



UNBOXING FAKE FASHION UNLEASHING REAL DANGERS

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AMERICAN
**APPAREL &
FOOTWEAR**
ASSOCIATION

Americans love to buy fashion online. As with in-store experiences, Americans relish the search for affordable styles and can't wait to model these looks to friends and family. Unlike brick-and-mortar shopping; however, online fashion purchases increasingly put consumers at risk of being harmed by dangerous counterfeit shoes, clothes, bags, and accessories

Counterfeit products are no longer solely found among street vendors hawking obviously fake designer handbags, scarves, and watches from atop a moth-eaten blanket. Counterfeits are now popping up across trusted online channels and fooling even the wariest of consumers.¹ These counterfeit product listings, often using real photos and website designs from legitimate companies, are insidious, pervasive, and hard to spot.

Through the American Apparel & Footwear Association's (AAFA) second study of counterfeit products, AAFA found that consumers are not only failing to receive authentic goods but are being exposed to a significant risk of serious harm from chemical exposure to counterfeits. With counterfeit products tested by AAFA containing hazardous chemicals, including per- and polyfluoroalkyl substances (PFAS) — also known as “forever chemicals” — heavy metals, and phthalates, American consumers are unknowingly bringing dangerous products into their homes.

This second study, completed in 2026 and building on AAFA's 2022 study,² finds that over forty percent of tested counterfeit products fail for hazardous chemicals. These results further demonstrate that dangers continue to grow as counterfeit AAFA member products continue to dominate the top 10 commodities seized by U.S. Customs and Border Protection for Intellectual Property Rights (IPR).³ U.S. consumers face substantial risk when knowingly or unknowingly purchasing counterfeit products. At the same time, counterfeits pose a serious threat beyond the risks to AAFA's world-famous brands, including risks to workers, consumers, the environment, and industry innovation.

AAFA members participated in this latest test by sending in counterfeit items to be tested between August and December 2025. The products supplied included counterfeit accessories, footwear, and apparel. The counterfeit products were obtained through test purchases on online platforms or seizures. These samples were then sent to Intertek's ISO/IEC 17025–accredited laboratory, selected for its testing expertise and experience with similar testing programs. A comprehensive methodology is outlined in Appendix 2.

The testing results come as American consumers continue to be confronted with fraud and dangerous counterfeit products across the Digital Devalue Chain of Counterfeits® (digital devalue chain)⁴. With Valentine's Day, Mother's Day, the start of the 2026 Winter Olympic Games, Super Bowl 60, and the 2026 FIFA world cup fast approaching, these events and holidays are typically associated with increased purchases of apparel, footwear, and accessories. Therefore, it is critical to advocate for stronger accountability and proactive measures across all platforms to prevent counterfeit listings and the fraudulent promotion of counterfeits to protect consumers.

AAFA continues to lobby for stronger consumer protection, most recently in the association's comments to the Office of the U.S. Trade Representative (USTR) as part of USTR's 2025 Review of Notorious

¹Alhabash, S., Kononova, A., Huddleston, P. Moldagaliyeva, M., & Lee, H. (2023). Global Anti-Counterfeiting Consumer Survey 2023: A 17 Country Study. East Lansing, MI: Center for Anti-Counterfeiting and Product Protection, Michigan State University. <https://a-capp.msu.edu/article/global-anti-counterfeiting-consumer-survey-2023>

²AAFA Press Release: Fashion Industry Study Reveals Dangerous Chemicals, Heavy Metals in Counterfeit Products https://www.aafaglobal.org/AAFA/AAFA_News/2022_Press_Releases/Fashion_Industry_Study_Reveals_Dangerous_Chemicals_Heavy_Metals_Counterfeits.aspx

³U.S. Customs and Border Protection Intellectual Property Rights Seizure Statistics, Fiscal Year 2024 <https://www.cbp.gov/trade/priority-issues/ipr/statistics>

⁴Please see the section in additional pages to define and explain the Digital Devalue Chain of Counterfeits®

Markets for Counterfeiting and Piracy (NML). AAFA recommended the inclusion of several online marketplaces, including Meta's Facebook; Meta's Instagram; Shopee; Alibaba's AliExpress; and Alibaba's Taobao.⁵ These online marketplaces, and many others, continue to facilitate counterfeit purchases as well as play host to fake advertisements, hidden links, fraudulent websites, and more. As AAFA's counterfeit study demonstrates, these actions not only constitute intellectual property theft, but also a real threat to consumer safety.

With the publication of this study on counterfeits, AAFA aims to once again raise awareness of the dangers posed by counterfeit products and to encourage platform accountability.

41% of counterfeit products tested failed to comply with product safety standards



SUMMARY OF FAILED PRODUCTS

Of the 39 counterfeit products tested—including clothing, footwear, and other accessories—16 products (41 percent) failed to comply with U.S. and international product safety standards. A product-by-product list of the 39 products is included in Appendix 1.

Of the failing products, eight—representing more than 20 percent of the total counterfeit samples—failed due to excessive phthalate levels. One product contained nearly 327,000 parts per million of diethyl phthalate (DEP), exceeding the regulatory limit by more than 650 times, as outlined in AAFA's Restricted Substances List (RSL).⁶ Phthalates have been found to be endocrine disruptors that can adversely affect health, particularly children's health. They have been linked to heart disease, early

⁵AAFA Press Release: AAFA Calls on U.S. Government to Protect American Companies, Workers, and Families from Digital Devalue Chain of Counterfeits Promulgated by Platforms
https://www.aafaglobal.org/AAFA/AAFA_News/2025_Press_Releases/AAFA_USTR_USG_Protect_Counterfeits_Digital_Devalue_Chain.aspx?WebsiteKey=49c45f4d-69b3-4c66-823a-6d285960fed2

⁶AAFA Product Safety Guidance: Restricted Substances List (RSL)
https://www.aafaglobal.org/AAFA/Solutions_Pages/Restricted_Substance_List.aspx

death, and hormone disruption.⁷ In addition to these well-documented risks, the National Research Council has concluded that prenatal exposure to certain phthalates could cause harm in utero.⁸

Beyond the preponderance of phthalates, five products failed for PFAS, six for alkylphenols and alkylphenol ethoxylates (AP/APEOs), three for bisphenol-A (BPA), two for formaldehyde, and three for heavy metals. One product notably contained as many as 191 parts per million of lead, while another contained almost ten times the regulatory limit for formaldehyde. Exposure to high levels of lead is linked to kidney and nervous system damage, particularly among children.⁹ The Center for Disease Control and Prevention (CDC) has also noted that there is no safe level of lead exposure for children and even small amounts of lead in blood have been shown to negatively affect a child's intelligence, ability to pay attention, and academic achievement. Formaldehyde, a known toxic substance, can cause severe burns, and is linked to cancer.¹⁰

All the hazardous chemicals found in the tested counterfeit products are listed in the [AAFA Restricted Substances List \(RSL\)](#). Across over 25 editions, AAFA has been publishing and regularly updating the AAFA RSL, an open-industry resource and trusted tool that lists all banned and restricted chemicals and substances for finished apparel, footwear, accessories, and home textile products. The RSL identifies the most restrictive regulations worldwide for each substance and offers appendices on State and European reporting and product labeling requirements. The RSL can be accessed as both PDF and excel files.¹¹

GOING DEEPER, EXAMINING FOUR FAILED COUNTERFEIT PRODUCTS

The following section presents four short case studies drawn from the failed products. Please see Appendix 1 for a list of all products tested.

Case Study: Brown Handbag (GUAT25031899)

- One counterfeit item found to pose a significant risk to consumer health was a brown handbag, purchased by a brand in July 2025 from a fraudulent website promoted by a TikTok dupe influencer known for selling counterfeit goods. This fraudulent website was linked through the dupe influencer's Linktree page, which advertised infringing products sourced from DHgate as well as from other websites, including luxeget.com. The seller used the exact style name of the legitimate product and reproduced the brand's print, which is a registered trademark (TM) in multiple jurisdictions. Unfortunately for consumers who purchased this counterfeit product, the item contained more than **98 times the allowable concentration of total phthalates as well as a toxic level of nickel**. Had this product entered the country through legitimate channels, it would have failed multiple regulatory safety requirements.
- *Consumer Danger*

⁵ Wang, Yufei, and Haifeng Qian. "Phthalates and Their Impacts on Human Health." *Healthcare (Basel, Switzerland)* vol. 9, 5 603. 18 May. 2021, <https://pdfs.semanticscholar.org/9feb/bf4562e2b095f048a86312ee5cc9212d8ee8.pdf>

⁸National Research Council (US) Committee on the Health Risks of Phthalates. *Phthalates and Cumulative Risk Assessment: The Tasks Ahead*. National Academies Press (US), 2008. <https://www.nationalacademies.org/projects/BEST-K-07-07-A>

⁹CDC. "Lead Exposure Symptoms and Complications." *Childhood Lead Poisoning Prevention*, CDC, 16 Apr. 2024, www.cdc.gov/lead-prevention/symptoms-complications/index.html

¹⁰National Cancer Institute. "Formaldehyde and Cancer Risk." *National Cancer Institute*, Cancer.gov, 10 June 2011, www.cancer.gov/about-cancer/causes-prevention/risk/substances/formaldehyde/formaldehyde-fact-sheet

¹¹ AAFA Releases Version 26 Restricted Substance List https://www.aafaglobal.org/AAFA/AAFA_News/2026_Press_Releases/AAFA_Releases_Version_26_Restricted_Substance_List.aspx

- According to the U.S. Environmental Protection Agency (EPA), “some phthalates are suspected endocrine disruptors, which means they may interfere with the body’s natural hormones, even at low levels of exposure.”¹²
- According to the National Institutes of Health (NIH), “...nickel contact can cause a variety of side effects on human health, such as allergies, cardiovascular and kidney diseases, lung fibrosis, lung and nasal cancer.”¹³

Case Study: Men’s Black Down Jacket (GUAT25028555)

- Another poignant example of the noxious effects of counterfeit products on consumer health was a counterfeit men’s black jacket quite literally **lined with lead**. This counterfeit, using a protected TM of a legitimate brand, was promoted by Instagram and Facebook accounts, using images of the legitimate product. An investigation linked these illicit actors (@gdzdgj123 and @gdzdgj124) to a physical warehouse in Quanzhou City, Fujian Province, with distribution ties to a local market in Vietnam. The company that seized the product was aware of several other brands that were similarly counterfeited by the same illicit actors. With nearly 200 parts per million of lead, the practices that led to this counterfeit product being sold should spark concern in every safety-conscious legislator.
- *Consumer Danger*
 - According to the Mayo Clinic, “Even small amounts of lead can cause serious health problems. Children younger than age six are especially vulnerable to lead poisoning, which can severely affect how a child's body grows and how their brain develops. At very high levels, lead poisoning can be fatal.”¹⁴

Case Study: Sports Hat (GUAT25033213)

- A counterfeit sports hat contained almost **10 times the regulatory limit for formaldehyde**. This hat was purchased from a fraudulent website where the illicit seller had also leveraged fraudulent advertisements from Facebook to link to the fraudulent website. This product was sold at a suspiciously low price, far below the market rate for the genuine item.
- *Consumer Danger*
 - The EPA says, “Exposure to formaldehyde may cause adverse health effects.”¹⁵ Additionally, high levels of exposure may cause cancer, particularly of the nose and throat. Formaldehyde has also been linked to leukemia.¹⁶

Case Study: High-Top Sneakers (GUAT25031750)

- This counterfeit pair of high-top sneakers, purchased by a brand from a seller operating via Facebook Marketplace under the name “Fashion Scale Boutique.” This seller offered products from this brand, as well as others, claiming they were “authentic” products, and maintained a

¹²U.S. Environmental Protection Agency: Biomonitoring - Phthalates

https://www.epa.gov/americaschildrenenvironment/biomonitoring-phthalates?utm_source=chatgpt.com

¹³The National Institutes of Health (NIH) Nickel: Human Health and Environmental Toxicology

<https://pmc.ncbi.nlm.nih.gov/articles/PMC7037090>

¹⁴The Mayo Clinic: Lead poisoning

https://www.mayoclinic.org/diseases-conditions/lead-poisoning/symptoms-causes/syc-20354717?cdata=MXxOfDB8WXww&cjevent=a3440dd3f0a711f0836c00860a82b836&cm_mmc=CJ- -100357191- -5250933- -Evergreen+Link+for+Mayo+Clinic+Diet&utm_source=cj&utm_content=100357191&utm_campaign=3-months

¹⁵EPA: Facts About Formaldehyde

<https://www.epa.gov/formaldehyde/facts-about-formaldehyde>

¹⁶American Cancer Society. “Formaldehyde and Cancer Risk | American Cancer Society.” *Www.cancer.org*, 24 Oct. 2022, www.cancer.org/cancer/risk-prevention/chemicals/formaldehyde.html

presence across Facebook, Instagram, and eBay. All known online profiles have since been deactivated. Unfortunately for consumers who purchased this counterfeit product, the shoes contained more than **151 times the allowable concentration of total phthalates and exceeded the regulatory limits for alkylphenols and PFAS**. Had this product entered the country through legitimate channels, it would have failed multiple regulatory safety requirements.

- *Consumer Danger*
 - According to the EPA, "...phthalates are suspected endocrine disruptors, which means they may interfere with the body's natural hormones, even at low levels of exposure."¹⁷
 - The National Institutes of Health (NIH) has linked PFAS with several health effects, including "altered immune and thyroid function, liver disease...kidney disease,...and cancer."¹⁸
 - Alkylphenols have also been linked to adverse effects on humans and wildlife and may affect the immune and nervous system.¹⁹

DANGERS BEYOND CHEMICALS AND HEAVY METALS HIDDEN BEHIND COUNTERFEIT PRODUCTS

For one of the failed counterfeit products (GUAT25033635 – Blue Children's T-Shirt with White Design), the AAFA member conducted in-country raids with law enforcement at both a warehouse and an adjacent production facility in Tumbes, Peru. Counterfeit goods were discovered in a filthy warehouse, and the conditions at the neighboring factory were unsafe and unfit for workers, which is consistent with the "underground" operations brands frequently encounter. Criminal charges are still pending against the site owner and facility managers. The action resulted in the seizure of over 5,000 finished counterfeit branded t-shirts, as well as decals that had not yet been applied. Other brands were also seized.

Beyond the dangers of exposure to hazardous chemicals, counterfeit products have implications on national security. Protecting intellectual property is in fact noted in the 2025 National Security Strategy, released by the White House in November 2025.²⁰ U.S. Customs and Border Protection has also stated that counterfeits are "often produced illegally and sold at a profit to fund other criminal activities." This makes the production and trafficking of counterfeit goods a transnational issue.

If a deal looks too good to be true, it usually is. Consumers should be aware of red flags such as atypically low prices and should steer clear of blindly trusting what is sold by third-party websites, especially when the associated social media ads urge consumers to "act now," or advertise "liquidating sales," or make claims of large percentage discounts. Illicit actors increase their business—and profits—around the key consumer holidays.²¹

¹⁷ Fenton, Suzanne E et al. "Per- and Polyfluoroalkyl Substance Toxicity and Human Health Review: Current State of Knowledge and Strategies for Informing Future Research."

<https://onlinelibrary.wiley.com/doi/pdfdirect/10.1002/etc.4890?msocid=375e16750c976d47164d00d10d416c7a>

¹⁸ Fenton, Suzanne E et al. "Per- and Polyfluoroalkyl Substance Toxicity and Human Health Review: Current State of Knowledge and Strategies for Informing Future Research."

<https://onlinelibrary.wiley.com/doi/pdfdirect/10.1002/etc.4890?msocid=375e16750c976d47164d00d10d416c7a>

¹⁹ Acir, Ismail-H., and Klaus Guenther. "Endocrine-Disrupting Metabolites of Alkylphenol Ethoxylates – a Critical Review of Analytical Methods, Environmental Occurrences, Toxicity, and Regulation." *Science of the Total Environment*, vol. 635, Sept. 2018, pp. 1530–1546,

<https://doi.org/10.1016/j.scitotenv.2018.04.079>

²⁰ White House: National Security Strategy of the United States of America <https://www.whitehouse.gov/issues/national-security>

²¹ Counterfeit Goods: A Danger to Public Safety <https://www.ice.gov/features/dangers-counterfeit-items>

SPOTLIGHT: AT LEAST 25 PERCENT OF THE FAILED COUNTERFEIT PRODUCTS WERE AFFILIATED WITH TOOLS PROVIDED BY A META PLATFORM

As part of this process, AAFA members were invited to voluntarily provide information, where available, on the modus operandi and provenance associated with each failed counterfeit item. The information included in this summary is derived solely from materials voluntarily submitted and does not include background for each failed item.

From what was shared with AAFA, at least 25 percent of the failed counterfeit products were affiliated with tools provided by a Meta platform. This finding supports the high propensity of consumers purchasing counterfeit goods through social media platforms, including Facebook, observed in the recent Global Anti-Counterfeiting Consumer Survey.²² These products are listed below:

- Men's Black Down Jacket (GUAT25028555): Instagram and Facebook accounts (@gdzdgjb123 and @dgzdgjb124) were used to promote images of counterfeit products, for this brand and many others.
- High-Top Sneaker (GUAT25031750): This counterfeit footwear product was seized from a seller operating on Facebook Marketplace under the name "Fashion Scale Boutique."
- Sports Hat (GUAT250332130): This sports hat was purchased from a fraudulent website (jerseysmall.com). The brand also found fraudulent advertisements from Facebook linking to the fraudulent website.
- Sports Jersey (GUAT25033222): This sports jersey was purchased from a fraudulent website (jerseysmall.com). The brand found fraudulent advertisements from Facebook linking to the fraudulent website.

This is one of the many reasons AAFA has nominated Meta, and Meta-related platforms to be added to the U.S. government's Notorious Markets List (NML) for many years.²³

BRICK AND MORTAR COUNTERFEITING

U.S. law currently contains many guardrails to make sure brick and mortar retailers of all sizes do not sell counterfeit items.²⁴ Authentic brands do not have to visit every store across the country to make sure these brick-and-mortar locations are only selling legitimate goods. They also do not have to go through lengthy takedown fights with these physical stores, only to find fake goods pop up again, shielded by a new name.

Notably, one outlier among the failed counterfeit products involved a counterfeit item identified by an AAFA member at a brick-and-mortar retail outlet in Maine. Subsequent investigation revealed a broader distribution of this inventory from New England to the South. The affected brand is currently engaged in multiple litigation cases to trace the source of the counterfeit jackets, which were sold in U.S. retail stores as legitimate merchandise. This incident represents the first documented instance in which this

²²Alhabash, S., Kononova, A., Huddleston, P. Moldagaliyeva, M., & Lee, H. (2023). Global Anti-Counterfeiting Consumer Survey 2023: A 17 Country Study. East Lansing, MI: Center for Anti-Counterfeiting and Product Protection, Michigan State University. <https://a-capp.msu.edu/article/global-anti-counterfeiting-consumer-survey-2023/>

²³AAFA Letter to USTR Seeks Inclusion of Domestic Platforms in Notorious Markets List https://www.aafaglobal.org/AAFA/AAFA_News/2025_Letters_and_Comments/Letter_to_USTR_Seeks_Inclusion_of_Domestic_Platforms_in_Notorious_Markets_List.aspx?WebsiteKey=49c45f4d-69b3-4c66-823a-6d285960fed2

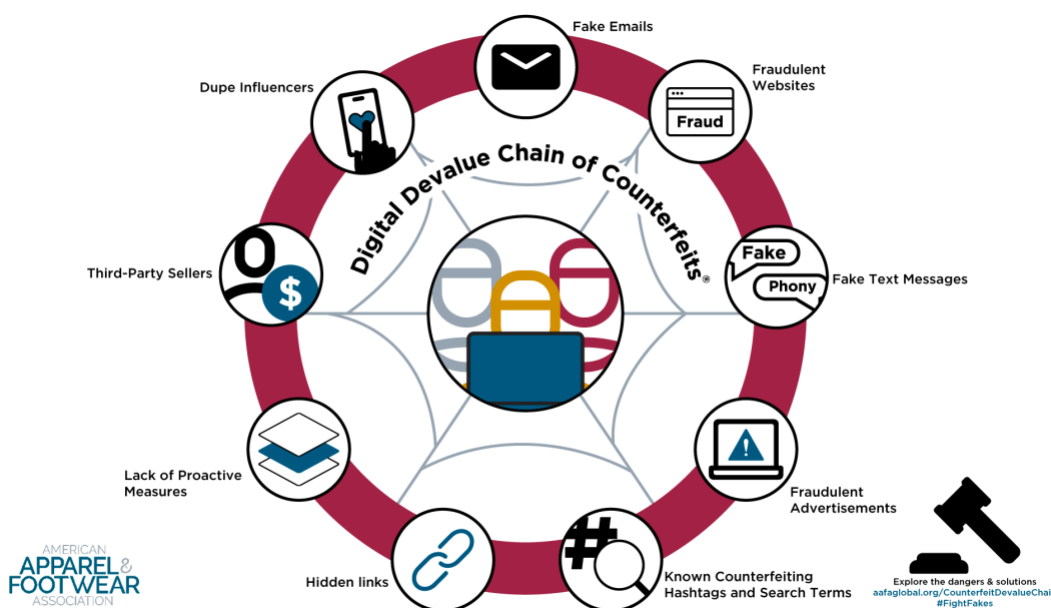
²⁴The Fashion Law: Louis Vuitton Nabs \$584M Damages Award in Sweeping Case Over Counterfeits <https://www.thefashionlaw.com/louis-vuitton-nabs-584m-damages-award-in-case-over-counterfeits/>

brand encountered a significant influx of counterfeit products sold through brick-and-mortar retail channels in the United States.

THE DIGITAL DEVALUE CHAIN OF COUNTERFEITS®

Data from Salesforce for the 2025 holiday shopping season showed that online sales across all industries surged, representing seven percent of global annual sales growth and four percent sales growth in the U.S. as compared with the 2024 holiday season.²⁵ AAFA members report that annual holiday shopping continues to shift earlier each year; consequently, many of the products examined in this study were purchased during the 2025 holiday shopping window. As online commerce expands, consumer fraud has increased, as has the difficulty brands face in addressing fraud across The Digital the Devalue Chain of Counterfeits®, where many members acquired the failed counterfeit products.

Counterfeiters thrive on the anonymity of the internet to use digital tools that confuse consumers or, in more severe cases, deliberately steer them toward illegal products—while putting consumers’ digital and broader financial security at risk. Brand owners face an explosion of problems across dupe influencers,²⁶ fraudulent advertisements,²⁷ hidden links, fraudulent websites,²⁸ fake emails, and more, due in large part to one basic reality: the systems brands and regulators rely upon today are ineffective at curbing counterfeiting across the digital devalue chain.



²⁵Salesforce: Global online holiday sales near \$1.3T, rise 4% in U.S.

https://chainstoreage.com/salesforce-global-online-holiday-sales-near-13t-rise-4-us?utm_source=swiftmail&utm_medium=email&utm_campaign=CSA_NL_DayBreaker&mkt_tok=OD11LUxTUC01NDUAAAGfNxcy9aWx2YZIfv9WH53MY06xe3qJr8v9Vt6IILofXjeSYxQD4nmbMBRbmu4O1peNiBu-USkeF747ZZYl5TZVoxnuZPnx_R56Qsvj3n

²⁶AAFA Report: Dupe Influencers on Social Media <https://www.aafaglobal.org/DupeInfluencers>

²⁷TRACIT/AAFA Report: Fraudulent Advertising Online Emerging Risks and Consumer Fraud https://www.tracit.org/uploads/1/0/2/2/102238034/tracit_fraudulentadvertisingonline_july21_2020_final.pdf

²⁸AAFA Report: The Rising Risk of Fraudulent Websites: Spotlight within the Digital Devalue Chain of Counterfeits https://www.aafaglobal.org/AAFA/Solutions_Pages/Rising_Risk_%20Fraudulent%20_Websites.aspx

CONCLUSION AND RECOMMENDATIONS

The results of this counterfeit study are clear. Left unchecked, counterfeiters will continue to flood the U.S. market with products that pose a significant hazard to consumers. The time to protect U.S. citizens from unscrupulous online sellers is now.

Brands currently have limited avenues for holding platforms accountable, and online marketplaces remain inconsistent in addressing counterfeiting and fraud in a comprehensive manner.²⁹ Brands are expected to monitor vast numbers of product listings across multiple platforms and jurisdictions, even as new platforms continue to emerge. At the same time, brands must navigate disparate brand-protection protocols and reporting systems, many of which lack effective mechanisms for bulk reporting or meaningful engagement with platform representatives to address systemic failures in enforcement tools.

Moreover, brands are often required to cultivate relationships with individual platforms to gain access to specialized enforcement programs, with enhanced scrutiny and preferential treatment. Such heightened attention and proactive action are frequently granted on a brand-by-brand basis, contingent upon the strength of the relationship, or the commercial value, a brand brings to the platform.

This fragmented and relationship-dependent approach is unsustainable. Meaningful reforms to the current enforcement framework are necessary to curb illicit activity and to create an online marketplace that supports legitimate commerce.

AAFA has advanced a series of policy recommendations aimed at curbing counterfeiting, promoting equitable digital trade, and disrupting key elements of the Digital Devalue Chain of Counterfeits®, including AAFA's Brand Protection current priorities for the 119th Congress:

- Calling on Congress and the Federal Trade Commission (FTC) to find new solutions to address the growing epidemic of fraudulent websites and exploring pre-verification of paid advertisements across platforms to sever the fraud impacting American consumers.
- Advocating for the reintroduction of the SHOP SAFE Act (S. 2934/ H.R.8684) to require all online platforms to meet the same requirements as brick-and-mortar retailers to not sell or promote counterfeit or illicit products. Platforms must take proactive measures to prevent counterfeit listings and follow through with robust programs against repeat infringers.
- Calling on all stakeholders to follow through on the commitment to transparency and accountability as directed by the INFORM Consumers Act (15 U.S.C. § 45f), exploring any needs for technical clarifications to ensure enforcement continues.
- Encouraging passage of S.2677/ H.R. 4930 to authorize Customs and Border Protection (CBP) to clarify and expand CBP's authority to share key IP-related information with rights holders and other relevant stakeholders.
- Urging sustained funding of key intellectual property offices, priorities, and policies preventing counterfeit products from entering U.S. homes—thereby safeguarding innovation, business competitiveness, and the livelihoods of American workers.

Additional recommendations and best practices are outlined in the following comments and reports:

CNBC: Trump Organization says Amazon, Walmart, eBay sellers are hawking knockoff shirts, hats, mugs
<https://www.cnn.com/2025/07/28/trump-amazon-walmart-ebay-sellers-counterfeit.html?msocid=375e16750c976d47164d00d10d416c7a>
Reuters Special Report: Meta is earning a fortune on a deluge of fraudulent ads, documents show
<https://www.reuters.com/investigations/meta-is-earning-fortune-deluge-fraudulent-ads-documents-show-2025-11-06>

- [Attention Congress: We Share Legislative Priorities!](#)
- [AAFA Files 2025 Notorious Markets Comments to USTR](#)
- [AAFA Submits Comments on OECD Marketplace Guidelines to PTO](#)
- [The Rising Risk of Fraudulent Websites](#) AAFA Explainer: [Digital Devalue Chain](#) of Counterfeits
- [Fraudulent Advertising Online Emerging Risks and Consumer Fraud - TRACIT and AAFA](#)

ABOUT AAFA

AAFA is the national trade association representing apparel, footwear, and other sewn products companies and their suppliers, which compete in the global market. Representing more than 1,100 world-famous name brands, AAFA is the trusted public policy and political voice of the apparel and footwear industry, its management and shareholders, its more than 3.6 million U.S. workers, and its contribution of more than \$523 billion in annual U.S. retail sales.

AAFA advocates for the protection of intellectual property rights (IPR) with Brand Protection as a key advocacy pillar to build awareness of the dangers of counterfeits to businesses, consumers, workers, and the environment; and educates the industry on how to overcome shared challenges that cause lost sales and irreparable damage to brand reputation.

AAFA is also on the front lines of product safety and an advocate for regulatory requirements that can effectively protect human health and the environment. AAFA members design and execute the quality and compliance programs that stitch product safety into every garment and shoe.

APPENDIX 1: SUMMARY OF TESTED PRODUCTS

Number of Products	Report No.	General Description – NO BRANDS	Status	What was Tested – NO BRAND NAMED	Why Product Failed
1	GUAT25028549	Black Down Jacket	Fail	1. Top Stop / Chain / Fastener Box, Zipper Plastic Substrate – Black 2. Pull / Slider Slider / Zipper - Metallic Substrate Black 3. Chain Inside Plastic Substrate Black 4. Pull / Slider - Slider / Zipper - Metallic Substrate – Black 5. Draw lock Drawcord Plastic Substrate – Black 6. Fabric Body Fabric - Inside	-Total Organic Fluorine (TOF) by Combustion Ion Chromatography (CIC) (Fabric - Body, Fabric - Inside)
2	GUAT25028555	Men's Black Down Jacket	Fail	1. Top Stop/Chain/ Fastener Boc, Pocket/Zipper Plastic Substrate Black 2. Pull/Slider Slider/Zipper Metallic Substrate Black 3. Chain Zipper Plastic Substrate Black 4. Embroidery Front & Back Textile Substrate White 5. Velcro Sleeve Plastic Substrate Black 6. Lining Body Textile Substrate Black	-Determination of Heavy Metals: Total Content (Pull/Slider - Slider/Zipper - Metallic Substrate - Black) -Determination of Bisphenol-A (BPA) (Chain - Zipper - Plastic Substrate - Black)

3	GUAT25031750	High-Top Sneakers	Fail	1. Care Label Tongue, Plastic Substrate White 2. Tip Lace, Drawcord Plastic Substrate White 3. Welt Shoe Plastic Substrate White, Black 4. Sole Shoe Plastic Substrate – Honey 5. Midsole Shoe Plastic Substrate – White 6. Lining Shoe Textile Substrate Black	-Determination of Phthalates (Tip Lace - Drawcord - Plastic Substrate - White, Welt - Shoe - Plastic Substrate - White, Black, Midsole / Sole - Shoe - Plastic Substrate - White / Honey) -Alkylphenols (APs) and Alkylphenol Ethoxylates (APEOs) Content (Sole - Shoe - Plastic Substrate - Honey, Welt - Shoe - Plastic Substrate - White, Black, Midsole - Shoe - Plastic Substrate - White) -Total Organic Fluorine (TOF) by Combustion Ion Chromatography (CIC) (Lining - Shoe - Textile Substrate - Black)
4	GUAT25031762	Crossbody Bag	Fail	1. Screen Print - Neck - Surface Coating – White 2. Logo (Plastic) - Front - Surface Coating - Light Pink 3. Chain / Chain - Zipper / Zipper (Inside) - Plastic Substrate - Gray / Gray (Composite) 4. Plastic - Toy - Plastic Substrate - Dark Purple 5. Chain / Pull / Slider - Bag / Inside - Metallic	-Determination of Phthalates (Logo (Plastic) - Front - Surface Coating - Light Pink) -Determination of Heavy Metals: Extractable Content (Screen Print - Inside - Surface Coating - Dark Grey) -Alkylphenols (APs) and Alkylphenol Ethoxylates (APEOs) Content (Fabric - Lining - Textile)

				Substrate - Silver / Silver / Silver (Composite) 6. O-Ring / Ring - Bag / Bag - Metallic Substrate - Silver / Silver (Composite) 7. Stud / Socket - Bag / Bag - Metallic Substrate - Silver / Silver (Composite) 8. Slider - Drawcord - Metallic Substrate – Silver 9. Tip Lace - Pull - Plastic Substrate – Black 10. Fabric - Drawn Cord - Cotton / Polyester – Green 11. Fabric - Lining - Cotton / Polyester - Green Olive 12. Fabric - Backpack - Textile Substrate - Navy.	Substrate - Green Olive) - Determination of Bisphenol-A (BPA) (Fabric - Drawn Cord - Textile Substrate – Green)
5	GUAT25031766	Navy Backpack	Fail	1. Fabric - Inside Lining - Textile Substrate - Black 2. Fabric - Outside Lining - Textile Substrate – Black 3. Chain / Buckel - Zipper / Backpack - Plastic Substrate - Black / Black (Composite)	Total Organic Fluorine (TOF) by Combustion Ion Chromatography (CIC) (Fabric - Backpack - Textile Substrate – Navy)
6	GUAT25031899	Brown Handbag	Fail	1. Paint - Edge - Surface Coating - Black	-Nickel Detection (Spot test) (hook, logo, socket)

				2. Leather - Bag - Leather Substrate - Brown 3. Leather - Inside Belt - Leather Substrate - Light Brown 4. Hook / Dark Ring / Ring - Bag / Belt - Metallic Substrate - Golden (Composite) 5. Logo - Belt - Metallic Substrate - Golden 6. Socket / Stud - Bag - Metallic Substrate - Golden 7. Chain - Zipper - Plastic Substrate - Brown 8. Pull / Slider - Slider / Zipper - Plastic Substrate - Golden 9. Leather - Inside / Belt - Leather Substrate - Light Brown 10. Leather - Bag - Leather Substrate - Brown	-Determination of Phthalates (Leather - Bag / Inside Belt - Leather Substrate - Brown / Light Brown (Composite))
7	GUAT25032823	Soccer Youth Jersey (Top)	Fail	1. Heat Transfer - Neck - Surface Coating - Black 2. Screen Print - Front / Back / Surface Coating -	Determination of Phthalates (Screen Print / Front / Back / Front - Surface Coating - Black)
8	GUAT25032823	Soccer Youth Jersey (Bottom)	Fail	1. Screen Print - Front - Surface Coating - Black 2. Tip Lace - Drawn Cord - Plastic Substrate - White	Determination of Phthalates (Screen Print / Front / Back / Front - Surface Coating - Black)

				3. Label - Waist - Plastic - Substrate -	
9	GUAT25032824	Black Sling Bag	Fail	1. Logo - Inside - Surface Coating - Black, White (NS) 2. Chain / Tip / Logo - Bag / Zipper / Pull - Plastic Substrate - Silver / Black / White, Black (Composite) 3. Buckle / Slider - Strap - Plastic Substrate - Black (Composite) 4. Pull / Slider - Slider / Zipper / Pocket - Metallic Substrate - Silver (Composite) 5. Socket / Stud / Logo - Front - Metallic Substrate - Silver (Composite) 6. Ring - Bag - Metallic Substrate - Silver 7. Fabric - Bag / Inside - Textile Substrate - Black (Composite) 8. Fabric - Strap - Textile Substrate - Black	-Formaldehyde Content: Free and hydrolyzed formaldehyde (water extraction method) (Fabric Interior) -Total Organic Fluorine (TOF) by Combustion Ion Chromatography (Fabric - Front Bag - Textile Substrate – Black)
10	GUAT25032828	Soccer Ball	Fail	1. Synthetic Leather - Ball - Leather Substrate - Multicolor (Orange, Blue, L. Blue, Yellow, Green, Black & Red) (NS)	-Total Organic Fluorine (TOF) by Combustion Ion Chromatography (CIC) (Synthetic Leather - Ball - Leather Substrate - Multicolor (Orange, Blue, L. Blue, Yellow, Green, Black & Red) (NS))

11	GUAT25032844	Low-Top Sneakers	Fail	1. Screen Print - Insole - Surface Coating - Black 2. Tip Lace - Drawcord - Plastic Substrate - Transparent 3. Sole - Shoe - Plastic Substrate - Honey 4. Insole - Shoe - Plastic Substrate - White 5. Tongue Leather / Lining Leather - Shoe / Back Shoe - Leather Substrate - Red / Green (Composite) 6. Fabric - Shoe - Textile Substrate - Brown, Dark Brown 7. Fabric - Drawcord - Textile Substrate - White 8. Lining - Inside & Shoe - Leather Substrate - White	-Determination of Phthalates (Tip Lace - Drawcord - Plastic Substrate – Transparent) -Alkylphenols (APs) and Alkylphenol Ethoxylates (APEOs) Content (Tongue - Shoe - Leather Substrate – Red)
12	GUAT25033213	Sports Hat	Fail	1. Int Black 2. Fabric Front 3. Back Brown 4. In White 5. Screen print- Inside-Surface Coating-White 6. Adjustable Strap- Cap-Plastic Substrate-Brown 7. Rivet-Inside Cap- Metallic Substrate-Silver 8. Adjustable Strap - Cap - Plastic Substrate Brown 9. Fabric - Cap - Polyester - Brown	-Formaldehyde Content (Int Black, Fabric Front, Back Brown, In White)

				/ Yellow (Composite) 10. Fabric - Visor / Inside - Polyester - Grey / Black (Composite) 11. Embroidery / Embroidery- Cap / Cap - Polyester - Brown, Orange / White Orange (Composite)	
13	GUAT25033222	100% Polyester Sports Jersey	Fail	1. Tip Lace - Draw Cord - Plastic Substrate - Transparent 2. Logo (Plastic) - Front - Surface Coating - silver, Black (NS) 3. Eyelet - Front - Metallic Substrate - Silver 4. Heat Transfer - Neck - Surface Coating - Black, White, Red (NS) 5. Fabric - Neck / Body - Polyester - Navy / Red / Mustard (Composite) 6. Embroidery - Front - Polyester - Multicolor - (Red, White, Navy Golden) 7. Embroidery - Sleeve - Polyester - Multicolor (Red, White, Navy Golden) 8. Embroidery - Back / Shoulder - Polyester - Golden, White (NS)	-Determination of Phthalates (Logo (Plastic) - Front - Surface Coating - Silver, Black (NS) Tip Lace - Draw Cord - Plastic Substrate – Transparent) -Alkylphenols (APs) and Alkylphenol Ethoxylates (APEOs) Content (Embroidery - Front - Textile Substrate - Multicolor (Red, White, Navy, Golden) (NS) Embroidery - Sleeve - Textile Substrate - Multicolor (Red, White, Navy, Golden) -Determination of Bisphenol-A (BPA) (Embroidery - Front - Textile Substrate - Multicolor (Red, White, Navy, Golden) (NS) Embroidery - Sleeve - Textile Substrate -

				9. Fabric - Neck - Polyester - Black, White (NS)	Multicolor (Red, White, Navy, Golden) (NS))
14	GUAT25033620	Black T-Shirt, w/ Yellow Design	Fail	1. Fabric - Body - Textile Substrate – Black 2. Heat Transfer / Puff - Neck / Front - Surface Coating - Yellow / Yellow (Composite) 3. Puff - Front - Surface Coating - Yellow 4. Fabric - Body - Textile Substrate - Black	-Alkylphenols (APs) and Alkylphenol Ethoxylates (APEOs) Content (Puff - Front - Surface Coating - Yellow - Fabric - Body - Textile Substrate – Black)
15	GUAT25033635	Blue Children's T-Shirt w/ White Design	Fail	1. Heat Transfer - Neck - Surface Coating - Grey 2. Component 2: Puff - Front - Surface Coating – White 3. Fabric - Body - Textile Substrate – Blue 4. Heat Transfer / Puff - Neck / Front - Surface Coating - Yellow / Yellow (Composite) 5. Fabric - Body - Textile Substrate – Blue 6. Puff - Front - Surface Coating - White	-Determination of Phthalates (Heat Transfer / Puff - Neck / Front - Surface Coating - Grey / White (Composite))
16	GUAT25035290	Soccer Ball	Fail	1. Synthetic Leather - Ball - Leather Substrate - Multicolor (White, Green, Dark Green, Red, Dark Red, Blue, Navy, Golden) (NS)	-Alkylphenols (APs) and Alkylphenol Ethoxylates (APEOs) Content (Synthetic Leather - Ball - Leather Substrate - Multicolor (White,

					Green, Dark Green, Red, Dark Red, Blue, Navy, Golden) (NS))
17	GUAT25027757	Black Shapewear High-Waisted Shorts	Pass	1. Tape Plastic - Waist - Substrate Plastic – Transparent 2. Fabric - Pants - ELASTANE/ NYLON/COTTON – Black 3. Fabric - Pants - Substrate Textile - Black	
18	GUAT25027926	Men's Grey Tank Top	Pass	1. Heat Transfer - Neck - Surface Coating – White 2. Fabric - Body - Polyester / Elastane - Grey	
19	GUAT25027960	Grey Women's Tank Top	Pass	1. Care Label - Neck - Substrate Plastic – Grey 2. Fabric - Body - Modal / Rayon – Grey 3. Fabric - Inside - Polyester / Elastane - Dark Grey	
20	GUAT25027964	Grey Men's Tech T-Shirt	Pass	1. Care Label - Neck - Substrate Plastic – Grey 2. Fabric - Body - Polyester / Elastane - Grey	
21	GUAT25031893	Pair of White High Heels	Pass	1. Sole / Heel - Shoe - Plastic Substrate - Brown / Black (Composite) 2. Chain - Shoe - Metallic Substrate – Silver 3. Chain - Shoe - Metallic Substrate – Silver	

				4. Synthetic Leather - Inside / Insole - Leather Substrate – Brown 5. Synthetic Leather - Shoe - Leather Substrate - White	
22	GUAT25032810	Water Bottle	Pass	1. Paint - Water Bottle - Surface Coating - Black (Individual) 2. Top - Water Bottle - Plastic Substrate - Black (Individual) 3. Covert - Top - Plastic Substrate - Black (Individual) 4. Grabber - Top - Plastic Substrate - Black (Individual) 5. Texture - Top - Plastic Substrate - Black (Individual) 6. Packing - Top / Cover - Plastic Substrate - Transparent (Individual) 7. Water Bottle - Metallic Substrate - Silver (Individual)	
23	GUAT25032838	Brown Jacket	Pass	1. Tip Lace - Pull - Metallic Substrate - Black (Individual) 2. Chain / Top Stop - Zipper - Metallic Substrate - Silver (Composite) 3. Pull / Slider - Slider / Zipper - Metallic Substrate - Silver (Composite) 4. Logo - Pull - Metallic	

				Substrate - Silver (Individual) 5. Fabric - Body - Textile Substrate - Brown	
24	GUAT25032848	Pink Jacket	Pass	1. Paint - Pull / Slider - Surface Coating - Light Pink (A) (Individual) 2. Pull / Slider - Slider / Zipper - Metallic Substrate - Silver (A) (Composite) 3. Logo - Pull - Metallic Substrate - Silver (A) (Individual) 4. Top Stop / Chain / Fastener Box - Zipper / Pocket - Plastic Substrate - Light Pink (A) (Composite) 5. Tip Lace - Pull - Plastic Substrate - Black (A) (Individual) 6. Care Label - Neck - Plastic Substrate - White (A) (Individual) 7. Fabric - Body - Textile Substrate - L. Pink	
25	GUAT25032848	Pink Leggings	Pass	1. Care Label - Waist - Plastic Substrate - White (B) (Individual) 2. Logo (Foil) - Back - Surface Coating - Silver (B) (Individual) 3. Fabric - Body - Textile Substrate - L. Pink	
26	GUAT25032854	Black Leggings	Pass	1. Care Label - Waist - Substrate - White	

				2. Logo (Foil) - Back - Screen Print – Silver 3. Fabric - Pants - Textile Substrate - Black	
27	GUAT25033669	Faded Blue Jeans	Pass	1. Chain - Zipper - Metallic Substrate - Gold (Individual) 2. Pull - Slider - Metallic Substrate - Gold (Individual) 3. Slider - Zipper - Metallic Substrate - Gold (Individual) 4. Button - Front - Metallic Substrate - Gold (Individual) 5. Socket - Back - Metallic Substrate - Gold (Individual) 6. Rivet - Pocket - Metallic Substrate - Gold (Individual) 7. Burr - Pants - Metallic Substrate - Gold (Individual) 8. Fabric - Pants - Textile Substrate - Blue	
28	GUAT25033672	Blue Jeans	Pass	1. Chain - Zipper - Metallic Substrate - Gold (Individual) 2. Button Stop - Zipper - Metallic Substrate - Gold (Individual) 3. Puff - Slider - Metallic	

				Substrate - Gold (Individual) 4. Slider - Zipper - Metallic Substrate - Gold (Individual) 5. Socket - Back - Metallic Substrate - Gold (Individual) 6. Bottom - Front - Metallic Substrate - Gold (Individual) 7. Rivet - Pocket - Metallic Substrate - Gold (Individual) 8. Burr - Pocket - Metallic Substrate - Gold (Individual) 9. Fabric - Pants - Textile Substrate - Blue	
29	GUAT25033674	Black Jeans	Pass	1. Chain - Zipper - Metallic Substrate - Gold (Individual) 2. Button Stop - Zipper - Metallic Substrate - Gold (Individual) 3. Pull - Slider - Metallic Substrate - Gold (Individual) 4. Slider - Zipper - Metallic Substrate - Gold (Individual) 5. Socket - Back - Metallic Substrate - Gold (Individual) 6. Button - Front - Metallic	

				Substrate - Gold (Individual) 7. Rivet - Pocket - Metallic Substrate - Gold (Individual) 8. Burr - Pocket - Metallic Substrate - Gold (Individual) 9. Fabric - Pants - Textile Substrate - Light Blue	
30	GUAT25033675	Dark Blue Jeans	Pass	1. Chain - Zipper - Metallic Substrate - Gold (Individual) 2. Button Stop - Zipper - Metallic Substrate - Gold (Individual) 3. Pull - Slider - Metallic Substrate - Gold (Individual) 4. Slider - Zipper - Metallic Substrate - Gold (Individual) 5. Socket - Back - Metallic Substrate - Gold (Individual) 6. Bottom - Front - Metallic Substrate - Gold (Individual) 7. Rivet - Pocket - Metallic Substrate - Gold (Individual) 8. Burr - Pocket - Metallic Substrate - Gold (Individual) 9. Fabric - Pants - Textile Substrate - Dark Blue	

31	GUAT25036383	Silver Heart Chain Bracelet	Pass	1. Heart Bracelet - Metallic Substrate - A) Silver (Individual)	
32	GUAT25036383	Earrings In Silver With Blue Shape and Diamonds	Pass	1. Earrings - Metallic Substrate - B) Silver, Blue / Diamond (Individual)	
33	GUAT25036383	Necklace in Yellow Gold w/ Fresh Water Pearls	Pass	1. Necklace - Metallic Substrate - C) Yellow Golden (Individual) 2. Pearls - Neck Lace - Plastic Substrate - Fresh Pearls (Individual)	
34	GUAT25036383	Earrings In Yellow Gold + Platinum w/ Diamonds	Pass	1. Earrings - Metallic Substrate - D) Yellow Golden, Platinum, Diamonds (Individual)	
35	GUAT25036383	Small Ring w/ Diamonds	Pass	1. Small Ring - Metallic Substrate - E) Yellow Golden, Diamonds (Individual)	
36	GUAT25036383	Bracelet In Titanium and Gold w/ Diamonds	Pass	1. Bracelet - Metallic Substrate - F) Titanium Gold, Diamonds (Individual)	
37	GUAT25036383	Diamond Earrings In Yellow Gold	Pass	1. Earrings - Metallic Substrate - G) Yellow Gold, Diamonds (Individual)	
38	GUAT25036654	Pink Dress	Pass	1. Elastic - Drawcord -	

				Plastic Substrate – Pink 2. Fabric - Body - Textile Substrate – Pink 3. Fabric - Neck - Textile Substrate - Pink	
39	GUAT25038956	Brown Workwear Jacket	Pass	1. Fabric - Body - Textile Substrate – Brown 2. Fabric - Inside - Textile Substrate – Beige 3. Fabric - Bag - Textile Substrate – Brown 4. Top Stop / Chain / Fastener Box - Zipper - Plastic Substrate - Brown / Brown / Brown (Composite) 5. Socket / Stud - Front - Metallic Substrate - Silver / Silver (Composite) 6. Button / Pull / Slider - Front / Slider / Zipper - Metallic Substrate - Silver / Silver (Composite) 7. Pull / Slider - Slider / Zipper - Metallic Substrate – Silver 8. Stud - Front - Metallic Substrate – Silver 9. Paint - Button - Surface Coating – Black 10. Paint - Pull / Slider - Surface Coating – Brown 11. Top Stop / Chain / Fastener Box	

				- Zipper - Plastic Substrate - Brown / Brown / Brown (Composite	
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APPENDIX 2: METHODOLOGY

In response to the persistent and escalating risk posed by counterfeit products, the American Apparel & Footwear Association (AAFA) initiated a second counterfeit study, beginning with the issuance of a request for proposals (RFP). Following a competitive evaluation process, Intertek—a globally recognized provider of total quality assurance services—was selected from among the respondents.

AAFA worked with Intertek on next steps based on Intertek's RFP submission, including a customized sample-tracking tool utilizing Intertek's Interlink platform with an integrated electronic test request form (e-TRF). This e-TRF was custom designed to capture detailed product information and product source data.

AAFA invited its members to participate in the Counterfeit Products Testing Program between August and December 2025, assessing accessories, footwear, and apparel products. Participating members submitted their counterfeit samples through the e-TRF system, including sharing any information about the counterfeit product, before sending the samples directly to Intertek's laboratory in Guatemala. This facility was selected based on its recognized expertise in Restricted Substances List (RSL) testing, ISO/IEC 17025 accreditation, and demonstrated experience in administering comparable testing programs.

Specially designed testing packages were developed in conjunction with an Intertek team of restricted substances testing experts, for the testing of the below high-risk restricted substances:

- Lead in Surface Coatings
- Phthalates
- Total Heavy Metals
- Nickel
- Extractable Heavy Metals
- Chromium VI
- Formaldehyde
- Flame Retardants
- Alkylphenols (APs) and Alkylphenol Ethoxylates (APEOs)
- Azo-amines
- Bisphenol A
- Total Organic Fluorine (TOF) - to test for per- and polyfluoroalkyl substances (PFAS)

Upon receiving the products, Intertek Guatemala sampled the relevant components (main fabrics, trims, surface coatings, plastic or metallic substrates, etc.) and selected the appropriate tests for each component type. The testing packages were developed to align each component type (plastics, metals, natural or synthetic fibers) with the restricted substances most associated with that material. Analytical testing was conducted on each sampled component using advanced methodology, such as Liquid Chromatography – Mass Spectrometry (LC-MS/MS), Gas Chromatography – Mass Spectrometry (GC-MS), Inductively Coupled Plasma Mass Spectrometry (ICP-MS), and Combustion Ion Chromatography (CIC).

Individual test reports were generated for each product submitted and uploaded to Interlink. Interlink provided AAFA with data repositories for reports and e-TRFs, test data analytics including common failure trends, and real-time test status tracking.

The final test concluded the second week of January in 2026, test reports were analyzed and AAFA worked with members to confirm the intake information to compile this summary of results.