. clarifications. |
| 4/24/25 | Endanal Danistan | Economic Delicy/Toriffe | |
| 4/24/23 | Federal Register | Economic Policy/Tariffs | The U.S. Department of Commerce initiated an |
| | Notice of Request for | | |
| | Public Comments on | | investigation under |
| | Section 232 National | | Section 232 of the Trade |
| | Security Investigation of | | Expansion Act of 1962 |
| | Imports of Trucks | | into the national security |
| | | | impacts of imports of |
| | | | medium-and heavy-duty |
| | | | trucks, truck parts, and |
| | | | their derivative products. |
| | | | The investigation began |
| | | | on April 22, 2025, and |
| | | | may lead to new tariffs |
| | | | imposed on products |
| | | | subject to the |
| | | | investigation. Interested |
| | | | parties, including those |
| | | | that may be impacted by |
| | | | new tariffs, are invited to |
| | | | submit comments for |
| | | | consideration during |
| | | | Commerce's |
| | | | |
| i | | | investigation. The |

| | | | submission of comments |
|---------|---|-------------------------|---|
| | | | |
| 4/24/25 | White House Unleashing America's Offshore Critical Minerals and Resources | Economic Policy | will be May 16, 2025. President Trump issued an Executive Order establishing a framework to advance the exploration and exploitation of offshore critical minerals and seabed resources. The Executive Order seeks to expedite permitting processes related to seabed exploration, mining, and mineral processing and bolster the U.S. domestic supply chain for critical minerals. Within 60 days, specified Department heads, including the Secretaries of Commerce, Defense, and Energy must take action to expedite and streamline respective permitting processes and provide reports on specified topics related to furthering seabed exploration and critical mineral exploitation. |
| 4/23/25 | Federal Register Notice of Action and Proposed Action in Section 301 Investigation of China's Targeting the Maritime, Logistics, and Shipbuilding Sectors for Dominance, Request for Comments | Economic Policy/Tariffs | This Notice follows the USTR's investigation of China's actions, practices, and policies in the maritime, ship building, and logistics sectors. The USTR determined that China's targeting of these areas is unreasonable, decreasing competition and increasing U.S. dependency on China in a way that is harmful to U.S. business and counter to the goal of bolstering U.S. supply chain |

| | | | resilience. The USTR determined that appropriate action includes enactment of the |
|---------|---|-----------------------|--|
| | | | following: maritime transport services fees (for Chinese built, owned, or operated vessels as well as vessel operators of foreign vehicle carriers) |
| | | | and certain restrictions on maritime transport services to encourage U.S. transport for U.S. goods. |
| | | | In addition, the USTR proposed additional tariffs on certain chassis equipment, and STS cranes. |
| 4/23/25 | White House Transparency Regarding Foreign Influence at American Universities | Department of Justice | This Executive Order directs the Department of Education to strengthen enforcement of foreign funding disclosure requirements under the Higher Education Act, aiming to increase transparency and protect national interests in higher education. It also authorizes audits, investigations, and funding consequences for noncompliance, with an emphasis on revealing the true sources and purposes of foreign financial contributions to universities. |
| 4/17/25 | White House Restoring American Seafood Competitiveness | Economic Policy | This Executive Order directs federal agencies to revise or eliminate regulations that hinder domestic seafood production and to promote |
| | | | policies that support the |

| | | | competitiveness, |
|---------|--------------------------------------|-------------------------|---|
| | | | sustainability, and |
| | | | modernization of the U.S. fishing industry. It also |
| | | | initiates a coordinated |
| | | | strategy to address illegal |
| | | | and unethical global |
| | | | fishing practices, improve |
| | | | seafood trade policy, and |
| | | | expand domestic |
| | | | processing and export |
| 4/17/25 | White House | Economic Policy | capacity. This proclamation lifts the |
| 4/1//23 | Unleashing American | Leononne i oney | prohibition on |
| | Commercial Fishing in | | commercial fishing within |
| | the Pacific | | the Pacific Remote |
| | | | Islands Marine National |
| | | | Monument's expanded |
| | | | areas, allowing regulated |
| | | | domestic fishing while |
| | | | maintaining environmental protections |
| | | | under existing federal |
| | | | laws. It directs federal |
| | | | agencies to revise related |
| | | | regulations and coordinate |
| | | | oversight to support |
| | | | sustainable fishing and |
| | | | local economic activity without compromising the |
| | | | scientific and historic |
| | | | integrity of the |
| | | | monument. |
| 4/16/25 | Federal Register | Economic Policy/Tariffs | The U.S. Department of |
| | Notice of Request for | | Commerce initiated an |
| | Public Comments on | | investigation into the |
| | Section 232 National | | national security impacts |
| | Security Investigation of Imports of | | of imports of semiconductors, |
| | Semiconductors and | | semiconductor |
| | Semiconductor | | manufacturing equipment, |
| | Manufacturing | | and derivative products |
| | Equipment | | under Section 232 of the |
| | | | Trade Expansion Act of |
| | | | 1962. The investigation |
| | | | began on April 1, 2025, |

| | | | and will culminate in a |
|----------|---------------------------|-------------------------|-----------------------------|
| | | | |
| | | | report (due no later than |
| | | | December 27, 2025) |
| | | | presented by Commerce |
| | | | to the President detailing |
| | | | investigation findings and |
| | | | Commerce's |
| | | | recommendations on what |
| | | | actions should be taken to |
| | | | address identified national |
| | | | security risks. The |
| | | | investigation may lead to |
| | | | the assessment of new |
| | | | tariffs on semiconductor |
| | | | and related imports. |
| | | | Interested parties, |
| | | | including those that may |
| | | | be impacted by new |
| | | | tariffs, may submit public |
| | | | comments for |
| | | | consideration by |
| | | | Commerce up to May 7, |
| | | | 2025, when the comment |
| | | | period closes. |
| 4/16/25 | Federal Register | Economic Policy/Tariffs | The U.S. Department of |
| | Notice of Request for | | Commerce initiated an |
| | Public Comments on | | investigation under |
| | Section 232 National | | Section 232 of the Trade |
| | Security Investigation of | | Expansion Act of 1962 |
| | Imports of | | into the national security |
| | Pharmaceuticals and | | impacts of imports of |
| | Pharmaceutical | | pharmaceuticals and |
| | Ingredients | | pharmaceutical |
| | 0 | | ingredients, including |
| | | | finished drug products, |
| | | | medical countermeasures, |
| | | | critical inputs such as |
| | | | active pharmaceutical |
| | | | ingredients, and key |
| | | | starting materials, and |
| | | | derivative products of |
| | | | those items. The |
| | | | investigation began on |
| | | | April 1, 2025, and will |
| | | | culminate in a report (due |
| | | | no later than December |
| <u> </u> | | | no fater than December |

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| | | | 27, 2025) presented by |
| | | | Commerce to the |
| | | | President detailing |
| | | | investigation findings and |
| | | | Commerce's |
| | | | recommendations on what |
| | | | actions should be taken to |
| | | | address identified national |
| | | | security risks. The |
| | | | • |
| | | | investigation may lead to |
| | | | the assessment of new |
| | | | tariffs on pharmaceuticals |
| | | | and related products. |
| | | | Interested parties, |
| | | | including those that may |
| | | | be impacted by new |
| | | | tariffs, may submit public |
| | | | comments for |
| | | | consideration by |
| | | | Commerce up to May 7, |
| | | | 2025, when the comment |
| | | | period closes. |
| 4/15/25 | White House | Economic Policy/Tariffs | President Trump issued an |
| 7/13/23 | Ensuring National | Leononne i oney/ rainis | Executive Order directing |
| | | | the Secretary of |
| | Security and Economic | | Commerce to initiate an |
| | Resilience Through Section 232 Actions on | | |
| | | | investigation under |
| | Processed Critical | | Section 232 of the Trade |
| | Minerals and Derivative | | Expansion Act of 1962 |
| | Products | | into whether imports of |
| | | | processed critical minerals |
| | | | and derivative products |
| | | | impair U.S. national |
| | | | security. The Secretary of |
| | | | Commerce must submit a |
| | | | draft interim report of |
| | | | investigation findings and |
| | | | recommended actions |
| | | | within 90 days of the E.O. |
| | | | A final report, expected to |
| | | | include tariff |
| | | | recommendations, is due |
| | | | 180 days after Commerce |
| | | | officially initiates the |
| | | | <u> </u> |
| | | | investigation. A notice of |
| | | | this investigation may be |

| | | | published in the Federal |
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| | | | Register in the coming |
| | | | days that may also |
| | | | provide a period of |
| | | | opportunity for interested |
| | | | parties to submit |
| | | | comments to Commerce for consideration in its |
| | | | investigation. |
| 4/11/25 | White House | Tariffs | A Presidential |
| 4/11/23 | Clarification of | Taillis | Memorandum was issued |
| | Exceptions Under | | clarifying the scope of |
| | Executive Order 14257 | | exclusions for |
| | of April 2, 2025, as | | semiconductor products |
| | Amended | | from reciprocal tariffs. |
| | | | This Memorandum |
| | | | provides a list of |
| | | | semiconductor products |
| | | | classified under Chapters |
| | | | 84 and 85 of the HTS that |
| | | | are excluded from |
| | | | reciprocal tariffs |
| | | | implemented under E.O. |
| | | | 14257, as amended. The |
| | | | exclusions apply as of |
| | | | April 5, 2025, and are in addition to product |
| | | | exclusions originally set |
| | | | forth in Annex II of E.O. |
| | | | 14257. |
| 4/9/25 | White House | Customs/Tariffs | In response to an 84% |
| | Modifying Reciprocal | | tariff announced by China |
| | Tariff Rates to Reflect | | on U.S. goods, President |
| | Trading Partner | | Trump ordered a further |
| | Retaliation and | | tariff increase on imports |
| | Alignment | | from China from 84% to |
| | | | 125% and raised tariffs on |
| | | | de minimis imports from |
| | | | China. The Executive |
| | | | Order also temporarily |
| | | | paused country-specific |
| | | | tariffs for other trade |
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| | | | partners until July 1, 2025. In the meantime, a 10% blanket tariff applies to covered imports from |

| 4/8/25 | White House Amendment To Reciprocal Tariffs and Updated Duties as Applied to Low-Value Imports from the People's Republic of China | Customs/Tariffs | all countries- except China, Mexico, and Canada- which are subject to separate tariffs as set forth in this Executive Order and past actions. In response to new tariffs imposed by China on U.S. goods, President Trump has ordered an increase in certain U.S. tariffs on low-value imports from China, raising specific tariffs from 34% to 84% and increasing tariffs on de minimis shipments. These changes aim to ensure the effectiveness of earlier trade measures and will be implemented through modifications to the Harmonized Tariff Schedule and related regulations. |
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| 4/2/25 | White House Further Amendment to Duties Addressing the Synthetic Opioid Supply Chain in the People's Republic of China as Applied to Low-Value Imports | Imports/Tariffs | President Trump issued an executive order eliminating duty-free de minimis treatment for covered goods imported from China, effective May 2, 2025. Goods imported from China via means other than the "international postal network" will be subject to all applicable duties imposed on Chinese goods despite whether they qualify for the de minimis exemption under 19 U.S.C. 1321(a)(2)(C). De minimis qualifying goods sent from China via the international postal |

| | | | network are subject to a duty rate of either 30% of the value or \$25 per item (increasing to \$50 after June 1, 2025) but will be exempt from all other duties on Chinese imports. |
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| 4/2/25 | White House Regulating Imports with a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Goods Trade Deficits | Tariffs | President Trump declared a national emergency in response to large and persistent U.S. goods trade deficits, citing non-reciprocal trade practices and foreign economic policies that have weakened domestic manufacturing and defense capabilities. To address these imbalances, the order imposes a 10% blanket tariff on most imports, with higher country-specific rates for certain trading partners, and outlines detailed implementation rules, exceptions, and modification authorities. The policy aims to restore domestic production capacity, protect national security, and incentivize trading partners to adopt more reciprocal trade arrangements. |
| 3/31/25 | White House Establishing The United States Investment Accelerator | Foreign Investment | This executive order establishes the United States Investment Accelerator within the Department of Commerce to streamline regulatory |

| | | | processes and support investments over \$1 billion by assisting with permitting, resource access, and collaboration efforts. It directs federal agencies to coordinate and modernize procedures to attract and expedite both domestic and foreign investment, while remaining consistent with existing laws and national security considerations. |
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| 3/26/25 | White House Adjusting Imports Of Automobiles And Automobile Parts Into The United States | Tariffs | President Trump issued a proclamation directing a 25% tariff on certain imported automobiles and automobile parts starting April 3, 2025, based on findings that continued import levels affect the United States' industrial capacity and supply chain resilience. The measure establishes procedures for applying the tariff, particularly under the USMCA, and authorizes ongoing monitoring and adjustments to support domestic manufacturing capabilities. |
| 3/24/25 | White House Imposing Tariffs on Countries Importing Venezuelan Oil | Tariffs | President Trump issued an executive order intensifying economic measures against Venezuela, citing the Maduro regime's ongoing threat to U.S. national security and the infiltration of the Tren de |

| | | | Aragua gang into the U.S. He authorized a 25% tariff on goods from countries that import Venezuelan oil, to be enforced starting April 2, 2025, as part of broader efforts to curtail Venezuela's destabilizing activities. |
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| 3/14/25 | White House Continuing The Reduction of the Federal Bureaucracy | Department of Justice | This executive order reduces the scope of the federal bureaucracy by eliminating non-statutory functions and minimizing statutory operations of several government entities, including the Minority Business Development Agency and the U.S. Interagency Council on Homelessness. It also directs agency heads to report compliance within seven days and restricts budgetary approvals for affected entities. |
| 3/13/25 | Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Copper | National Security/Economic Policy | The Department of Commerce initiated an investigation under Section 232 of the Trade Expansion Act of 1962 into the impact imports of copper, in various forms, and derivative products have on U.S. national security. Following President Trump's February 25 Executive Order directing the Department of Commerce and other relevant agency heads to take certain |

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| 3/3/25 | Federal Registrar Further Amendment to Duties Addressing the Synthetic Opioid Supply Chain in the People's Republic of China | U.S. Economic Sanctions | actions to address identified national security risks presented by U.S. reliance on foreign supplies of copper and the lagging domestic smelting and refining industry. Interested parties may submit public comments to the Office of Strategic Industries and Economic Security at the Department of Commerce for consideration until April 1, 2025. The amendment doubles tariffs on certain Chinese goods from 10% to 20% due to the PRC's failure to take adequate steps against the illicit synthetic opioid trade. It maintains that the order does not affect existing legal authorities or create enforceable rights. |
| 3/2/25 | Federal Registrar Amendment to Duties to Address the Situation at Our Southern Border | Imports/Tariffs | The amendment modifies Executive Order 14194 to limit duty-free de minimis treatment for certain covered articles under 19 U.S.C. 1321, making it conditional on the Secretary of Commerce confirming that systems are in place to efficiently process and collect applicable tariff revenue. It also clarifies that the order does not affect existing legal authorities or create enforceable rights. |

| 2/25/25 | Federal Registrar Addressing the Threat to National Security from Imports of Copper | Imports/Tariffs | Order 14220 addresses national security concerns related to copper imports and directs the Secretary of Commerce to initiate an investigation into copper imports pursuant to Section 232 of the Trade Expansion Act of 1962. |
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| 2/18/25 | White House Ensuring Accountability for All Agencies | Department of Justice | This order injected the President and the Department of Justice directly into the regulatory and interpretive processes of all federal agencies, mandating that agencies align their regulations and interpretations with the administration's policies, subject to oversight by the President and the Attorney General. |
| 2/13/25 | White House Reciprocal Trade and Tariffs | Tariffs | President Trump issued a memorandum outlining the U.S. policy to reduce the persistent annual trade deficit and address inequitable and unbalanced trade practices with foreign partners. He memorandum introduces the "Fair and Reciprocal Plan," which seeks to counter non-reciprocal trading arrangements by determining the equivalent of a reciprocal tariff with respect to each foreign trading partner. |
| 2/10/25 | White House | Department of Justice | This executive order directs a temporary pause |

| | Pausing Foreign Corrupt Practices Act Enforcement to Further American Economic and National Security | | and review of Foreign Corrupt Practices Act (FCPA) enforcement, arguing that its current application harms U.S. foreign policy and economic competitiveness. The Attorney General is instructed to reassess FCPA policies to better align with presidential authority over foreign affairs and national security interests. |
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| 2/10/25 | White House Strengthening American Leadership In Digital Financial Technology | Economic Policy | President Trump issued an executive order to bolster U.S. leadership in the cryptocurrency and digital assets sectors. The order seeks to establish regulatory clarity, promote innovation, and position the U.S. as the global leader in digital financial technology. |
| 2/10/25 | White House Adjusting Imports of Steel into The United States | Tariffs | President Trump announced the reinstatement of a 25% tariff on all steel and aluminum imports into the United States. This move is intended to support domestic metal industries by reducing foreign competition. Critics warn it may increase costs for U.S. manufacturers and consumers and strain relationships with key allies. |

| 2/6/25 | White House Imposing Sanctions on The International Criminal Court | U.S. Economic Sanctions | President Trump issued an executive order authorizing sanctions against individuals and their families who assist the International Criminal Court (ICC). The administration accused the ICC of unjustly targeting the U.S. and its ally, Israel, particularly following the court's issuance of arrest warrants against Israeli officials for alleged war crimes in Gaza. |
|--------|--|------------------------------------|---|
| 2/3/25 | White House Progress on the Situation at Our Northern Border White House Progress on the Situation at Our Southern Border | Tariffs | After discussions with Mexican President Claudia Sheinbaum and Canadian Prime Minister Justin Trudeau, President Trump agreed to delay the implementation of new tariffs on imports from Mexico and Canada for 30 days. |
| 2/3/25 | White House A Plan for Establishing a United States Sovereign Wealth Fund | Economic Policy/Foreign Investment | President Trump issued an executive order directing the Treasury and Commerce Departments to create a U.S. sovereign wealth fund. The fund is intended to serve as an investment tool for the country, with potential plans to acquire companies like TikTok. The establishment of the fund requires congressional approval and is expected to be completed within 12 months. |

| 2/1/25 | White House Fact Sheet: President Donald J. Trump Imposes Tariffs on Imports from Canada, Mexico and China | Tariffs | President Trump issued an executive order imposing a 25% tariff on imports from Mexico and Canada, including a 10% tariff on Canadian energy products, and a 10% tariff on imports from China. |
|---------|--|-----------------------|--|
| 1/27/25 | White House Prioritizing Military Excellence and Readiness | Department of Justice | President Trump issued an executive order titled "Prioritizing Military Excellence and Readiness," directing DOJ involvement in military-related legal matters and emphasizing prosecution of offenses related to national security. |
| 1/26/25 | White House Statement from the Press Secretary | Tariffs | Action: The U.S. imposed 25% tariffs on imports from Colombia and implemented travel and visa restrictions due to Colombia's refusal to accept deported migrants. Update: The measures were paused after Colombia agreed to resume deportation flights from the U.S. |
| 1/21/25 | White House America First Trade Policy | Tariffs | On January 20, 2025, President Trump issued a memorandum directing federal agencies to implement an "America First" trade policy, emphasizing domestic investment, productivity, and additional tariffs on Canada, Mexico, and China. |

| 1/20/25 | White House America First Trade Policy | Tariffs | President Trump issued a Memorandum directly addressing tariffs by proposing a global supplemental tariff, or other policies, to remedy trade deficits and identified national security risks. |
|---------|---|----------------------------|--|
| 1/20/25 | White House Designating Cartels and Other Organizations as Foreign Terrorist Organizations and Specially Designated Global Terrorists | U.S. Economic Sanctions | The Order declares a national emergency to combat cartels and transnational organizations, designates them as Foreign Terrorist Organizations, and authorizes OFAC to impose sanctions on FTOs |
| 1/20/25 | White House Protecting the American People Against Invasion | Department of Justice | The Order directs the Attorney General to prioritize the prosecution of criminal offenses related to unauthorized entry or continued unauthorized presence of aliens in the United States. |

About Torres Trade Law:

Our firm is a national law firm specialized in international trade and national security law. We represent clients ranging from Fortune 100 companies to small businesses that are located throughout the United States and the world. Through our professional network we can resolve the most complicated issues impacting global business in today's high stakes regulatory environment.