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INTRODUCTION

The Information Technology and Innovation Foundation (ITIF) is pleased to submit the following comments for consideration by the Office of the United States Trade Representative (USTR) for the 2025 Notorious Markets List (NML). ITIF is an independent, nonprofit, nonpartisan research and educational institute focusing on the intersection of technological innovation and public policy.

CHINESE E-COMMERCE PLATFORMS FACILITATE INTELLECTUAL PROPERTY (IP) INFRINGEMENT

As documented in ITIF’s August 2025 report *How Chinese Online Marketplaces Fuel Counterfeits* (see appendix 2), Chinese online marketplaces Temu, AliExpress, and SHEIN have become central actors in the global counterfeit economy.¹ In the summer of 2025, ITIF purchased suspected counterfeit goods from these platforms across a number of product categories, including apparel, cosmetics, toys, electronics, over-the-counter (OTC) pharmaceuticals, and household goods.² ITIF found 25 out of 43 successfully-delivered products purchased to be confirmed or likely counterfeits (see appendix 1).³

These counterfeits not only inflict significant harm on U.S. right holders and legitimate businesses but also pose serious risks to consumer safety and undermine fair competition. This has been documented through rights holders’ complaints and official investigations, including the Federal Trade Commission’s recent penalty against Temu for violating the INFORM Consumers Act by not adequately protecting consumers

¹ Eli Clemens, *How Chinese Online Marketplaces Fuel Counterfeits* (ITIF, August 2025), <https://itif.org/publications/2025/08/20/how-chinese-online-marketplaces-fuel-counterfeits/>.

² Ibid.

³ Ibid.

from counterfeit goods.⁴ Yet despite this scrutiny, these platforms have not adopted sufficient safeguards or enforcement practices to address counterfeit trafficking at the necessary scale.

Based on ITIF’s research, these platforms clearly meet USTR’s definition of markets that “engage in or facilitate substantial trademark counterfeiting or copyright piracy.”⁵

Temu (temu.com)

Temu is owned and operated by PDD Holdings, a company headquartered in Dublin, Ireland, and has operational and logistical bases in China.⁶

ITIF purchased 10 likely counterfeit products of well-known brands sold on Temu across categories such as apparel, cosmetics, toys, OTC pharmaceuticals, and household goods, often at prices far below typical retail prices.⁷ ITIF found Temu’s likely counterfeits to be more sophisticated and likely more deceptive to consumers than likely counterfeits identified on other Chinese online marketplaces.

Temu also alarmingly had multiple suspected and confirmed counterfeit items that pose direct health and safety risks to consumers. One example, delivered after the report’s publication, resembled dog treats from the U.K.-based pet food company NutriPaw.⁸ The counterfeit packaging contained spelling errors such as

⁴ European Commission, “Commission designates Temu as Very Large Online Platform under the Digital Services Act,” news release, May 30, 2024, https://ec.europa.eu/commission/presscorner/detail/en/ip_24_3047; The European Consumer Organisation (BEUC), “Under the Microscope: Tests of Temu Products by Consumer Groups” (BEUC, February 2025), https://www.beuc.eu/sites/default/files/publications/BEUC-X-2025-%20007_Tests_of_Temu_Products_by_Consumer_Groups.pdf; Michelle Chapman, “China’s Shein hit with lawsuit citing RICO violations, a law originally used against organized crime,” *The Associated Press*, July 14, 2023, <https://apnews.com/article/shein-fast-fashion-rico-lawsuit-designer-retail4ff4b10a29f65faa65165a1c900484>; The Office of the United States Trade Representative (USTR), “2021 Review of Notorious Markets for Counterfeiting and Piracy” (Washington DC: USTR, 2022), <https://ustr.gov/sites/default/files/IssueAreas/IP/2021%20Notorious%20Markets%20List.pdf>; U.S. Department of Justice, “Temu Agrees to \$2M Civil Penalty and Injunction for Alleged Violations of the INFORM Consumers Act,” news release, September 8, 2025, <https://www.justice.gov/opa/pr/temu-agrees-2m-civil-penalty-and-injunction-alleged-violations-inform-consumers-act>.

⁵ USTR, “USTR Releases 2024 Review of Notorious Markets for Counterfeiting and Piracy,” news release, January 8, 2025, <https://ustr.gov/about/policy-offices/press-office/ustr-archives/2007-2024-press-releases/ustr-releases-2024-review-notorious-markets-counterfeiting-and-piracy>.

⁶ PDD Holdings Inc., *Form 20-F Annual Report* (Washington, DC: U.S. Securities and Exchange Commission, 2024), <https://investor.pddholdings.com/static-files/e9586d93-bb1d-4e98-af8a-4e73b62350f2>.

⁷ Eli Clemens, *How Chinese Online Marketplaces Fuel Counterfeits*.

⁸ “NutriPaw Prebiotics, Prebiotics & Postbiotics Dog Digestive Treats - 12 Billion Live Probiotics for Gut Health, Sensitive Light Beige & Allergy Support, Natural Digestion & Immune Booster Treats for Puppies & Adult Dogs, Fun Pet Snacks, Probiotic Formula, Biotic Supplements, Healthconscious Pet Parents, Wholesome Ingredients, Highquality Supplements, Healthconscious Owners,” Temu, accessed August 2025, <https://www.temu.com/---posts-dog-digestive-treats-12--live-pros-for--sensitive-light-beige--natural--booster-treats-for-puppies-adult-dogs-fun--pro-formula--supplements-healthconscious---ingredients--supplements-healthconscious-owners-g-601101724685437.html> (webpage delisted); “120 triple-biotic treats for gut, immunity & digestion,” NutriPaw, accessed September 2025, <https://nutri-paw.com/products/pre-probiotic-digestive-treats>.

“complimentary” and “beel flavor,” as seen in figure 1. Yanyankeji Local, a vendor profiled in depth in ITIF’s report, listed the product.⁹

Figure 1: NutriPaw treats purchased by ITIF, product front



Additionally, the brand name was misspelled as “NutriPaw,” as seen in figure 2, and the barcode, seen in figure 3, mapped to a completely unrelated product.¹⁰ In correspondence with ITIF, NutriPaw said “these are fakes,” and that they “had received a report of rushing their dog to the vet after giving the fake treats due to severe vomiting.”¹¹

Figure 2: NutriPaw treats purchased by ITIF, product lid

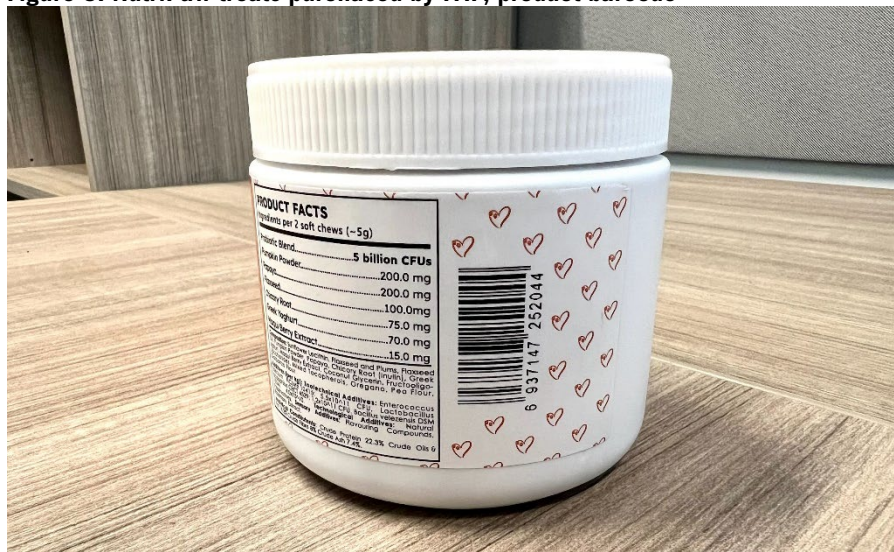


⁹ “NutriPaw Prebiotics, Prebiotics & Postbiotics Dog Digestive Treats - 12 Billion Live Probiotics for Gut Health, Sensitive Light Beige & Allergy Support, Natural Digestion & Immune Booster Treats for Puppies & Adult Dogs, Fun Pet Snacks, Probiotic Formula, Biotic Supplements, Healthconscious Pet Parents, Wholesome Ingredients, Highquality Supplements, Healthconscious Owners,” Temu; Eli Clemens, *How Chinese Online Marketplaces Fuel Counterfeits*.

¹⁰ “EAN 6937147252044,” Barcode Lookup, accessed September 2025, <https://www.barcodelookup.com/6937147252044>.

¹¹ ITIF correspondence with NutriPaw on September 4, 2025.

Figure 3: NutriPaw treats purchased by ITIF, product barcode



Another product purchased from the test buy, listed as “Cold Relief,” mimicked the appearance of Theraflu Nighttime Severe Cold Relief Powder, an OTC drug.¹² After ITIF submitted photos and information about the product to Haleon—the manufacturer of the authentic product—Haleon said, “It is most probably a counterfeit.”¹³ Notably, Temu’s rebuttal letter to the 2024 Review of Notorious Markets for Counterfeiting and Piracy said that “Temu does not sell prescription medications or any oral or injectable drugs.”¹⁴

To Temu’s credit, the company delisted nearly every product and vendor behind it mentioned in ITIF’s report following the report’s publication, including the likely counterfeit Theraflu medicine. Yet in subsequent searches, ITIF has continued to identify additional OTC drugs available for purchase on Temu, often miscategorized under unrelated product categories. This ongoing availability underscores the gap between Temu’s public relations claims and its on-the-ground enforcement. Temu has shown commendable speed and willingness to respond to external reporting, but the company’s anti-counterfeiting enforcement still has substantial room for improvement.

AliExpress (aliexpress.com)

AliExpress.com is owned by Alibaba Group, headquartered in Hangzhou, China.¹⁵

¹² Eli Clemens, *How Chinese Online Marketplaces Fuel Counterfeits*.

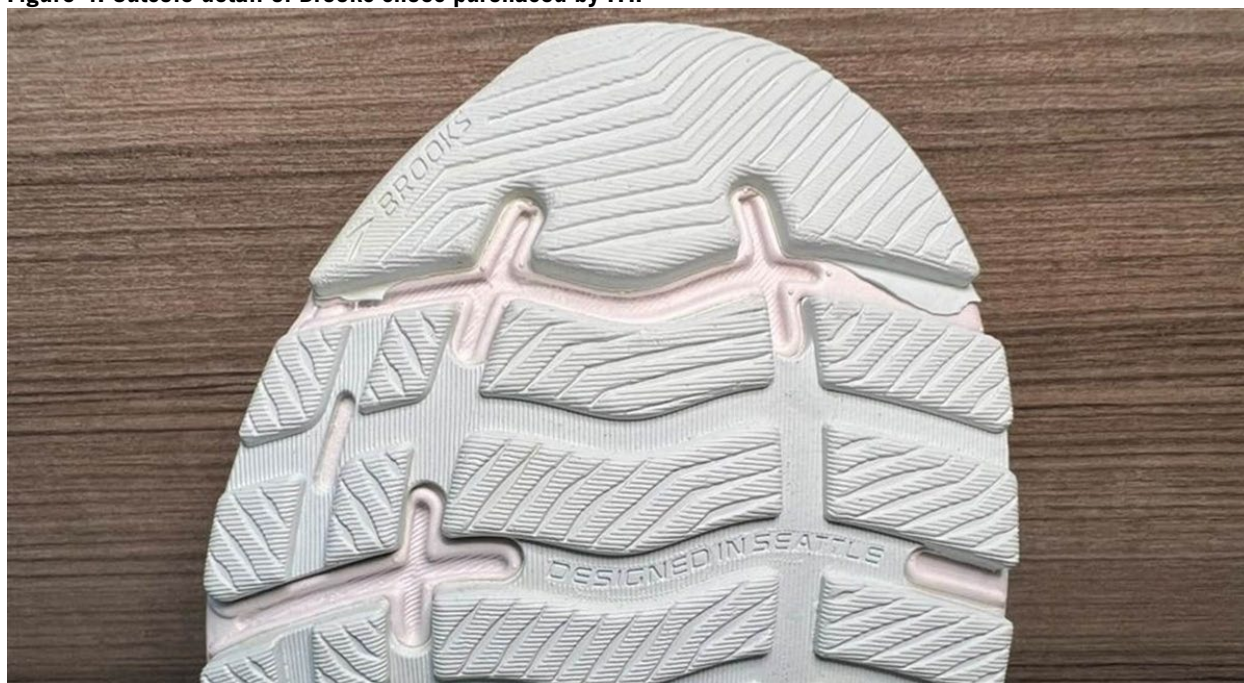
¹³ Ibid.

¹⁴ “Comment from Temu,” Office of United States Trade Representative, accessed September 2025, <https://www.regulations.gov/comment/USTR-2024-0013-0054>.

¹⁵ “Alibaba.com vs AliExpress: What are the Differences,” *Alibaba*, December 10, 2020, <https://seller.alibaba.com/us/businessblogs/alibaba-com-vs-aliexpress-what-are-the-differences-px53308i>.

ITIF purchased 14 likely counterfeit goods on AliExpress, including luxury items, apparel, toys, and cosmetics.¹⁶ For example, ITIF purchased a pair of men's shoes marketed as Brooks Ghost 15 running shoes on AliExpress for \$78.48, significantly below Brooks' MSRP of \$140 for the same product.¹⁷ The seller's listed name was "Brooks Authorized Store," but in reality was the Chinese company Xiamen Bond New Material Technology, a subsidiary of Suzhou Tryan Plastic Technology (Tryan). Tryan is a plastics company whose products are used in "shoemaking" and which specializes in matching plastic colors to specific hues, according to its website. The shoes ITIF purchased had numerous discrepancies from authentic Brooks shoes, including mismatched barcodes on the shoe box and tongue, visual differences in design elements, and quality control issues with the outsole, as seen in figure 4. In correspondence with ITIF, a Brooks representative said, "I've confirmed with our quality teams here and can confirm this does not appear to be an authentic Brooks product."

Figure 4: Outsole detail of Brooks shoes purchased by ITIF



Despite years of scrutiny, including AliExpress's listing on the 2021 and 2022 NMLs, ITIF's investigation revealed that counterfeit trafficking is still prevalent on AliExpress.¹⁸ Following the publication of ITIF's report, AliExpress delisted some of the flagged listings and a portion of the vendors named in the report, including the Brooks shoes and "Brooks Authorized Store," but the platform's response was overall slower than Temu's.

¹⁶ Eli Clemens, *How Chinese Online Marketplaces Fuel Counterfeits*.

¹⁷ Ibid.

¹⁸ USTR, "2021 Review of Notorious Markets for Counterfeiting and Piracy;" Eli Clemens, *How Chinese Online Marketplaces Fuel Counterfeits*; USTR, "2022 Review of Notorious Markets for Counterfeiting and Piracy" (Washington DC: USTR, 2023), [https://ustr.gov/sites/default/files/2023-01/2022%20Notorious%20Markets%20List%20\(final\).pdf](https://ustr.gov/sites/default/files/2023-01/2022%20Notorious%20Markets%20List%20(final).pdf).

SHEIN (us.shein.com)

SHEIN is headquartered in Singapore, with corporate roots and supply chains in China, and it is owned by Roadget Business Pte. Ltd.¹⁹

ITIF purchased one likely counterfeit luxury item from SHEIN in the report’s test buy.²⁰ SHEIN appears to have stronger anti-counterfeiting enforcement capabilities than Temu and AliExpress towards well-known brands’ IP, although this may be due to SHEIN’s narrower product focus on apparel and other fashion-related goods, which presents a smaller attack surface to defend against counterfeiters.²¹ However, SHEIN still meets the NML’s grounds for inclusion because it allows vendors on its platform to copy independent creators’ designs to mass-produce and resell them at lower prices, undercutting original designs and small business brands.

For instance, ITIF found the same design on a t-shirt originally sold on Etsy for \$33.50 by the U.S.-based, women-owned design company “WE THE BABES” on SHEIN for \$14.46, with minor photo alterations and no acknowledgement of the source design.²² While SHEIN appears to have made commendable strides in its anti-counterfeiting efforts against infringement of large brands’ IP, it also appears to leave infringement against smaller—yet still important—rights holders largely unchecked.

FOR THE 2025 NML “ISSUE FOCUS” CONSIDERATION: USTR SHOULD URGE MORE COUNTRIES TO COMBAT DIGITAL PIRACY OF SPORTS BROADCASTS

ITIF welcomes the 2025 NML’s “issue focus” examining copyright piracy of sports broadcasts. Online piracy of live events, including American sports broadcasts such as UFC matches and NFL, NBA, or MLB games, is a growing global trend.²³ Countries can protect copyright holders by allowing judicial website blocking of video streams of live events. Yet only six countries in the world currently provide this safeguard: Canada, Ireland, Latvia, Portugal, the United Kingdom, and Uruguay.

In June 2025, ITIF released its latest report on website blocking measures to curb access to digital piracy.²⁴ Policies to combat digital piracy can target the demand side (i.e., minimizing piracy consumption) or the supply side (i.e., targeting pirates and their sites); website blocking measures are part of the latter, along with

¹⁹ “SHEIN (part of Roadget Business Pte Ltd),” Business & Human Rights Resource Centre, accessed September 2025, <https://www.business-humanrights.org/en/companies/shein/>; Eli Clemens, “How China’s State-Backed E-Commerce Platforms Threaten American Consumers and U.S. Technology Leadership” (ITIF, April 2025), <https://itif.org/publications/2025/04/02/chinas-state-backed-e-commerce-platforms-threaten-american-consumers-us-technology-leadership/>.

²⁰ Eli Clemens, *How Chinese Online Marketplaces Fuel Counterfeits*.

²¹ *Ibid.*

²² Eli Clemens, “How Policymakers Can Stop Chinese Copycat Commerce,” *ITIF*, June 11, 2025, <https://itif.org/publications/2025/06/11/how-policymakers-can-stop-chinese-copycat-commerce/>.

²³ “Report: Live Event Piracy Soars,” *Advanced Television*, September 9, 2025, <https://www.advanced-television.com/2025/09/09/report-live-event-piracy-soars/>.

²⁴ Rodrigo Balbontin, “Blocking Access to Foreign Pirate Sites: A Long-Overdue Task for Congress,” (ITIF, June 2025), <https://itif.org/publications/2025/06/09/blocking-access-to-foreign-pirate-sites-a-long-overdue-task-for-congress/>.

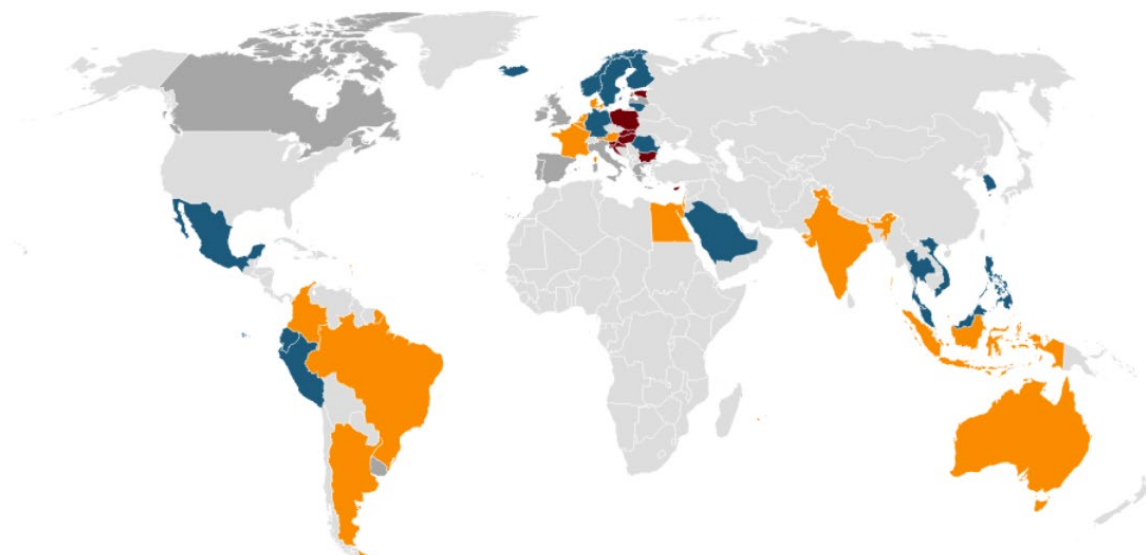
prosecuting the piracy networks and disrupting their financial channels. ITIF's report shows evidence suggesting that website blocking is a particularly effective tool against digital piracy, as it reduces the consumption of pirated content and creates incentives to consume legal content.²⁵

Blocking pirate websites that stream sports broadcasts is particularly challenging, as the value of the event is primarily in watching it in real time, and proxy sites can appear at any moment during the transmission. Thus, protecting copyright holders in these instances requires having a legal framework that allows blocking specific websites (static blocking orders), their proxies (dynamic blocking orders), and targeting specific timeframes when the sports events occur (live blocking orders). As shown in figure 5, 50 countries allow website blocking orders. Of those, only nine countries have measures to block live events, but in three of those countries (Greece, Italy, and Spain), government agencies can issue the website blocking orders—sometimes creating procedures without public consultation. Blocking orders mandated by courts are important because they can secure due process, ensure Internet Service Providers (ISPs) are not liable for their customers' content, and balance the interests of all parties, ensuring there is no contradiction between copyright enforcement and freedom of expression.

USTR should urge other countries to adopt website blocking with judicial oversight to combat online piracy, including piracy of live sports events.

Figure 5. Countries allowing website blocking, by type of blocking injunction (N/A denotes not actively using)

■ Static ■ Static, dynamic ■ Static, dynamic, live ■ Static, dynamic, live (N/A)



CONCLUSION

ITIF recommends that USTR include Temu, AliExpress, and SHEIN on the 2025 Notorious Markets List because all three platforms meet USTR's criteria as notorious online markets. They facilitate systemic trafficking in counterfeit goods, harming U.S. right holders, undermining fair competition, and placing U.S.

²⁵ Ibid.

consumers at risk. For detailed evidence of test buys, seller and supply chain information, and methodology, please see ITIF's August 2025 report, *How Chinese Online Marketplaces Fuel Counterfeits* (see appendix 2).

To prevent digital piracy of sports broadcasts, USTR should urge countries not already doing so to implement judicial website blocking of live events.

Thank you for your consideration.

APPENDIX 1: ITIF TEST PURCHASE RESULTS

Product Listing	Platform	Product Category	Counterfeit Status
Beyblade 1	AliExpress	Toys/Children	Suspected
Brooks Shoes	AliExpress	Apparel/Luxury	Suspected
CH Bag 1	AliExpress	Apparel/Luxury	Suspected
Disney Elsa Doll	AliExpress	Toys/Children	Suspected
Disney Yoda Figure	AliExpress	Toys/Children	Suspected
Honda Dirt Pad	AliExpress	Auto	Suspected
K18 Treatment 1	AliExpress	Cosmetics	Suspected
Milk Makeup	AliExpress	Cosmetics	Suspected
Nike Shoes	AliExpress	Apparel/Luxury	Suspected
Ralph Lauren Polo Shirt	AliExpress	Apparel/Luxury	Suspected
Rhode Lip Gloss	AliExpress	Cosmetics	Suspected
Marvel Action Figure 1	AliExpress	Toys/Children	Suspected
Marvel Action Figure 2	AliExpress	Toys/Children	Suspected
Tarte Concealer	AliExpress	Cosmetics	Suspected
CH Bag 2	SHEIN	Apparel/Luxury	Suspected
Besque Oil	Temu	Cosmetics	Suspected
Beyblade 2	Temu	Toys/Children	Suspected
Beyblade 3	Temu	Toys/Children	Suspected
Color Wow Treatment	Temu	Cosmetics	Confirmed
Haleon Cold Medicine	Temu	Pharmaceuticals	Suspected
K18 Treatment 2	Temu	Cosmetics	Suspected
KontrolFreek Thumbsticks	Temu	Toys/Children	Confirmed
NutriPaw Dog Treats	Temu	Household	Confirmed
Philips Toothbrush Heads	Temu	Household	Suspected
YETI Tumbler	Temu	Household	Suspected

How Chinese Online Marketplaces Fuel Counterfeits

ELI CLEMENS | AUGUST 2025

Chinese e-commerce platforms facilitate sales of counterfeit products, threatening U.S. intellectual property, fair competition, and consumer safety. Policymakers should take action to hold these platforms accountable and protect American consumers and businesses.

KEY TAKEAWAYS

- ITIF purchased 51 products from suspicious listings on Temu, AliExpress, and SHEIN. Of those, ITIF assessed that 24 were likely counterfeits, including cosmetics, toys, luxury goods, pharmaceuticals, and household items.
- U.S. Customs and Border Protection correctly inspected a small fraction of probable counterfeit shipments but ultimately failed to seize them, and neither inspected nor seized any of the other probable counterfeit shipments, revealing gaps in enforcement.
- Temu and AliExpress, in particular, consistently failed to identify and delist probable counterfeits, allowing them to remain available and accumulate significant sales.
- Addressing counterfeiting requires policy interventions that target both platforms and vendors, focusing on structural deterrents and enforcement gaps.
- The U.S. Trade Representative should designate Temu, AliExpress, and SHEIN as notorious markets, and Customs and Border Protection should increase its AI-driven anti-counterfeiting capabilities to weight its enforcement toward these platforms.

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INTRODUCTION

On any given day, an American consumer can open a Chinese e-commerce app such as Temu or AliExpress and buy branded apparel, toys, or pharmaceuticals for a fraction of the price they would find at U.S. retailers. The listings may look convincing. The packaging might even carry the right logos. But peel back the surface, and a different reality emerges: cold medicine boxes with mystery caplets, video game accessories with incorrect packaging text, and unlicensed action figures. The problem is significant: a steady pipeline of counterfeit goods, mostly sold by China-based vendors, is entering U.S. households with products that infringe on intellectual property (IP), undermine U.S. brands, and expose American consumers to real safety risks.

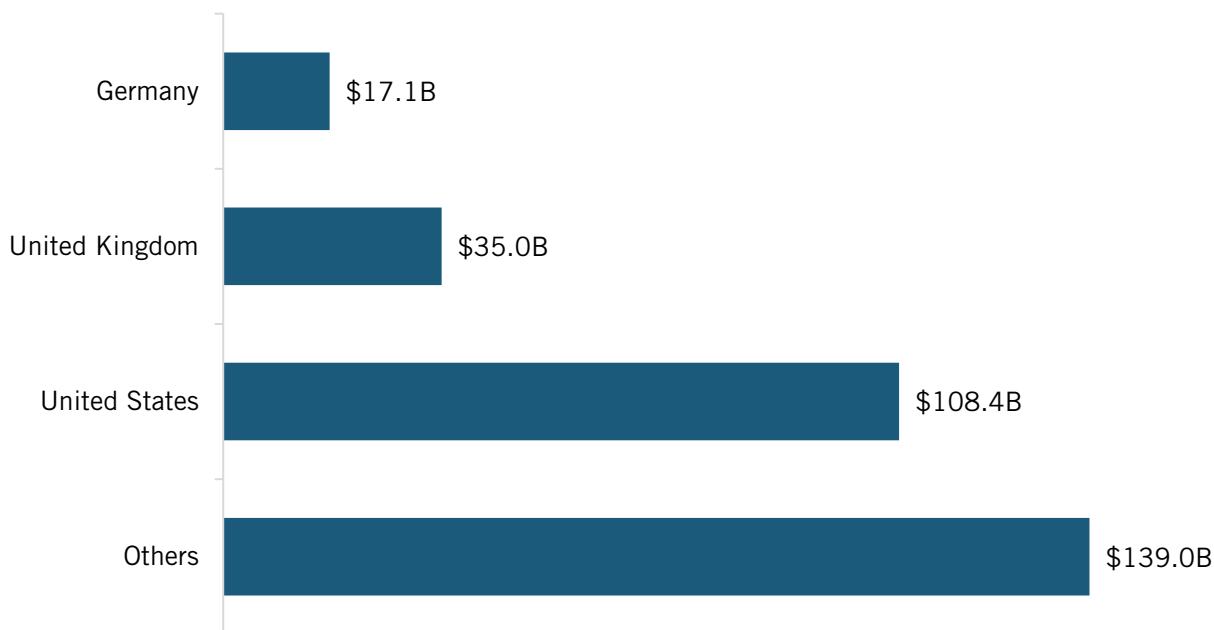
This report investigates that pipeline. On three popular Chinese e-commerce platforms—Temu, AliExpress, and SHEIN—the Information Technology and Innovation Foundation (ITIF) identified, purchased, and analyzed counterfeit products spanning multiple categories, including cosmetics, luxury goods and apparel, toys, over-the-counter (OTC) pharmaceuticals and supplements, automotive parts, and household goods. Using open-source intelligence and business registration records, ITIF traced likely counterfeit vendors' specific locations, shell and legitimate companies, and supply chain networks.

Vendors that knowingly list and sell counterfeit products that present consumer safety risks bear direct responsibility for the harm suffered by Americans. Yet, Chinese platforms that provide counterfeiters with a storefront and an audience of millions while offering inadequate anticounterfeiting services also share in the responsibility.

The issue is structural, going beyond spotty enforcement. In many regards, these platforms are no different from other for-profit global online platforms that attempt to create economies of scale. But they exist in China's industrial policy environment, which creates different incentives than the platforms' U.S. counterparts. To maintain the significant benefits they receive from the Chinese government's e-commerce industrial policy, Temu, AliExpress, SHEIN, and other Chinese e-commerce platforms need to continue growing market share globally, which at the moment means competing on value.¹ Therefore, lax enforcement of counterfeit goods is not simply a business failure but also a byproduct of the system in which these platforms operate. With little regard to regulatory liability or consumer advocacy, their tolerance for counterfeit sales will continue unless it threatens significant reputational or diplomatic blowback.

These platforms are capable of improving their accountability mechanisms. But shifting their incentives will require a combination of pressure and reform. Investigations such as this report can generate more transparency for consumers and create more demand for accountability. Yet, Chinese platforms' behavior will not shift on public sentiment alone. Behavior change requires U.S. government intervention to both incentivize and, where necessary, compel Chinese e-commerce platforms to adopt stricter anticounterfeiting measures. Foreign companies should be held to the same expectations as domestic companies when selling into the U.S. market. If they wish to access the vast U.S. e-commerce market, which as of 2024 made up by far China's largest cross-border e-commerce export market, as seen in figure 1, they should take meaningful responsibility for what they sell.

Figure 1: E-commerce exports from China to select countries (2024)²



It is no secret that these platforms list and frequently sell counterfeits. This report serves as the most current, comprehensive, and extensive public analysis of how counterfeits are sold on Chinese e-commerce platforms. It presents a framework for policymakers to consider how counterfeiting intersects with U.S.-China economic competition, platform governance, the future of e-commerce, and product safety.

Lax enforcement of counterfeit goods is not simply a business failure but also a byproduct of the system in which Chinese e-commerce platforms operate.

Whether through trade negotiations, regulatory modernization, or agency action, the United States should treat counterfeit enforcement as a priority. Allowing foreign platforms to facilitate the import of counterfeits while postponing hard questions about safety, legality, and market fairness is not good for U.S. businesses or consumers. Global e-commerce competition should not be a race to the bottom through cutting corners on product safety, IP rights, and consumer protection. Ideally, future e-commerce competition will be fought on next-generation logistics, consumer choice and transparency, and AI-driven retail innovations.

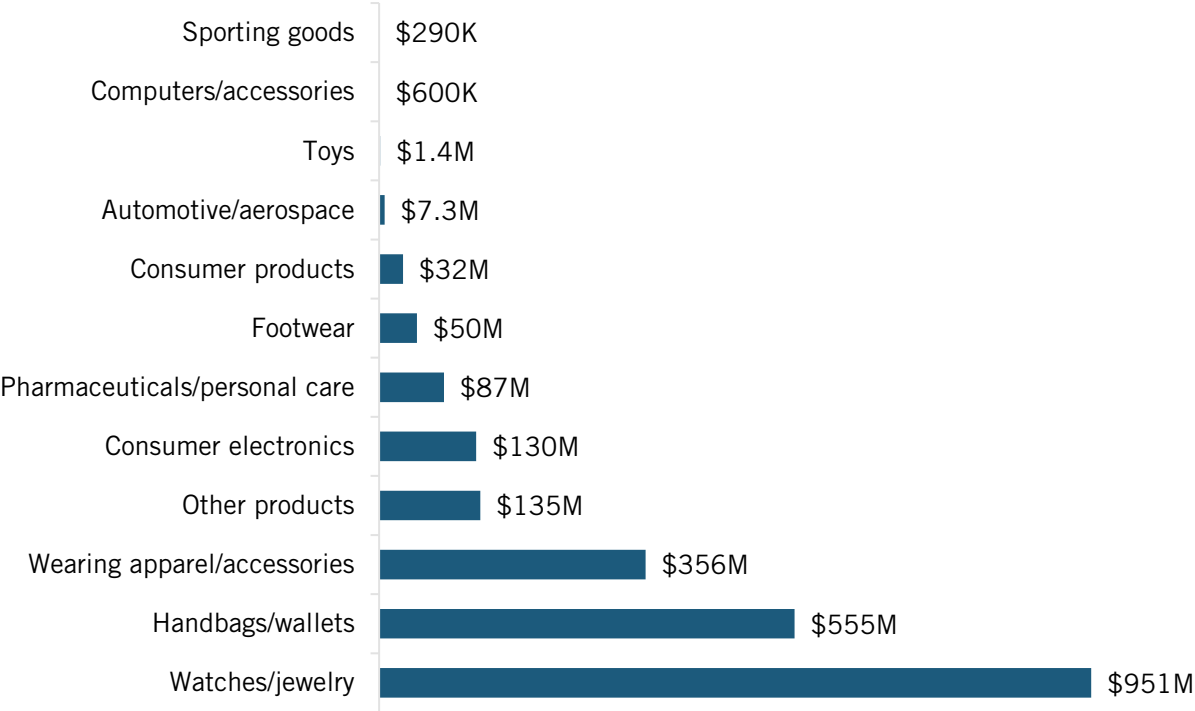
This report presents an alternative path that strives to preserve the benefits of a fast and affordable U.S. e-commerce market—that remains open to global competition—while protecting American innovation and consumer safety.

How Counterfeits Hurt American Businesses and Consumers

Counterfeit goods from China violate the IP rights of U.S. businesses and pose a risk to American consumers. U.S. Customs and Border Protection (CBP) seizes many IP-infringing imports, but many counterfeit goods still enter the U.S. market. According to CBP data, in FY 2024, the agency seized 27,927,068 counterfeit or pirated products from China and Hong Kong, with a

retail value of \$5.02 billion (using manufacturers' suggested retail price, or MSRP), making up approximately 90 percent of the total quantity of seized counterfeit goods entering the United States that year.³ In FY 2023, the top three most imported counterfeit products from China and Hong Kong included watches and jewelry (\$951 million), handbags and wallets (\$555 million), and apparel (\$356 million), with a collective retail value of \$1.86 billion.⁴ (See figure 2.)

Figure 2: MSRP of CBP-seized counterfeit products from China in 2023⁵



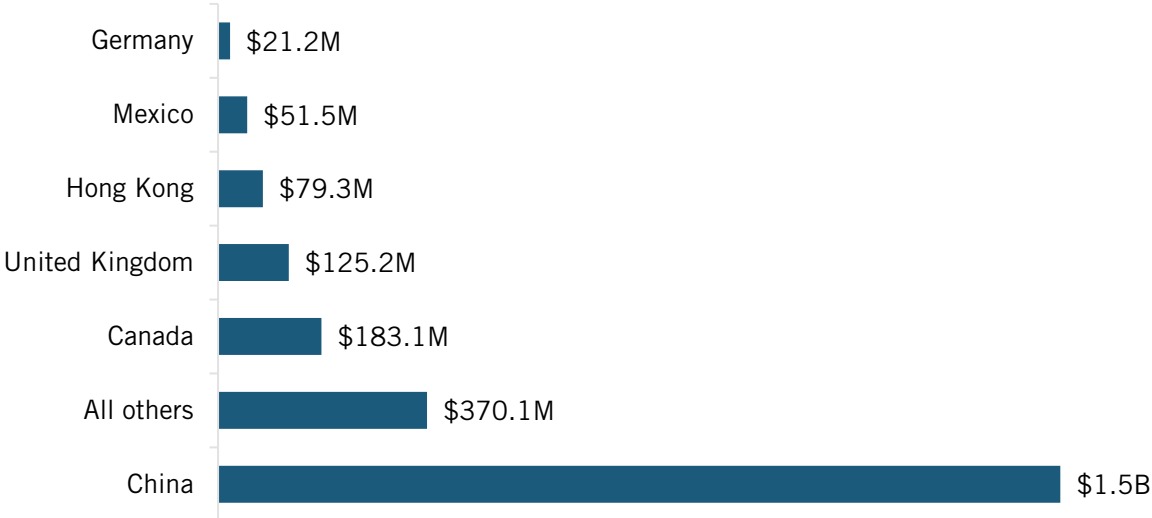
Unfortunately, CBP does not intercept all counterfeit goods entering the United States. A 2021 report by the Buy Safe America Coalition estimates that CBP intercepted only a small fraction of counterfeits, and that the total value of counterfeit goods from China in 2019 was \$45.5 billion.⁶ Given that CBP is unlikely to catch many of the counterfeits smuggled into the United States, the trade deficit with China may be higher than traditional trade statistics suggest. Moreover, the Buy Safe America Coalition estimates that counterfeits led to about \$54.1 billion in lost sales for domestic retailers, and that 283,400 retail jobs and 39,860 wholesale jobs, paying \$13.6 billion in wages, were lost due to those counterfeit imports.⁷ Finally, they estimated that counterfeit goods cost the U.S. government \$13.5 billion in lost tax revenue.⁸

These estimates may be overinflated, as the report's methodology seems to assume that consumers will always buy authentic goods from U.S. retailers as opposed to authentic goods from foreign sellers and that counterfeiters do not use any legitimate U.S. logistics service providers. However, the estimates nonetheless provide an indication of the magnitude of economic harm to the United States from counterfeits.

One reason the U.S. market has become saturated with Chinese counterfeit goods is because of the Section 321 de minimis exemption that previously allowed imports under \$800 in value to enter the United States free of tariffs and with minimal customs inspection. Indeed, the U.S.

International Trade Commission asserted that “Section 321 imports have been the key channel for Chinese business-to-customer (B2C) online retailers that ship direct from factories ... in China to U.S. consumers.” And, “Chinese e-commerce firms have ‘exploited’ the high U.S. de minimis level and minimal inspections to increase U.S. market share.”⁹ CBP estimated Chinese de minimis exports to the United States to be approximately 34 percent of the total U.S. de minimis imports in 2023—\$18.4 billion of the total \$54.5 billion U.S. de minimis imports.¹⁰ Moreover, CBP also showed that China has consistently accounted for the highest volume of de minimis volume among all nations from 2018 to 2021.¹¹ During that period, China, not including Hong Kong, accounted for 64 percent of all de minimis shipments by volume.¹² As such, it is no surprise that SHEIN and Temu accounted for over 30 percent of de minimis imports to the United States in 2022.¹³

Figure 3: De minimis volume by country of shipment from 2018 to 2021¹⁴



Supporting these figures, the Buy Safe America Coalition found that Section 321 shipments that meet the de minimis requirements grew significantly from just \$4 billion in 1992 to \$17.5 billion in 2020, with China having grown the most in dollar terms.¹⁵ Moreover, 36.9 percent of all seized shipments in 2019 were Section 321 shipments, showing how significant the de minimis exemption was to those importing counterfeits.¹⁶ Chinese e-commerce platforms, where counterfeits are often sold, have surged in popularity in the United States in recent years. Indeed, from September 2022 to September 2023, Temu’s U.S. visitors rose from 5.1 million to 80.3 million, almost catching up to eBay’s number of visitors.¹⁷ According to *Axios*, Temu and SHEIN ranked the top 5 most downloaded apps in the United States from February to March 2023.¹⁸ In that one-month period, Temu was downloaded 10 million times while SHEIN was downloaded 6.3 million times.¹⁹ By November 2023, Temu had claimed approximately 17 percent of the U.S. online discount market.²⁰ By the end of 2024, it had 186 million monthly active users in the United States, had become the world’s most downloaded shopping app for iOS and Android, and had overtaken eBay to become the world’s second most-visited e-commerce website.²¹

This rise in the number of visitors is partly due to a shift in the e-commerce platforms Generation Z consumers prefer to shop at: one in four shop on a Chinese e-commerce platform at least once

a week.²² Moreover, nearly half of Generation Z shoppers have bought from Chinese marketplaces, with 44 percent of Generation Z making at least one purchase monthly on SHEIN, and 41 percent on Temu.²³

Finally, it is important to note that purchases of counterfeit goods can funnel financial resources to criminal activity. UL Standards and Engagement, a global safety organization, asserts that “counterfeit sales may fund criminal enterprises that engage in human trafficking, organized crime, drug dealing, and other illegal activities.”²⁴ Given this evidence, frequent usage of Chinese e-commerce platforms that facilitate counterfeits does not just benefit unscrupulous sellers, but may also fund criminal networks and their illicit activities.

METHODOLOGY

To better understand the scope and nature of counterfeit goods originating from Chinese e-commerce platforms, ITIF conducted a structured series of test purchases on these platforms. The goal was to examine the prevalence of counterfeit products across multiple product categories and to assess how easily a U.S.-based consumer could purchase such products.

ITIF selected six product categories based on their known prevalence in counterfeit trade and the potential for consumer harm or IP infringement: pharmaceuticals and OTC health products, automotive parts, cosmetics, luxury goods and apparel, toys and children’s products, and household goods and consumer electronics. These categories allowed the study to capture a broad spectrum of potential safety risks, from ingestible products to items that could present electrical or mechanical hazards.

ITIF purchased from three Chinese e-commerce platforms—Temu, AliExpress, and SHEIN—which were selected because they are among the largest Chinese e-commerce companies operating internationally and have rapidly grown their U.S. consumer bases. ITIF examined hundreds of listings across the selected product categories, applying a set of indicators to identify potential counterfeit goods before purchase. These included significant price deviations from MSRP, unsupported claims of authorized reseller status, customer reviews flagging inauthenticity or poor quality, ambiguous or deceptive branding, and the misuse of major brand names in product metadata.

The objective of these test purchases was not to determine the percentage of counterfeits on these platforms, but rather to assess the accessibility, visibility, and characteristics of listings that raise serious concerns regarding authenticity, regulatory compliance, and platform accountability.

Classification of Imitation Goods

Imitation goods are products designed to resemble or replicate the appearance, style, or features of another product. Legal imitation goods include generic products, dupes, or other lawful lookalikes that avoid using protected trademarks or infringing on design patents. Illegal imitation goods include counterfeits, pirated goods, or knockoffs that infringe on trademarks, copyrights, patents, trade dress, or other protected rights.

For the purposes of this investigation, ITIF defined counterfeit products as fake or unauthorized replicas of genuine products that a consumer could be misled into believing is authentic. This

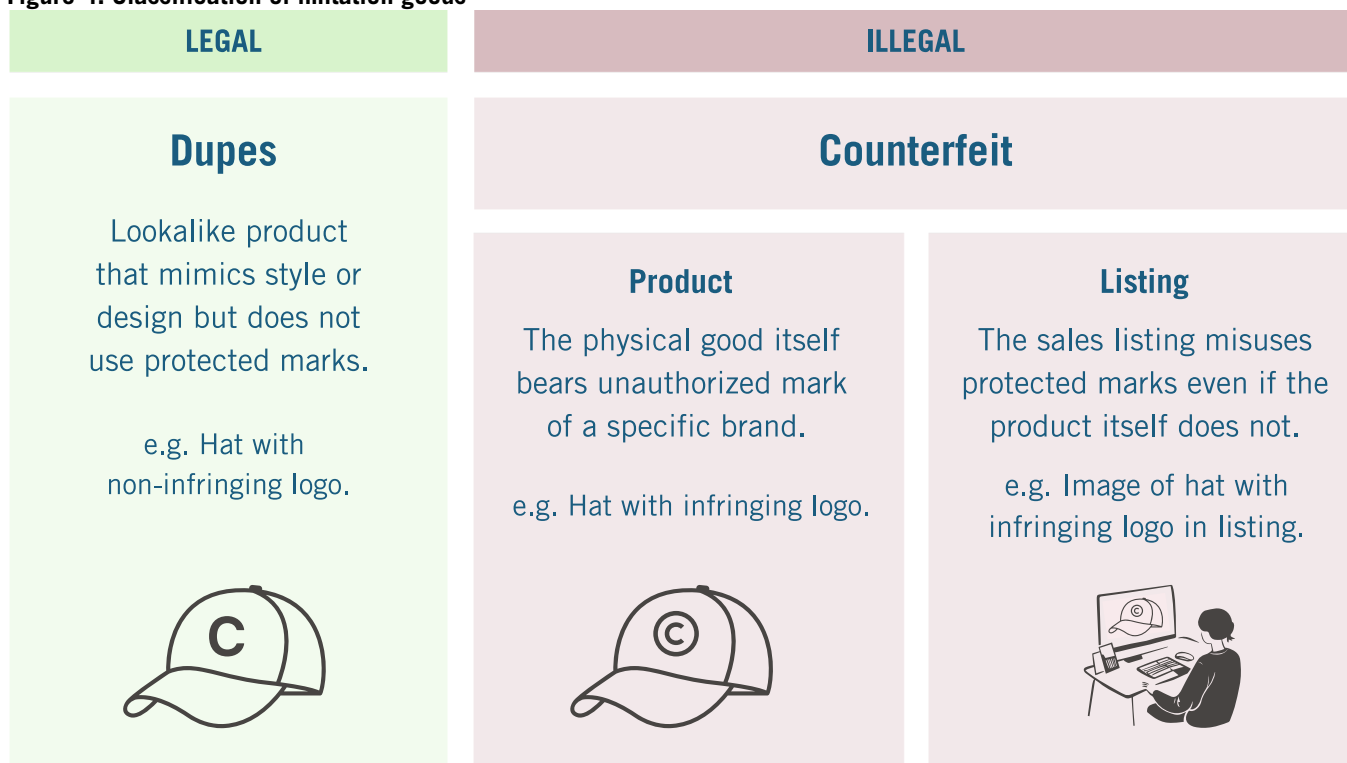
included cases where the listing or the product itself used protected brand identifiers that infringe upon registered trademarks or copyrights.

The investigation identified two main categories of counterfeit presentation:

- **Listing-level infringement.** The online listing contained protected brand names, logos, or copyrighted imagery, but the product itself did not carry those marks.
- **Product-level infringement.** The product itself displayed brand names, logos, or copyrighted imagery without authorization.

Because this investigation only focused on illegal counterfeits, ITIF excluded from its analysis listings that merely resembled branded goods without using protected marks.

Figure 4: Classification of imitation goods



Evaluation Process

ITIF identified potential counterfeit products before purchase using several indicators:

- **Price** (low or slightly undercut prices relative to MSRP)
- **Branding** (no or minimal use of brand names in listing text despite brand imagery in photos; obfuscated brand names slightly misspelled to remain familiar but avoid detection)
- **Images** (poor-quality, altered, or inconsistent product images)
- **Suspicious seller** (prevalence of other suspicious listings; seller histories suggesting high product turnover)
- **Reviews** (consumer reviews reporting counterfeit goods or product discrepancies)

Notably, these indicators do not always mean a product is a counterfeit. For example, a low price relative to MSRP could indicate that the vendor is selling stolen goods or goods not authorized for resale.

After receiving the products, ITIF conducted a structured inspection process:

- Physical and visual inspection for differences in materials, build quality, packaging details, or labeling compared with known authentic products
- Visual analysis of logos, trademarks, and copyrighted imagery
- Barcode and product identifier checks using verification tools to detect invalid or recycled identifiers
- Manufacturer verification by contacting the rights holders and submitting product photographs, batch numbers, or visual discrepancies for confirmation

ITIF only conclusively labeled a product as counterfeit when the original manufacturer confirmed that it was not an authorized or genuine item. Where confirmation could not be obtained, products meeting the working definition above were categorized as “probable counterfeits” for analytical purposes.

This methodology provided a controlled yet realistic view of the experience of a U.S.-based consumer in purchasing counterfeits, while ensuring that findings were grounded in verifiable evidence wherever possible.

COUNTERFEITS PURCHASED ON CHINESE E-COMMERCE PLATFORMS

Summary of Purchases

ITIF ordered 51 products of which 42 were successfully delivered. The remainder failed to arrive due to delivery cancellations by the vendor, shipping delays, or other logistical issues.

As seen in table 1, CBP detained 4 of the 12 products ITIF ordered from AliExpress and held those products in import customs clearance for inspection for 25 days before releasing them. For one of the items detained for inspection, a pair of Brooks shoes, ITIF re-ordered the same product from the same vendor, and CBP failed to inspect it. All four items appear to be likely counterfeits and originated from different vendors. CBP has authority under 19 C.F.R. § 133.23 to restrict the importation of gray market articles and to seize counterfeit goods bearing protected trademarks.²⁵

Table 1: CBP detentions

Product Listing	Vendor	Suspicious Indicators	Customs Status
Brooks Shoes	Brooks Authorized Store	Price and suspicious seller	Inspected and released for delivery
Brooks Shoes	Brooks Authorized Store	Price and suspicious seller	Delivered without inspection
Rhode Lip Gloss	Shop1104388430 Store	Price	Inspected and released for delivery
Tarte Concealer	Shop1104187705 Store	Price and branding	Inspected and released for delivery
Milk Makeup	Shop1102882139 Store	Price	Inspected and released for delivery

CBP appears to have correctly identified some shipments that likely violate IP protections, but failed to seize any likely counterfeits ITIF purchased.

As seen in table 2, of the 42 successfully delivered products, ITIF identified 24 likely counterfeits and 2 counterfeits that were confirmed by the infringed-upon rights holder. Out of the additional 9 products that were not successfully delivered, 3 contained substantive-enough evidence to also be deemed likely counterfeits. The products that were successfully delivered but appeared unlikely to be counterfeits were largely unauthorized resales, such as a product only meant to be sold in the mainland China market, otherwise diverted authentic products, or cases where the vendor deceptively showed a larger quantity of an authentic product than what was delivered.

Table 2: ITIF test purchase results

Product Listing	Platform	Product Category	Counterfeit Status
Beyblade 1	AliExpress	Toys/Children	Suspected
Brooks Shoes	AliExpress	Apparel/Luxury	Suspected
CH Bag 1	AliExpress	Apparel/Luxury	Suspected
Disney Elsa Doll	AliExpress	Toys/Children	Suspected
Disney Yoda Figure	AliExpress	Toys/Children	Suspected
Honda Dirt Pad	AliExpress	Auto	Suspected
K18 Treatment 1	AliExpress	Cosmetics	Suspected
Milk Makeup	AliExpress	Cosmetics	Suspected
Nike Shoes	AliExpress	Apparel/Luxury	Suspected
Ralph Lauren Polo Shirt	AliExpress	Apparel/Luxury	Suspected
Rhode Lip Gloss	AliExpress	Cosmetics	Suspected
Marvel Action Figure 1	AliExpress	Toys/Children	Suspected
Marvel Action Figure 2	AliExpress	Toys/Children	Suspected
Tarte Concealer	AliExpress	Cosmetics	Suspected
CH Bag 2	SHEIN	Apparel/Luxury	Suspected
Besque Oil	Temu	Cosmetics	Suspected
Beyblade 2	Temu	Toys/Children	Suspected
Beyblade 3	Temu	Toys/Children	Suspected
Color Wow Treatment	Temu	Cosmetics	Confirmed
Haleon Cold Medicine	Temu	Pharmaceuticals	Suspected
K18 Treatment 2	Temu	Cosmetics	Suspected
KontrolFreek Thumbsticks	Temu	Toys/Children	Confirmed
Philips Toothbrush Heads	Temu	Household	Suspected
YETI Tumbler	Temu	Household	Suspected

Details About Counterfeit Purchases

KontrolFreek Thumbsticks

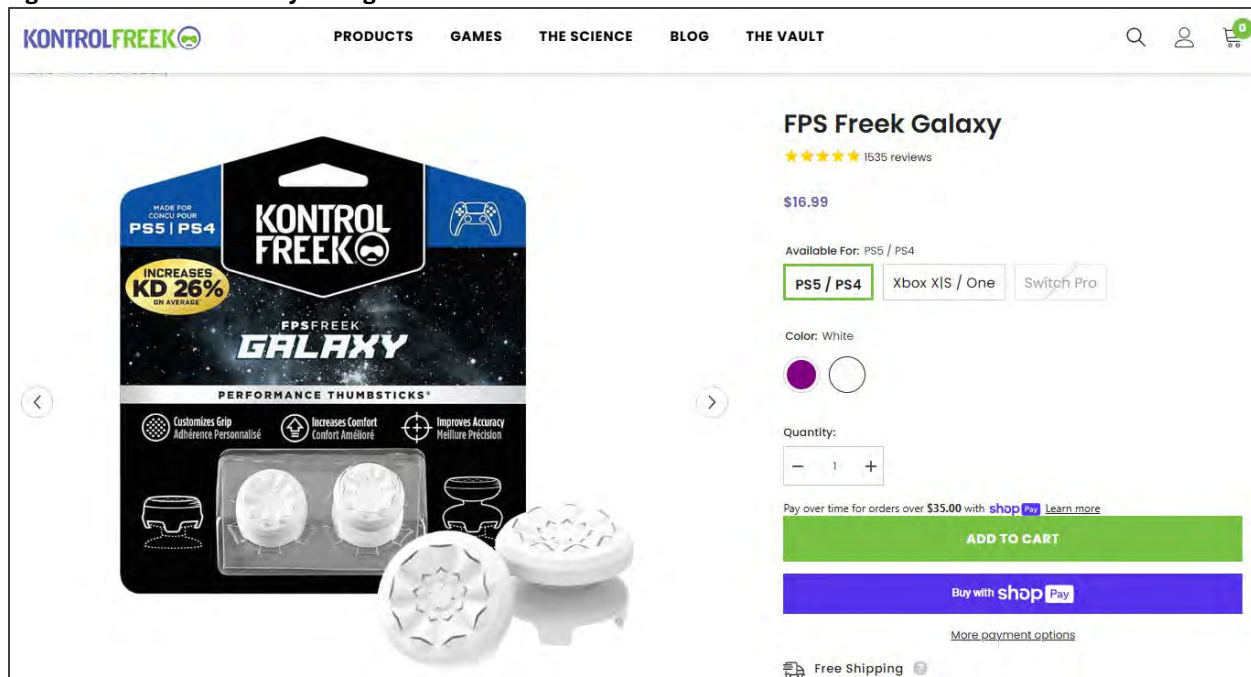
ITIF purchased an accessory from Temu that goes on the joysticks of video game console controllers to speed up players' range of motion.²⁶ The listing, seen in figure 5, is titled "New Freek Galaxy High Performance Thumb Grip Silicone Keycaps."

Figure 5: FPS Freek Galaxy listing on Temu²⁷

The screenshot shows a product listing on the Temu website. The main image is the product packaging for 'KontrolFreek FPS Freek Galaxy Performance Thumbsticks'. The packaging is black and blue, featuring the KontrolFreek logo and the text 'MADE FOR CONQU FOUR PS5 | PS4', 'INCREASES KD 26% ON AVERAGE', and 'FPS FREEK GALAXY PERFORMANCE THUMBSTICKS'. Below the packaging, there are three individual thumbsticks: one black, one white, and one red. The listing includes a price of \$3.27 (75% off from \$13.25), a 4.6-star rating from 5 reviews, and a 'Buy now' button with 'Faster dispatch'. The listing also mentions 'Local warehouse' and 'Free shipping on orders over \$30 from this seller'. The product is described as 'New Freek Galaxy High Performance Thumb Grip Silicone Keycaps, Analog Joystick Cap Sleeves for PS4, PS5 High Cocking Analog Joystick [Easy to Use] Enhance your gaming experience!'.

The listing photo clearly displays the video game accessory company KontrolFreek's product "FPS Freek Galaxy White," as advertised on its website in figure 6. The U.S. Patent and Trademark Office has awarded KontrolFreek with two patents for its Thumbstick products.²⁸

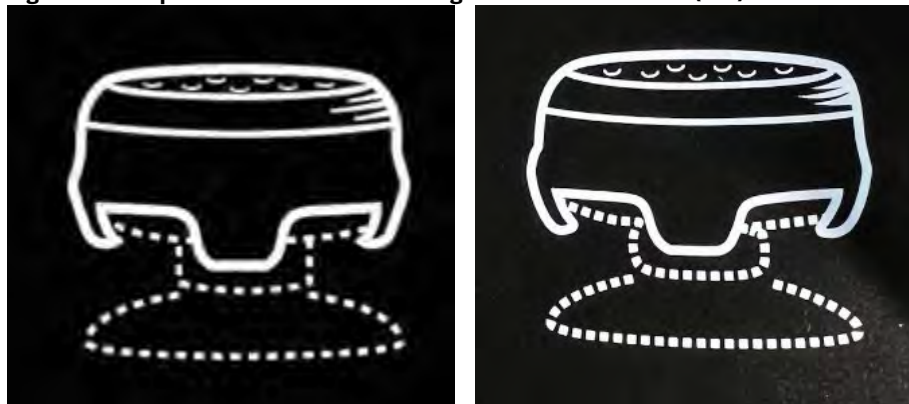
Figure 6: FPS Freek Galaxy listing on KontrolFreek's website²⁹



On the Temu listing, suspicious indicators of counterfeit included the listing price of \$4.96, far lower than KontrolFreek's MSRP of \$16.99, as well as the omission of the brand "KontrolFreek" and using the term "keycaps" instead of "thumbsticks."³⁰ The vendor behind the listing, "dabaobao," is the public-facing alias of a company based in China called "Haikoulonghuaxufenyishangmaoxing."³¹ ITIF was unable to determine the vendor's business name or address in Chinese. KontrolFreek states on its website that "products purchased from non-authorized sellers are often used, fake, counterfeit, or defective."³²

Upon inspecting the product following shipment, ITIF identified a number of discrepancies. For example, as seen in figure 7, the design of the Thumbstick on the purchase's packaging has different dashed lines than the online listing. In general, the design appeared unprofessional, being slightly crooked and thus not parallel with the packaging's outer lines.

Figure 7: Comparison of thumbstick design between authentic (left) and counterfeit (right)³³



As seen in figure 8, there are also several discrepancies on the back of the packaging compared with an authentic product package.³⁴ First, the description at the top has “Freek® Galaxy” (two spaces rather than one) and “comfort,control” (missing space after comma). The font size shifts on the third and fourth lines of the description. Additionally, the Italian description has some punctuation typos including “Performance.Thumbstick,é.” There is no “Made in the USA” emblem.

Figure 8: Detail of errors and inconsistencies in text on Kontrol Freek thumbstick packaging purchased by ITIF



Figure 9: KontrolFreek Thumbstick purchased by ITIF



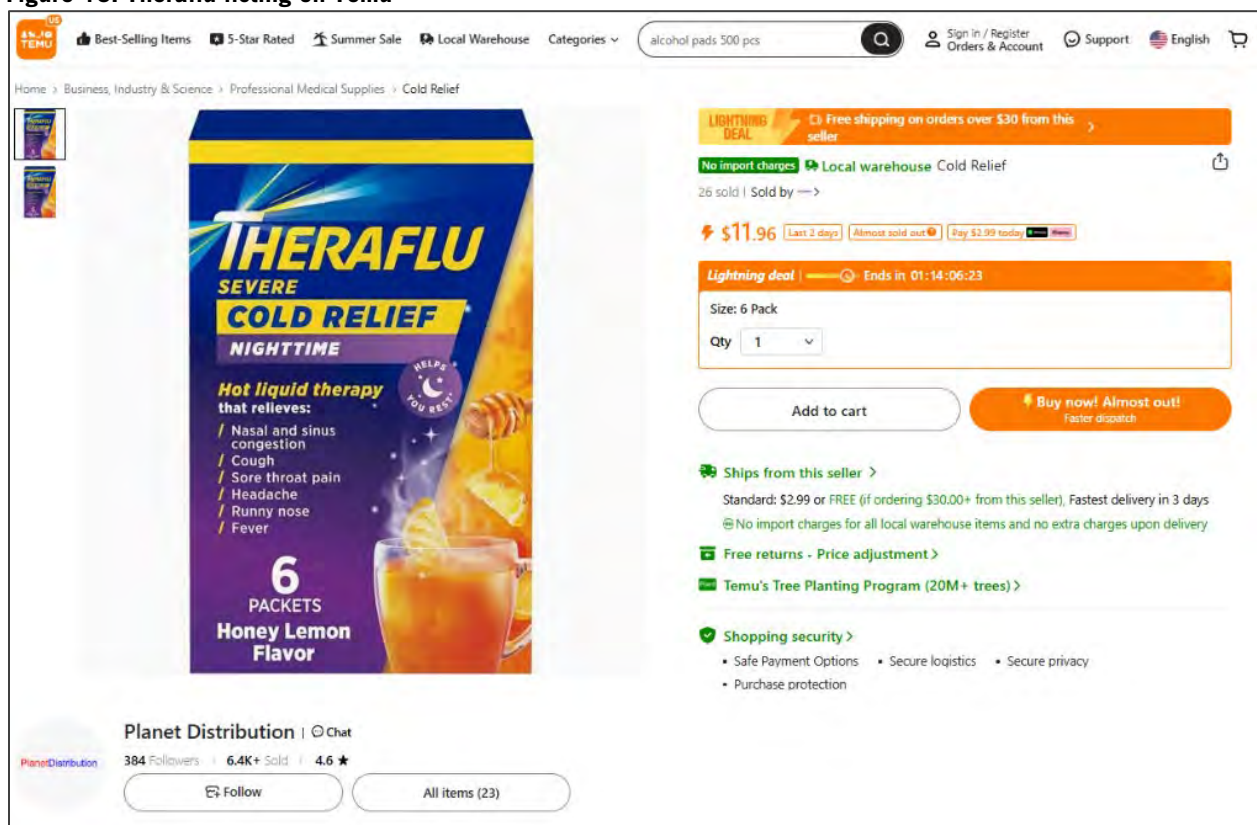
The listed UPC on the packaging of the test purchase, “850007079987,” matches the correct product listing, “FPS Freek Galaxy Performance Thumbsticks KontrolFreek Playstation 5,” on Barcode Lookup.³⁵ ITIF reached out to KontrolFreek’s parent company SteelSeries with photos of the purchase, which responded that “this is not an authentic KontrolFreek product.”³⁶

As of August 2025, according to Temu’s public metrics, the vendor “dabaobaoy” has sold 440 items across nine KontrolFreek-branded listings.³⁷

Haleon Cold Medicine

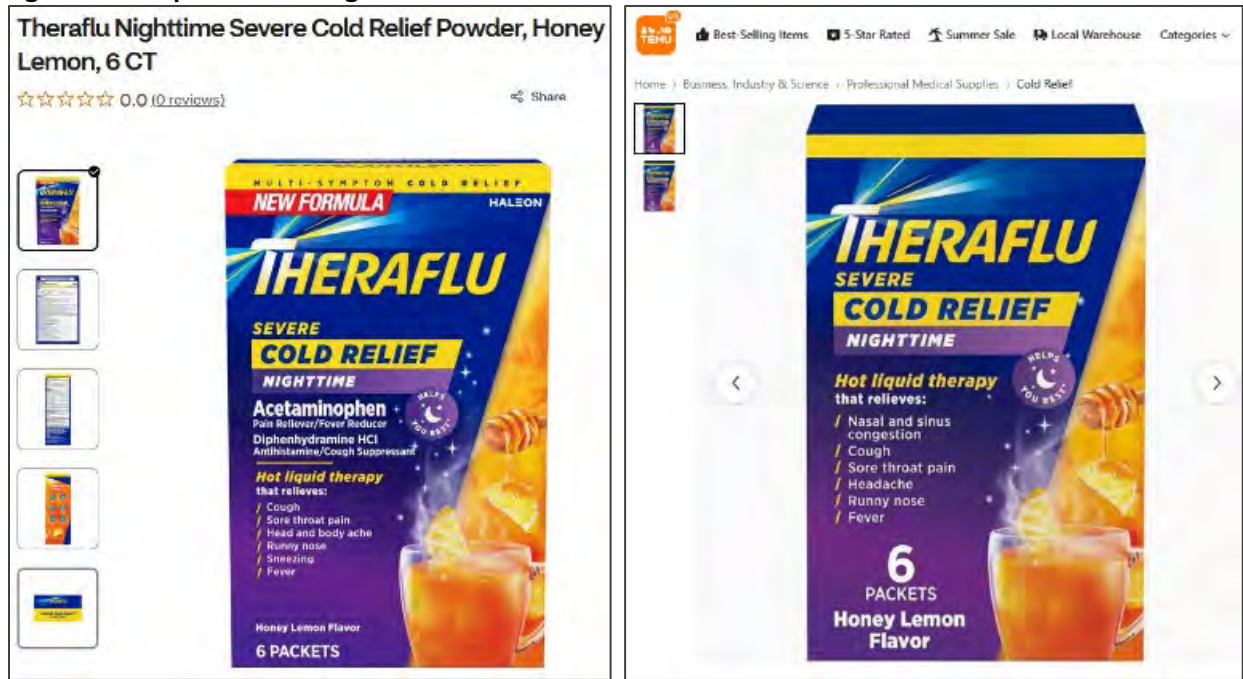
ITIF purchased a product vaguely titled as “Cold Relief,” without a listed brand or product name, on Temu.³⁸ However, the listing photo, as seen in figure 10, clearly showed a branded U.S. OTC medication: Theraflu Nighttime Severe Cold Relief Powder, Honey Lemon, 6 CT.

Figure 10: Theraflu listing on Temu



The product closely resembled what is sold in major U.S. retail pharmacies, such as CVS and Walgreens, in appearance and price. However, the listing’s vague product title was suspicious.³⁹ Additionally, the vendor appeared to have altered the listing’s image to remove the original product’s description of “multi-symptom cold relief” and “new formula,” and most conspicuously, seemingly wiped “Haleon,” the brand owner of Theraflu, from the image’s top right corner.⁴⁰

Figure 11: Comparison of listing on CVS versus Temu for Theraflu⁴¹



Upon receiving the product, as seen in figure 12, ITIF contacted Haleon, the multinational health-care company that makes Theraflu, to inquire about the product's authenticity.⁴² After sharing information about the purchase, a representative from Haleon's product authenticity department noted, "It is most probably a counterfeit."⁴³ The company representative also stated that "the product is targeted at the U.S. market only," suggesting that it originated outside Haleon's authorized supply chain, a strong indicator of counterfeiting. Haleon has previously faced counterfeiting issues from online retailers.⁴⁴

Figure 12: Theraflu purchased by ITIF



The vendor behind the test purchase, “Planet Distribution,” had—as of July 2025—sold 26 of this likely counterfeited Theraflu product.⁴⁵ In all, Planet Distribution had sold a total of over 6,400 items on Temu.⁴⁶ As of July 2025, Planet Distribution had only 23 items listed, of which the Theraflu product was the only OTC medicine. Customers have left negative reviews claiming that Planet Distribution sells fake products. The business behind Planet Distribution, “Thera Management, INC.,” is in Illinois and appears to operate out of a suburban residence.⁴⁷

A subsequent Planet Distribution package included an advertisement, as seen in figure 13, for customers to “check out” Planet Distribution’s website, which they advertise as “cheaper than Temu!”

Figure 13: Planet Distribution advertisement included in package sent to ITIF



Planet Distribution’s website offers products that raise questions about IP rights, legality, and product safety.⁴⁸ These include products such as sexual-health supplements and the same Theraflu product ITIF purchased, as seen in figure 14, which is offered for \$8.99, indeed undercutting the vendor’s Temu listing price of \$11.96.⁴⁹

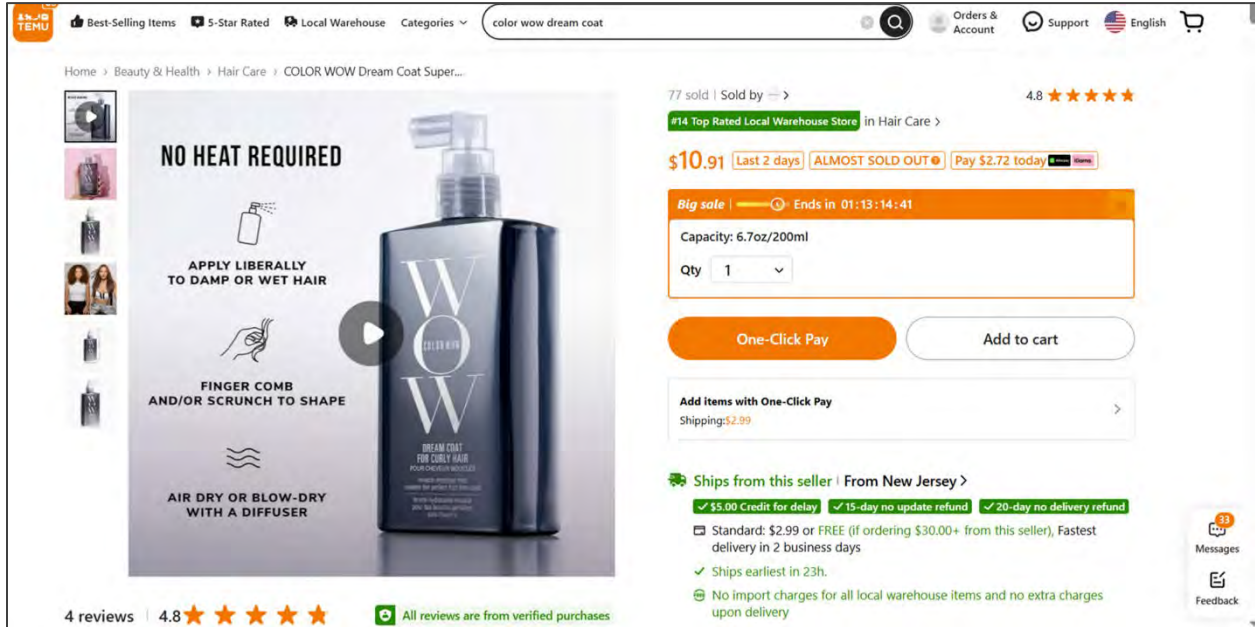
Figure 14: Theraflu listing on Planet Distribution's website⁵⁰

The screenshot displays the product listing for Theraflu Nighttime Severe Cold Relief Honey Lemon Flavor Powder (6 Ct) on Planet Distribution's website. The page includes a search bar, navigation links, and a promotional banner for a 10% sale. The product image shows a box of Theraflu with a glass of honey lemon tea. The price is listed as \$8.99, down from \$9.99. The page also features a 'Buy More Save More!' section with three options: Buy 3 items get 5% OFF, Buy 6 items get 10% OFF, and Buy 10 items get 15% OFF. The estimated delivery is 5 days, and the categories are Uncategorized.

Color Wow Treatment

ITIF purchased a “COLOR WOW Dream Coat Supernatural Serum” from Temu for \$10.91, as seen in figure 15, while the product as sold by Color Wow has a \$24 MSRP.⁵¹ The Temu listing, which has since been delisted, used official Color Wow marketing materials, including product images identical to those used by the legitimate company.

Figure 15: Color Wow treatment listing on Temu⁵²



Following shipment of the product, as seen in figure 16, ITIF observed discrepancies compared with authentic versions of the product on the back label of the bottle.

Figure 16: Color Wow treatment purchased by ITIF



As seen in figure 17, these include typographical errors such as “they re” instead of “they’re” and “Weightless,moisturizing” without a space following the comma.

Figure 17: Detail of errors and inconsistencies in text on Color Wow treatment purchased by ITIF



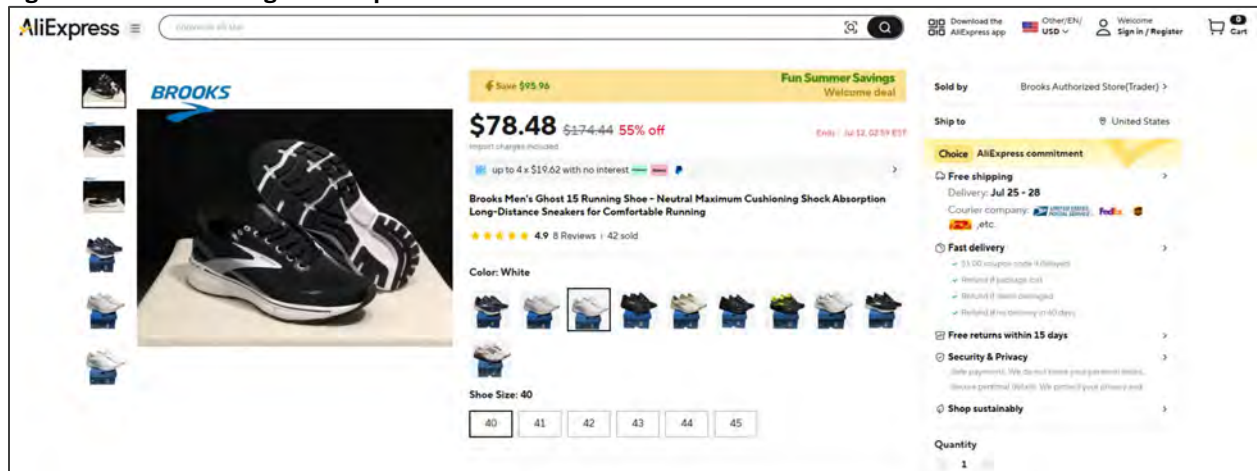
ITIF sent pictures and information of the purchased product to Color Wow. The company responded: “This is definitely a counterfeit.”⁵³ Color Wow also noted that they have heard from “customers who have purchased products through Temu and those have been counterfeit as well.”⁵⁴

The vendor selling the item, N502688, operates out of Colorado under the business name “Beacon Export Edge Inc.”⁵⁵ The owner of this company has seven other registered businesses, most of which appear to be e-commerce operations, all located at the same building.⁵⁶

Brooks Shoes

ITIF purchased a pair of men's shoes marketed as Brooks Ghost 15 running shoes on AliExpress. The seller listed them for \$78.48, as seen in figure 18, presenting a large price discrepancy with Brooks' \$140 MSRP for the same product.⁵⁷

Figure 18: Brooks listing on AliExpress



The seller's AliExpress-listed vendor name is "Brooks Authorized Store" and they sell hundreds of Brooks products below MSRP.⁵⁸ Brooks' website says, "Unfortunately, we can't guarantee the quality of shoes bought from marketplace websites."⁵⁹

Brooks is not behind Brooks Authorized Store, which is just a chosen vendor name. The company actually behind Brooks Authorized Store is Xiamen Bond New Material Technology Co., Ltd, which is a subsidiary of a plastic particles company, Suzhou Tryan Plastic Technology Co., Ltd., or Tryan.⁶⁰ Tryan, whose website is seen in figure 19, has four factories "specializing in the research and development, production, sales and after-sales of various high-performance modified plastics."⁶¹ Notably, Tryan states that its products are used in the production of "shoemaking."⁶² Tryan additionally specializes in "computer color matching," owns a colorimeter that can precisely measure color matching in pigments, and is hiring for a "color matching engineer" who is "able to independently match colors."⁶³ Tryan has patented technology for gas-assisted injection molding, which would be useful to make molded components in running shoes and shares similarities with Brooks' nitrogen infusion process.⁶⁴ Tryan is currently hiring for a "TikTok video shooting and editing" position to use "short videos and graphic self-media to promote the company's products."⁶⁵

Figure 19: Screenshot of Tryan’s website



Tryan is a company with technical knowledge, including 30 employees and 3 senior engineers, and significant capital investment.⁶⁶ It has seemingly legitimate business streams, including a plastics and colorants business.⁶⁷ Tryan is, in part, subsidized by the Chinese government. The Suzhou local government awarded Tryan a stipend in 2023.⁶⁸ The Jiangsu Provincial Department of Science and Technology additionally recognized Tryan as a “Jiangsu Province Science and Technology Small and Medium Enterprise” that same year.⁶⁹

A company such as Tryan would have some of the capabilities required to make counterfeit shoes but likely not all the components. Counterfeiters can leverage recognizable brands such as Brooks not just to make profits, but also to gather consumer feedback, refine production processes, and accelerate development of a counterfeit version of its sneaker technology. This allows the counterfeiter to iterate on designs, reverse engineer authentic shoes, and gradually move up the value chain as it improves its processes. If Tryan produces counterfeit products, it uses a sophisticated model of counterfeiting that is more akin to advanced manufacturing than simple replications of plastic products.

The Brooks shoes appeared very similar to authentic Brooks Men Ghost 15 shoes on first glance. They arrived in a shoebox that looks identical to Brooks shoeboxes, and with a seemingly authentic label on the box’s side. However, ITIF quickly observed some discrepancies. First, the shoe box the shoes arrived in contained a different barcode, “195394438666,” as seen in figure 20, than the shoe tongue’s label, “195394160406,” as seen in figure 21. The shoebox barcode maps to Brook’s Men Ghost 15 shoes, but in the wrong color, “Gray/Green/Daylilly,” according to Barcode Lookup.⁷⁰ The shoe tongue label’s barcode maps to Brooks Women’s Glycerin 20 shoes, which is the wrong model shoes entirely.⁷¹

Figure 20: Shoe box label barcode on Brooks shoes purchased by ITIF

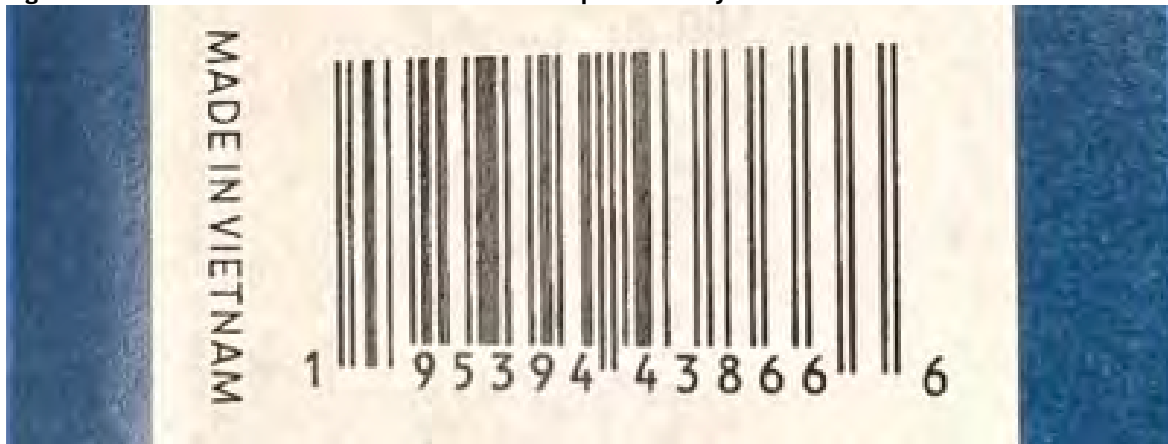
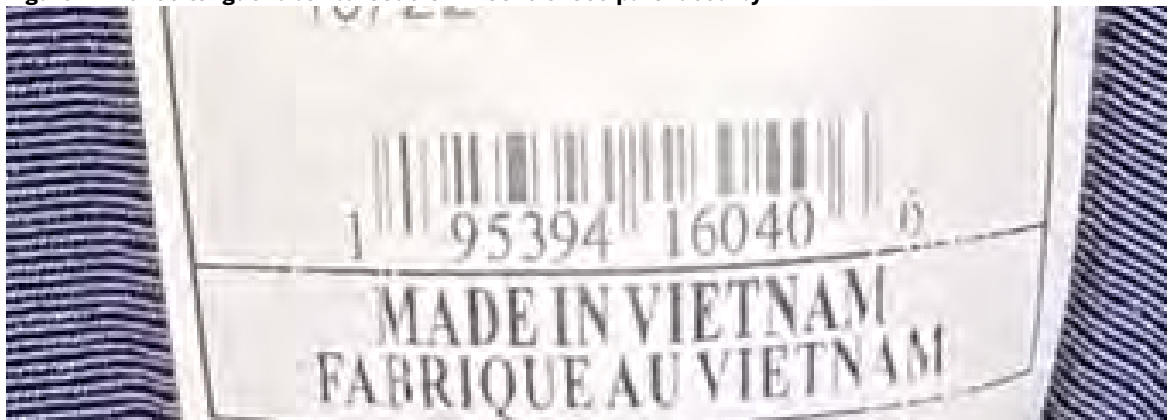


Figure 21: Shoe tongue label barcode on Brooks shoes purchased by ITIF



Second, the shoes physically presented some visual discrepancies from the authentic model online, as seen in figure 22.⁷² The design of the wraparound heel overlay is less reflective in the product ITIF purchased and also appears taller in the heel section, as seen in figure 23.

Figure 22: Heel detail of Brooks Men's Ghost 15 listing on Brooks' website⁷³



Figure 23: Heel detail of Brooks shoes purchased by ITIF



Third, the shoes' outsole also displayed some quality control discrepancies with images of the authentic pair of shoes. Two parts of the teal tread appear to have been cut imprecisely and hang out over the white outsole and the tread as a whole appears to have been slightly misaligned with the entire white part of the outsole, as seen in figure 24. This contrasts with Brooks' images of its outsole, as seen in figure 25.⁷⁴

Figure 24: Outsole detail of Brooks shoes purchased by ITIF

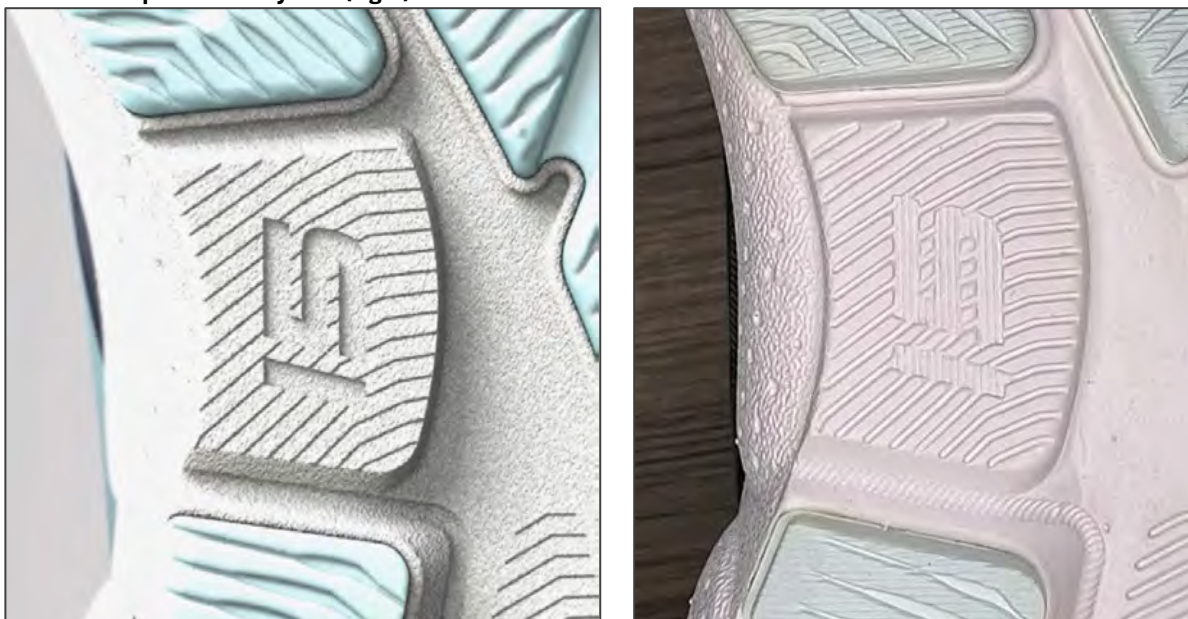


Figure 25: Outsole detail of Brooks Men's Ghost 15 listing on Brooks' website⁷⁵



The shoes also appeared to have a different “15” logo on their outsole based on comparison with the authentic model’s outsole, as seen in figure 26.⁷⁶ The “15” logo on the shoes ITIF purchased appears to be more shallowly carved and contains striped lines that the authentic version does not.

Figure 26: Outsole “15” logo detail of Brooks Men’s Ghost 15 listing on Brooks’ website (left), compared with Brooks shoes purchased by ITIF (right)⁷⁷

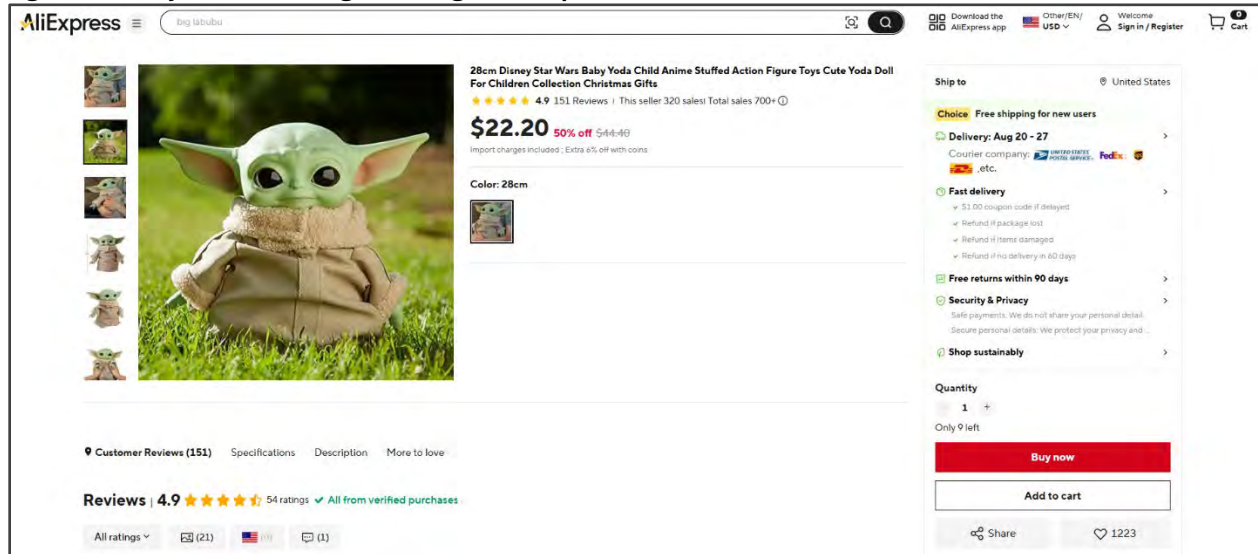


While Tryan has capabilities consistent with manufacturing counterfeit shoes, ITIF was unable to confirm whether the company itself is directly producing them. ITIF contacted Brooks to inquire about the purchased product’s authenticity, sharing photos and details about how the product was acquired. A Brooks supervisor responded: “I’ve confirmed with our quality teams here and can confirm this does not appear to be an authentic Brooks product.”⁷⁸

Baby Yoda Action Figure

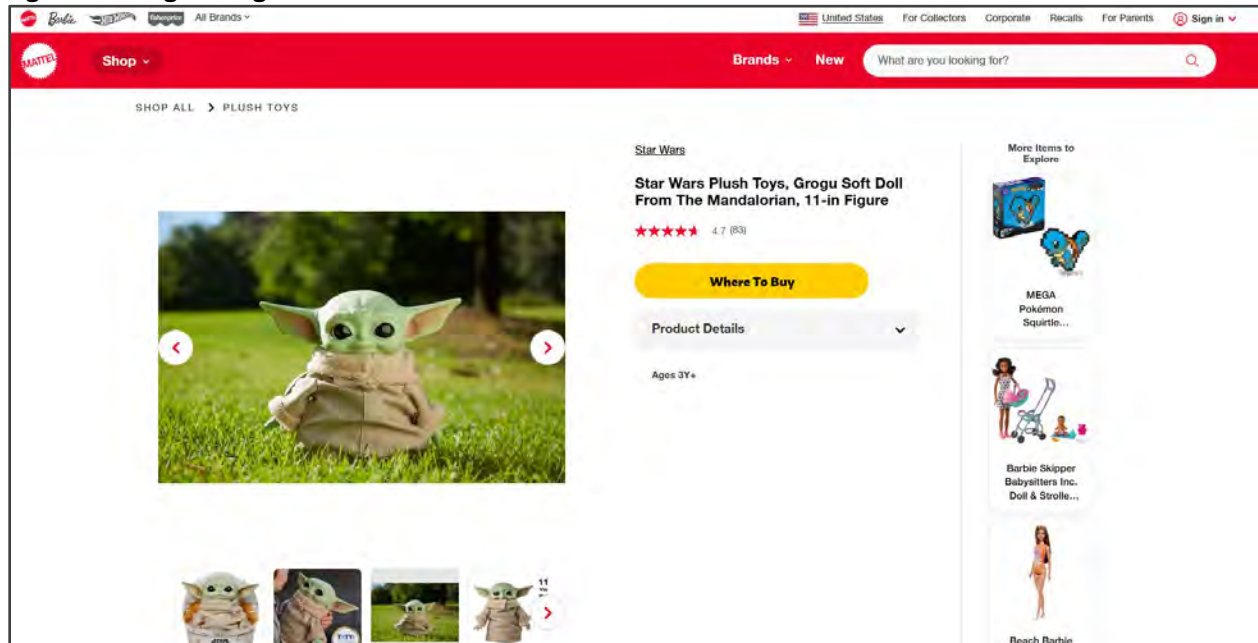
ITIF purchased a product titled “Disney Movies Star Wars 28cm Baby Yoda Action Figure Toy Model Dolls Toys Kids Birthday Gifts” on AliExpress for \$22.20, as seen in figure 27.⁷⁹

Figure 27: Baby Yoda action figure listing on AliExpress



The listing used a photo repurposed in listings on Disney-licensed vendors such as Mattel, seen in figure 28, which references the product’s Star Wars licensing.⁸⁰

Figure 28: Grogu listing on Mattel’s website



Upon arrival, the product lacked any Disney, Lucasfilm, or Star Wars branding. It arrived without packaging of any kind that could have indicated it was officially licensed. As seen in figure 30, it also contained visual discrepancies from the listing’s repurposed photo.

Figure 29: Baby Yoda action figure purchased by ITIF



Figure 30: Baby Yoda toy product AliExpress listing photo compared with the product ITIF received



Despite this, the figure was an unmistakable likeness of “Grogu” (commonly known as Baby Yoda), a character owned by Disney and Lucasfilm.⁸¹ The use of “Disney” and “Star Wars” in the product title, combined with the visual imitation of a well-known character, strongly suggests this is an unauthorized product infringing on Disney’s IP rights.

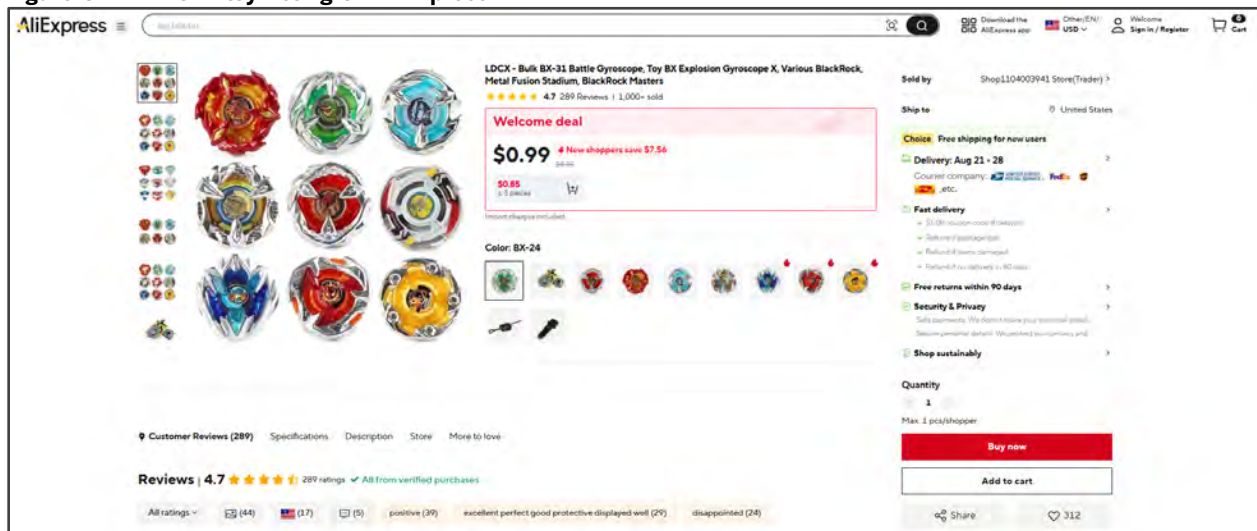
This type of infringement represents one of the highest margin forms of counterfeiting. Because the product itself is a simple combination of molded plastic and low-cost fabric, the real value lies in the product's IP: the Disney and Star Wars branding and the character design. Counterfeiters can manufacture these items at low overhead costs and profit by exploiting brand recognition, while avoiding licensing fees and quality control standards. In this case, the listed price of the counterfeited item was less than the typical MSRP for smaller, officially licensed Star Wars merchandise.⁸²

The seller, operating under the storefront Bandai Anime Lucky Shop Store, lists an address and company name that do not match.⁸³ The company name given is for a metallurgy and furnace company, but the business address given maps to an energy storage company in a different part of Shanghai.⁸⁴

Beyblade

ITIF purchased a children's spinning-top toy from AliExpress listed as "LDCX – Bulk BX-31 Battle Gyroscope," as seen in figure 31, which mimics the marketing, naming conventions, and design of the popular Beyblade brand.⁸⁵

Figure 31: "BX-31" toy listing on AliExpress



The listing prominently includes the term "BX-31," a code that mirrors Beyblade's product numbering system, and the product image features the word "BEY" in stylized capital letters at the center of the toy, as seen in figure 33, despite no affiliation with the official Beyblade trademark owner. Upon arrival, the product displayed no acknowledgement of any Beyblade IP.

Figure 32: "BEY" toy purchased by ITIF



Figure 33: "BEY" toy product listing photo compared with the product purchased by ITIF



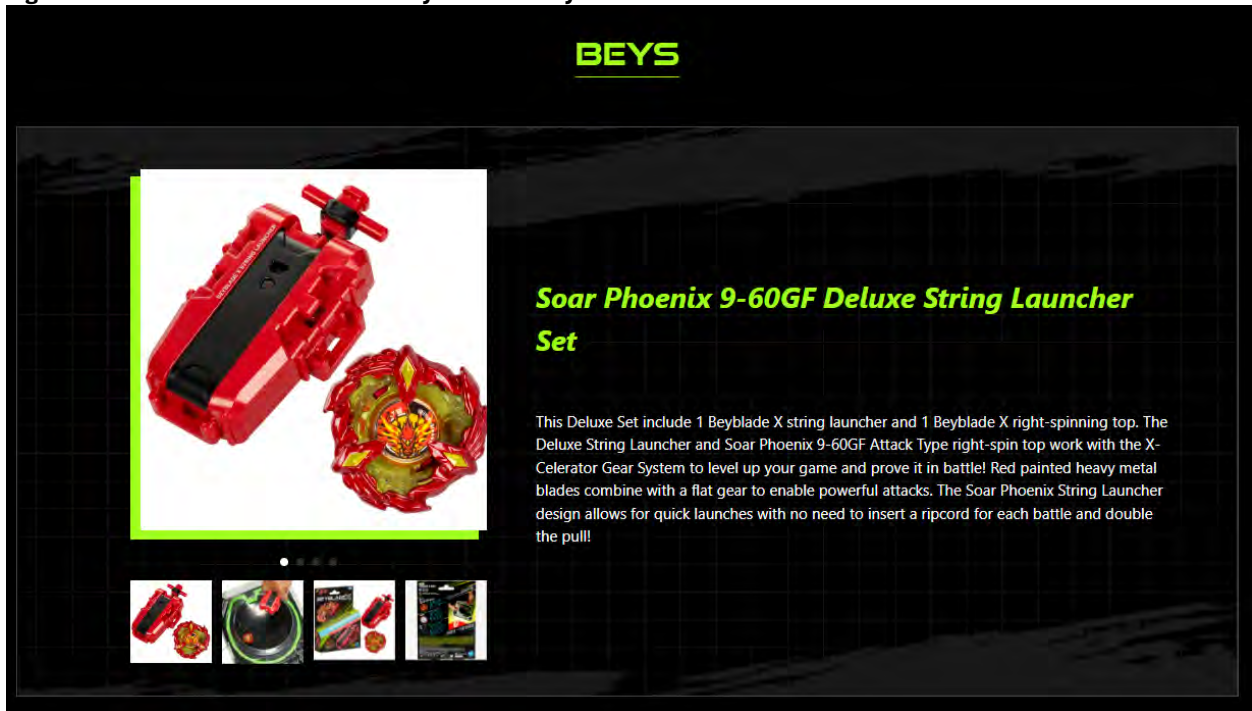
Figure 34: Detail of AliExpress listing showing “BEY”



These elements are designed to evoke the brand identity of Beyblade and signal to consumers that this product is part of the broader Beyblade universe, even though it is not.

While this listing does not use the full brand name in the product title, it uses the “BX-31” code, the “BEY” text, and a phoenix image that is identical to official Beyblade products, as seen in figure 35.

Figure 35: Screenshot of authentic Beyblade on Beyblade's official website⁸⁶

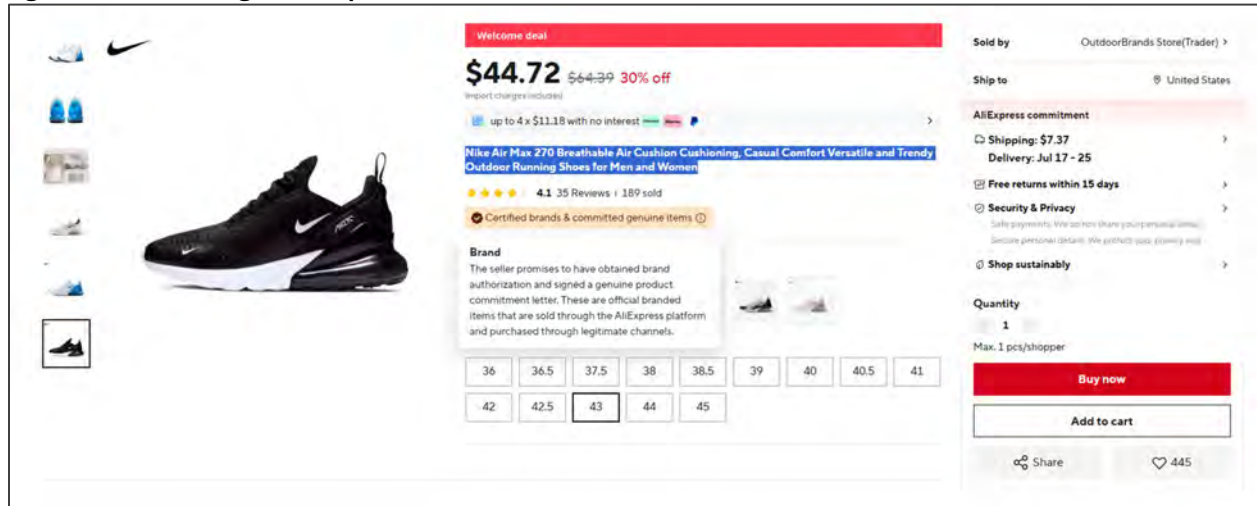


These factors allow the vendor to benefit commercially from the unauthorized use of Beyblade's branding and design language and align this product more closely with the definition of a counterfeit than a dupe. Additionally, the prevalence of nonstandard English and inconsistent text on listings such as this one make it harder for consumers to distinguish between legitimate products and knockoffs. In this case, the deliberate usage of brand imagery and terminology appears designed to exploit that confusion for commercial gain.

Nike Shoes

ITIF purchased a pair of Nike “Air Max 270” shoes from AliExpress based on a suspicious listing in which the listed price at \$44.72 was far below Nike’s typical Air Max 270 MSRP of between \$130 and \$160.⁸⁷ On the listing, seen in figure 36, AliExpress designated the vendor, OutdoorBrands Store, as a “certified brand” that “promises to have obtained brand authorization and signed a genuine product commitment letter.”⁸⁸

Figure 36: Nike listing on AliExpress⁸⁹



The shoes arrived in a plastic bag instead of a box and showed dents that reflected poor quality control. The shoes’ label, as seen in figure 38, appeared different from customer-submitted images of the authentic product’s label.⁹⁰

Figure 37: Nike shoes purchased by ITIF

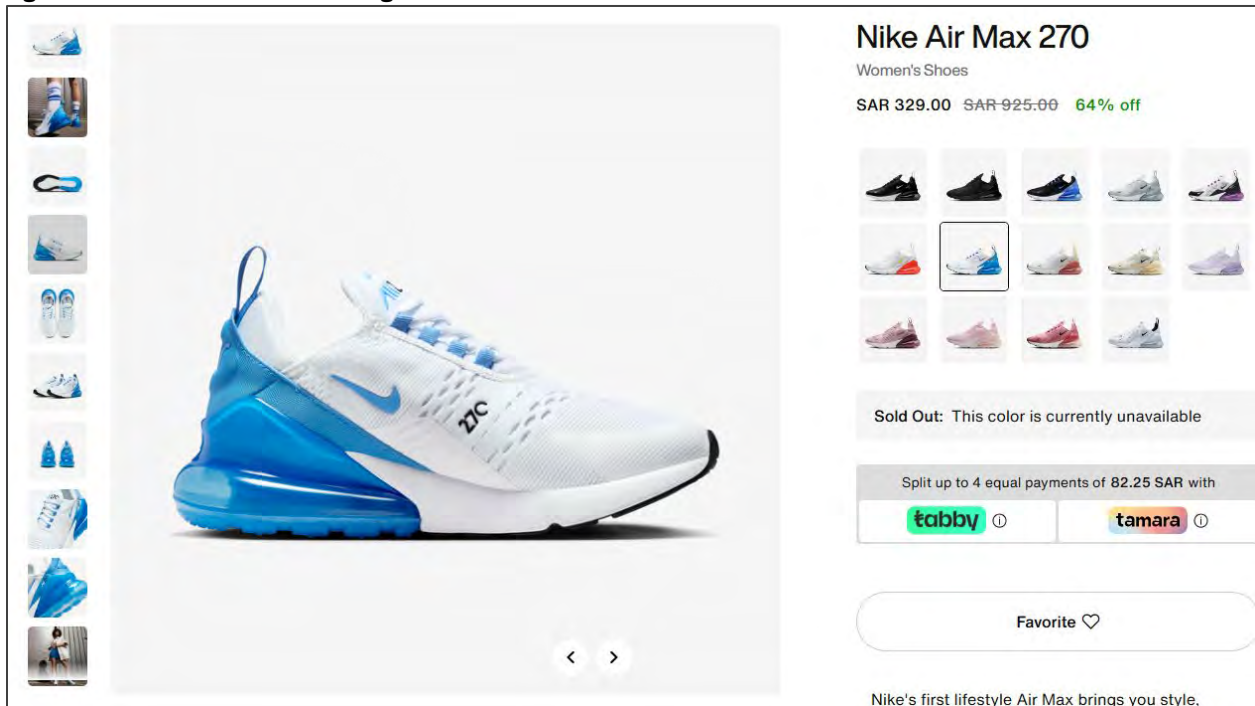


Figure 38: Label from Nike shoes purchased by ITIF



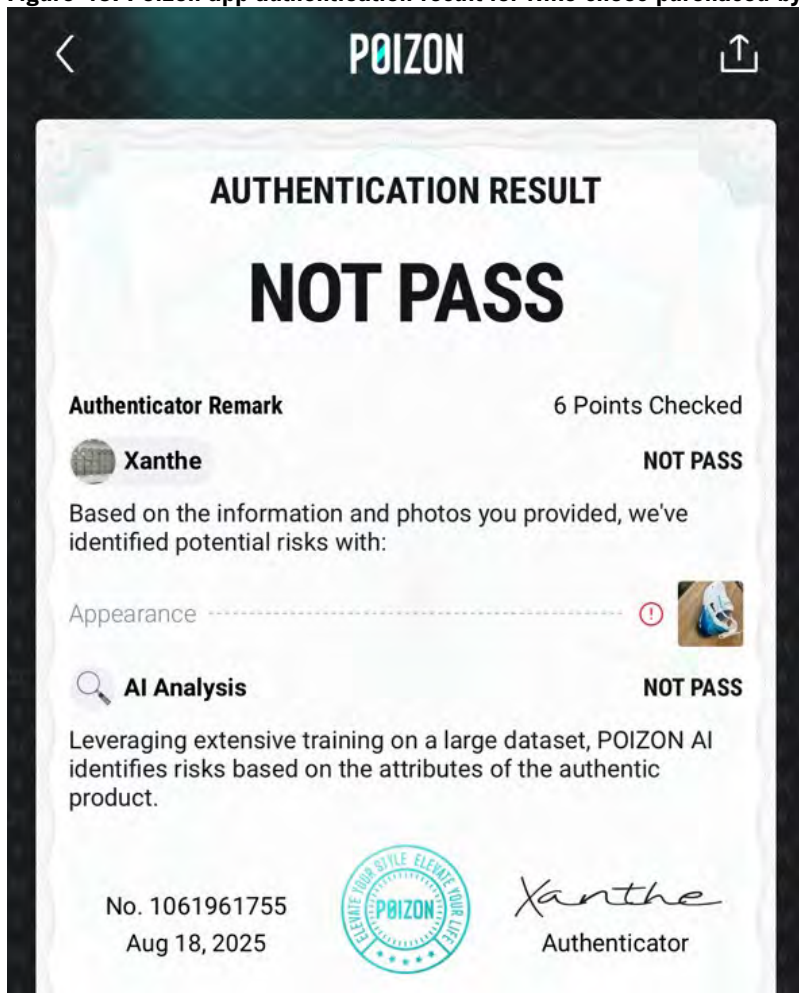
Additionally, the product's UPC that is printed on the label linked to the Nike Air Max 270 "Dusty Cactus" in U.S. size 8, which has black highlights and differences in design from the product received.⁹¹ The closest visual match to the purchased product appeared on Nike's Saudi Arabia website, as seen in figure 39. Yet, this was also not an exact match, as seen in discrepancies in both product design and labeling.⁹²

Figure 39: Nike Air Max 270 listing on Nike Saudi Arabia's website⁹³



ITIF requested that Nike authenticate the shoes, but the company responded that it does not provide authentication services.⁹⁴ ITIF tested the shoes using Poizon, a Chinese authentication app that “uses advanced AI technology, backed by extensive datasets” to authenticate brand authenticity to 90 percent accuracy through user-uploaded photos.⁹⁵ The shoes did not pass Poizon’s authentication, which, as seen in figure 40, identified authenticity risks based on the shoes appearance.⁹⁶

Figure 40: Poizon app authentication result for Nike shoes purchased by ITIF⁹⁷



Days after ITIF conducted the purchase, AliExpress seemingly delisted the vendor behind the product, OutdoorBrands Store.⁹⁸ The vendor's page is still live but its listings—which included Nike, “adids” (likely dupes of Adidas products), and bags—are no longer accessible. Established on December 13, 2024, the online vendor accumulated nearly 5,000 followers before its delisting.

“Qingdao Suzhi Trading Co., Ltd.” is the registered business name behind OutdoorBrands Store, with the address of “CN, Room 605-7, Building 3, Sino-German Institute of New Energy and Environmental Protection Technology, 816 Nanli Village, Aoshanwei Street, Jimo District, Qingdao City, Shandong Province, 370282.”⁹⁹ ITIF could find neither the business nor address on the Chinese Internet, but identified a different company, “Qingdao Shengda Floral Fragrance Trading Co., Ltd.,” that inhabits rooms 602-8.¹⁰⁰

AliExpress's removal of OutdoorBrands Store suggests that the platform does have some anticounterfeiting measures in place, at least when sellers are flagged or draw scrutiny. However, the fact that a vendor with nearly 5,000 followers could operate openly with listings for multiple suspected counterfeit brands before being taken down points to gaps in proactive enforcement. While AliExpress's delisting of the store shows an ability to respond to problematic sellers, the

persistence of counterfeit Nike products on the platform indicates that detection and removal likely remain reactive rather than systematic, allowing bad actors to continue exploiting the marketplace.

K18 Hair Treatment

ITIF purchased a hair treatment product from Temu marketed as “K18 Leave-in Molecular Hair Mask.” The listing, as seen in figure 41, showed a bottle that visually matched the authentic product sold by the U.S. haircare brand K18, known for its patented biotech products.¹⁰¹ Suspicious indicators of counterfeit included a low listing price of \$5.55 for three 50 ml bottles, compared with K18’s official MSRP of \$75 for one 50 ml bottle.¹⁰² The vendor behind the listing, “Yanyankeji Local,” Temu’s second best-selling local warehouse store in hair care as of August 2025, does not appear to be affiliated with K18 or any known authorized distributor.¹⁰³

Figure 41: K18 listing on Temu¹⁰⁴



Upon delivery of the product, ITIF found several packaging anomalies. When sold through an authorized vendor, the product displays a different slogan on the same pane: “10 years of biosciences research - 1 breakthrough peptide.”¹⁰⁵ On the box, the side to the right of the white pane displays the slogan “Where biotech meets haircare,” as seen in figure 42.

Figure 42: K18 treatment advertised through official channel (left), and K18 treatment purchased by ITIF (right)



In the English instructions for product usage on the bottle, there are numerous punctuation errors, such as “Towel-dry thoroughly.Begin with” and “Do not rinse out.Style as usual.” A company name is given as “AQUIS EU Ltd..” These subtle but telling inconsistencies were cross-referenced against legitimate K18 products, where no such errors were present.

Figure 43: Detail of instructions on K18 treatment purchased by ITIF



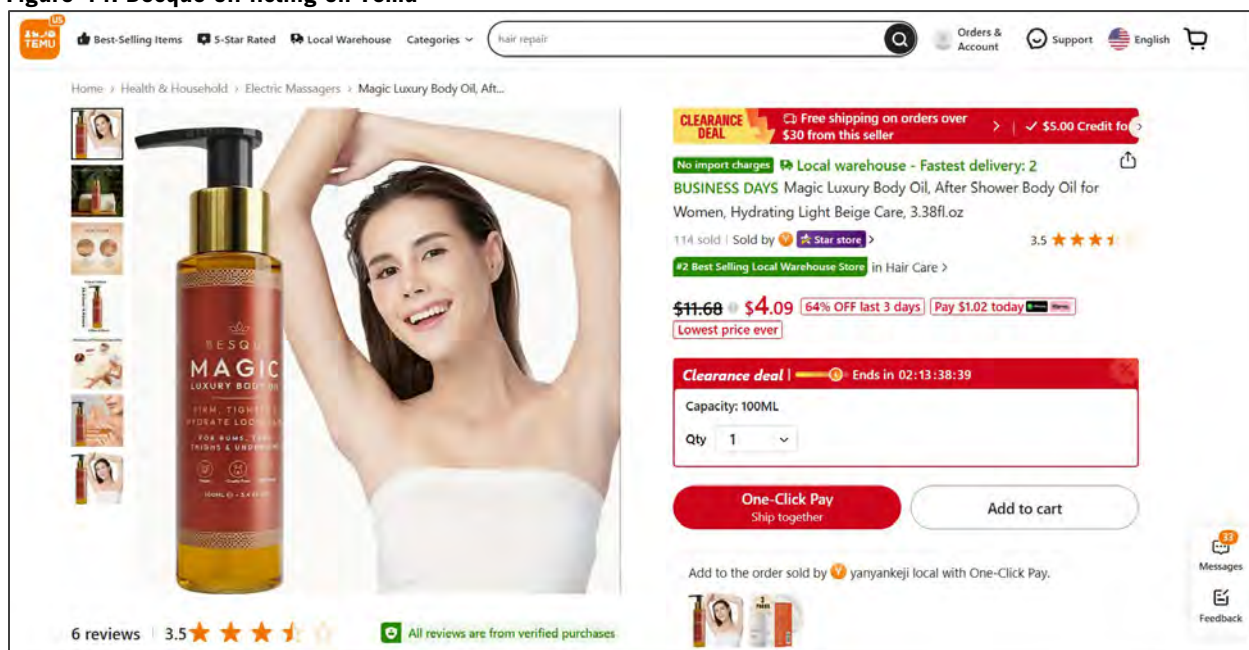
The bottom of the bottle displayed a batch number, “LT25028A,” which ITIF provided to K18 in an inquiry to verify authenticity. While the company stated it cannot guarantee the quality or authenticity of products purchased from unauthorized sources such as Temu, a representative said that the product was likely diverted, and that these diverted products “are often expired, counterfeit, stolen, or tampered with.”¹⁰⁶

As of August 2025, Yanyankeji Local has sold over 400 units of the K18 product on Temu. If each of those 411 orders replaced a legitimate triple-pack purchase, K18 would stand to lose nearly \$100,000 in potential retail sales on that one listing alone. This case demonstrates how even a single low-profile vendor can inflict substantial financial harm on legitimate companies. For a science-based brand such as K18, that nearly \$100,000 could have gone toward research and development (R&D) or product development.

Besque Oil

ITIF also purchased another product from Yanyankeji Local titled “Magic Luxury Body Oil, After Shower Body Oil for Women, Hydrating Light Beige Care, 3.38 fl.oz” via Temu.¹⁰⁷ The image in the listing clearly showed the product “Besque Magic Body Oil,” a U.K.-based skincare company. The seller listed the product for \$4.09, significantly below the \$60 MSRP listed on Besque’s official website.¹⁰⁸ The listing was also miscategorized under “electric massagers,” as seen in figure 44, and user reviews flagged the item as fake.¹⁰⁹

Figure 44: Besque oil listing on Temu¹¹⁰



Upon receipt, the package showed clear signs of poor quality control. The oil had fully leaked from the bottle during transit, soaking through both the paper box and outer plastic wrap as seen in figure 45.

Figure 45: Nearly empty Besque oil bottle as it arrived to ITIF



The packaging displayed several inconsistencies with Besque’s known branding, including typographical errors such as “Smoothens&deeply,” “once per day .Apply to,” and “vegon” instead of “vegan,” as seen in figure 46. These red flags, combined with the misleading product category, other branding discrepancies on the packaging, and extraordinarily low price point, strongly suggest that the item is counterfeit.

Figure 46: Typographical errors on packaging for Besque oil purchased by ITIF



The business behind Yanyankeji Local, Shenzhen Yanyan Network Technology Co., Ltd., was established in 2021 and advertises itself as an information technology company, with a business scope including computer hardware and software, database management, and maintenance of network platforms.¹¹¹ The only business activity remotely related to the sale of cosmetics is a mention of the “import and export of goods and technology.”

Shenzhen Yanyan Network Technology operates out of a residential building in the outskirts of Shenzhen, as seen in figure 47. Critically, the individuals most responsible for producing counterfeit goods—the plastics manufacturers replicating product colors, the engineers reverse-engineering original products, and the graphic designers copying logos and branding—often remain hidden. Residential addresses such as “Room 805, Building 72, Junlong New Village, Yousong Community, Longhua Street, Longhua District, Shenzhen” are used to shield the true source of counterfeit production.¹¹² This address is possibly where counterfeit cosmetics products are manufactured, but is more likely where final assembly occurs or where listings on e-commerce platforms are managed.

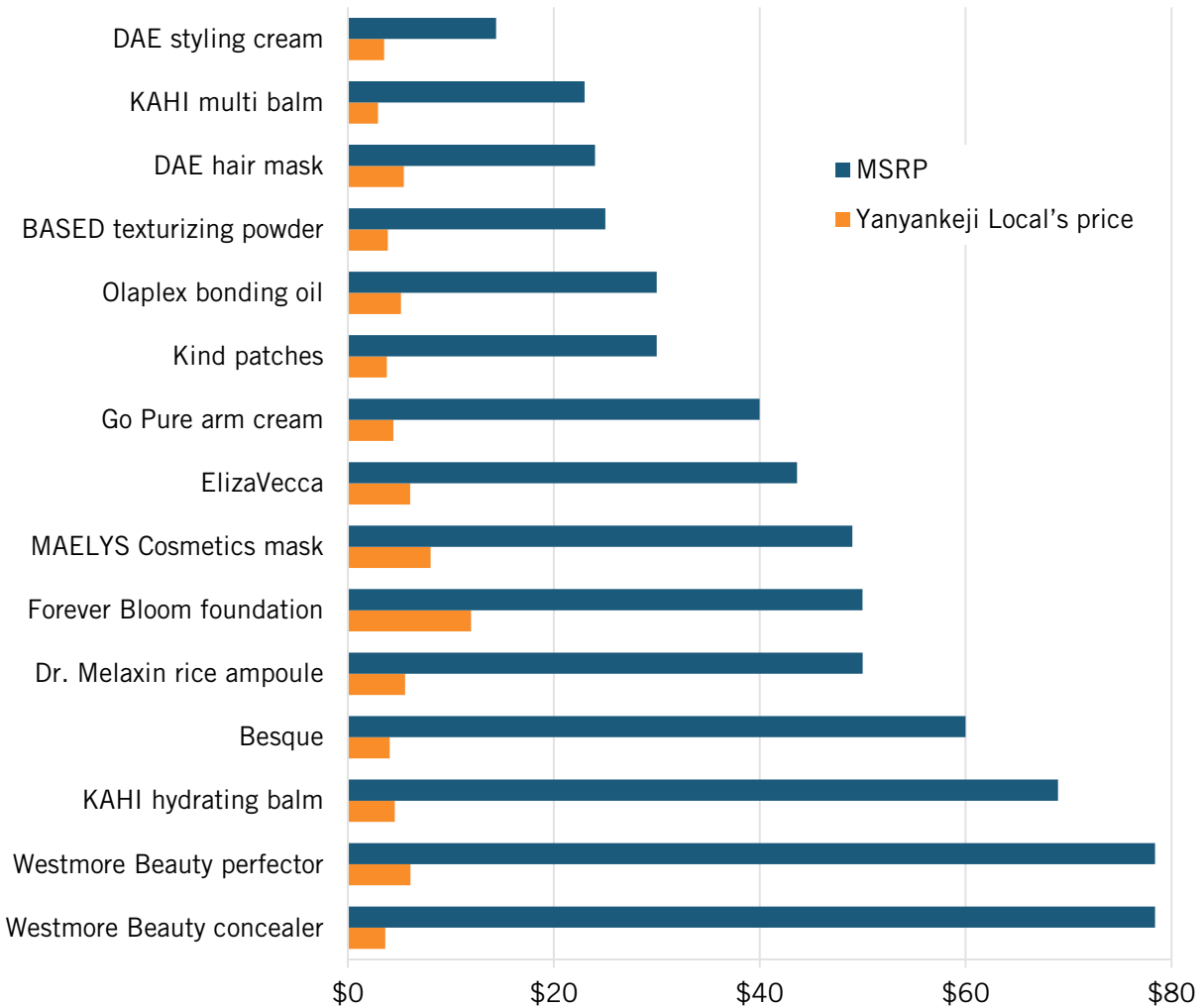
Figure 47: Screenshot from Baidu Maps of Yanyankeji Local's listed address¹¹³



With two very likely counterfeits attributed to Yanyankeji Local, the vendor presents a good case study of the overall impact of counterfeits. Many of the vendor's listings appear to imitate well-known health and beauty brands. As of August 2025, the storefront has sold 15,626 units across 59 current listings for a total of \$80,487. As of August 2025, the store has in total sold at least 36,000 products.¹¹⁴ Assuming similar pricing for its previous sales, Yanyankeji Local would have sold at least \$193,767 worth of goods over time.

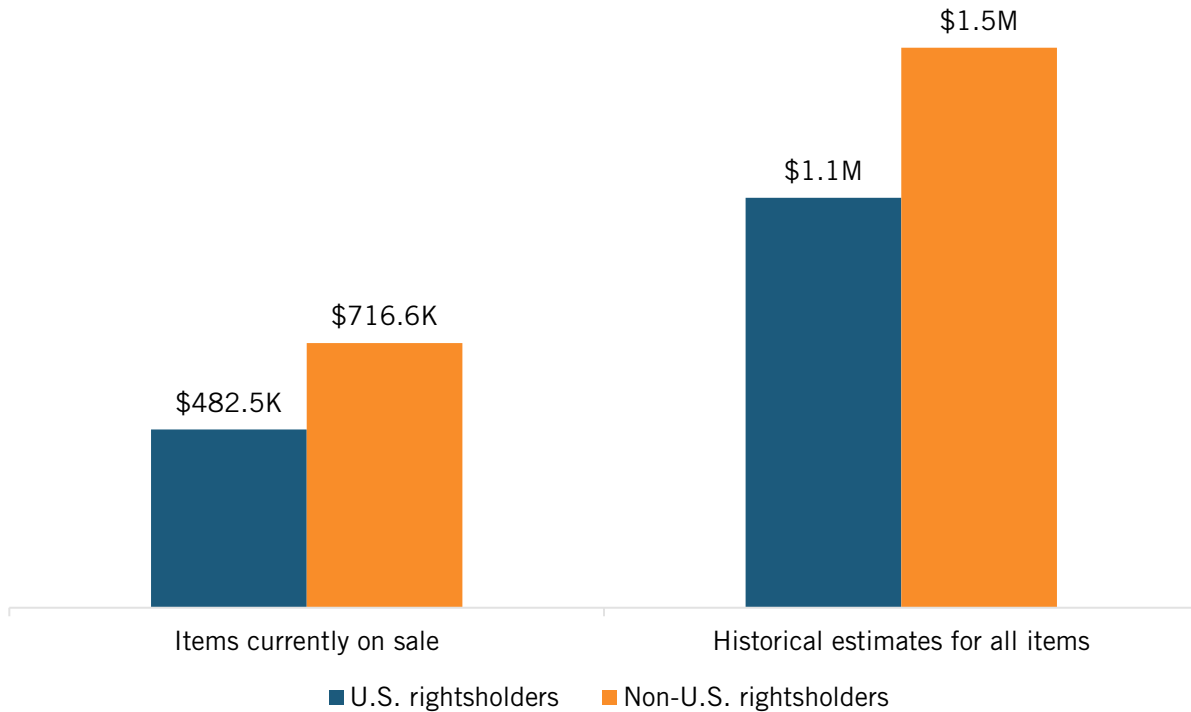
Of the 59 listed items in August 2025, ITIF identified 55 as potential counterfeits and 4 likely dupes that do not appear to infringe on brands' IP. In almost all cases, the listed price was significantly lower than the imitated product's MSRP, as seen in figure 48, a comparison of Yanyankeji Local's prices on its current 15 best-selling products versus the imitated products' MSRPs.

Figure 48: MSRP versus listing price for potential counterfeits



Using the imitated products' MSRPs, ITIF estimated the total amount of revenue lost by rights holders resulting from Yanyankeji Local's sales. On average, rights holders lost approximately \$40 every time a consumer purchased a counterfeit rather than a rights holder's authentic product. ITIF calculated the total lost revenues for U.S. and non-U.S. rights holders based on Yanyankeji Local's August's marketplace offerings, as well as its past sales. As seen in figure 49, U.S. rights holders stand to lose \$482,461 from August's listings and have lost \$1,109,917 in past listings, while non-U.S. rights holders stand to lose \$716,556 from August's listings and have lost \$1,516,247 in past listings.

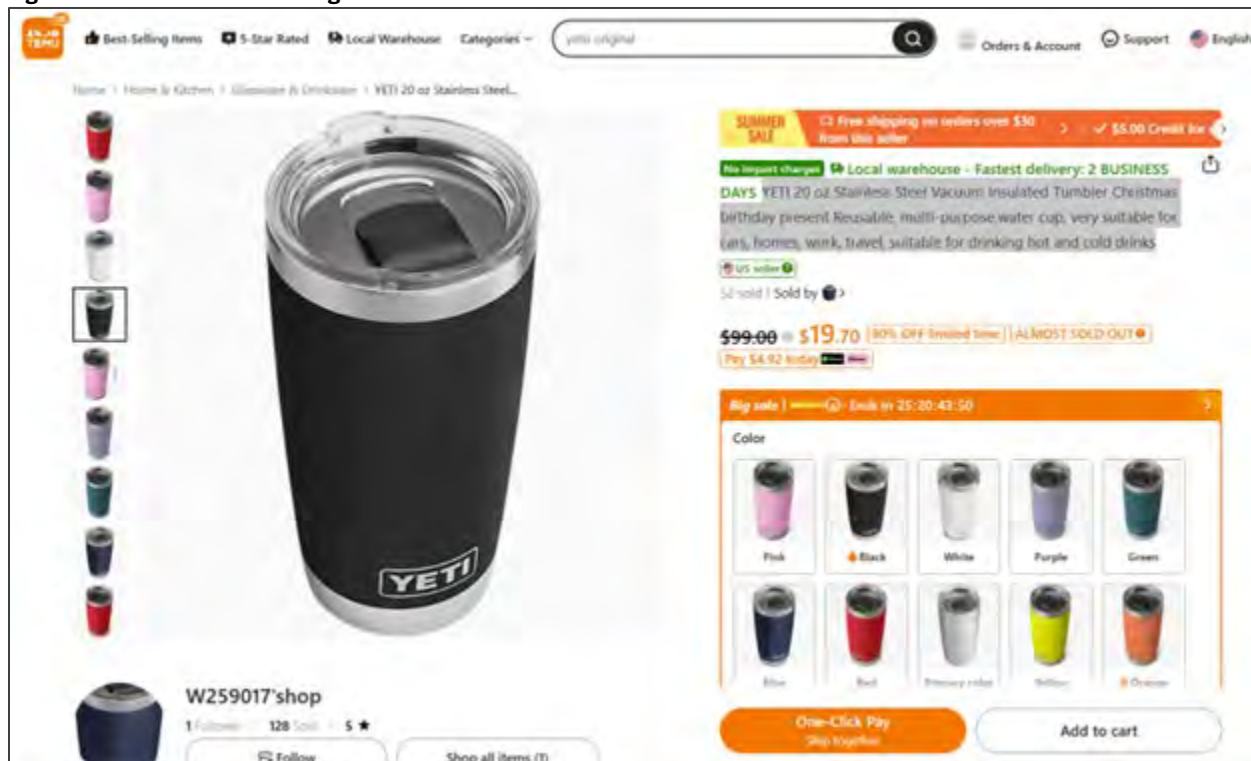
Figure 49: Lost revenue for U.S. and non-U.S. rights holders, August 2025¹¹⁵



YETI Tumbler

ITIF purchased a 20 ounce stainless steel tumbler marketed as a YETI product from a Temu listing titled “YETI 20 oz Stainless Steel Vacuum Insulated Tumbler Christmas birthday present Reusable, multi-purpose, water cup,” as seen in figure 50.¹¹⁶ The product is sold by a vendor operating under the storefront name “W259017’shop,” with a listed business address in Denver, Colorado, under the name EANDDOON LTD. The seller listed the product for \$19.70, far below YETI’s official MSRP for this model, which typically retails for around \$35. While the listing did not prominently display the YETI name in the product title on Temu’s search results page, it did use YETI in the listing’s description and appeared to be designed to evoke the well-known brand.

Figure 50: YETI tumbler listing on Temu¹¹⁷



Upon arrival, the product presented several red flags indicating that it was likely not authentic. The text engraved on the bottom of the tumbler did not match the alignment or font seen on verified YETI products online.¹¹⁸ Notably, where the text should say “PAT OR PENDING · YETI.COM/PATENTS,” the product ITIF purchased instead used the interpunct twice, with an engraved “PAT OR PENDING · YETI · COM,” as seen in figure 51. Additionally, where the text should say “DESIGNED IN TEXAS · MADE IN CHINA,” the product ITIF purchased again messed up the punctuation with “DESIGNED IN TEXAS.MADE IN CHINA.” The magnetic sliding piece on the lid—a signature component of YETI’s “MagSlider” technology—also looked visibly different from official designs as seen on verified YETI products online.¹¹⁹

Figure 51: Bottom of YETI-branded tumbler purchased by ITIF



Most notably, the tumbler did not include YETI’s trademark registration QR code, which is supposed to come with every product and allows consumers to verify authenticity and register their purchase via YETI’s website. Instead, it came with a small slip of paper displaying a sample QR code that does not scan.

When ITIF contacted YETI with photos and details of the listing, the company declined to verify the item directly because the seller was not an authorized distributor.¹²⁰ However, a representative stated that the lack of a QR code and the described discrepancies “doesn’t sound right,” reinforcing suspicions of inauthenticity.¹²¹ The seller in question had no other products listed on Temu, and public records suggest the business was only recently registered—both characteristics commonly associated with short-lived or pop-up storefronts that are difficult to trace or hold accountable.

Philips Toothbrush Heads

In July 2025, ITIF identified a suspicious listing on Temu for “Philips Sonicare Original W2 Optimal White Standard Sonic Toothbrush Heads - 4 Pack in White (Model HX6064/10),” as seen in figure 52.¹²² The listing drew suspicion not only due to a lower price compared with official retail channels but also due to a warning left in a customer review: “do not buy from this seller. they are selling fake used toothbrush heads.”¹²³

Figure 52: Philips toothbrush heads listing on Temu¹²⁴

The screenshot shows a product listing for Philips Sonicare Original W2 Optimal White Standard Sonic Toothbrush Heads - 4 Pack in White (Model HX6064/10). The listing features a main image of the toothbrush heads and a smaller image of the packaging. The price is \$13.02, marked down from \$35.00 (62% off). The listing is ranked as the #14 best-selling item in the Oral Care Electronics category. The seller has a 4.7-star rating based on 18 reviews, with a note that all reviews are from verified purchases. The listing includes a 'Buy now' button with 'Faster dispatch' and an 'Add to cart' button with '62% OFF'. Shipping information indicates 'Ships from this seller' with a standard shipping cost of \$2.99 or free shipping for orders over \$30.00. The listing also mentions 'No import charges' and 'Local warehouse'.

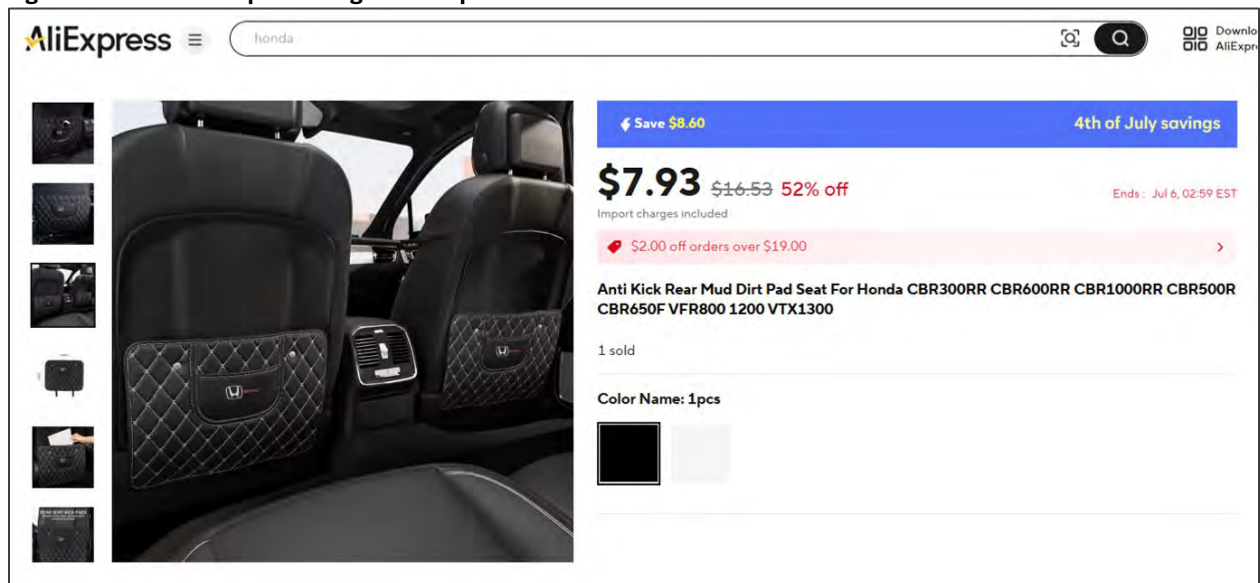
Shortly after ITIF documented the listing, Temu delisted it, along with the vendor’s entire storefront. This delisting provides insight into Temu’s anticounterfeiting measures. Days before its delisting, the toothbrush heads had amassed 542 sales and was ranked as the “#14 best selling item” in Temu’s Oral Care Electronics product category. The reason for the product’s delisting remains unclear. While the negative review referencing “fake” products was one star, the listing maintained an average 4.7-star rating across 18 reviews, so it is unlikely that a low overall rating would have flagged the product to Temu’s anticounterfeiting team or automated scans. More plausibly, keywords such as “fake” in the review may have tripped automated moderation, or Philips may have submitted a formal complaint, especially since a separate listing for Philips toothbrush heads that ITIF had come across was also delisted around the same time.¹²⁵ Regardless of the mechanism, the case highlights that Temu’s current practices appear to allow counterfeit goods to thrive until they become too visible, at which point the platform acts, but not before consumers have made hundreds of purchases.

ITIF was unable to identify any further information about the vendor behind the toothbrush heads, “Nazima Shaheen Ge Ecommerce Inc.” The seller’s listed business address corresponded to a suite in a commercial building on the outskirts of Denver that until recently was a health care business, so the vendor likely used a false address.¹²⁶

Honda Dirt Pad

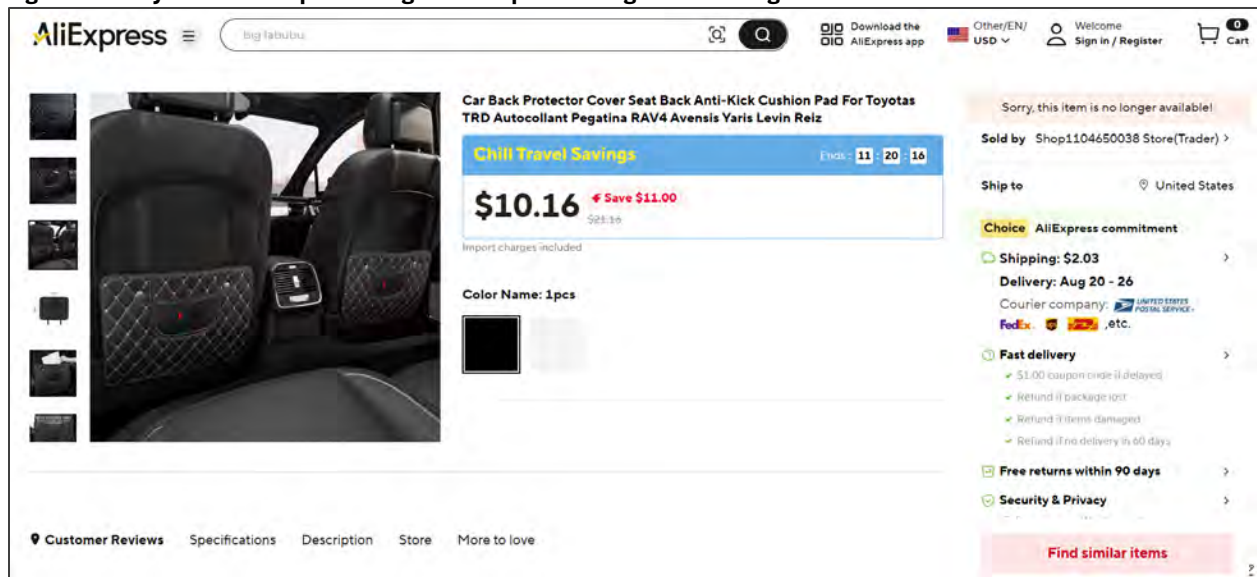
ITIF purchased a dirt pad for motorcycles on AliExpress listed as “Anti Kick Rear Mud Dirt Pad Seat For Honda CBR300RR CBR600RR CBR1000RR CBR500R CBR650F VFR800 1200 VTX1300” for \$7.93, as seen in figure 53.¹²⁷ The vendor behind the listing, “Shop1104458030 Store,” seemingly added an extra “R” to each of the model numbers written in the product title, such as “CBR300RR” instead of Honda’s branding of “CBR300R.”¹²⁸ This could have been a mistake, or it could be a deliberate way to avoid scrutiny. The use of “for Honda” in listings can be acceptable when describing compatibility, such as a vendor selling a replacement battery for a known brand’s power tools, but this listing crosses into infringement by reproducing Honda’s branding.

Figure 53: Honda dirt pad listing on AliExpress



Curiously, the AliExpress listing only shows pictures of the dirt pad being used in a car, even though the product name only names Honda motorcycle models.¹²⁹ This looks like a case of re-using a stock image and editing a photo to place the Honda logo. ITIF identified a separate AliExpress vendor, with a similar name—Shop1104650038 Store—connected to a separately registered business that appears to use the same base image but with a different brand edited into the image, as seen in figure 54.¹³⁰

Figure 54: Toyota cushion pad listing on AliExpress using similar image¹³¹



The dirt pad arrived with no barcode or manufacturer information. The product itself features the Honda logo and name. The logo and Honda lettering are not parallel with the entire dirt pad, as seen in figure 55. ITIF was unable to identify any official Honda-branded motorcycle dirt pads sold online, so this product represents a form of counterfeit where the seller attempted to legitimize a generic product by applying the rights holder's name and trademarked logo.

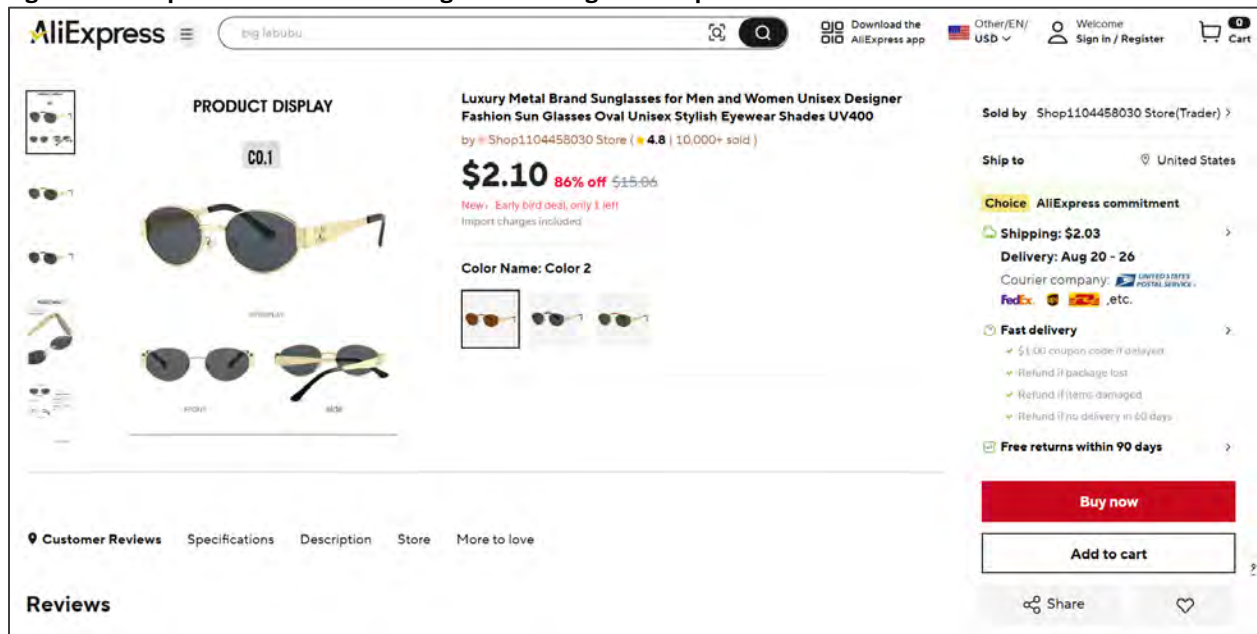
Figure 55: Logo detail on Honda dirt pad purchased by ITIF



The business behind Shop1104650038 Store is Foshan Zuofei Culture Media Co., Ltd. (Zoffy).¹³² The business address listed on AliExpress does not match the one in the company's

corporate registration, which has changed seven times in the last five years.¹³³ The business had previously been marked as operating abnormally due to being unreachable at its registered address. Its registered phone number has also been used by 54 other companies, suggesting possible shell companies or mass corporate registrations. The company’s business scope includes “motorcycle parts and accessories” along with a wide variety of unrelated goods and services.¹³⁴ Shop1104650038 Store only sells car accessories, with one exception: a listing that appears to be a logo-infringing pair of Celine sunglasses, as seen in figure 56.¹³⁵ Based on this evidence, Zoffy likely operates multiple online storefronts to target specific product niches, and it appears the sunglasses listing was mis-listed on the company’s auto accessory storefront.

Figure 56: Shop1104650038 Store sunglasses listing on AliExpress



Zoffy is currently recruiting for a video editing role that will be “responsible for filming and editing Douyin videos,” referring to TikTok’s mainland China sibling company.¹³⁶ Examples of Zoffy’s videos show models posing with products such as backpacks and handbags.¹³⁷ ITIF was unable to determine whether these promotional videos were intended for marketing the sale of products such as the dirt pad or—based off the vendor’s business name—reflect a media business stream separate from e-commerce.

Along with Tryan, Zoffy displays a pattern of potential counterfeiters hiring for digital marketing roles, reflecting that counterfeiting activity is not just limited to the supply chain but also the promotional ecosystems that support sellers. In addition to its activity on Douyin, on which it is “a top seller,” Zoffy is also active on Toutiao, another media platform that exclusively operates in the mainland China market.¹³⁸ Zoffy’s presence on multiple platforms, both international and domestic, illustrates that IP infringement is ultimately a global challenge rather than one confined to U.S. platforms.

Elsa Doll

ITIF purchased an Elsa doll on AliExpress listed as a “40-50CM Frozen Anna Elsa Dolls Snow Queen Princess Anna Elsa Doll Toys Stuffed Frozen Plush Kids Toys Birthday Christmas Gift,” as seen in figure 57.¹³⁹ ITIF paid \$8.61 for the product, far below the MSRP of much smaller Elsa dolls sold through Disney’s official store.¹⁴⁰

Figure 57: Elsa doll listing on AliExpress

The screenshot shows the AliExpress product page for a Disney Frozen Elsa doll. The main image displays three dolls: Elsa, Olaf, and Anna. The price is \$0.99, marked down from \$17.78 (94% off). The product title is "40-50CM Frozen Anna Elsa Dolls Snow Queen Princess Anna Elsa Doll Toys Stuffed Frozen Plush Kids Toys Birthday Christmas Gift". The listing features a "Buy now" button and an "Add to cart" button. The page also includes a disclaimer, customer reviews (4.8 stars, 141 ratings), and shipping information.

The doll ITIF purchased, seen in figure 58, arrived with a tag that states, “from the movie Frozen” and “Elsa,” as seen in figure 59. The back of the tag has no barcode, no product ID, no manufacturer name, and no Disney logo, but has an emblem saying “genuine,” “original,” and “authentic.”

Figure 58: Elsa doll purchased by ITIF



Figure 59: Label from Elsa doll purchased by ITIF



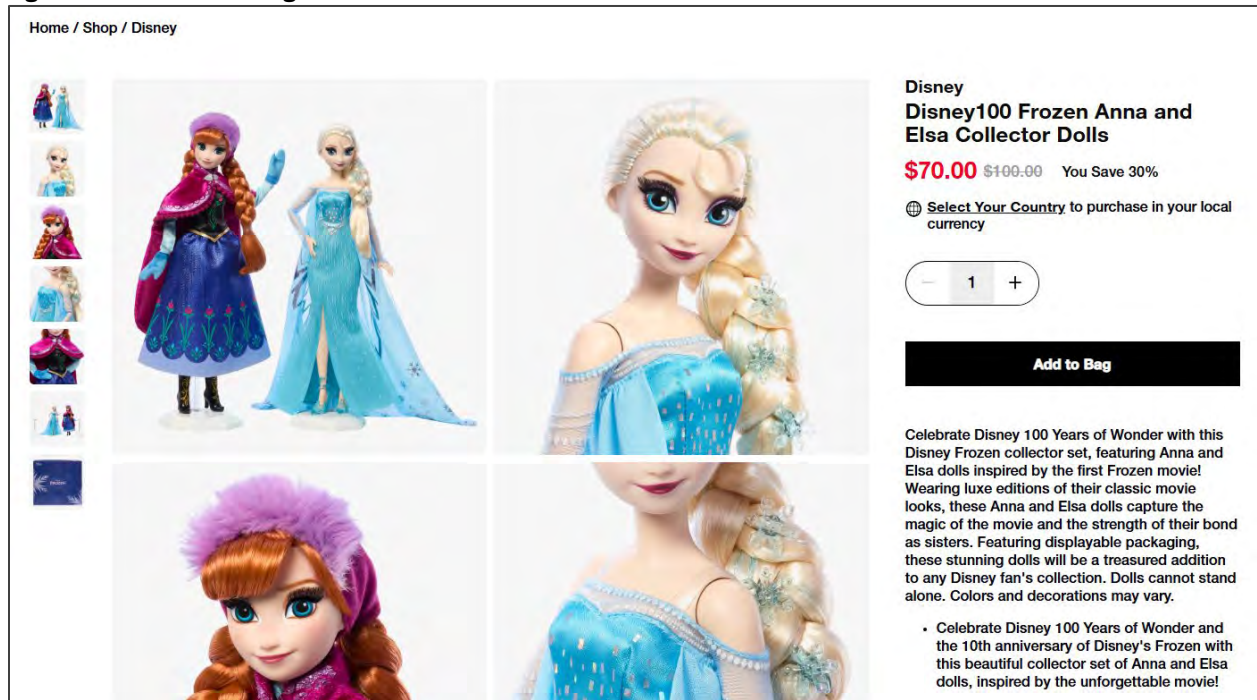
The overall workmanship appears lower in quality than expected from an officially licensed Disney product. As seen in figure 60, the stitching is inconsistent, and the fabric quality feels thin and inexpensive.

Figure 60: Stitching on Elsa doll purchased by ITIF



Disney must grant a company the right to produce Frozen branded products, and the company works only with approved licensees under formal agreements that include compliance with Disney's International Labor Standards Program, maintain control of their supply chain, and meet all applicable product safety laws and other specific requirements.¹⁴¹ A licensed Disney plush toy example, Mattel's licensed Disney100 Frozen Anna and Elsa Collector Dolls, can be seen in figure 61.¹⁴²

Figure 61: Elsa doll listing on Mattel's website¹⁴³



The AliExpress vendor for the Elsa doll uses the storefront name Big Boy Store, which is operated by the business Foshan Dingyue E-Commerce Co., Ltd.¹⁴⁴ Corporate records show that, in addition to toys, the company offers household, electronic, maternal and child, and automotive-related items.¹⁴⁵ The storefront on AliExpress, however, only offers action figures and plush dolls. This mismatch suggests that the company may operate additional storefronts with different names but under the same business registration to sell specialized product categories, which could also include potential infringing goods. The address listed on the AliExpress vendor profile also differs from Foshan Dingyue E-Commerce's corporate registration address, further complicating traceability within the supply chain.¹⁴⁶

CH Bag

ITIF purchased a “CH Premium Versatile Leather Crossbody Bag Ladies Large Capacity Daily Commuter Tote Bag Letter Print Design Ladies Fashion” from AliExpress.¹⁴⁷ The product listing, seen in figure 62, appears designed to mimic a CH Carolina Herrera “Matryoshka Locked M” shopping bag, seen in figure 63, closely resembling the genuine product in style and presentation while prominently using the “CH” branding in both labeling and product images.¹⁴⁸ The bag was priced at \$43.85 at the time of ITIF’s purchase compared with the \$1,100 MSRP of the authentic Carolina Herrera model.¹⁴⁹

Figure 62: CH bag listing on AliExpress¹⁵⁰

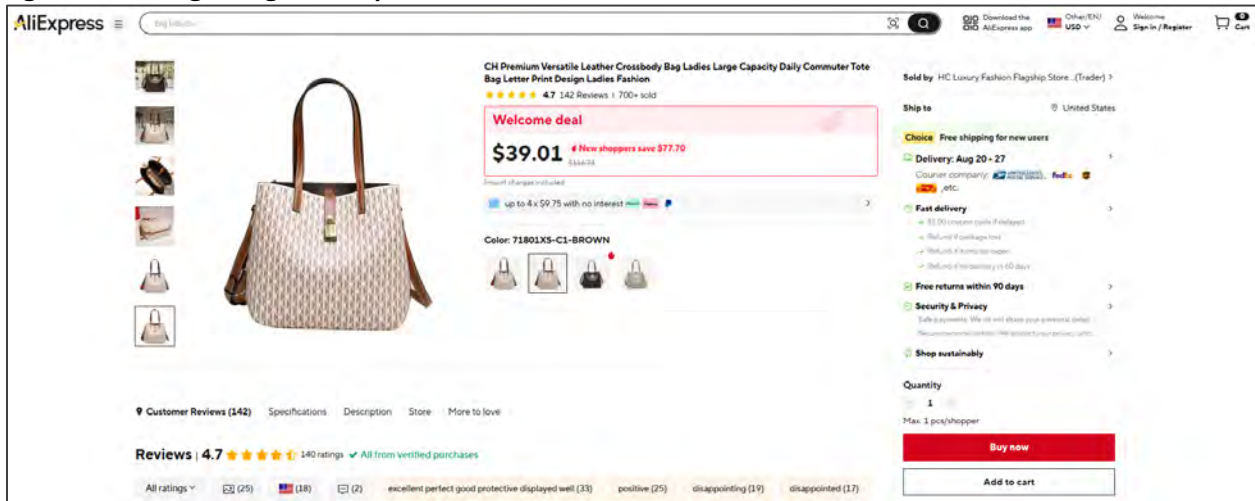
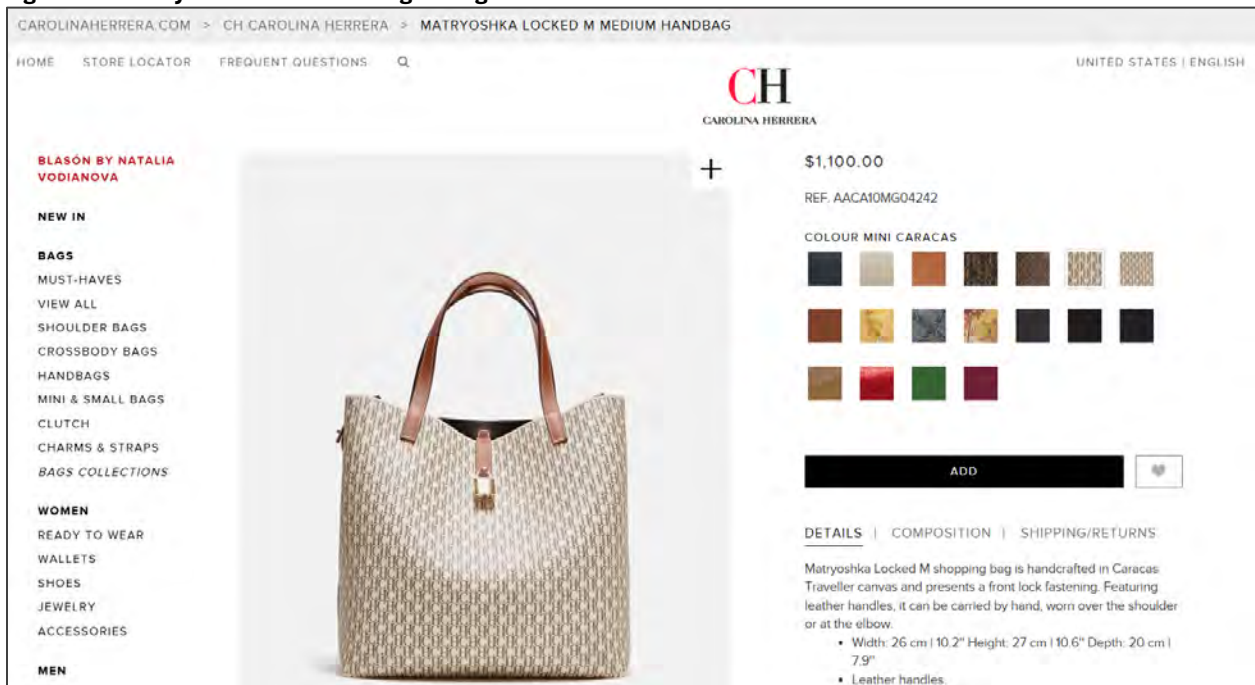


Figure 63: Matryoshka Locked M bag listing on CH Carolina Herrera’s website¹⁵¹



Upon arrival, the bag, seen in figure 64, contained no mentions of “Carolina Herrera,” including on its label but heavily features the letters “CH.”

Figure 64: CH bag purchased by ITIF on AliExpress



The product tag, seen in figure 65, contains typos such as “thank you very muchi” and “customars,” errors inconsistent with Carolina Herrera’s quality control standards. The product tag also displays an emblem reading “CHHC” and includes a message to customers under that branding.

Figure 65: Detail of product tag from CH bag purchased by ITIF on AliExpress



The bag's magnetic clasp hardware also contains a code, "NOATD8831628," as seen in figure 66, which has appeared verbatim on numerous forums online describing counterfeit luxury bags dating back to 2006.¹⁵²

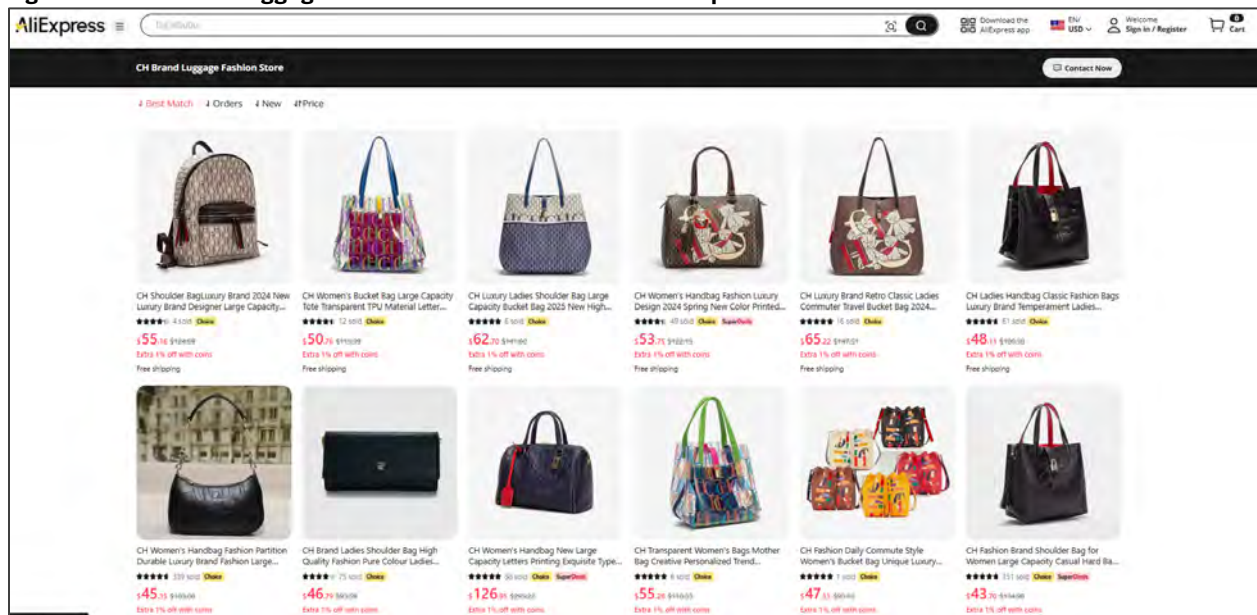
Figure 66: Detail of magnetic clasp hardware on CH bag purchased by ITIF on AliExpress



Carolina Herrera holds registered trademarks that include “CH” in a stylized design, which the ordered product’s branding closely resembles.¹⁵³ The vendor, “HC Luxury Fashion Flagship Store Store,” appears to have built a business model around infringing Carolina Herrera IP. As of August 2025, its AliExpress storefront contains 203 listings, all featuring “CH” in the title and on product branding.¹⁵⁴ ITIF identified a second storefront on Alibaba operated by the same business, “Global Overseas Luxury Store Store,” which also exclusively sells CH-branded goods.¹⁵⁵

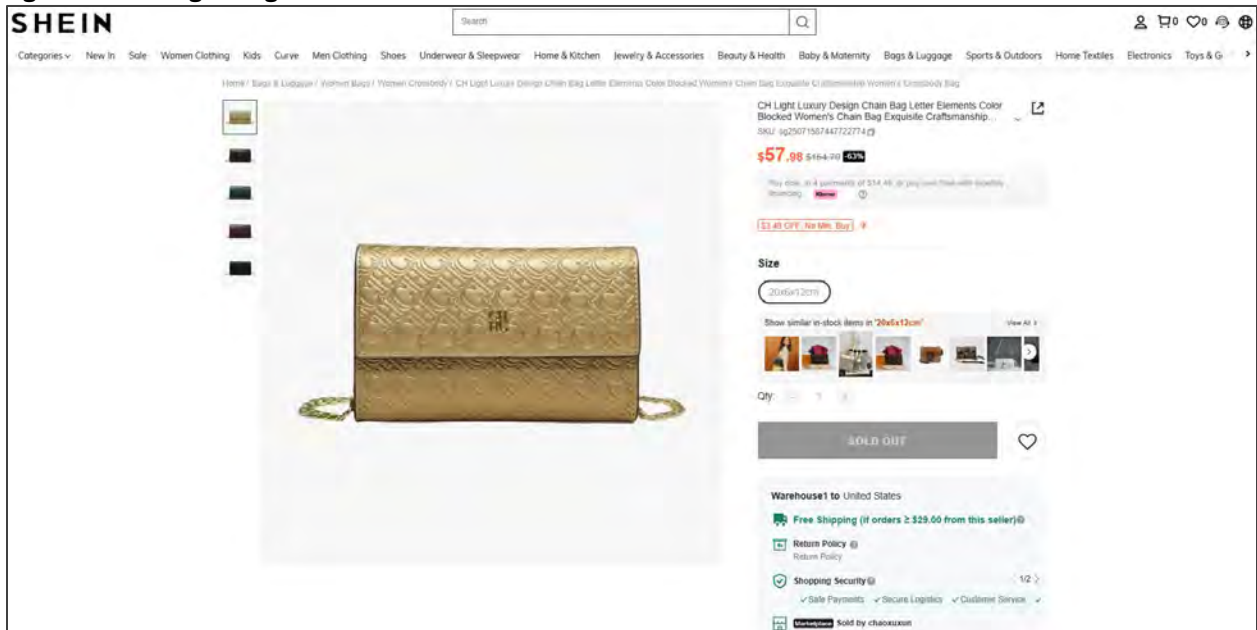
The two online storefronts launched in 2024, although the business behind both—July Clothing Store—claims an establishment date of 2022.¹⁵⁶ ITIF additionally identified a third AliExpress vendor, called “CH Brand Luggage Fashion Store,” which almost exclusively sells CH-branded products, as seen in figure 67.¹⁵⁷ This third vendor, however, maps to a different business than July Clothing Store called Guangzhou Sujia Leather Co., Ltd.¹⁵⁸

Figure 67: CH Brand Luggage Fashion Store’s storefront on AliExpress¹⁵⁹



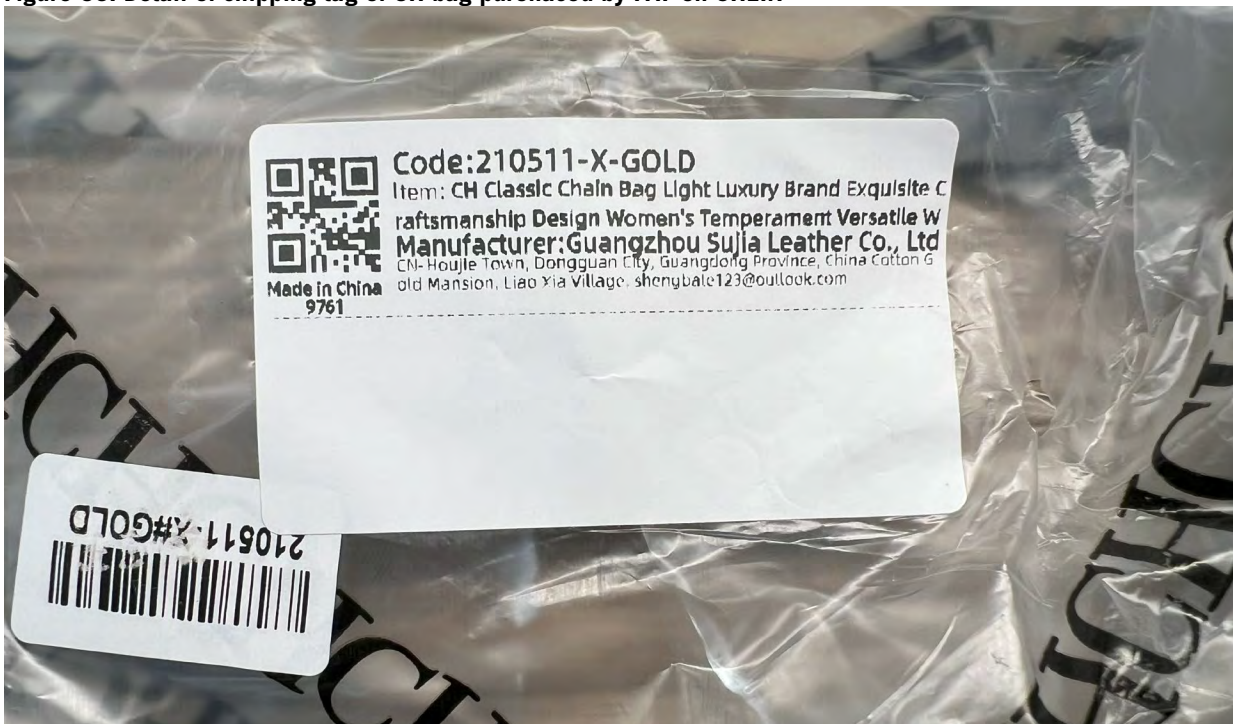
ITIF traced all three of these storefronts back to the same origin. ITIF purchased a likely counterfeit CH bag from Guangzhou Sujia Leather from a listing on SHEIN, as seen in figure 68. The product, “CH Light Luxury Design Chain Bag Letter Elements Color Blocked Women's Chain Bag Exquisite Craftsmanship Women's Crossbody Bag,” was from a vendor called “Chaoxuxun,” and listed for \$57.98.¹⁶⁰

Figure 68: CH bag listing on SHEIN



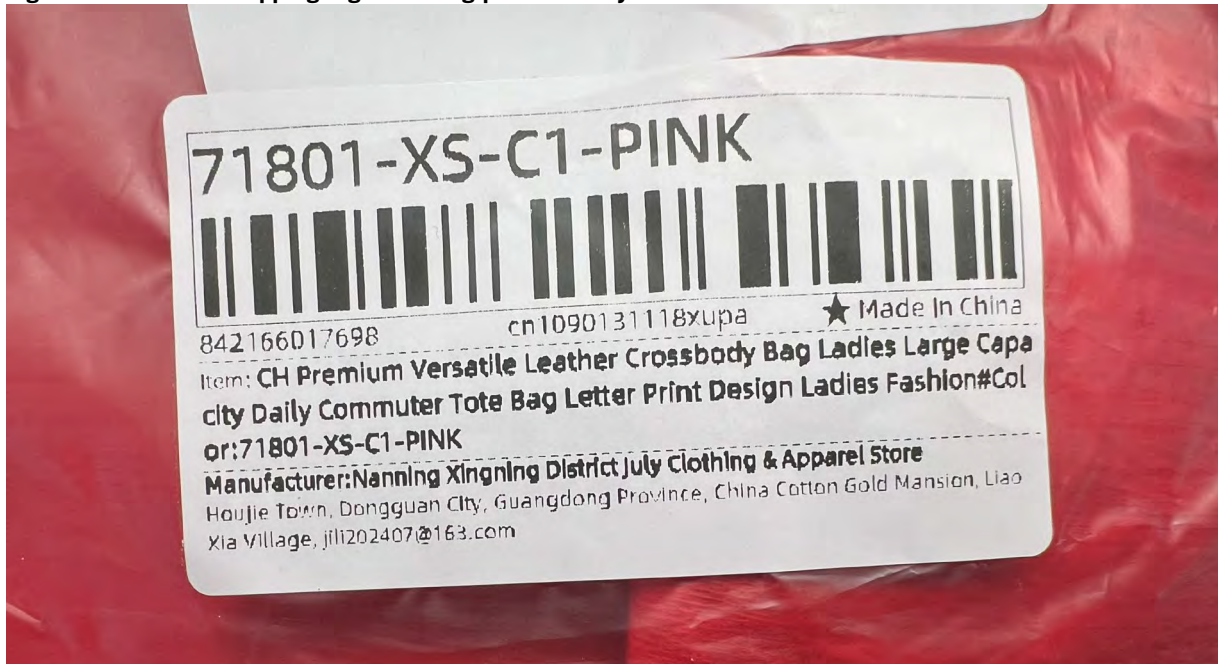
Unlike AliExpress and Temu, SHEIN vendors typically do not share business registration information such as company names or addresses. Upon delivery, however, the shipping tag on the product, seen in figure 69, revealed Guangzhou Sujia Leather to be the business behind Chaoxuxun. The shipping tag additionally had the same address of “China Cotton Gold Mansion” as the shipping tag listed on the AliExpress CH bag order.

Figure 69: Detail of shipping tag of CH bag purchased by ITIF on SHEIN



China Cotton Gold Mansion was also listed on the shipping tag on the CH bag ITIF purchased from HC Luxury Fashion Flagship Store Store on AliExpress, as seen in figure 70, despite the vendor listing a different address on AliExpress.¹⁶¹

Figure 70: Detail of shipping tag of CH bag purchased by ITIF



China Cotton Gold Mansion is better known as Guangzhou Baiyun World Leather Trading Centre, as seen in figure 71.¹⁶² The wholesale market was established in 2003 and contains at least 1,100 stores selling different leather products, many of which are bags.¹⁶³

Figure 71: Guangzhou Baiyun World Leather Trading Centre¹⁶⁴



July Clothing Store and Guangzhou Sujia Leather likely both have stalls at Guangzhou Baiyun World Leather Trading Centre. This demonstrates how China's well-known counterfeit bazaars are not confined to physical marketplaces but spill over into Chinese e-commerce channels, allowing the same bad actors to reach consumers directly online.¹⁶⁵

The two companies potentially share the same manufacturer for their CH bags. The SHEIN-purchased CH bag's magnetic clasp hardware contains an identical code, NOATD8831628, to the AliExpress-purchased CH bag, as seen in figure 72.

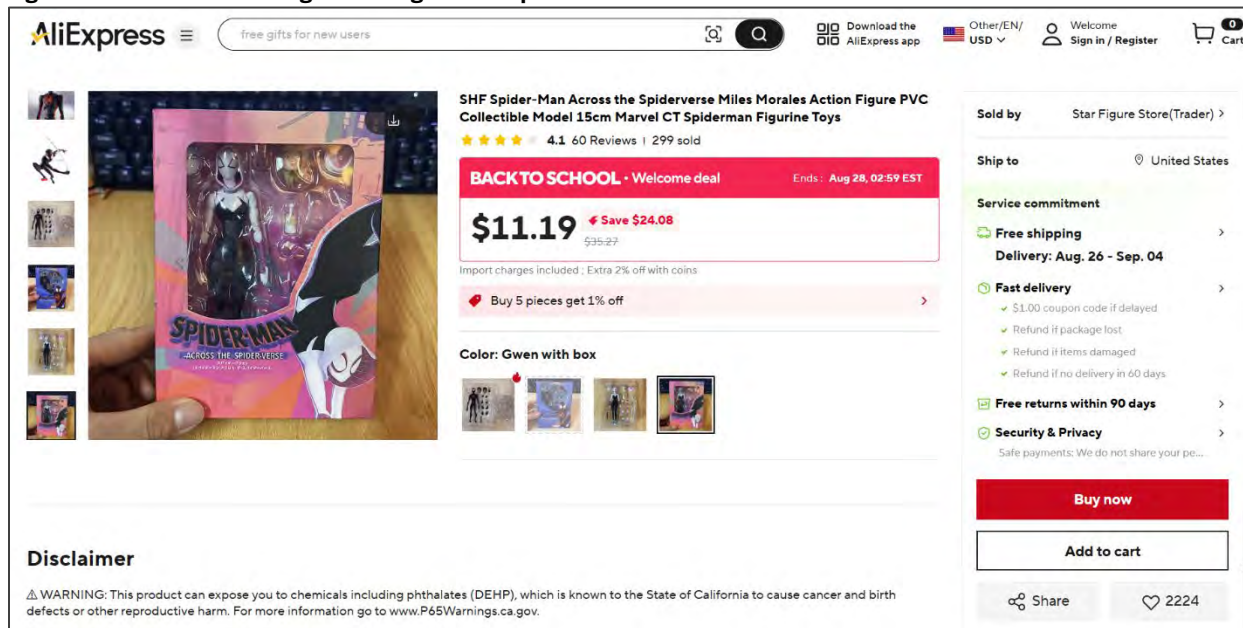
Figure 72: Detail of the magnetic clasp of CH bag purchased by ITIF on SHEIN



Marvel Action Figures

ITIF purchased two Spider-Man Universe action figures from AliExpress, both listed under the title “SHF Spider-Man Across the Spideverse Miles Morales Action Figure PVC Collectible Model 15cm Marvel CT Spiderman Figurine Toys.” The first purchase was a Miles Morales figurine sold under the option “Miles no box” for \$19.42, while the second was a Spider-Gwen figurine sold under the option “with box” for \$21.93. Both purchases came from the same vendor, Star Figure Store, with the listing seen in figure 73. When sold through official channels, authentic Spider-Gwen and Miles Morales SHFiguarts carry an MSRP of approximately \$80 each.¹⁶⁶

Figure 73: Marvel action figure listing on AliExpress



The box of the Spider-Gwen product claims the action figure is part of the SHFiguarts line, as seen in figure 74, a brand operated by Bandai that holds legitimate Marvel licensing rights.¹⁶⁷

Figure 74: Spider-Gwen action figure box purchased by ITIF



The listing photo for the boxed Spider-Gwen displayed no Marvel logo. When the action figure arrived, however, the packaging included both a Marvel logo and a “CT” logo where an authentic Bandai product would display the Bandai logo, as seen in figure 75.¹⁶⁸

Figure 75: Spider-Gwen action figure box purchased by ITIF



CT Toys is allegedly a Chinese company that manufactures bootleg versions of high-end collectibles, with a particular focus on Marvel figures.¹⁶⁹ CT Toys operates largely through social media, where its official account on X regularly promotes AliExpress listings that link back to the same vendor, Funly Toy Store.¹⁷⁰ CT Toys also seems to operate an online storefront on TikTok Shop.¹⁷¹

The action figures ITIF purchased have some subtle differences from the original SHFiguarts models. CT Toys has claimed that it itself faces infringement, and because the action figures ITIF purchased on AliExpress were not from Funly Toy Store, it is possible that ITIF purchased a counterfeit of a CT Toys likely counterfeit.¹⁷² Regardless, the action figures ITIF purchased appear less detailed than official SHFiguarts action figures. For example, the detail of facial features, particularly the eyebrows, differs slightly in one of the Miles Morales detachable heads in comparison to the authentic SHFiguarts action figure in product images as sold through official channels, as seen in figure 76.¹⁷³

Figure 76: Detail of Miles Morales detachable head from action figure purchased by ITIF (left), compared with detail of Miles Morales detachable head from action figure sold through official channel (right)¹⁷⁴



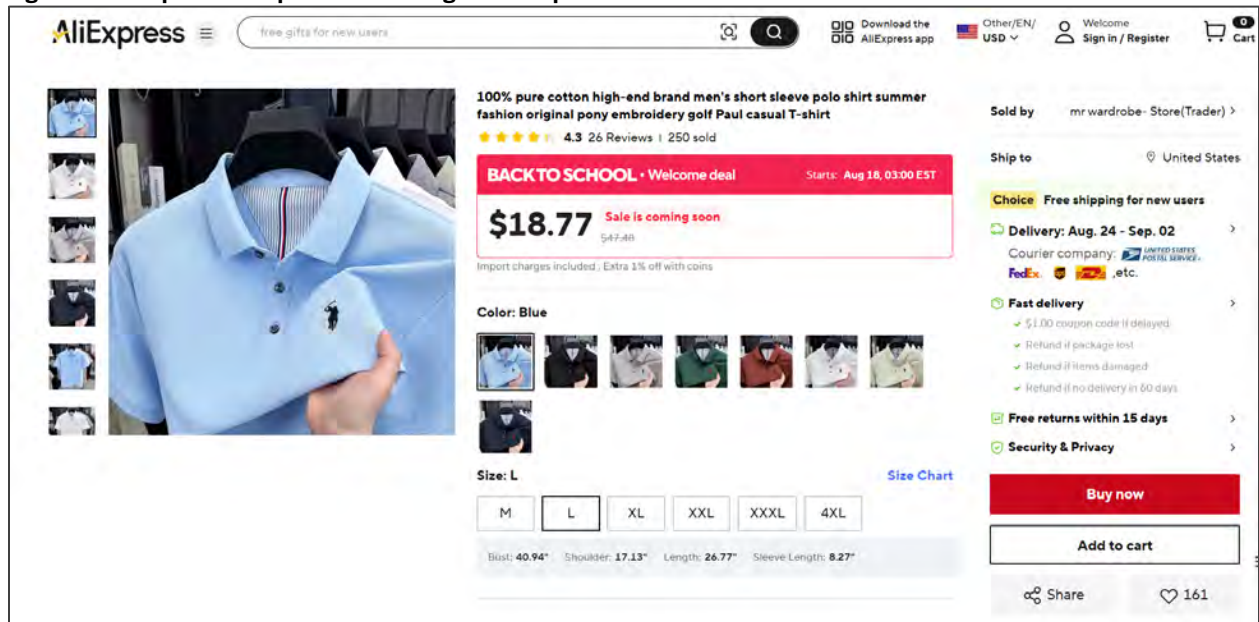
ITIF was unable to find any official CT Toys website outside of the company's X, AliExpress, and TikTok Shop accounts, and based on posts in CT Toys' subreddit, Funly Toy Store is CT Toys' primary means of selling its product.¹⁷⁵ Since CT Toys operates and sells almost exclusively through AliExpress, the platform is seen in this example not merely tolerating probable counterfeit sales but actively serving as the core infrastructure that enables businesses like CT Toys to run and scale their operations.

This case highlights the hybrid nature of certain counterfeiters. CT Toys does not necessarily attempt to deceive dedicated collectors who recognize the difference between Bandai and CT branding. Indeed, CT Toys appears to have a following and loyalty with action figure enthusiasts. At the same time, the company also likely exploits the broader market of consumers who may not know the distinction and simply want a Marvel-branded action figure.

Ralph Lauren Polo Shirt

ITIF purchased a polo shirt from AliExpress for \$19.70, marketed as a “100% pure cotton high-end brand men’s short sleeve polo shirt summer fashion original pony embroidery golf Paul casual T-shirt.”¹⁷⁶ The listing, seen in figure 77, did not explicitly reference Ralph Lauren but included clear cues to the brand, such as the terms “polo,” “pony,” and “golf,” as well as product imagery depicting a logo closely resembling Ralph Lauren’s polo player on horseback.

Figure 77: Ralph Lauren polo shirt listing on AliExpress¹⁷⁷



The screenshot shows an AliExpress product listing for a polo shirt. The main image is a light blue polo shirt with a small, dark polo player logo on the chest. The listing title is "100% pure cotton high-end brand men's short sleeve polo shirt summer fashion original pony embroidery golf Paul casual T-shirt". The price is \$18.77, with a "Sale is coming soon" banner. The listing includes a "BACK TO SCHOOL" welcome deal, a 4.3 star rating from 26 reviews, and 250 items sold. The seller is "mr wardrobe - Store(Trader)". The shipping location is the United States. The listing also features a "Choice" badge for free shipping for new users, a delivery date of August 24 - September 02, and a list of benefits including fast delivery, free returns within 15 days, and security & privacy. The size selection is set to L, and the color is blue. The listing includes a size chart and a "Buy now" button.

Upon arrival, the shirt bore little resemblance to an authentic Ralph Lauren product, the closest comparable being Ralph Lauren’s Classic Fit Performance Polo Shirt, which sells for an MSRP of \$110.¹⁷⁸ Visual discrepancies included black buttons instead of white and a collar accent featuring a blue-white-red-blue stripe, evoking Tommy Hilfiger’s branding more than Ralph Lauren’s, as seen in figure 78.

Figure 78: Ralph Lauren polo shirt purchased by ITIF



The vendor, “Mr Wardrobe- Store,” is operated by Shangrao Aoli Technology Co., Ltd., which according to corporate records has a business scope limited to the telecommunications industry, with no mentions of any apparel.¹⁷⁹ The vendor vaguely lists its business address on AliExpress as “South of the Eagle Highway.”¹⁸⁰ However, a separate corporate record lists Shangrao Aoli Technology’s business address as “Chengnan Shangying Highway.”¹⁸¹ ITIF was able to identify the highway in question on the Chinese Internet, which had at least four businesses linked to it, none of them named Shangrao Aoli Technology.

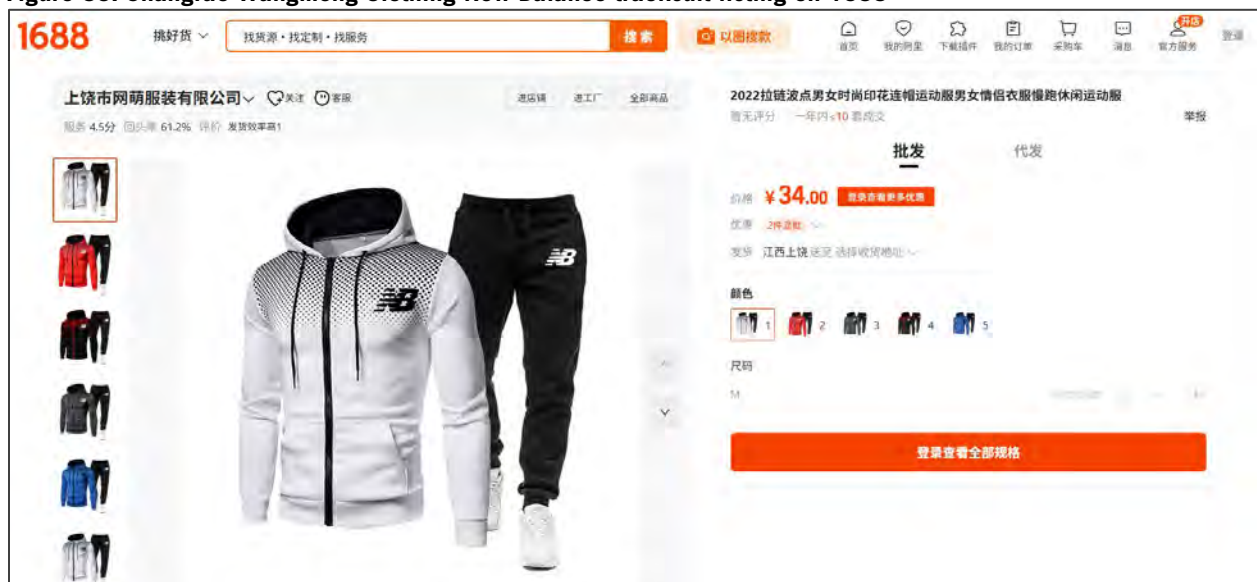
Three of the businesses are e-commerce and retail companies, but one of them, Shangrao Wangmeng Clothing Co., Ltd., looks like the actual company behind the shirt ITIF purchased. Shangrao Wangmeng Clothing specializes in manufacturing men’s clothing, and has a factory, seen in figure 79, located to the south of Shangying highway.¹⁸²

Figure 79: Shangrao Wangmeng Clothing's factory¹⁸³



On a storefront on 1688, a Chinese e-commerce platform, Shangrao Wangmeng Clothing lists men's polo shirts along with many articles of clothing that appear to infringe upon U.S. brands' IP, such as a New Balance tracksuit sold for less than \$5 seen in figure 80.¹⁸⁴

Figure 80: Shangrao Wangmeng Clothing New Balance tracksuit listing on 1688¹⁸⁵



Analysis of Findings

Overall Takeaways

ITIF identified likely counterfeits in multiple product categories across several Chinese e-commerce platforms. Moreover, those selling counterfeits exhibited certain common practices.

Some vendors falsely claimed to be authorized sellers of major U.S. brands, such as “Brooks Authorized Store,” without any public or legal evidence to support the claim. This could mislead consumers into believing that they are buying authentic products. Such activity may also signal upstream leakage from China’s legitimate manufacturing ecosystem, including unauthorized overproduction or diversion of goods.

Suspicious listings frequently attract traffic by embedding brand names or related keywords in product descriptions, such as the inclusion of the “BX-31” model number in the product description of the infringing Beyblade. This manipulation of product descriptions and metadata allows counterfeit sellers to capture search traffic while maintaining plausible deniability. It also distorts marketplace search results and undermines consumer trust.

Despite many signals indicating likely counterfeits, such as suspicious pricing and consumer feedback, platforms inconsistently intervene to take down these listings. Many suspect listings remain live for extended periods and accumulate substantial sales volumes before removal, suggesting that enforcement systems prioritize complaint-driven interventions over proactive risk mitigation. Vendors also appear to exploit platform design features—such as the ability to relabel listings, alter product categories, or rotate seller identities—to evade removal.

The persistence of high-volume sellers with counterfeit products indicates that these are not isolated opportunists but rather repeat actors who operate a business model centered on exploiting known weaknesses in IP enforcement on Chinese online marketplaces. Tactics such as keyword hijacking, miscategorization, misleading claims of brand authorization, and strategic manipulation of images and product titles allow sellers to evade detection while continuing to capture consumer traffic. The ability to reappear under new storefront identities after enforcement further underscores the inadequacy of current takedown mechanisms.

Temu vs. AliExpress vs. SHEIN

The initial hypothesis was simple: Temu, AliExpress, and SHEIN would be rife with counterfeits, based on journalistic, corporate, and governmental scrutiny of all three platforms on issues of product safety, human rights, and IP infringement.¹⁸⁶ But this report tells a more complex story that reflects the ongoing evolution of the counterfeit economy.

ITIF identified the most potential counterfeits and suspicious listings on AliExpress and Temu, but the platforms differ in the likely counterfeiting behavior they support.

AliExpress appears to host vendors that misuse brand trademarks across multiple product types, particularly in low-cost categories such as accessories, toys, and shoes. Likely counterfeits purchased on AliExpress often appear crude, with unauthorized use of brand names and logos applied to goods that the legitimate rights holder does not produce, or products with inferior quality than would be expected from the original manufacturer.

The U.S. Trade Representative (USTR) listed AliExpress on the 2021 and 2022 Reviews of Notorious Markets List (NML) for Counterfeiting and Piracy, which highlights prominent and

illustrative examples of online and physical markets that reportedly engage in, facilitate, turn a blind eye to, or benefit from substantial piracy or counterfeiting.”¹⁸⁷ USTR’s justification for adding AliExpress was “a significant increase in counterfeit goods being offered for sale on AliExpress, including goods that are blatantly advertised as counterfeit and goods that are falsely advertised as genuine” and that AliExpress “sellers apparently are not sufficiently vetted to ensure that they will not be selling counterfeit goods.”¹⁸⁸

Based on the test purchases detailed in this report, ITIF did not observe any goods on AliExpress that were blatantly advertised as counterfeit, but sellers on AliExpress clearly continue to falsely list many goods as genuine, and the platform still inadequately vets sellers for counterfeit risk. It is unclear why USTR removed AliExpress from the NML in 2023.

Temu presents a different counterfeit profile. The test buys suggest that the platform may host more deceptive counterfeits that closely mimic legitimate products in appearance and packaging. These goods often bear barcodes, certification marks, or manufacturer references that appear authentic. This makes Temu counterfeits more difficult for consumers to spot while browsing, and more difficult to determine are counterfeit upon receipt of the goods. Taken as a whole, potential counterfeit vendors on Temu appear to have a strategy aimed at selling counterfeit goods as legitimate-looking products to maintain customer trust while still profiting from infringing sales. The prices of likely counterfeits on Temu also frequently undercut authentic products’ MSRPs, increasing the appeal for consumers who may not realize that they are buying infringing goods. As seen in the Theraflu case, another strategy of suspicious vendors on Temu is to divert customers to alternative websites with potentially even less IP enforcement and consumer safety protections.

SHEIN’s anticounterfeit policies and practices appear to have shifted in the past year. Following negative press during the 2024 holiday season, the platform has tightened controls in certain categories.¹⁸⁹ Specifically, SHEIN announced plans to spend \$15 million on compliance initiatives and conduct 2,500,000 product safety and quality tests throughout 2025.¹⁹⁰ While ITIF’s test buy only included the purchase of one current SHEIN listing that appears to misuse a known brand’s trademark, IP infringement on SHEIN remains a live issue in the form of unauthorized reproduction of creative works by independent designers.¹⁹¹ These cases often avoid brand names and logos entirely, making them harder to detect with automated tools and more burdensome for individual rights holders to challenge.

Across all three tested platforms, for some product categories, such as the auto aftermarket, consumer appliances and electronics, OTC medicine, and luxury products, ITIF found that many of the test buy products received were unauthorized resales or otherwise diverted, authentic products. Clearly, the platforms appear to have implemented more sophisticated controls in certain categories.

These improvements could reflect selective investment in anticounterfeiting tools or cooperation with specific brand protection programs. At the same time, ITIF’s test buys have found counterfeit toys, mid-tier apparel, and household goods, suggesting that counterfeiters may simply shift to categories that face less scrutiny. Selective anticounterfeiting efforts likely create a whack-a-mole effect wherein enforcement in one area drives infringement into another. Likely counterfeiters such as Zoffy appear to operate multiple online storefronts that offer IP-infringing

products and may easily be able to maintain their overall business even if a platform tightens restrictions in a certain area.

Previous, more-permissive platform policies continue to influence today's e-commerce ecosystem. If counterfeiting was more common on Chinese e-commerce platforms in 2024 or earlier, those platforms likely attracted many customers who were lured in by cheaper, infringing goods. That customer base remains, so the economic effects of prior counterfeiting persist long after enforcement actions.

POLICY RECOMMENDATIONS

The scope of counterfeiting observed suggests that the risk is systemic, cutting across product categories and requiring regulatory responses that address platform-wide vulnerabilities rather than isolated verticals. These patterns point to structural misalignments between platform incentives and compliance with IP and consumer protection laws, enabling products to be marketed and sold at scale with minimal, sustained interference. Addressing this problem will require coordinated, sustained policy interventions that target both platforms and vendors, tackling the structural incentives driving counterfeiting and the tactical evasions counterfeiters use to exploit enforcement gaps.

To address the role of Chinese e-commerce platforms enabling counterfeits, ITIF recommends the following:

1. **USTR should classify Temu, AliExpress, and SHEIN as notorious markets.** This report shows that Temu, AliExpress, and SHEIN meet the USTR's criteria of notorious markets, meaning that they "engage in or facilitate substantial trademark counterfeiting or copyright piracy."¹⁹² These platforms benefit from hosting and algorithmically promoting products that undermine U.S. IP rights holders at scale. Including these companies in the NML would signal that the United States does not tolerate IP infringement in the U.S. market. It would also push these platforms toward real behavioral change in how they monitor, respond to, and work to prevent the sale of counterfeit goods.
2. **CBP should target platforms listed on the NML.** The NML currently functions as a name-and-shame mechanism without meaningful operational consequences. To turn it into an enforcement tool, CBP should integrate NML designations into its targeting and inspection protocols. Ideally, whenever USTR flags an online marketplace as a notorious market, CBP would have the capability to treat products purchased through that platform as high-priority risk sources in its automated cargo targeting systems, while still reserving enforcement bandwidth for detecting counterfeits from nonlisted sources. The solution lies in refining the inputs, infrastructure, and methodology behind CBP's counterfeit enforcement models by more heavily weighting shipments tied to NML-listed platforms with potential counterfeit risk.
3. **CBP should invest in AI capabilities to support anticounterfeiting efforts.** CBP inspected four suspicious test purchases, but failed to seize them. Additionally, CBP failed to inspect any likely counterfeits purchased on Temu and failed to inspect others purchased on AliExpress. And in the case of the Brooks shoes, CBP failed to seize the second shipment from the same vendor when ITIF repurchased the identical product—presumably after CBP had prior knowledge that this vendor was shipping likely counterfeit goods.

Moreover, CBP not only failed to seize products shipped directly from China to ITIF such as the Honda dirt pad, but it also failed to seize counterfeit goods imported from China in bulk to U.S. warehouses and then shipped domestically, such as the KontrolFreek Thumbsticks.¹⁹³ These results suggest that there is much room for improvement.

CBP already deploys AI solutions to boost numerous e-commerce enforcement issues, such as procuring the supply chain start-up Altana's software to assist CBP analysts in "determin[ing] high risk areas for trade targeting in the forced labor mission set."¹⁹⁴ According to CBP's AI Use Case Inventory, the agency has an institutional appetite to utilize AI and—through procurement power—shape the development of AI tools for assisting its mission. However, there is no mention of the counterfeit issue in the AI Use Case Inventory.

To address this gap, CBP should procure an AI-driven software solution that systematically "crawls" e-commerce platforms and essentially replicates what ITIF conducted in this test purchase by identifying suspicious listings. The procurement should instruct the software solution to detect MSRP and listing price discrepancies, compare product images and descriptions for inconsistencies (e.g., "cold relief" as a product description but the listing's photo clearly displaying "Theraflu"), and analyze user reviews for red flags.

Initially, this tool can serve as a lead generation system to prioritize and guide CBP analysts toward high-risk shipments and sellers, such as how CBP currently uses Altana's product, in which "no decisions or actions come directly from the information presented by Altana."¹⁹⁵ And, over time, there should be potential for more autonomous, agentic AI systems to take a primary role in identifying counterfeit operations at scale while more manual capabilities focus more on disrupting said operations.

4. Government oversight should focus on policies, processes, and outcomes, not public relations.

In recent months, Temu has joined the International AntiCounterfeiting Coalition's (IACC's) Marketplace Advisory Council (MAC) as an inaugural member, and joined the International Trademark Association (INTA) to serve on its Anti-Counterfeiting Committee.¹⁹⁶ IACC is made up of corporations, law enforcement, and industry groups working to combat counterfeiting and piracy, while INTA is made up of brand owners and platforms dedicated to supporting trademarks and IP protection.¹⁹⁷ These engagements signal Temu's willingness to participate in the global dialogue on IP enforcement and brand protection. However, as this report shows, Temu meets the bar of a notorious market due to ongoing widespread counterfeit and IP infringement issues. Its membership in IACC and INTA does not reflect a corresponding level of meaningful change in its platform governance or enforcement practices.

On one hand, Temu's involvement in IACC and INTA offers an opportunity for fellow members in these anticounterfeiting organizations, including other platforms, industry associations, and consumer safety groups, to pressure Temu to improve its platform. Participation can encourage transparency, knowledge sharing, and adoption of best practices. On the other hand, without tangible enforcement improvements, Temu's membership risks deflecting regulatory scrutiny and public criticism without producing substantive reforms. Indeed, in its formal submission to USTR for the 2024 NML review,

IACC wrote positively about Temu, saying that it had “been pleased with Temu’s direct engagement in recent months,” and that it “had an opportunity to meet with the company’s most senior executives, who reiterated Temu’s commitment to working with rights-holders to address IP concerns.”¹⁹⁸ But those efforts are not a replacement for implementing an aggressive anticounterfeiting program that delivers clear results.

IACC, INTA, and other independent organizations occupy an important position in the anticounterfeiting landscape. U.S. government oversight should focus on the policies, processes, and outcomes of Chinese platforms, rather than on the organizations they join. However, Congress and the administration can still urge these organizations to rigorously enforce membership standards—requiring platforms to maintain strong, ongoing anticounterfeiting measures as policies and practices as an ongoing prerequisite for participation. This would help ensure that memberships reflect genuine commitments to IP enforcement rather than reputational shields.

5. **Congress should pass CBP information-sharing legislation.** Congress should enact the bipartisan legislation introduced in the House (H.R. 4930) and the Senate (S.2677) to expand CBP’s authority to share detailed information on suspected counterfeit imports with rights holders, carriers, and online marketplaces.¹⁹⁹ Providing CBP with explicit authority to share shipping labels, sender and recipient addresses, and other packaging details would enable faster identification of trafficking networks, improve coordination with the private sector, and help intercept counterfeit goods before they reach U.S. consumers.²⁰⁰

To address vendors selling counterfeits on Chinese e-commerce platforms, ITIF recommends the following:

1. **Improve enforcement of INFORM Consumers Act.** The INFORM Consumers Act is designed to increase transparency and accountability in online marketplaces by requiring platforms to collect and verify detailed seller information.²⁰¹ Despite the law being in place, enforcement by the Federal Trade Commission (FTC) and state attorneys general remains uneven and insufficient. As this report shows, many vendors list erroneous business information, such as fake or shell companies and business names and addresses that do not match. SHEIN seemingly does not require its vendors to list any business information whatsoever.

The FTC should prioritize rigorous enforcement of the INFORM Act on high-risk platforms listed on the NML as a test case to develop future best practices for broader implementation. This targeted approach would provide valuable lessons on effective verification methods and enforcement mechanisms that could then be scaled to cover the wider e-commerce ecosystem. Demonstrating clear consequences for noncompliance by NML platforms would send a strong signal to all marketplaces about the seriousness of the law and the government’s commitment to combating counterfeit goods.

2. **The Department of Homeland Security should establish a Foreign Counterfeit Complaint Center (FC3).** Given the amount of counterfeit and infringing goods sold on platforms such as Temu, SHEIN, and AliExpress, as well as how quickly new vendors and listings may appear, rights holders struggle to effectively monitor these sites. Many items, as

identified in this report, do not blatantly misuse logos or trademarks, but instead replicate designs, packaging, and functionality in ways that evade simple authenticity tests. In addition, U.S. enforcement agencies operate in silos when tracking online counterfeit sales. Altogether, this weakens U.S. enforcement efforts and undermines the integrity of IP protection frameworks.

To address this challenge, the U.S. government should establish a centralized, public-facing counterfeit reporting mechanism modeled after the FBI's Internet Crime Complaint Center (IC3).²⁰² This system would allow consumers and rights holders to report suspected counterfeit or copycat goods sold by foreign sellers by providing details such as suspicious product listings, vendor behavior, or product discrepancies. By giving consumers a role in intelligence collection, the system would, over time, serve as a rich dataset for U.S. agencies such as the Consumer Product Safety Commission, CBP, USTR, FTC, and Homeland Security Investigations to aggregate with their own data and better identify repeat offenders, compile evidence for enforcement, and understand how counterfeiting intersects with adjacent issues such as product safety.

- 3. The administration should integrate IP enforcement against Chinese-based counterfeit vendors into its broader trade negotiations with China.** On an annual basis, USTR's Special 301 Report consistently identifies China as the primary source of counterfeit goods entering the U.S. market, with the 2025 report asserting that "China continues to be the world's leading source of counterfeit and pirated goods."²⁰³ Based on this evidence, the administration should press China's government to extend its already existing domestic anticounterfeiting policies to cover counterfeit goods sold by Chinese vendors targeting U.S. consumers.²⁰⁴ Any negotiations should clearly signal that failure to address cross-border counterfeiting will carry economic consequences and impact any potential of reaching a trade deal.

CONCLUSION

The challenge posed by counterfeit goods on Chinese e-commerce platforms is both urgent and complex. This report reveals Temu and AliExpress to be online marketplaces that tolerate the sale of infringing and unsafe products to millions of American consumers. Addressing this issue requires more than spot enforcement. It demands coordinated, sustained U.S. government intervention to recalibrate platform behavior through targeted regulatory, trade, and technological measures. Policymakers have the tools to hold foreign e-commerce platforms to the same standards already adhered to by major domestic platforms. Global e-commerce, and the United States' place within it, depends on the ability to foster innovation and open markets without sacrificing the integrity and safety of the goods Americans buy every day.

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About ITIF

The Information Technology and Innovation Foundation (ITIF) is an independent 501(c)(3) nonprofit, nonpartisan research and educational institute that has been recognized repeatedly as the world's leading think tank for science and technology policy. Its mission is to formulate, evaluate, and promote policy solutions that accelerate innovation and boost productivity to spur growth, opportunity, and progress. For more information, visit itif.org/about.

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