

John Zacharia “ON COUNTERFEIT PET MEDICATION”



Leah Evert-Burks: This is Leah Evert-Burks with the Center for Anti-Counterfeiting and Product Protection @ Michigan State University and *this is Brand Protection Stories* - stories about the practice of brand protection by those who live it.

Leah Evert-Burks: In *Brand Protection Stories* we talk to those in the brand protection community about particular cases in their careers. Through some *stranger than fiction* real life scenarios we learn about the practice of brand protection and the challenges faced by brand-owners worldwide.

John Zacharia: Right, so there were there were folks who were purchasing these re-boxed goods, if you will, re-boxed pet medicine. Sometimes the pet medicine came from overseas, sometimes the pet medicine was counterfeit. But in, in, in all instances relevant to this case, the labels themselves were counterfeit. And they were, and the convicted defendants knew that the marks on the labels were counterfeit. And they trafficked and sold in particular, counterfeit label Frontline Plus products with labels bearing counterfeit Frontline Plus marks in order to deceive US retail stores and consumers into believe that the Frontline Plus products were in fact manufactured for and approved for sale in the US.

Leah Evert-Burks: John Zacharia is a Professorial Lecturer in Law at the George Washington University School of Law, and the Founder of Zacharia Law. For over two decades, John has worked at the forefront of the legal issues confronting intellectual property owners, becoming one of the leading subject matter experts in IP criminal law in the country. Previously, as the Assistant Deputy Chief for Litigation of the Computer Crime and Intellectual Property Section of the United States Department of Justice’s Criminal Division (or C-CIPS), John was responsible for supervising all of the IP and cybercrime prosecutions by the Section’s 40 attorneys. In his 12 years at C-CIPS, John became one of the most experienced US federal prosecutors of IP crime. Notably, John prosecuted and obtained jury verdicts in one of the largest counterfeit goods prosecutions in U.S. history. In addition, John has secured a number of “first of its kind” convictions, including the first-ever conviction and sentencing of a cyber-locker operator, and the first-*ever* prosecution and conviction for criminal copyright infringement of mobile device apps. John also obtained the first-ever maximum sentence for felony copyright

infringement and online copyright infringement. John defended the United States as co-counsel against the first-ever challenge to the constitutionality of the Stored Communications Act before the U.S. Court of Appeals. Before joining C-CIPS, John was a trial attorney with the Federal Programs Branch of the Justice Department's Civil Division, where he handled several significant IP cases of first impression, including cases in which he successfully defended against challenges to the constitutionality of the Copyright Act and the Digital Millennium Copyright Act. John has trained law enforcement officials from over sixty countries and presented to a variety of international fora across the globe. He has authored and co-authored several articles and studies in the area of IP, including several articles for our very own *The Brand Protection Professional*, which drew some of the highest numbers of views. John also serves on the Editorial Board of the *BPP*.

Leah Evert-Burks: Welcome to *Brand Protection Stories* John.

John Zacharia: Thank you. It's wonderful to be here with you.

Leah Evert-Burks: I am one of millions of pet lovers around the world. Sometimes I in fact have been known to state that I like dogs more than most people. Pets enrich our lives, and we know that when we take them into our homes, they are relying on us to ensure their health and safety. As with many counterfeit products, this case reveals how counterfeit networks develop, how parties come together to build an illicit supply chain. But in this case involving pet flea and tick medications, those products, actually made it to the shelves of a major US retailer. So John to start out this case came to the attention of several parties, including retailers, because of the appearance of the packaging.

John Zacharia: Thank you, Leah I do want to thank you in your capacity in this doing this posting this podcast it's been great I've been listening to it, and of course *The Brand Protection Professional*. This case came to the attention of law enforcement, when they started receiving complaints about packaging that didn't look right to them and that they thought might be counterfeit. That is how it, how it began, and there were several federal investigative agencies that eventually became involved in the investigation, Homeland Security, Food and Drug Administration FDA Office of Criminal Investigations and the Environmental Protection Agency EPA.

Leah Evert-Burks: Right and the venue for this case, ultimately was the US District Court Southern District of Texas. And, and for the listeners an interesting thing to note is that in criminal cases some of the defendants that we will talk about were not necessarily residents of Texas but Texas became the venue

because that's where the product was purchased. It was then tested by manufacturers and driving this case was the Assistant US Attorney out of the Southern District. Can you just start out by explaining to the audience the role of the AUSA?

John Zacharia: Sure, and I can talk a little bit about the venue question you mentioned too. So, in terms of law enforcement, as they were investigating the case, they were investigating it in Houston, Texas, and the US Attorney's Office started looking into it for a prosecutorial standpoint. And in general, when there is a criminal IP case that case can start in any district where a federal crime has been completed, or it can be in more than one district, if the crime was committed in more than one district, and may be investigated and prosecuted in any district in which the offense was begun, continued, or completed, and in particular for cases like that involve hard goods, as counterfeit cases typically do, trademark counterfeit cases typically do, any crime involvement use of mail, transportation or interstate foreign commerce or the import of an object into the US is it's considered a continuing offense, and generally may be investigated and prosecuted in any district from, through, or into which that imported object moves. So something could be imported into New York and transshipped into Houston, and then ultimately arrive in Los Angeles and depending on the facts, any one of those venues could be places where the case could be investigated. In this case, in 2013, the investigators went to a Target in Houston, Texas, and they made purchases in November, I think 22 and 23 of 2013, and they had that product that they purchased, samples of it tested, and both the product, and, I should add this was Frontline Plus, both the product, and the labeled product that were located on the shelves are both found to be counterfeit. And so that created some urgency in the investigation. I jumped a little bit ahead, just to give an idea of an example of how venue, could be established in a district, even if the defendants are not there. But there were many other connections, to the Houston Division of the of the Southern District of Texas, there were wires, and there were other shipments of counterfeit labeled goods, and in some instances in various stages in the case, the product itself was also counterfeit. So, so there were many opportunities for the goods to touch that venue in the case, and in terms of the other thing you mentioned before I forget. When a case begins, it can be it can begin for example by a brand owner referring a case to a field division of a law enforcement agency like Homeland Security or FDA, or FBI, for example, it could start by referral to the, the IPR Center, The Intellectual Property Rights Center in Arlington, Virginia, or it could start with a referral to the US Attorney's Office and there are 93 US Attorney's offices, which are, which are throughout the United States. And there could be a referral to Main Justice, including The

Computer Crime and Intellectual Property Section, the Justice Department's Criminal Division. So, and, you know, I've worked on cases where the first referral happened in all of the above. That's, that's something that can happen. And when US Attorney's offices get the case referrals, they can decide whether to pursue the case themselves which they often do, or they can ask for partnership with Main Justice and in particular The Computer Crime Intellectual Property Section. And that's what happened in this case, and that's why we work together on the case.

Leah Evert-Burks: Okay, and that particular AUSA, out of Houston, you had actually worked with this person on a pharma case previously, is that right?

John Zacharia: Yeah I worked with a couple of Assistant US Attorneys in Houston, and there was, there was a prior case that I worked on involving counterfeit pharmaceuticals. That's right. And it so happened, if my memory is right, that this case arose around the same time that we were working on that case.

Leah Evert-Burks: And at this time you were at Main Department of Justice in Washington DC, as you indicated the C-CSIPS Office.

John Zacharia: Yes, that's correct.

Leah Evert-Burks: So you joined with AUSA for this counterfeit pet medication case. You mentioned some other agencies, and I think it's it's important to talk about them when we talk about cooperation to ensure that these prosecutions happen. In this case, the EPA was involved the Environmental Protection Agency, the FDA Food and Drug Administration had a role, as you mentioned a HSI was also involved. And I think it's interesting for the listener, in thinking about the EPA and the FDA and their particular roles, their responsibilities are segregated in a, in an interesting way, they both are involved in health and safety. And when it came to pet medications, as I understand it the EPA was responsible because some of the pet medications that were topically applied were considered pesticides. The FDA being involved because again health and safety, but if the pet medications were ingested by the animal, they were under their protection. So I just think it's an interesting kind of side note, to talk about.

John Zacharia: Sure, yeah so it's a, it's a rule of thumb that I learned, working on this case and I'm sure there's much more nuance to it than this but if the medicine is being as you suggested applied to a pet on the outside, it's, it's considered a pesticide regulated by the EPA. If it's a medicine that the pet

ingests, then it is regulated by the FDA. So, we had, we had in the course of this investigation both types of medicine, and we had both investigative agencies involved in addition to Homeland Security and I, you know, I would say too that for some folks listening to that they might they probably think - Wow, that's a lot of federal agencies that, you know, how did that all work, and it doesn't always work the same in every case but in this case, these agencies work really, really well together, and they get a really herculean job in this case, which we'll talk, we'll talk a bit about more, but they did a great job and they deserve a lot of kudos, as well as the US Attorney's Office of course, which you know did a tremendous job too.

Leah Evert-Burks: They certainly did and they certainly do deserve those kudos.

So getting to the cast of characters involved in this case, we kind of break them out into two categories one the manufacturing of goods and secondly the repackaging of the goods.

The first in the manufacturing, these were products again pet medications that were obtained from other areas around the world, not authorized or approved for sale in the US. In the repackaging, the named defendants were taking those products and repackaging them to appear that they were in fact approved for sale in the US. So some of these medications came from Europe, Asia and elsewhere. Many times they were using cheaper medications and relabeling or re-boxing to appear to be legitimate products such as you mentioned, Frontline, Frontline Plus and other trademarks.

Leah Evert-Burks: The discipline of brand protection is derived out of trademark law- since counterfeiting is a violation of trademark rights – it's important to remember that these are laws set up regionally throughout the world to protect the consumer. Yes, trademarks are assets of companies, but they tell the consumer the source of the goods and provide the assurance of origin. But, brand protection isn't only the responsibility of the legal profession, it's multi-disciplinary by nature, and necessity. People find themselves in this field from such diverse career paths as security, supply chain, law enforcement, marketing, IT, finance and yes legal, as well as many more.

John Zacharia: Right, so there were there were folks who were purchasing these reboxed goods, if you will, reboxed pet medicine. Sometimes the pet medicine came from overseas, sometimes the pet medicine was counterfeit. But in, in, in all instances relevant to this case, the labels themselves were counterfeit. And they were, and the convicted defendants knew that the marks on the labels were counterfeit. And they trafficked and sold in particular, counterfeit label Frontline Plus products with labels bearing counterfeit Frontline Plus marks in order to deceive US retail stores and consumers into believing that the Frontline Plus products were in fact manufactured for and approved for sale in the US,

and you know those counterfeit labels would involve for example false and fraudulent lot numbers, which is problematic for a couple of reasons. One, if the numbers are fraudulent on the outside they might not match the lot numbers on the blister packs for example on the inside. And for those who are unfamiliar with lot numbers are significant. They allow regulatory agencies like the EPA and FDA, as well as consumers to identify and trace the origin of specific package and the event the product that contains is harmful. And in the event that a product is recalled by the manufacturer, due to a defect or some other kinds of risk, the, the lot numbers marked on the outside, package allow distributors and retailers to remove the recalled products from stream of commerce and allow consumers to easily figure out whether the products have already been purchased, that they've already purchased have been recalled. There's also the issue of having FDA registered numbers or EPA numbers on the products, those, those, those numbers, you know, are there at the authorization of FDA and EPA. So, if they're placed there without authorization, that's another problem. And then the measurements might match. So, metric measurements we call sometimes Imperial measurements. As we use in the US, even though I don't know that they use them in the United Kingdom anymore. They, those, those may not match and that creates problems too. So I think that the, the, those types of deceptions are problematic for the consumers and the retailers, and in this case that there was, there was successful deception, if you will, of retailers and consumers.

Leah Evert-Burks: Right. In in a previous *Brand Protection Stories* we, we talked about counterfeit therapeutic drugs for humans with a guest Bobby Sherman, who did talk about grey market and how each country has its own, jurisdiction-wise, has its own regulatory requirements for medication, medications and that's the same for pet medication.

So getting into the, the defendants of the case the first one Ian McKellar is is currently fighting extradition to the US. He was, I want to be careful in stating this, he was indicted by a Grand Jury there in Houston, but he was not tried or convicted. So we need to keep that in mind, of course in the United States you're innocent until proven guilty. But that is Ian McKellar.

John Zacharia: Yeah, I do want to emphasize that although, as you pointed out the Grand Jury returned an indictment against Mr. McKellar he is presumed innocent until proven guilty. And I can't say what is happening currently because I don't know but the last mentioned in the public record is that the government was seeking extradition of him, and he was disputing that extradition. But for purposes of

this podcast everything we say really relates to the convicted defendants, because, again, Mr. McKellar is presumed innocent until he has the opportunity to go to trial. If it if he goes to trial.

Leah Evert-Burks: Right. So the first convicted defendant we'll talk about here is Mark Tran, he was involved in the manufacturing side of the operation. So Mr. Tran was sentenced to 46 months, which is three years and eight and eight months.

John Zacharia: I was told there'd be no math in law school.

Leah Evert-Burks: He pled guilty and as you indicated previously the charges were trafficking of counterfeit labels, documentation and packaging.

John Zacharia: Correct, correct. He that he pled guilty to one count of trafficking and counterfeit labels, and he was initially sentenced to 47 months, but pursuant to a motion from the government pursuant to Rule 35B of Rules of Criminal Procedure which relates to reducing a sentence with substantial assistance. I believe his sentence was reduced to 36 months. And in, in, in his in his case he knew that the Frontline Plus marks on the labels were counterfeit. And he had worked with third parties and directed them to manufacture labels bearing the counterfeit marks, and he intentionally trafficked in those labels bearing the counterfeit marks again with the intent to deceive retailers and consumers into believing that what goods were went along with those names were in fact manufactured for and approved for sale in the United States.

Leah Evert-Burks: And then that the other two convicted defendants, Alan Smith and Chris Martin are on the repackaging side of the equation. They were also convicted. Serving sentences. What I find interesting about the, about Chris Martin is he was not a veterinarian nor a pharmacist, yet he was the sole supplier of Frontline, Frontline Plus to the retail chain of Target. Again he was convicted of the trafficking of counterfeit labels. And he was also sentenced to a similar sentence time-wise.

Leah Evert-Burks: Counterfeiting can be lucrative but in many jurisdictions prosecution results only in low penalties, therefore it attracts a wide spectrum of criminals from out-of-garage sellers to sophisticated networks funding terrorism. And what *is* counterfeited? *Just about everything.*

Leah Evert-Burks: I think it's interesting to get into a little bit John, the, the convictions of trafficking of counterfeit labels and how that came about in the legislation to protect products and consumers relating to the, the sale of products that have counterfeit labels.

John Zacharia: Sure. So that is something that was added to Federal law in 2006. There was a relatively famous case that came out of the 10th Circuit, United States vs. Giles. I believe in 2000. And in that case, the defendant sold patches bearing counterfeit Dooney & Bourke trademarks, and the patches could then be attached to generic handbags or luggage to make them, essentially make them counterfeit too. But Dooney & Bourke registered the marks, not surprisingly for use on handbags and luggage, but not patches. And the defendant did not sell the fake handbags and luggage to which the patches were to be attached. And so the 10th Circuit concluded that the patches were labels, not goods and the defendants could not be convicted under Section 2320 of Title 18 of US Code for trafficking, unattached labels. But so if we think about that statute - It states, and it stated before 2006 that a defendant who intentionally traffics services knowing using a counterfeit mark, on or in connection with his goods and services is committing trademark counterfeiting under Section 2320. But this what this case highlights was a problem in terms of what happens when someone is trafficking in labels bearing the counterfeit mark separate from the goods, and there's a seizure, for example of labels. So, in part in reaction to the Giles case in other cases, Congress changed the law 2006, so that intentionally trafficking in labels, documentation, labeling components. Knowing that, intentionally trafficking such components knowing that a kind of mark has been applied to those components and is used in a way to likely to cause confusion to cause mistake or to deceive that too can be prosecuted. Whereas in Giles the Court had held it could not be held under the statute. Whereas in child support and help that could not be done to the statute, it's formed in 2000. As of 2006 that type of conduct, could be charged.

Leah Evert-Burks: That's extremely, obviously valuable legislation and important for brand owners to know that. So we've talked about cooperation of the federal agencies that we've listed. This case also exemplifies the success achieved from cooperation of brand owners. And quite frankly, some benefits to them. Merial Pharmaceutical which I believe is part of Sanofi, the pharma manufacturer that manufactured Frontline and Frontline Plus was very instrumental in testing the product that was seized and located to determine whether or not it was in fact counterfeit, acting quickly as you indicated this is a health and safety issue for for our pets and cooperated closely with the investigators and prosecution in providing the evidence for the case.

John Zacharia: Right, so, correct Merial and Sanofi, they worked, I think very hard being responsive to requests from law enforcement, when there would be seizures, whether it was when there was a purchase for example at the Target store in Houston I mentioned, or whether

it was the execution of the search warrant, almost a month later, at Flea Control Enterprises, which is the company owned by Mr. Martin, or when they were reviewing all the product that eventually Target took off the shelves. Throughout the process, there were samples taken and Merial and, which is I think nowadays with Sanofi. They, or at least at the time was. They were very responsive, and very diligent in testing and telling us when the labels were counterfeit. And if the product was counterfeit in certain instances, so that was a really important piece.

It's an important piece I think to all criminal IP cases but it's especially important in a case like this, where they really have the expertise to test these products, you know, in an efficient way. And so like the investigative agencies, they deserve a lot of kudos. I think they do too for doing a lot of good work in response to requests from law enforcement and eventually they were awarded at sentencing a restitution amount. I believe in excess of \$65,000 US dollars.

Leah Evert-Burks: Right. I believe one of the other brands Bayer was also given some restitution not to that level but that's significant over \$800,000 in restitution to the brand owner.

Leah Evert-Burks: Convicted Defendant Chris Martin challenged the payment of restitution to Sanofi the brand owner, per a case known as *Lagos*, but lost that challenge because the restitution was done at the direction of law enforcement not the brand owners. John authored an article for *The Brand Protection Professional* in the September, 2018 Legislative Update column entitled: "The Supreme Court Just Made Restitution Harder for Brand Owners: Here's What They Can do About it." Another learning opportunity from John Zacharia.

Leah Evert-Burks: We also talked about Target, of course that's where the product was located product was taken off the shelf to be tested. And they were also very cooperative, this is, as the listeners know this is a large-scale retailer across the United States. Can you talk about their cooperation?

John Zacharia: Sure I, I don't know the details as well as the investigators do but I do know that once the purchase was made in Houston in November of 2013 it created a sense of urgency, because both the product and the labels were found to be counterfeit in that purchase and so, law enforcement, really work very quickly to execute a search warrant, I believe a month later, a little bit for Christmas in December, in California, so that so kudos should also go to the field office there for helping with with that search warrant. And once it was clear that this was a problem of a large scale. And we later came to learn that FCE, Martin's company was the sole supplier Frontline Plus for the retail chain Target for

distribution to all Target stores throughout the US. So Target to its credit once, once it became clear that this was a problem, they took the product off their shelves at every retail store in the country and, you know, at the time I'm in Virginia. And so I just go to my local Target, just to see. And sure enough, Frontline Plus was there. And all of that product was taken down and, eventually, it was sent to Houston and some of it was taken as samples for testing. So, they, they, you know, once once there was probable cause sufficient for a warrant, the warrant was executed. Target, I believe, acted very quickly thereafter, and they that's you know that that is a very, very big task for such a big retailer. But they did do it to their credit.

Leah Evert-Burks: Absolutely. And you mentioned the issuance of the search warrant. Really when a search warrant is issued, that's the beginning of the case, I think some people think that that's the end result but that's the beginning.

John Zacharia: Yeah, that's a really, that's a really important point - that when we think of seizures, whether they're at the border, or pursuant to search warrants, they're very important and we you know we will hear about them in the press, with large seizures, that happen in the course of investigations including whether it's in the, in the country or at the border, but that really is the beginning of case. From there, it's very important for investigators to sort of climb the, the chain of distribution if you will, find out who are at the retail level, who's at the wholesale level, and then who's at the manufacturing level. And sometimes, going through that chain of distribution will take you overseas. But that is a very important process and I think it's one that law enforcement, knows and I think victims know too that it's important not to stop at the at the seizure. Obviously the facts have to be there for you to be able to find and follow the evidence. But there also has to be the will to do it, and not to stop. So I think that's a very important point and it's something again that the agents, the investigative agencies here HSI, FDA, EPA did a really good job with this case.

Leah Evert-Burks: So again, going back to the fact that these products were found at a major retailer and thinking about other counterfeit situations that are in more illicit markets. But what do you see John is the difference in the impact, or how to combat counterfeits that have infiltrated the, the legitimate supply chain versus the illegitimate supply chain?

John Zacharia: Yeah, that that is something that I think is is very important because, you know, there are black markets, both physical and on the dark web, if you will, is an online version in some instances of a black that has black markets, and when it's in the legitimate supply chain. I think it really

increases the scope of potential victims because in a case like this you had, at least retailers who were deceived, and there were consumers who were deceived. And you could have an of course, you have the victims who are the brand owners themselves, and you could in some cases have the wholesalers who were deceived. So you have the full, and you have, in this case folk's pets, who aren't deceived but are victims as well, so the scope of victims it's almost 360 degree scope of victims, when it's in the legitimate supply chain, and again, once you have a scope of victims and health and safety case like this, it does properly generate a lot more urgency for, you know, investigators and prosecutors to, to, to try to stop the trafficking in those legitimate supply chains, as well as the illegitimate supply chains of course.

Leah Evert-Burks: Some of the deception in getting this product into the supply chain I find particularly reprehensible and that is, there was evidence and allegations that these goods some of these goods were imported into the United States using humane reasons, in particular for hurricane relief.

John Zacharia: Yeah, so there, there were there was, an instance where a shipper called Humane Rescue came from overseas and the contents of the shipment were declared as PC products, pet care products, and there was an accompanying letter which stated that the products were donations a result of hurricanes. So, that is, is a, that's a separate layer of deception in that case it's, you know, presumably for Customs. So that Customs might let the products through without inspecting. So, that is, that is something that was found by investigators in this case, unfortunately.

Leah Evert-Burks: Right. And in thinking about this case involving repackaging and counterfeit labels on products from outside the United States, grey market products. Just generally, why is this similar or equal of equal concern to those products that are thought of as traditional counterfeits?

John Zacharia: Well, so I think it's important to note that in the, in the US, we cannot bring a criminal, cause of action for the repackaging of genuine goods, unless they are intended, meaning the packaging, repackaging is intended to see or to confuse. So if the repackaging is intent to deceive are to confuse, then a criminal cause of action can be made. And in this case, we had counterfeit labels that were intended to deceive and the convicted defendants pled guilty to doing exactly that, too, you know, on the various, you know, topics that we talked about involving lot numbers and what have you. They did seek to deceive US retailers and consumers into believing that the product, particularly the product from overseas was intended for the US market. In fact it was not.

Leah Evert-Burks: Right, right. Well John this has been a fascinating case and as I mentioned on the outset, of particular interest, I think too those of us who are pet owners - Interesting or concern. If you could think of one word, that would describe this case or your experience with this case or your takeaways. What would that one word be?

John Zacharia: Cooperation. I think that a case like this that's, you know, as large as this is involved in multiple defendants who reside in different places, product that's all over the country. And with overlapping authorities, the cooperation among the agencies was so important in cooperation with the brand owner was very important, in cooperation with the retailer was very important. So I would, you know, I won't use more than one word, because, although I could, but cooperation, I think the first word that comes to mind.

Leah Evert-Burks: Wonderful. I certainly do think that this demonstrates the power of cooperation. So John I want to thank you and I want to thank you for doing the hard work.

John Zacharia: Thank you and I was very lucky to be working with great fellow prosecutors and great investigators and obviously great cooperation from the private sector too. So I was very fortunate.

Leah Evert-Burks: John Zacharia, my fellow DOJ alum, is as a former prosecutor, an educator, whether pleading to a judge, teaching the next class of lawyers, or instructing a jury through the facts of a case or in this case a Grand Jury, he takes the time to explain important aspects of the law and some nuances including venue, jurisdiction, search warrants and why a counterfeit label and/or packaging can be a health and safety risk when that label may not match the contents of the medicine inside. Through pursuit of the indictments and convictions of this case he and the team of law enforcement, fellow prosecutors, investigators, brand owners and retailers cooperated and protected the cherished 4-legged members of our families.

Leah Evert-Burks: If you're interested in sponsoring episodes of Brand Protection Stories, please contact A-CAPP Assistant Director Kari Kammel at kkammel@msu.edu.

Leah Evert-Burks: Travel with us to the motorcycle rally capital of the world-Sturgis South Dakota with our guest Kevin McPherson reliving his brand protection days with Harley Davidson. Some of your preconceived notions of church ladies and bikers may be challenged, as we explore brand protection in the motorcycle world in *Short Stories from Sturgis*.

Leah Evert-Burks: Thanks for joining us today for this edition of *Brand Protection Stories*, produced by the Center for Anti-Counterfeiting and Product Protection (or A-CAPP) @ Michigan State University in East Lansing, MI. Please visit us @ a-capp.msu.edu. A-CAPP is a non-profit organization founded in 2009. It is the first and only academic body focusing upon the complex global issues of anti-counterfeiting and product protection of all products, across all industries, in all markets. In addition to this series, we offer certificate courses in brand protection, applied education and academic courses, executive education, student internships, live summits and virtual events, ground-breaking research, and publish the quarterly digital industry journal, *The Brand Protection Professional*.

Leah Evert-Burks: This is Leah Evert-Burks with A-CAPP. Until our next session, keep protecting your brands, and the world's consumers. Keep it real.