

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

In the Matter of

**CERTAIN PRODUCTS CONTAINING
TIRZEPATIDE AND PRODUCTS
PURPORTING TO CONTAIN
TIRZEPATIDE**

Investigation No. 337-TA-1377

GENERAL EXCLUSION ORDER

The United States International Trade Commission (“Commission”) has determined that there is a violation of section 337 of the Tariff Act of 1930, as amended (19 U.S.C. § 1337), in the unlawful importation, sale for importation, or sale within the United States after importation of certain products containing tirzepatide and products purporting to contain tirzepatide (as defined in paragraph 2 below) that infringe U.S. Trademark Registration No. 6,809,369 (“Asserted Trademark”). The Commission has also determined that there is a violation of section 337 in the unlawful importation into the United States of products containing tirzepatide and products purporting to contain tirzepatide that have a false designation of origin under 15 U.S.C. § 1125(a)(1)(A) that is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such product with Eli Lilly & Co. (“Lilly”), or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by Lilly, for example in internet advertising that uses the Asserted Trademark (irrespective of whether the products themselves bear the mark) or that claims that the products have been subject to clinical trials or received FDA approval.

Having reviewed the record in this investigation, including the written submissions of the parties, the Commission has made its determinations on the issues of remedy, the public interest, and bonding. The Commission has determined that a general exclusion from entry for

consumption is necessary (1) to prevent circumvention of an exclusion order limited to products of named persons and (2) because there is a pattern of violation of section 337 and it is difficult to identify the source of the infringing products. Accordingly, the Commission has determined to issue a general exclusion order prohibiting (1) the unlicensed importation of products infringing the Asserted Trademark that contain tirzepatide and products purporting to contain tirzepatide; and (2) the importation of products containing tirzepatide and products that have a false designation of origin that is likely to confuse consumers regarding the origin, sponsorship, or regulatory approval of the products, or in the unlawful sale of such products by the owner, importer, or consignee.

The Commission has also determined that the public interest factors enumerated in 19 U.S.C. § 1337(d) do not preclude the issuance of this Order, and that the bond during the period of Presidential review shall be in the amount of one hundred percent (100%) of the entered value of the entered value of the articles subject to this Order.

Accordingly, the Commission hereby **ORDERS** that:

1. Products containing tirzepatide and products purporting to contain tirzepatide (as defined in paragraph 3 below) that infringe the Asserted Trademark, for example, through use of the Asserted Trademark in internet advertising (irrespective of whether the products themselves bear the mark), are excluded from entry for consumption into the United States, entry for consumption from a foreign-trade zone, or withdrawal from a warehouse for consumption, except under license of the trademark owner or as provided by law until such date as the trademark has been abandoned, canceled, or rendered invalid or unenforceable.
2. Products containing tirzepatide and products purporting to contain tirzepatide (also as

defined in paragraph 3 below) that have a false designation of origin that is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such product with Eli Lilly & Co. (“Lilly”), or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by Lilly, for example in internet advertising that uses the Asserted Trademark (irrespective of whether the products themselves bear the mark) or that claims that the products have been subject to clinical trials or received FDA approval, are excluded from entry for consumption into the United States, entry for consumption from a foreign-trade zone, or withdrawal from a warehouse for consumption, except as provided by law.

3. The products containing tirzepatide and products purporting to contain tirzepatide subject to this exclusion order (*i.e.*, “covered articles”) are as follows: products containing tirzepatide or purporting to contain tirzepatide sold in powdered or constituted form.

4. For the purpose of assisting U.S. Customs and Border Protection (“CBP”) in the enforcement of this order, and without in any way limiting the scope of this Order, the Commission has attached to this Order a copy of the relevant trademark registration as Exhibit 1.

5. Notwithstanding paragraph 1 of this Order, covered articles are entitled to entry into the United States for consumption, entry for consumption from a foreign trade zone, or withdrawal from a warehouse for consumption, under bond in the amount of one hundred percent (100%) of their entered value, pursuant to subsection (j) of section 337 (19 U.S.C. § 1337(j)) and the Presidential Memorandum for the United States Trade Representative of July 21, 2005 (70 Fed. Reg. 43,251), from the day after this Order is received by the United States Trade Representative until such time as the United States Trade Representative notifies the Commission that this Order is approved or disapproved but, in any event, not later than sixty (60)

days after the receipt of this Order. All entries of covered articles made pursuant to this paragraph are to be reported to CBP, in advance of the date of the entry, pursuant to procedures CBP establishes.

6. This Order does not exempt infringing articles from seizures under trademark laws enforced by CBP, most notably 19 U.S.C. § 1526(e) and 19 U.S.C. § 1595a(c)(2)(C) in connection with 15 U.S.C. § 1124.

7. At the discretion of CBP and pursuant to the procedures it establishes, persons seeking to import articles may be required to certify that they are familiar with the terms of this Order, that they have made appropriate inquiry, and thereupon state that, to the best of their knowledge and belief, the products being imported are not excluded from entry under paragraph 1 of this Order. At its discretion, CBP may require persons who have provided the certification described in this paragraph to furnish such records or analyses as are necessary to substantiate the certification.

8. Complainant shall file a written statement with the Commission, made under oath, each year on the anniversary of the issuance of this Order stating whether Complainant continues to use the Asserted Trademark in commerce in the United States in connection with the products at issue and whether the Asserted Trademark has been abandoned, canceled, or rendered invalid or unenforceable.

9. The Commission may modify this Order in accordance with the procedures described in Rule 210.76 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 210.76).

10. The Secretary shall serve copies of this Order upon each party of record in this investigation and upon CBP.

11. Notice of this Order shall be published in the Federal Register.

By order of the Commission.

A handwritten signature in black ink, appearing to read 'LRB', enclosed within a thin black rectangular border.

Lisa R. Barton
Secretary to the Commission

Issued: April 9, 2025

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

PUBLIC CERTIFICATE OF SERVICE

I, Lisa R. Barton, hereby certify that the attached **ORDER, COMMISSION** has been served via EDIS upon the Commission Investigative Attorney, **Yoncha Kundupoglu, Esq.**, and the following parties as indicated, on **April 9, 2025**.



Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

On Behalf of Complainant Eli Lilly and Company:

Paul F. Brinkman, Esq.
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Email: paul.brinkman@kirkland.com

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of Availability for Download

Respondents:

Arctic Peptides LLC
2104 NE Oak Drive
Ankeny, IA 50021

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- ☒ Via Express Delivery
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- ☐ Other: Email Notification
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Audrey Beauty Co.
Flat C 23/F Lucky Plaza
315-321 Lockhart Road
Wan Chai, Hong Kong
China

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Biolabshop Limited
25 Scotforth Road
Lancaster, PR1 4XX
United Kingdom

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Certificate of Service – Page 2

Fibonacci Sequence LLC d/b/a GenX Peptides
P.O Box 4747, Research Forest Drive, Suite 180-119
The Woodlands, TX 77381

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
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Mew Mews Company Limited
RM C1 11/F Blk 1 152 Tai Lin Pai Road
Golden Dragon IND Ctr.
Kwai Chung, New Territories,
Hong Kong
China

- ☐ Via Hand Delivery
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Paradigm Peptides
1511 N. Convent St. Suite 700-156
Bourbonnais, IL 60914

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Strate Labs LLC
18482 Kuykendahl Road #123
Spring, TX 77379-8123

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Super Human Store
Passeig Del Taulat 267, 5O 4A
Barcelona 08019
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Total Compounding Pharmaceuticals
30 N. Gould Street, Suite R
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tcpcompoundingpharmacy@gmail.com

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Certificate of Service – Page 3

Triggered Supplements LLC (d/b/a The Triggered Brand)
1361 S Martin Luther King Jr Ave.
Clearwater, FL 33756

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Xiamen Austronext Trading Co., Ltd. (d/b/a AustroPeptide)
Room 3001, No. 5998, Maqing Rd.
Haicang District, Xiamen
Fujian, China 361026

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
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Washington, D.C.

In the Matter of

**CERTAIN PRODUCTS CONTAINING
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Investigation No. 337-TA-1377

LIMITED EXCLUSION ORDER

The United States International Trade Commission (“Commission”) has found respondents Super Human Store of Barcelona, Spain, Xiamen Austronext Trading Co., Ltd. (d/b/a AustroPeptide) of Fujian, China, and Arctic Peptides LLC of Akeny, Iowa (collectively, “Defaulting Respondents”) in default. *See* Order No. 13 (Apr. 22, 2024), *unreviewed by* Comm’n Notice (May 15, 2024). The Complaint alleged a violation of section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, in the unlawful importation of articles into the United States, or in the unlawful sale of such articles by the owner, importer, or consignee of certain products containing tirzepatide and products purporting to contain tirzepatide that are falsely advertised in violation of 15 U.S.C. § 1125(a)(1)(B). Because the conditions in 19 U.S.C. § 1337(g)(1)(A)-(E) have been satisfied, the Commission, upon the request of the complainant, issues a limited exclusion order, based on the allegations regarding a violation of section 337 in the Complaint that are presumed to be true as to the Defaulting Respondents.

Having reviewed the record in this investigation, including the written submissions of the parties, the Commission has made its determinations on the issues of remedy, the public interest, and bonding. The Commission has determined that the appropriate form of relief is a limited exclusion order prohibiting the entry of falsely advertised products containing tirzepatide and

products purporting to contain tirzepatide that are manufactured by or on behalf of Defaulting Respondents or any of their affiliated companies, parents, subsidiaries, agents, or other related business entities, or its successors or assigns.

The Commission has also determined that the public interest factors enumerated in 19 U.S.C. § 1337(g) do not preclude the issuance of the limited exclusion order, and that the bond during the period of Presidential review shall be in the amount of one hundred percent (100%) of the entered value of the entered value of the articles subject to this Order.

Accordingly, the Commission hereby **ORDERS** that:

1. Products containing tirzepatide and products purporting to contain tirzepatide that are falsely advertised, including, but not limited to, by means of online advertisements, print advertisements, packaging and/or data sheets, misrepresentation of the unauthorized use of U.S. Trademark Registration No. 6,809,369 on advertisements (irrespective of whether the articles themselves bear the mark) for the remaining term of the trademark; and that are manufactured abroad by, or on behalf of, or imported by or on behalf of Defaulting Respondents or any of their affiliated companies, parents, subsidiaries, agents, or other related business entities, or its successors or assigns, are excluded from entry for consumption into the United States, entry for consumption from a foreign-trade zone, or withdrawal from a warehouse for consumption, except as provided by law.

2. The products containing tirzepatide and products purporting to contain tirzepatide subject to this exclusion order (*i.e.*, “covered articles”) are as follows: products containing tirzepatide or purporting to contain tirzepatide sold in powdered or constituted form.

3. For the purpose of assisting U.S. Customs and Border Protection (“CBP”) in the enforcement of this order, and without in any way limiting the scope of this Order, the

Commission has attached to this Order a copy of the relevant trademark registration as Exhibit 1.

4. Notwithstanding paragraph 1 of this Order, covered articles are entitled to entry into the United States for consumption, entry for consumption from a foreign trade zone, or withdrawal from a warehouse for consumption, under bond in the amount of one hundred percent (100%) of their entered value, pursuant to subsection (j) of section 337 (19 U.S.C. § 1337(j)) and the Presidential Memorandum for the United States Trade Representative of July 21, 2005 (70 Fed. Reg. 43,251), from the day after this Order is received by the United States Trade Representative until such time as the United States Trade Representative notifies the Commission that this Order is approved or disapproved but, in any event, not later than sixty (60) days after the receipt of this Order. All entries of covered articles made pursuant to this paragraph are to be reported to CBP, in advance of the date of the entry, pursuant to procedures CBP establishes.

5. At the discretion of CBP and pursuant to the procedures it establishes, persons seeking to import articles may be required to certify that they are familiar with the terms of this Order, that they have made appropriate inquiry, and thereupon state that, to the best of their knowledge and belief, the products being imported are not excluded from entry under paragraph 1 of this Order. At its discretion, CBP may require persons who have provided the certification described in this paragraph to furnish such records or analyses as are necessary to substantiate the certification.

6. The Commission may modify this Order in accordance with the procedures described in Rule 210.76 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 210.76).

7. The Secretary shall serve copies of this Order upon each party of record in this investigation and upon CBP.

8. Notice of this Order shall be published in the Federal Register.

By order of the Commission.

A handwritten signature in black ink, appearing to read 'L.R. Barton', enclosed within a thin black rectangular border.

Lisa R. Barton
Secretary to the Commission

Issued: April 9, 2025

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Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

On Behalf of Complainant Eli Lilly and Company:

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2104 NE Oak Drive
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Kwai Chung, New Territories,
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Bourbonnais, IL 60914

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Strate Labs LLC
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Passeig Del Taulat 267, 5O 4A
Barcelona 08019
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Total Compounding Pharmaceuticals
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Xiamen Austronext Trading Co., Ltd. (d/b/a AustroPeptide)
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Fujian, China 361026

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**UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.**

In the Matter of

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Investigation No. 337-TA-1377

CEASE AND DESIST ORDER

IT IS HEREBY ORDERED THAT RESPONDENT Strate Labs LLC of Spring, Texas cease and desist from conducting any of the following activities in the United States: importing, selling, offering for sale, marketing, advertising, distributing, transferring (except for exportation), soliciting United States agents or distributors, and aiding or abetting other entities in the importation, sale for importation, sale after importation, transfer (except for exportation), or distribution of certain products containing tirzepatide and products purporting to contain tirzepatide (as defined in Definition (G) below) that, in violation of section 337 of the Tariff Act of 1930, as amended (19 U.S.C. § 1337), include a false designation of origin that is likely to confuse consumers regarding the origin, sponsorship, or regulatory approval of the products, in violation of 15 U.S.C. § 1125(a)(1)(A).

**I.
Definitions**

As used in this order:

- (A) “Commission” shall mean the United States International Trade Commission.
- (B) “Complainant” shall mean Eli Lilly and Company of Indianapolis, Indiana.
- (C) “Respondent” shall mean Strate Labs LLC of Spring, Texas.

- (D) “Person” shall mean an individual, or any non-governmental partnership, firm, association, corporation, or other legal or business entity other than Respondent or its majority-owned or controlled subsidiaries, successors, or assigns.
- (E) “United States” shall mean the fifty States, the District of Columbia, and Puerto Rico.
- (F) The terms “import” and “importation” refer to importation for entry for consumption under the Customs laws of the United States.
- (G) The term “covered products” shall mean products containing tirzepatide and products purporting to contain tirzepatide that include a false designation of origin that is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such product with Eli Lilly & Co. (“Lilly”), or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by Lilly, for example in internet advertising that uses claims that Respondent’s products have been subject to clinical trials or received FDA approval. The products containing tirzepatide and products purporting to contain tirzepatide subject to this order are as follows: products containing tirzepatide or purporting to contain tirzepatide sold in powdered or constituted form. Covered products shall not include articles for which a provision of law permits importation.

II. Applicability

The provisions of this Cease and Desist Order shall apply to Respondent and to any of its principals, stockholders, officers, directors, employees, agents, distributors, controlled (whether by stock ownership or otherwise) and majority-owned business entities, successors, and assigns,

and to each of them, insofar as they are engaging in conduct prohibited by section III, *infra*, for, with, or otherwise on behalf of, Respondent.

III. Conduct Prohibited

Respondent shall not:

- (A) import or sell for importation into the United States covered products;
- (B) market, distribute, sell, offer to sell, or otherwise transfer (except for exportation) in the United States imported covered products;
- (C) advertise imported covered products;
- (D) solicit U.S. agents or distributors for imported covered products; or
- (E) aid or abet other entities in the importation, sale for importation, sale after importation, transfer (except for exportation), or distribution of covered products.

IV. Reporting

For purposes of this requirement, the reporting periods shall commence on July 1 of each year and shall end on the subsequent June 30. The first report required under this section shall cover the period from the date of issuance of this order through July 31, 2025. This reporting requirement shall continue in force until such time as Respondent has truthfully reported, in two consecutive timely filed reports, that it has no inventory (whether held in warehouses or at customer sites) of covered products in the United States.

Within thirty (30) days of the last day of the reporting period, Respondent shall report to the Commission: (a) the quantity in units and the value in dollars of covered products that it has (i) imported and/or (ii) sold in the United States after importation during the reporting period,

and (b) the quantity in units and value in dollars of reported covered products that remain in inventory in the United States at the end of the reporting period.

When filing written submissions, Respondent must file the original document electronically on or before the deadlines stated above. Submissions should refer to the investigation number (“Inv. No. 337-TA-1377”) in a prominent place on the cover pages and/or the first page. *See Handbook for Electronic Filing Procedures*, http://www.usitc.gov/secretary/fed_reg_notices/rules/handbook_on_electronic_filing.pdf. Persons with questions regarding filing should contact the Secretary (202-205-2000). If Respondent desires to submit a document to the Commission in confidence, it must file the original and a public version of the original with the Office of the Secretary and must serve a copy of the confidential version on Complainant’s counsel.¹

Any failure to make the required report or the filing of any false or inaccurate report shall constitute a violation of this Order, and the submission of a false or inaccurate report may be referred to the U.S. Department of Justice as a possible criminal violation of 18 U.S.C. § 1001.

V. Record-Keeping and Inspection

- (A) For the purpose of securing compliance with this Order, Respondent shall retain any and all records relating to the sale, marketing, or distribution in the United States of covered products, made and received in the usual and ordinary course of business, whether in detail or in summary form, for a period of three (3) years from the close of the fiscal year to which they pertain.

¹ Complainants must file a letter with the Secretary identifying the attorney to receive reports and bond information associated with this Order. The designated attorney must be on the protective order entered in the investigation.

- (B) For the purposes of determining or securing compliance with this Order and for no other purpose, subject to any privilege recognized by the federal courts of the United States, and upon reasonable written notice by the Commission or its staff, duly authorized representatives of the Commission shall be permitted access and the right to inspect and copy, in Respondent's principal offices during office hours, and in the presence of counsel or other representatives if Respondent so chooses, all books, ledgers, accounts, correspondence, memoranda, and other records and documents, in detail and in summary form, that must be retained under subparagraph V(A) of this Order.

VI.
Service of Cease and Desist Order

The Secretary shall serve copies of this Order upon each party of record in this investigation.

Respondent is ordered and directed to:

- (A) Serve, within fifteen (15) days after the effective date of this Order, a copy of this Order upon each of its respective officers, directors, managing agents, agents, and employees who have any responsibility for the importation, marketing, distribution, transfer, or sale of imported covered products in the United States;
- (B) Serve, within fifteen (15) days after the succession of any persons referred to in subparagraph VI(A) of this order, a copy of the Order upon each successor; and
- (C) Maintain such records as will show the name, title, and address of each person upon whom the Order has been served, as described in subparagraphs VI(A) and VI(B) of this order, together with the date on which service was made.

VII. Confidentiality

Any request for confidential treatment of information obtained by the Commission pursuant to any section of this order should be made in accordance with section 201.6 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 201.6). For all reports for which confidential treatment is sought, Respondent must provide a public version of such report with confidential information redacted.

VIII. Enforcement

Violation of this order may result in any of the actions specified in section 210.75 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 210.75), including an action for civil penalties under section 337(f) of the Tariff Act of 1930 (19 U.S.C. § 1337(f)), as well as any other action that the Commission deems appropriate. In determining whether Respondent is in violation of this order, the Commission may infer facts adverse to Respondent if it fails to provide adequate or timely information.

IX. Modification

The Commission may amend this order on its own motion or in accordance with the procedure described in section 210.76 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 210.76).

X Bonding

The conduct prohibited by section III of this order may be continued during the sixty (60) day period in which this Order is under review by the United States Trade Representative, as delegated by the President (70 Fed. Reg. 43,251 (Jul. 21, 2005)), subject to Respondent's posting

of a bond in the amount of one hundred percent (100%) of their entered value. This bond provision does not apply to conduct that is otherwise permitted by section IV of this Order. Covered products imported on or after the date of issuance of this Order are subject to the entry bond as set forth in the exclusion order issued by the Commission, and are not subject to this bond provision.

The bond is to be posted in accordance with the procedures established by the Commission for the posting of bonds by complainants in connection with the issuance of temporary exclusion orders. *See* 19 C.F.R. § 210.68. The bond and any accompanying documentation are to be provided to and approved by the Commission prior to the commencement of conduct that is otherwise prohibited by section III of this Order. Upon the Secretary's acceptance of the bond, (a) the Secretary will serve an acceptance letter on all parties, and (b) Respondent must serve a copy of the bond and accompanying documentation on Complainant's counsel.²

The bond is to be forfeited in the event that the United States Trade Representative approves this Order (or does not disapprove it within the review period), unless (i) the U.S. Court of Appeals for the Federal Circuit, in a final judgment, reverses any Commission final determination and order as to Respondent on appeal, or (ii) Respondent exports or destroys the products subject to this bond and provides certification to that effect that is satisfactory to the Commission.

This bond is to be released in the event (i) the United States Trade Representative disapproves this Order and no subsequent order is issued by the Commission and approved (or not disapproved) by the United States Trade Representative, (ii) the U.S. Court of Appeals for

² *See* Footnote 1.

the Federal Circuit, in a final judgment, reverses any Commission final determination and order as to Respondent on appeal, or (iii) Respondent exports or destroys the products subject to this bond and provides certification to that effect that is satisfactory to the Commission, upon service on Respondent of an order issued by the Commission based upon application therefor made by Respondent to the Commission.

By order of the Commission.

A handwritten signature in black ink, appearing to read 'Lisa R. Barton', enclosed within a thin black rectangular border.

Lisa R. Barton
Secretary to the Commission

Issued: April 9, 2025

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

PUBLIC CERTIFICATE OF SERVICE

I, Lisa R. Barton, hereby certify that the attached **ORDER, COMMISSION** has been served via EDIS upon the Commission Investigative Attorney, **Yoncha Kundupoglu, Esq.**, and the following parties as indicated, on **April 9, 2025**.



Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

On Behalf of Complainant Eli Lilly and Company:

Paul F. Brinkman, Esq.
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Email: paul.brinkman@kirkland.com

- ☐ Via Hand Delivery
- ☐ Via Express Delivery
- ☐ Via First Class Mail
- ☒ Other: Email Notification
of Availability for Download

Respondents:

Arctic Peptides LLC
2104 NE Oak Drive
Ankeny, IA 50021

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Audrey Beauty Co.
Flat C 23/F Lucky Plaza
315-321 Lockhart Road
Wan Chai, Hong Kong
China

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Biolabshop Limited
25 Scotforth Road
Lancaster, PR1 4XX
United Kingdom

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

Certificate of Service – Page 2

Fibonacci Sequence LLC d/b/a GenX Peptides
P.O Box 4747, Research Forest Drive, Suite 180-119
The Woodlands, TX 77381

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Mew Mews Company Limited
RM C1 11/F Blk 1 152 Tai Lin Pai Road
Golden Dragon IND Ctr.
Kwai Chung, New Territories,
Hong Kong
China

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Paradigm Peptides
1511 N. Convent St. Suite 700-156
Bourbonnais, IL 60914

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Strate Labs LLC
18482 Kuykendahl Road #123
Spring, TX 77379-8123

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Super Human Store
Passeig Del Taulat 267, 5O 4A
Barcelona 08019
Spain

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Total Compounding Pharmaceuticals
30 N. Gould Street, Suite R
Sheridan, WY 82801
Email: tcpcompound@gmail.com
tcpcompoundingpharmacy@gmail.com

- ☐ Via Hand Delivery
- ☐ Via Express Delivery
- ☐ Via First Class Mail
- ☒ Other: Email Notification

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

Certificate of Service – Page 3

Triggered Supplements LLC (d/b/a The Triggered Brand)
1361 S Martin Luther King Jr Ave.
Clearwater, FL 33756

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Xiamen Austronext Trading Co., Ltd. (d/b/a AustroPeptide)
Room 3001, No. 5998, Maqing Rd.
Haicang District, Xiamen
Fujian, China 361026

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

In the Matter of

**CERTAIN PRODUCTS CONTAINING
TIRZEPATIDE AND PRODUCTS
PURPORTING TO CONTAIN
TIRZEPATIDE**

Investigation No. 337-TA-1377

CEASE AND DESIST ORDER

IT IS HEREBY ORDERED THAT RESPONDENT Triggered Supplements LLC (d/b/a The Triggered Brand) of Clearwater, Florida cease and desist from conducting any of the following activities in the United States: importing, selling, offering for sale, marketing, advertising, distributing, transferring (except for exportation), soliciting United States agents or distributors, and aiding or abetting other entities in the importation, sale for importation, sale after importation, transfer (except for exportation), or distribution of certain products containing tirzepatide and products purporting to contain tirzepatide (as defined in Definition (G) below) that, in violation of section 337 of the Tariff Act of 1930, as amended (19 U.S.C. § 1337), (1) infringe U.S. Trademark Registration No. 6,809,369 (“Asserted Trademark”), and/or (2) have a false designation of origin that is likely to confuse consumers regarding the origin, sponsorship, or regulatory approval of the products in violation of 15 U.S.C. § 1125(a)(1)(A).

I.
Definitions

As used in this order:

- (A) “Commission” shall mean the United States International Trade Commission.
- (B) “Complainant” shall mean Eli Lilly and Company of Indianapolis, Indiana.

- (C) “Respondent” shall mean Triggered Supplements LLC (d/b/a The Triggered Brand) of Clearwater, Florida.
- (D) “Person” shall mean an individual, or any non-governmental partnership, firm, association, corporation, or other legal or business entity other than Respondent or its majority-owned or controlled subsidiaries, successors, or assigns.
- (E) “United States” shall mean the fifty States, the District of Columbia, and Puerto Rico.
- (F) The terms “import” and “importation” refer to importation for entry for consumption under the Customs laws of the United States.
- (G) The term “Trademark covered products” shall mean products that infringe the Asserted Trademark, for example, through use of the Asserted Trademark in internet advertising (irrespective of whether the products themselves bear the mark). Trademark covered products shall not include articles for which a provision of law or license avoids liability for infringement.
- (H) The term “False Designation of Origin covered products” shall mean products containing tirzepatide and products purporting to contain tirzepatide that include a false designation of origin that is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such product with Eli Lilly & Co. (“Lilly”), or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by Lilly, for example in internet advertising that uses claims that Respondent’s products have been subject to clinical trials or received FDA approval. False Designation of Origin covered products shall not include articles for which a provision of law avoids liability.

- (I) The general term “covered products” shall mean both Trademark covered products and False Designation of Origin covered products.
- (J) The products containing tirzepatide and products purporting to contain tirzepatide subject to this order are as follows: products containing tirzepatide or purporting to contain tirzepatide sold in powdered or constituted form.

II. Applicability

The provisions of this Cease and Desist Order shall apply to Respondent and to any of its principals, stockholders, officers, directors, employees, agents, distributors, controlled (whether by stock ownership or otherwise) and majority-owned business entities, successors, and assigns, and to each of them, insofar as they are engaging in conduct prohibited by section III, *infra*, for, with, or otherwise on behalf of, Respondent.

III. Conduct Prohibited

(1) Until such date as the Asserted Trademark is abandoned, canceled, or rendered invalid or unenforceable, Respondent shall not:

- (A) import or sell for importation into the United States Trademark covered products;
- (B) market, distribute, sell, offer to sell, or otherwise transfer (except for exportation) in the United States imported Trademark covered products;
- (C) advertise imported Trademark covered products;
- (D) solicit U.S. agents or distributors for imported Trademark covered products; or

- (E) aid or abet other entities in the importation, sale for importation, sale after importation, transfer (except for exportation), or distribution of Trademark covered products.

(2) Respondent shall not:

- (A) import or sell for importation into the United States False Designation of Origin covered products;
- (B) market, distribute, sell, offer to sell, or otherwise transfer (except for exportation) in the United States imported False Designation of Origin covered products;
- (C) advertise imported False Designation of Origin covered products;
- (D) solicit U.S. agents or distributors for imported False Designation of Origin covered products; or
- (E) aid or abet other entities in the importation, sale for importation, sale after importation, transfer (except for exportation), or distribution of False Designation of Origin covered products.

IV. Conduct Permitted

Notwithstanding any other provision of this Order, specific conduct otherwise prohibited by the terms of this Order shall be permitted if, as to Trademark covered products, in a written instrument, the owner of the Asserted Trademarks licenses or authorizes such specific conduct.

V. Reporting

For purposes of this requirement, the reporting periods shall commence on July 1 of each year and shall end on the subsequent June 30. The first report required under this section shall

cover the period from the date of issuance of this order through July 31, 2025. This reporting requirement shall continue in force until such time as Respondent has truthfully reported, in two consecutive timely filed reports, that it has no inventory (whether held in warehouses or at customer sites) of covered products in the United States.

Within thirty (30) days of the last day of the reporting period, Respondent shall report to the Commission: (a) the quantity in units and the value in dollars of covered products that it has (i) imported and/or (ii) sold in the United States after importation during the reporting period, and (b) the quantity in units and value in dollars of reported covered products that remain in inventory in the United States at the end of the reporting period.

When filing written submissions, Respondent must file the original document electronically on or before the deadlines stated above. Submissions should refer to the investigation number (“Inv. No. 337-TA-1377”) in a prominent place on the cover pages and/or the first page. *See Handbook for Electronic Filing Procedures,*

http://www.usitc.gov/secretary/fed_reg_notices/rules/handbook_on_electronic_filing.pdf.

Persons with questions regarding filing should contact the Secretary (202-205-2000). If Respondent desires to submit a document to the Commission in confidence, it must file the original and a public version of the original with the Office of the Secretary and must serve a copy of the confidential version on Complainant’s counsel.¹

Any failure to make the required report or the filing of any false or inaccurate report shall constitute a violation of this Order, and the submission of a false or inaccurate report may be referred to the U.S. Department of Justice as a possible criminal violation of 18 U.S.C. § 1001.

¹ Complainants must file a letter with the Secretary identifying the attorney to receive reports and bond information associated with this Order. The designated attorney must be on the protective order entered in the investigation.

VI.
Record-Keeping and Inspection

- (A) For the purpose of securing compliance with this Order, Respondent shall retain any and all records relating to the sale, marketing, or distribution in the United States of covered products, made and received in the usual and ordinary course of business, whether in detail or in summary form, for a period of three (3) years from the close of the fiscal year to which they pertain.
- (B) For the purposes of determining or securing compliance with this Order and for no other purpose, subject to any privilege recognized by the federal courts of the United States, and upon reasonable written notice by the Commission or its staff, duly authorized representatives of the Commission shall be permitted access and the right to inspect and copy, in Respondent's principal offices during office hours, and in the presence of counsel or other representatives if Respondent so chooses, all books, ledgers, accounts, correspondence, memoranda, and other records and documents, in detail and in summary form, that must be retained under subparagraph VI(A) of this Order.

VII.
Service of Cease and Desist Order

The Secretary shall serve copies of this Order upon each party of record in this investigation.

Respondent is ordered and directed to:

- (A) Serve, within fifteen (15) days after the effective date of this Order, a copy of this Order upon each of its respective officers, directors, managing agents, agents, and

- employees who have any responsibility for the importation, marketing, distribution, transfer, or sale of imported covered products in the United States;
- (B) Serve, within fifteen (15) days after the succession of any persons referred to in subparagraph VII(A) of this order, a copy of the Order upon each successor; and
 - (C) Maintain such records as will show the name, title, and address of each person upon whom the Order has been served, as described in subparagraphs VII(A) and VII(B) of this order, together with the date on which service was made.

VIII. Confidentiality

Any request for confidential treatment of information obtained by the Commission pursuant to any section of this order should be made in accordance with section 201.6 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 201.6). For all reports for which confidential treatment is sought, Respondent must provide a public version of such report with confidential information redacted.

IX. Enforcement

Violation of this order may result in any of the actions specified in section 210.75 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 210.75), including an action for civil penalties under section 337(f) of the Tariff Act of 1930 (19 U.S.C. § 1337(f)), as well as any other action that the Commission deems appropriate. In determining whether Respondent is in violation of this order, the Commission may infer facts adverse to Respondent if it fails to provide adequate or timely information.

X. Modification

The Commission may amend this order on its own motion or in accordance with the procedure described in section 210.76 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 210.76).

XI. Bonding

The conduct prohibited by section III of this order may be continued during the sixty (60) day period in which this Order is under review by the United States Trade Representative, as delegated by the President (70 Fed. Reg. 43,251 (Jul. 21, 2005)), subject to Respondent's posting of a bond in the amount of one hundred percent (100%) of their entered value. This bond provision does not apply to conduct that is otherwise permitted by section IV of this Order. Covered products imported on or after the date of issuance of this Order are subject to the entry bond as set forth in the exclusion order issued by the Commission, and are not subject to this bond provision.

The bond is to be posted in accordance with the procedures established by the Commission for the posting of bonds by complainants in connection with the issuance of temporary exclusion orders. *See* 19 C.F.R. § 210.68. The bond and any accompanying documentation are to be provided to and approved by the Commission prior to the commencement of conduct that is otherwise prohibited by section III of this Order. Upon the Secretary's acceptance of the bond, (a) the Secretary will serve an acceptance letter on all parties, and (b) Respondent must serve a copy of the bond and accompanying documentation on Complainant's counsel.²

² *See* Footnote 1.

The bond is to be forfeited in the event that the United States Trade Representative approves this Order (or does not disapprove it within the review period), unless (i) the U.S. Court of Appeals for the Federal Circuit, in a final judgment, reverses any Commission final determination and order as to Respondent on appeal, or (ii) Respondent exports or destroys the products subject to this bond and provides certification to that effect that is satisfactory to the Commission.

This bond is to be released in the event (i) the United States Trade Representative disapproves this Order and no subsequent order is issued by the Commission and approved (or not disapproved) by the United States Trade Representative, (ii) the U.S. Court of Appeals for the Federal Circuit, in a final judgment, reverses any Commission final determination and order as to Respondent on appeal, or (iii) Respondent exports or destroys the products subject to this bond and provides certification to that effect that is satisfactory to the Commission, upon service on Respondent of an order issued by the Commission based upon application therefor made by Respondent to the Commission.

By order of the Commission.

A handwritten signature in black ink, appearing to read "Lisa R. Barton", enclosed within a thin black rectangular border.

Lisa R. Barton
Secretary to the Commission

Issued: April 9, 2025

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

PUBLIC CERTIFICATE OF SERVICE

I, Lisa R. Barton, hereby certify that the attached **ORDER, COMMISSION** has been served via EDIS upon the Commission Investigative Attorney, **Yoncha Kundupoglu, Esq.**, and the following parties as indicated, on **April 9, 2025**.



Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

On Behalf of Complainant Eli Lilly and Company:

Paul F. Brinkman, Esq.
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Email: paul.brinkman@kirkland.com

- ☐ Via Hand Delivery
- ☐ Via Express Delivery
- ☐ Via First Class Mail
- ☒ Other: Email Notification
of Availability for Download

Respondents:

Arctic Peptides LLC
2104 NE Oak Drive
Ankeny, IA 50021

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Audrey Beauty Co.
Flat C 23/F Lucky Plaza
315-321 Lockhart Road
Wan Chai, Hong Kong
China

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
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- ☐ Other: Email Notification
of Availability for Download

Biolabshop Limited
25 Scotforth Road
Lancaster, PR1 4XX
United Kingdom

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

Certificate of Service – Page 2

Fibonacci Sequence LLC d/b/a GenX Peptides
P.O Box 4747, Research Forest Drive, Suite 180-119
The Woodlands, TX 77381

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Mew Mews Company Limited
RM C1 11/F Blk 1 152 Tai Lin Pai Road
Golden Dragon IND Ctr.
Kwai Chung, New Territories,
Hong Kong
China

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
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Paradigm Peptides
1511 N. Convent St. Suite 700-156
Bourbonnais, IL 60914

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Strate Labs LLC
18482 Kuykendahl Road #123
Spring, TX 77379-8123

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Super Human Store
Passeig Del Taulat 267, 5O 4A
Barcelona 08019
Spain

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Total Compounding Pharmaceuticals
30 N. Gould Street, Suite R
Sheridan, WY 82801
Email: tcpcompound@gmail.com
tcpcompoundingpharmacy@gmail.com

- ☐ Via Hand Delivery
- ☐ Via Express Delivery
- ☐ Via First Class Mail
- ☒ Other: Email Notification

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

Certificate of Service – Page 3

Triggered Supplements LLC (d/b/a The Triggered Brand)
1361 S Martin Luther King Jr Ave.
Clearwater, FL 33756

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Xiamen Austronext Trading Co., Ltd. (d/b/a AustroPeptide)
Room 3001, No. 5998, Maqing Rd.
Haicang District, Xiamen
Fujian, China 361026

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

In the Matter of

**CERTAIN PRODUCTS CONTAINING
TIRZEPATIDE AND PRODUCTS
PURPORTING TO CONTAIN
TIRZEPATIDE**

Investigation No. 337-TA-1377

CEASE AND DESIST ORDER

IT IS HEREBY ORDERED THAT RESPONDENT Arctic Peptides LLC of Akeny, Iowa cease and desist from conducting any of the following activities in the United States: importing, selling, offering for sale, marketing, advertising, distributing, transferring (except for exportation), soliciting United States agents or distributors, and aiding or abetting other entities in the importation, sale for importation, sale after importation, transfer (except for exportation), or distribution of certain products containing tirzepatide and products purporting to contain tirzepatide (as defined in Definition (G) below) that, in violation of section 337 of the Tariff Act of 1930, as amended (19 U.S.C. § 1337), are falsely advertised in violation of 15 U.S.C. § 1125(a)(1)(B).

I.
Definitions

As used in this order:

- (A) “Commission” shall mean the United States International Trade Commission.
- (B) “Complainant” shall mean Eli Lilly and Company of Indianapolis, Indiana.
- (C) “Respondent” shall mean Arctic Peptides LLC of Akeny, Iowa.

- (D) “Person” shall mean an individual, or any non-governmental partnership, firm, association, corporation, or other legal or business entity other than Respondent or its majority-owned or controlled subsidiaries, successors, or assigns.
- (E) “United States” shall mean the fifty States, the District of Columbia, and Puerto Rico.
- (F) The terms “import” and “importation” refer to importation for entry for consumption under the Customs laws of the United States.
- (G) The term “covered products” shall mean products containing tirzepatide and products purporting to contain tirzepatide falsely advertised by means of, including but not limited to, online advertisements, print advertisements, packaging and/or data sheets, misrepresentation of the unauthorized use of U.S. Trademark Registration No. 6,809,369 on advertisements for the remaining term of the trademark (irrespective of whether the articles themselves bear the mark). The products containing tirzepatide and products purporting to contain tirzepatide subject to this order are as follows: products containing tirzepatide or purporting to contain tirzepatide sold in powdered or constituted form. Covered products shall not include articles for which a provision of law permits importation.

II. Applicability

The provisions of this Cease and Desist Order shall apply to Respondent and to any of its principals, stockholders, officers, directors, employees, agents, distributors, controlled (whether by stock ownership or otherwise) and majority-owned business entities, successors, and assigns, and to each of them, insofar as they are engaging in conduct prohibited by section III, *infra*, for, with, or otherwise on behalf of, Respondent.

III. Conduct Prohibited

Respondent shall not:

- (A) import or sell for importation into the United States covered products;
- (B) market, distribute, sell, offer to sell, or otherwise transfer (except for exportation) in the United States imported covered products;
- (C) advertise imported covered products;
- (D) solicit U.S. agents or distributors for imported covered products; or
- (E) aid or abet other entities in the importation, sale for importation, sale after importation, transfer (except for exportation), or distribution of covered products.

IV. Reporting

For purposes of this requirement, the reporting periods shall commence on July 1 of each year and shall end on the subsequent June 30. The first report required under this section shall cover the period from the date of issuance of this order through July 31, 2025. This reporting requirement shall continue in force until such time as Respondent has truthfully reported, in two consecutive timely filed reports, that it has no inventory (whether held in warehouses or at customer sites) of covered products in the United States.

Within thirty (30) days of the last day of the reporting period, Respondent shall report to the Commission: (a) the quantity in units and the value in dollars of covered products that it has (i) imported and/or (ii) sold in the United States after importation during the reporting period, and (b) the quantity in units and value in dollars of reported covered products that remain in inventory in the United States at the end of the reporting period.

When filing written submissions, Respondent must file the original document electronically on or before the deadlines stated above. Submissions should refer to the investigation number (“Inv. No. 337-TA-1377”) in a prominent place on the cover pages and/or the first page. *See Handbook for Electronic Filing Procedures*, http://www.usitc.gov/secretary/fed_reg_notices/rules/handbook_on_electronic_filing.pdf. Persons with questions regarding filing should contact the Secretary (202-205-2000). If Respondent desires to submit a document to the Commission in confidence, it must file the original and a public version of the original with the Office of the Secretary and must serve a copy of the confidential version on Complainant’s counsel.¹

Any failure to make the required report or the filing of any false or inaccurate report shall constitute a violation of this Order, and the submission of a false or inaccurate report may be referred to the U.S. Department of Justice as a possible criminal violation of 18 U.S.C. § 1001.

V. Record-Keeping and Inspection

- (A) For the purpose of securing compliance with this Order, Respondent shall retain any and all records relating to the sale, marketing, or distribution in the United States of covered products, made and received in the usual and ordinary course of business, whether in detail or in summary form, for a period of three (3) years from the close of the fiscal year to which they pertain.
- (B) For the purposes of determining or securing compliance with this Order and for no other purpose, subject to any privilege recognized by the federal courts of the

¹ Complainants must file a letter with the Secretary identifying the attorney to receive reports and bond information associated with this Order. The designated attorney must be on the protective order entered in the investigation.

United States, and upon reasonable written notice by the Commission or its staff, duly authorized representatives of the Commission shall be permitted access and the right to inspect and copy, in Respondent's principal offices during office hours, and in the presence of counsel or other representatives if Respondent so chooses, all books, ledgers, accounts, correspondence, memoranda, and other records and documents, in detail and in summary form, that must be retained under subparagraph V(A) of this Order.

VI. Service of Cease and Desist Order

The Secretary shall serve copies of this Order upon each party of record in this investigation.

Respondent is ordered and directed to:

- (A) Serve, within fifteen (15) days after the effective date of this Order, a copy of this Order upon each of its respective officers, directors, managing agents, agents, and employees who have any responsibility for the importation, marketing, distribution, transfer, or sale of imported covered products in the United States;
- (B) Serve, within fifteen (15) days after the succession of any persons referred to in subparagraph VI(A) of this order, a copy of the Order upon each successor; and
- (C) Maintain such records as will show the name, title, and address of each person upon whom the Order has been served, as described in subparagraphs VI(A) and VI(B) of this order, together with the date on which service was made.

VII. Confidentiality

Any request for confidential treatment of information obtained by the Commission pursuant to any section of this order should be made in accordance with section 201.6 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 201.6). For all reports for which confidential treatment is sought, Respondent must provide a public version of such report with confidential information redacted.

VIII. Enforcement

Violation of this order may result in any of the actions specified in section 210.75 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 210.75), including an action for civil penalties under section 337(f) of the Tariff Act of 1930 (19 U.S.C. § 1337(f)), as well as any other action that the Commission deems appropriate. In determining whether Respondent is in violation of this order, the Commission may infer facts adverse to Respondent if it fails to provide adequate or timely information.

IX. Modification

The Commission may amend this order on its own motion or in accordance with the procedure described in section 210.76 of the Commission's Rules of Practice and Procedure (19 C.F.R. § 210.76).

X Bonding

The conduct prohibited by section III of this order may be continued during the sixty (60) day period in which this Order is under review by the United States Trade Representative, as delegated by the President (70 Fed. Reg. 43,251 (Jul. 21, 2005)), subject to Respondent's posting

of a bond in the amount of one hundred percent (100%) of their entered value. This bond provision does not apply to conduct that is otherwise permitted by section IV of this Order. Covered products imported on or after the date of issuance of this Order are subject to the entry bond as set forth in the exclusion order issued by the Commission, and are not subject to this bond provision.

The bond is to be posted in accordance with the procedures established by the Commission for the posting of bonds by complainants in connection with the issuance of temporary exclusion orders. *See* 19 C.F.R. § 210.68. The bond and any accompanying documentation are to be provided to and approved by the Commission prior to the commencement of conduct that is otherwise prohibited by section III of this Order. Upon the Secretary's acceptance of the bond, (a) the Secretary will serve an acceptance letter on all parties, and (b) Respondent must serve a copy of the bond and accompanying documentation on Complainant's counsel.²

The bond is to be forfeited in the event that the United States Trade Representative approves this Order (or does not disapprove it within the review period), unless (i) the U.S. Court of Appeals for the Federal Circuit, in a final judgment, reverses any Commission final determination and order as to Respondent on appeal, or (ii) Respondent exports or destroys the products subject to this bond and provides certification to that effect that is satisfactory to the Commission.

This bond is to be released in the event (i) the United States Trade Representative disapproves this Order and no subsequent order is issued by the Commission and approved (or not disapproved) by the United States Trade Representative, (ii) the U.S. Court of Appeals for

² *See* Footnote 1.

the Federal Circuit, in a final judgment, reverses any Commission final determination and order as to Respondent on appeal, or (iii) Respondent exports or destroys the products subject to this bond and provides certification to that effect that is satisfactory to the Commission, upon service on Respondent of an order issued by the Commission based upon application therefor made by Respondent to the Commission.

By order of the Commission.

A handwritten signature in black ink, appearing to read 'Lisa R. Barton', enclosed within a thin black rectangular border.

Lisa R. Barton
Secretary to the Commission

Issued: April 9, 2025

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

PUBLIC CERTIFICATE OF SERVICE

I, Lisa R. Barton, hereby certify that the attached **ORDER, COMMISSION** has been served via EDIS upon the Commission Investigative Attorney, **Yoncha Kundupoglu, Esq.**, and the following parties as indicated, on **April 9, 2025**.



Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

On Behalf of Complainant Eli Lilly and Company:

Paul F. Brinkman, Esq.
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Email: paul.brinkman@kirkland.com

- ☐ Via Hand Delivery
- ☐ Via Express Delivery
- ☐ Via First Class Mail
- ☒ Other: Email Notification
of Availability for Download

Respondents:

Arctic Peptides LLC
2104 NE Oak Drive
Ankeny, IA 50021

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Audrey Beauty Co.
Flat C 23/F Lucky Plaza
315-321 Lockhart Road
Wan Chai, Hong Kong
China

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Biolabshop Limited
25 Scotforth Road
Lancaster, PR1 4XX
United Kingdom

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

Certificate of Service – Page 2

Fibonacci Sequence LLC d/b/a GenX Peptides
P.O Box 4747, Research Forest Drive, Suite 180-119
The Woodlands, TX 77381

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Mew Mews Company Limited
RM C1 11/F Blk 1 152 Tai Lin Pai Road
Golden Dragon IND Ctr.
Kwai Chung, New Territories,
Hong Kong
China

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Paradigm Peptides
1511 N. Convent St. Suite 700-156
Bourbonnais, IL 60914

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Strate Labs LLC
18482 Kuykendahl Road #123
Spring, TX 77379-8123

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Super Human Store
Passeig Del Taulat 267, 5O 4A
Barcelona 08019
Spain

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Total Compounding Pharmaceuticals
30 N. Gould Street, Suite R
Sheridan, WY 82801
Email: tcpcompound@gmail.com
tcpcompoundingpharmacy@gmail.com

- ☐ Via Hand Delivery
- ☐ Via Express Delivery
- ☐ Via First Class Mail
- ☒ Other: Email Notification

**CERTAIN PRODUCTS CONTAINING TIRZEPATIDE AND
PRODUCTS PURPORTING TO CONTAIN TIRZEPATIDE**

Inv. No. 337-TA-1377

Certificate of Service – Page 3

Triggered Supplements LLC (d/b/a The Triggered Brand)
1361 S Martin Luther King Jr Ave.
Clearwater, FL 33756

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download

Xiamen Austronext Trading Co., Ltd. (d/b/a AustroPeptide)
Room 3001, No. 5998, Maqing Rd.
Haicang District, Xiamen
Fujian, China 361026

- ☐ Via Hand Delivery
- ☒ Via Express Delivery
- ☐ Via First Class Mail
- ☐ Other: Email Notification
of Availability for Download