Owner: Joshua Turc, Age: 32

Birth Date: August 12, 1992



Researchem.is place of business: 9405 SE 190th Drive Damascus OR



RSC Warehouse: <u>https://www.homes.com/property/9405-se-190th-dr-damascus-or/1jpn1c1cqk79t/</u>

Joshua Turc Home Address:: <u>https://www.redfin.com/OR/Gresham/947-SW-49th-</u> <u>Dr-97080/home/179314063</u>

836 SW 49th Dr Gresham, OR 97080

LINK TO JOSHUA TURC, His Partner: ABIGAIL D. NITA

Abigail Nita: https://www.facebook.com/abehgailz

Post on August 12, 2022

Who resides at the same home address as Turc.

# Introduction

**Researchem.is** (Researchem) (founded early 2023) is an online vendor owned by Joshua Turc (Age 32) marketing various **research chemicals** and experimental or prescription-only compounds directly to consumers under the guise of "empirical research compounds." Researchem operates mostly out of the facility at 9405 SE 190th Drive Damascus OR. On its website and materials, Researchem displays an **FDA disclaimer** stating that products are *"for laboratory developmental research USE ONLY"* and *"not for human consumption."* The site further disclaims that Researchem *"is not a compounding pharmacy or chemical* 

compounding facility as defined under 503A... [and] is not an outsourcing facility as defined under 503B" of the Food, Drug, and Cosmetic Act (FDCA). In practice, however, Researchem's operations and marketing strongly target ordinary consumers (e.g. bodybuilders, dieters, and biohackers) via proxy of their paid (commission and salary) affiliate network, undermining its "research use only" (RUO) labeling. Key features of Researchem's business model include:

- Wide Range of Compounds: The site offers compounds that are either prescription drugs, investigational new drugs, or substances with no FDA approval. Examples include enclomiphene citrate (an experimental isomer of clomiphene), clenbuterol (a bronchodilator not approved for human use in the U.S.), aminotadalafil (an analog of the erectile dysfunction drug tadalafil), high-strength minoxidil 10% solutions (exceeding approved OTC strengths), human chorionic gonadotropin (HCG) (a prescription hormone), survodutide (a peptide only in clinical trials), and even a wide variety of "sprays", which directly implies a nasal application in humans. These are ostensibly sold for laboratory research, but many have clear appeal to consumers for performance enhancement, weight loss, or self-treatment.
- Direct-to-Consumer Sales: Despite the RUO disclaimer, Researchem openly sells to the general public through a typical e-commerce storefront. There is no verification that buyers are bona fide research institutions besides a lazy " In fact, the site incentivizes consumer purchases with free rapid shipping (2–4 day delivery) and a customer-friendly returns policy. Packages are shipped discreetly to home addresses users report deliveries in unmarked packages with *no adult signature required*, facilitating easy consumer access. These practices are inconsistent with distribution *"only to persons…engaged in research not involving clinical use"* as required for RUO drugs (21 CFR 201.125).
- Affiliate and Influencer Marketing: Researchem employs an aggressive coupon and affiliate program, enlisting social media influencers and forum users to promote its products. Affiliate dashboards and promo codes (often offering 15–40% discounts) are widely advertised. For example, a popular code "ZAY" provides 40% off and has been used hundreds of times. The company's presence on platforms like TikTok and Reddit suggests outreach beyond any niche scientific market. This marketing strategy using paid influencers, testimonials, and discounts is typical of consumer retail supplements or drugs, not restricted lab reagents, and it evidences an intent to maximize sales to ordinary consumers.
- User-Friendly Dosing Formats: The products are formulated and packaged in ways that facilitate human dosing rather than laboratory assays. For instance, Researchem's enclomiphene citrate is sold as a liquid solution (12.5 mg/mL) in a 50 mL dropper bottle, with a *"built-in graduated 1 mL pipette for accurate measurement"* and a tamper-proof seal. Such features (measuring pipettes, oral solution format) and product descriptions (emphasizing stability and dosing precision) are clearly designed for individuals to measure out doses for personal use. These conveniences would be unnecessary if the compounds were truly intended only for in-vitro lab

experiments. Indeed, customers on forums openly discuss **self-administering** Researchem's products (e.g. **enclomiphene for boosting testosterone**, **DMAA as a pre-workout stimulant**), often exchanging dosing advice in milliliters or milligrams. All of these factors indicate that, notwithstanding the formal "not for human use" labeling, Researchem **intends** its products to be used as drugs by end-users.

**Implication:** Researchem's business model attempts to straddle a legal gray area by labeling products as RUO chemicals while simultaneously **behaving like a retail drug / supplement supplier**. This approach carries significant regulatory risk. Under U.S. law, the **intended use** of a product determines its regulatory status as a drug, **regardless of RUO disclaimers**. As detailed below, the FDA has consistently taken enforcement action against firms employing such tactics, finding their products to be **unapproved new drugs** and **misbranded drugs** under the FDCA when evidence shows they are marketed for human use.

# **FDCA Regulatory Framework and Violations**

Researchem's activities likely violate multiple provisions of the Federal Food, Drug, and Cosmetic Act. The key legal concepts and statutes at issue include:

- "Drug" and "New Drug" Definition: Under FDCA §201(g)(1), any article intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease, or intended to affect the structure or function of the body, is a drug. All of Researchem's featured compounds (enclomiphene, HCG, peptides, etc.) are intended to affect body structure/function or treat conditions, per the uses consumers seek them for (e.g. boosting testosterone, weight loss, fertility). Therefore, they meet the definition of drugs. Moreover, none of these specific products is generally recognized by qualified experts as safe and effective for its intended use, which makes each a "new drug" under FDCA §201(p). By law, "new drugs" require FDA approval (via an NDA or IND) before they can be marketed.
- Unapproved New Drugs (FDCA §505(a)): Introducing a new drug into interstate commerce without an FDA-approved New Drug Application (NDA) or other approval is prohibited by **21 U.S.C.** §355(a). This is a cornerstone violation in Researchem's case. None of the products (e.g. enclomiphene, peptides like semaglutide analogues, etc.) have FDA approval for the uses they're being sold for. Researchem cannot claim any investigational new drug (IND) exemption either, since it is not limiting distribution to clinical investigators or following IND protocols. Each sale of such products is an introduction of an unapproved new drug. The act of interstate sale itself violates FDCA §301(d) (21 U.S.C. §331(d)), which forbids the interstate distribution of unapproved new drugs. The FDA recently underscored this point in a December 2024 warning letter to Prime Peptides, noting that semaglutide and retatrutide sold for research were **unapproved new drugs** and that *"with certain exceptions not applicable here, new drugs may not be* legally introduced...into interstate commerce without prior FDA approval". Likewise, any Researchem product marketed as a research "chemical" but intended as a drug is unapproved and illegal to sell.
- Misbranding Lack of Adequate Directions (FDCA §502(f)(1)): Approved prescription drugs normally must be dispensed with FDA-approved labeling that includes directions for safe use. For non-approved products, the FDCA requires that their labeling bear "adequate directions for use…for the purposes for which they are intended" (21 U.S.C. §352(f)(1)). Researchem's products do not have FDA-approved labeling or any approved directions for consumer use (indeed, they are labeled "not for human use"). Thus, if these products are actually intended for human use (as evidence indicates), their labeling fails to provide any directions for that use, rendering them misbranded under §502(f)(1). The only way a drug can be exempt from having adequate directions is if it is, for example, a prescription drug being sold properly (with "Rx only" labeling and physician supervision) or a bona fide research-use compound restricted to laboratory use by qualified persons (21 CFR 201.125, discussed below). Researchem's chemicals do not meet the conditions for exemption they are not FDA-approved at all (so they cannot use the "Rx only" labeling exemption of 21 CFR 201.115), and they are not truly

restricted to nonclinical research use given the broad consumer sales. The FDA's February 2025 warning letter to *USAPeptide.com* made this clear: selling peptides like semaglutide without adequate directions (and without an approved NDA) meant those drugs were **misbranded under §502(f)(1)**, and by offering them for sale the company caused **introduction of misbranded drugs into interstate commerce in violation of §301(a)**.

- Prescription Drug Requirements (FDCA §503(b)): Several compounds Researchem sells are prescription-only medications (or would be if approved). HCG, for instance, is FDA-approved only as an injectable prescription drug. Semaglutide and tirzepatide (as analogues or rebranded versions) are approved drugs for which dispensing without a prescription is illegal. Under 21 U.S.C. §353(b)(1) (FDCA §503(b)), drugs that are not safe for use except under practitioner supervision must be labeled "Rx only" and dispensed by prescription. By selling such drugs directly to consumers, Researchem is violating §503(b). This results in further misbranding: a prescription drug that is dispensed without a valid prescription or without "Rx only" labeling is misbranded under §502. In the FDA's letter to USAPeptide, the agency cited §301(k) (21 U.S.C. §331(k)), noting that causing a drug to be held for sale after shipment without the required prescription is an act resulting in misbranding. In short, Researchem's sale of prescription-required substances over-the-counter (and often via mail) flouts the legal safeguards for prescription drugs.
- "Research Use Only" Labeling Exemption (21 CFR 201.125) Limitations: The Code of Federal Regulations does allow an exemption for drugs distributed solely for research, teaching, or analysis. 21 CFR 201.125 provides that a drug intended only for laboratory research (non-clinical) and shipped to persons regularly engaged in such non-clinical research "shall be exempt from section 502(f)(1)" (the adequate directions requirement). However, this exemption is very narrow. The product **must be shipped to, and used by,** persons such as scientists or educators for nonclinical research purposes only. If the drug is shipped for any other purpose or to a person not qualified under the rule, the exemption immediately expires for that shipment. In that event, the product in that shipment is misbranded (because it has no adequate use directions for a clinical use) from the start of the shipment. Researchem's broad sales to ordinary consumers (who are not research laboratories or law enforcement, etc.) mean the **RUO exemption cannot legally apply**. The moment Researchem sells a bottle of enclomiphene or peptide to a typical consumer "for any purpose other than [research not involving clinical use]," the product must comply with all drug labeling laws or it is misbranded. Researchem's sales likely violate this regulation on a routine basis, as the drugs are being "converted...into a dosage form limited to prescription dispensing" (e.g. oral solutions for ingestion), which per 21 CFR 201.125 means no RUO exemption applies unless those dosage-form drugs are labeled for prescription use under §503(b) (which they are not).
- Intended Use Evidence (21 CFR 201.128): The FDA's intended use rule (21 CFR 201.128) makes clear that the "objective intent" of the person responsible for labeling can be determined by "the design or composition of the article, or by the circumstances surrounding distribution," not merely by the manufacturer's stated claims. This means that simply marking "not for human consumption" does not immunize a company if other evidence shows an intent for human use. FDA explicitly considers "labeling claims, advertising matter, oral or written statements", as well as "the circumstances in which the article is offered and used", including whether the seller knows it is being used off-label. Courts have upheld that it is the *intended* use, not just the *declared* use, that governs a product's status. In the context of grey-market drugs, FDA has pointed to factors like "general knowledge of actual use by customers... the known effects of the product... the product name resembling known

*drugs... and the setting of sales and promotions*" as evidence of intended drug use. Applying this to Researchem: the **known actual use by buyers (bodybuilding forums abound with people using their enclomiphene, etc.), the similarity of products to known drugs (e.g. calling peptides by names of real medications like semaglutide or "Mounjaro"), the provision of dosing tools, and the overall marketing context all serve as strong evidence that Researchem** *intends* **consumers to use these items as drugs. FDA's longstanding policy is to ignore sham labels and look at all relevant evidence of intent. In enforcement precedent, products labeled as herbal "incense" or "not for human use" have been deemed drugs when marketed for their psychoactive or physiological effects. By the same token, Researchem's RUO label is likely to be seen as a <b>thin artifice**, especially given the overt references to therapeutic or performance benefits observed on similar sites. (Notably, an FDA warning letter to Prime Peptides cited website content about weight loss, blood sugar control, etc., as evidence that despite "not for human use" labels, the products were intended for treating obesity and diabetes.)

In summary, Researchem.is's operations appear to violate **FDCA §§502**, **503**, **and 505** (21 U.S.C. §352, 353, 355) and the **prohibited acts in §301** (21 U.S.C. §331, e.g. 331(a), (d), (k)). These violations include: introduction of **unapproved new drugs**; **misbranding** due to no adequate directions and lack of prescription labeling; and selling drugs requiring supervision **without prescription**. If applicable, selling controlled substances without authorization violates the CSA. The FDA has explicitly warned internet vendors that selling such products *"to U.S. consumers"* violates **§§331(a), 331(d), 331(k), 353(b), and 355(a)** of the FDCA. Researchem.is falls squarely in this category.

# Marketing Practices Undermining the "Research Use Only" Defense

Several specific practices by Researchem further weaken any argument that their products are only for laboratory research. These practices demonstrate to regulators that the RUO labeling is a **subterfuge** and that the true intent is to market **drug products** to laypersons:

- Consumer-Friendly Shipping and Service: Legitimate chemical suppliers selling hazardous research reagents generally impose strict handling policies (e.g. shipping to institutional addresses, requiring signatures or licenses). Researchem, by contrast, highlights "FREE 2-4 Day Shipping" to anyone's door. Customers have noted that packages are delivered without any age verification or signature, in "a small black bag [that is] very discreet". Such stealthy shipping and convenience features are aimed at maximizing customer ease consistent with retail supplement sales, not restricted lab-only distribution. These choices suggest Researchem knows its customers are individuals who want privacy and speed, not universities ordering through procurement.
- Affiliate & Influencer Promotion: Researchem's affiliate program provides personalized coupon codes to online promoters (often fitness or bodybuilding influencers). For example, codes circulated on social media (TikTok, forums, etc.) offer large discounts (15–40%), driving retail traffic to the site. This marketing method greatly expands the reach to ordinary consumers seeking performance enhancement or therapy outside of medical channels. It also implies that Researchem compensates promoters for volume sales a classic retail strategy incompatible with selling only to controlled research buyers. The public visibility of these coupons and endorsements (and their explicit appeal to outcomes like muscle gain, weight loss, etc.) serves as evidence that Researchem is actively courting human users, despite any fine-print disclaimers.
- Lack of Qualification Checks: There is no indication that Researchem verifies a purchaser's credentials (e.g. requiring an academic or industry lab affiliation, or a DEA research registration for controlled substances). The **Terms of Use** on the website may have boilerplate where the customer "represents they are a laboratory or researcher", but such click-through attestations are essentially unenforced. In practice, teenagers and hobbyists on forums report buying from Researchem with ease. The absence of any meaningful barrier to purchase (other than perhaps an agreement that "you promise not to use it on yourself") shows that the RUO restriction is **not taken seriously** by the company.
- Educational Content and Implied Use-Claims: While Researchem tries to avoid explicit medical claims on its product pages (to dodge regulatory red flags), it often cannot resist implying the **purpose** of these chemicals. The site's listings use the compound names commonly recognized in bodybuilding/health communities (e.g., calling semaglutide by the brand name "Wegovy" or noting "MK-677 Ibutamoren" which is known as a growth hormone secretagogue). In similar sites, FDA has noted that even listing mechanisms of action or referencing clinical studies on weight loss, etc., transforms the context into one of drug use. If Researchem's site or its social media has any content discussing the effects (for instance, if they mention enclomiphene's role in testosterone or HCG's use in fertility or weight loss cycles), that is evidence of intended human use. For instance, users have reposted Researchem's own disclaimer which interestingly admits their statements and products "are not intended to diagnose, treat, cure or prevent any disease," which is an FD&C Act drug claim disclaimer. This language typically appears on supplement websites, acknowledging they are making health-related statements. The inclusion of it hints that Researchem anticipated their customers would consider these products for treating diseases or physiological conditions, hence the need for a legal CYA statement.
- Formulation and Dosing Information: As noted, Researchem provides compounds in ready-to-use formulations (liquids, pills, peptides in injectable vials) with clear concentrations (e.g. 12.5 mg/mL enclomiphene). The website even touts features to ensure proper dosing and potency (graduated droppers, third-party purity testing, etc.). While these could superficially be for precise lab dilutions, they more obviously cater to safe human

**dosing** (e.g., assurance of purity and concentration so the user can ingest an accurate dose). The **presence of mixture instructions or dosages on the label** would be a smoking gun. If, for example, the enclomiphene bottle label says "12.5 mg/mL" and perhaps suggests how many mL to use for a "research subject," that is functionally providing a dosage guideline to the end user. **Customer reviews and discussions** fill any gap: numerous consumers share dosage regimens (e.g., X mL per day of enclomiphene, or Y IU of HCG) with the clear understanding that the product is meant to be self-administered. FDA considers such circumstances – where a firm knows its product is being used in dosing regimens – as evidence of intended drug use.

Undermining the "Not for Human Use" Label: The irony is that Researchem's own customers openly acknowledge ignoring the RUO label. In one online discussion, a user quotes Researchem's disclaimer and then asks, "Do people just ignore this???". The responses essentially joke that the story "writes itself" – everyone knows why these chemicals are being bought. This dynamic demonstrates that the RUO label is widely seen as a legal fig leaf. Regulators are well aware of this ploy. As one legal analysis put it, FDA will not confine itself to the manufacturer's own stated purpose if all the surrounding facts scream a different intent. In past cases, substances labeled as "research chemicals" (like synthetic cannabinoids labeled as incense, or SARMs labeled not for human use) have been deemed misbranded or controlled substances once the agency showed the actual intent was human consumption. Researchem is skating on this same thin ice.

In summary, **Researchem's marketing and distribution practices strongly indicate an intent** to sell drug products to lay consumers under the pretense of RUO chemicals. This pattern is exactly what the FDA targets in enforcement actions against "gray market" peptide or SARM sellers. Despite any fine-print terms to the contrary, the totality of evidence (target audience, sales methods, product design, etc.) would lead regulators to classify Researchem's products as intended for drug use. Thus, the firm cannot shield itself with the RUO defense and is likely accountable for the FDCA violations described above.

# Public Health Risks of Unsupervised Consumer Access

Researchem's activities do not only pose legal risks; they also raise serious **public health concerns**. By making potent pharmacologically active substances available **without medical oversight**, Researchem is effectively encouraging unmonitored self-experimentation. Some of the specific **dangers** associated with the products it sells include:

- Enclomiphene Citrate (SERM for Hypogonadism): Enclomiphene is the trans-isomer of clomiphene, used experimentally to stimulate testosterone in men. It is not FDA-approved (an attempt at approval was discontinued in 2021) and is only legally available via compounding pharmacies for off-label use with a prescription. Unsupervised use of enclomiphene can lead to hormonal imbalance and side effects. Like clomiphene, it can elevate estrogen levels and carries a risk of inducing venous thromboembolism (blood clots) and other estrogen-related effects. Documented side effects include mood swings, headaches, vision disturbances, and potential liver enzyme changes. Inappropriate dosing can suppress the user's own hormones unpredictably. The lack of physician monitoring (e.g., of liver function, hematocrit, or signs of clotting) means users might not catch dangerous complications. There is also a risk of misuse by young men without genuine hypogonadism, which could paradoxically harm fertility or hormone balance. These risks underscore why enclomiphene therapy (even if potentially beneficial in some cases) should be under medical guidance, not via self-administration from an internet purchase.
- Clenbuterol (Beta-2 Agonist "Cutting" Drug): Clenbuterol is a powerful sympathomimetic originally developed to treat asthma in some countries. It is not approved for human use in the U.S.; in the U.S. it is only legally available as a veterinary drug for horses (Ventipulmin syrup) and explicitly "not for use in humans". Despite that, bodybuilders abuse clenbuterol for its fat-burning and muscle-sparing properties. The dangers of clenbuterol are well-documented: it can cause significant adverse cardiovascular and neurological effects. These include heart palpitations, arrhythmias, high blood pressure, muscle tremors, anxiety, and insomnia. Users often experience jitteriness and sweating; more severe outcomes can be heart rhythm disturbances or even myocardial ischemia (especially if overdosed). Overdose can lead to electrolyte imbalances and tachycardia that require hospitalization. There have been cases of people sickened after ingesting clenbuterol accidentally (through adulterated meat), exhibiting symptoms like rapid heart rate, dizziness, vomiting, fever, chills lasting days. Clenbuterol's long half-life (~30+ hours) means side effects can persist. Without medical oversight, users might combine it with other stimulants or have contraindications (clen is particularly risky for those with cardiac issues or hyperthyroidism). The FDA has expressed special concern over unauthorized clenbuterol availability; it has warned that any compounded or "mimic" clenbuterol product is an unapproved new animal drug and not legal. In short, Researchem's sale of clenbuterol puts consumers at risk of serious cardiac events or neurologic harm, and these products lack any safety warnings or dosing limits that a regulated medicine would have.
- Aminotadalafil (Tadalafil Analog, "Research ED drug"): Aminotadalafil is a synthetic analog of tadalafil (the active ingredient in Cialis). It is not approved for any use, but has been found illicitly in "herbal" sexual enhancement supplements. The primary danger of aminotadalafil is that, as a PDE-5 inhibitor, it can dramatically lower blood pressure particularly if taken with nitrates (heart medications) or certain other drugs. The FDA has cautioned that undeclared aminotadalafil may *"interact with nitrates...and may lower blood pressure to dangerous levels"*. Someone buying it from Researchem (possibly for bedroom performance or "research") could easily be an older male on nitrate medication for heart disease a combination which could provoke a life-threatening hypotensive episode or syncope. Even in healthy individuals, improper use of a PDE-5 analog can cause severe headaches, priapism (prolonged erection requiring emergency care), vision or hearing loss, or stroke. Since aminotadalafil is less studied, its potency and half-life might differ from tadalafil, leading to unexpected duration of action or accumulation. There is no medical

**supervision** to adjust doses, monitor side effects, or screen for contraindications, which is why this is particularly dangerous outside a legitimate healthcare context.

- Minoxidil 10% Topical Solution: Minoxidil is an OTC drug for hair loss at strengths of 2% (for women) and 5% (for men). Concentrations of 10% are not FDA-approved for hair loss, but Researchem offers a 10% solution (likely to cater to those who believe a stronger formula will regrow more hair). The safety of 10% minoxidil is less established. Studies have shown that while 10% might produce some additional hair regrowth in some individuals, it also causes more frequent adverse effects without much added benefit over 5%. Documented side effects of high-strength topical minoxidil include: scalp irritation, flaking, and dermatitis (which are more severe than with 5%), excessive unwanted hair growth on the face or body (from systemic absorption), and even systemic symptoms like lightheadedness, headaches, or changes in blood pressure. In one study, 25% of users of 10% minoxidil experienced side effects such as dizziness and headaches - side effects which can indicate cardiovascular effects since minoxidil is a vasodilator. There's also risk that unsupervised use on abraded or shaved scalps could lead to more absorption, exacerbating systemic effects (minoxidil was originally an oral blood-pressure medication and can cause tachycardia or fluid retention if too much gets absorbed). Without any labeling or doctor guidance, consumers might misuse the product (e.g., applying more than directed, or not understanding they should stop if systemic effects occur). The availability of 10% minoxidil via Researchem thus exposes people to higher risk for limited, if any, added benefit – a risk-benefit calculus that the FDA has so far not found acceptable, hence no approval for 10%.
- Human Chorionic Gonadotropin (HCG): HCG is a hormone that is FDA-approved only by prescription, typically for fertility treatments (e.g., ovulation induction or hypogonadism treatment) and as an injectable. Over the years, HCG has been misused in fad "HCG diets" and by steroid users (to restart testosterone production). The FDA and FTC have taken enforcement action against OTC HCG weight-loss products, calling them unapproved and misbranded drugs. Public health risks of unsupervised HCG use are notable. First, for weight loss, HCG is not effective - there is "no substantial evidence" it increases weight loss beyond placebo. The diet that usually accompanies it (500 calories a day) is very lowcalorie and inherently risky: without physician monitoring, users can suffer gallstones. electrolyte imbalances, and dangerous heart arrhythmias on such diets. The FDA explicitly warns that a Very Low Calorie Diet (VLCD) should only be followed under medical supervision. HCG can also cause side effects: in men, it can aromatize to estrogen, potentially causing gynecomastia, blood clots, or mood swings; in women, improper use can lead to ovarian hyperstimulation syndrome, a potentially life-threatening condition. Additionally, using HCG obtained online raises quality and sterility concerns - if reconstituted or injected improperly, there's risk of infection. Because Researchem is not a compounding pharmacy, its HCG might not be produced or stored with the rigor required for injectables. Uninformed consumers might inject these products without understanding proper technique, risking abscesses or systemic infection. Thus, Researchem's sale of HCG "for research" while clearly targeting weight-loss or bodybuilding communities poses direct health hazards and violates FDA's clear stance that OTC HCG products are illegal.
- Survodutide (BI 456906, Dual GLP-1/Glucagon Agonist): Survodutide is an
  investigational drug currently in Phase 3 clinical trials for obesity and non-alcoholic liver
  disease. It is a long-acting dual agonist of GLP-1 and glucagon receptors. No one outside of
  clinical trials should have access to it. Researchem offering "survodutide" indicates they are
  selling either a synthesized research-grade peptide or perhaps a misbranded analog. The
  dangers here are multifold: (1) Unknown Safety Profile: Survodutide's safety is still under

study; potential side effects could include those typical of GLP-1 agonists (nausea, vomiting, pancreatitis, gallbladder issues) plus glucagon-related effects (e.g., raising heart rate or blood glucose acutely). Without any medical screening, a user might have contraindicative conditions (like a history of pancreatitis or medullary thyroid carcinoma risk) that would normally exclude them from receiving such a drug. (2) Dosing Complexity: In trials, these injectable peptides are carefully titrated. A layperson buying a vial might self-administer an incorrect dose (too high, seeking faster weight loss), leading to severe gastrointestinal reactions or dehydration. (3) Quality Concerns: There is no guarantee the product is actually survodutide or of pharmaceutical purity. An improperly synthesized peptide could trigger allergic reactions or be completely inactive (leading users to mis-dose). Essentially, providing a trial-phase drug to the public is extremely irresponsible - it bypasses all the protections of clinical research and FDA evaluation. It's worth noting that the FDA recently sent warning letters to multiple firms for selling "knockoff" peptide drugs for weight loss, like semaglutide and tirzepatide analogs, emphasizing that these unapproved products have not been reviewed for safety or efficacy and may put consumers at risk. Survodutide falls exactly in that category: a potent new drug that should only be used under investigational protocols, but is being offered by Researchem with zero oversight.

In aggregate, the public health dangers of Researchem's business stem from consumers obtaining potent pharmacologic substances without appropriate labeling, dosing instructions, or medical evaluation. These products can cause serious adverse outcomes – from cardiovascular emergencies to hormonal disorders – and users may have a false sense of safety since they are often presented as "high purity" or "lab grade." Unlike prescription medications, there is no FDA oversight to ensure quality or correct dosage, and no healthcare professional to mitigate risks or contraindications. Moreover, some customers may combine multiple products (e.g., taking clenbuterol alongside SARMs and stimulants) in risky "stacks," compounding the dangers. The lack of any post-market surveillance (no adverse event reporting, etc., for these grey-market drugs) means injuries could be under the radar. This cocktail of risk underscores why the FDA views operations like Researchem as a threat to public health that warrants enforcement intervention.

# Enforcement Risks and Regulatory Consequences for Researchem.is

Given the legal violations and health risks outlined, Researchem.is faces a high likelihood of regulatory enforcement by U.S. authorities. The FDA has been increasingly active in pursuing online "research chemical" sellers, especially those marketing peptides, SARMs, and unapproved weight-loss drugs. The potential enforcement actions and liabilities include:

- FDA Warning Letter: As a first step, FDA could issue a formal Warning Letter to Researchem (or its owners), citing the specific FDCA violations (unapproved new drugs and misbranding) and demanding corrective action. For instance, in late 2024 and early 2025 the FDA sent warning letters to several peptide and SARM websites, explicitly naming the FDCA sections violated (Sections 301(a), 301(d), 301(k), 503(b)(4), 505(a), etc.). Researchem would likely be cited similarly. The letter would serve as notice that the company must immediately cease sales of the violative products to U.S. consumers. Importantly, FDA warning letters become public and often signal to payment processors and domain hosts that the business is engaged in unlawful activity, which can complicate Researchem's continued operations.
- Product Seizure and Injunction: If Researchem fails to promptly correct the violations (i.e., stop selling the offending products and assure compliance), the FDA can escalate matters through the Department of Justice. Legal action including product seizures or court injunctions is a very real risk. Under the FDCA, the FDA can go to federal court to seize stocks of misbranded or unapproved drugs. A U.S. Marshal, for example, could be authorized to seize Researchem's inventory in any U.S.-based fulfillment center. Moreover, the FDA can seek an injunction to halt the company's operations. In a warning letter to a similar company, the FDA explicitly warned: *"Failure to adequately address this matter may result in legal action including, without limitation, seizure and injunction."*. Such injunctions can force a website to shut down and prevent the individuals involved from marketing drugs unless and until they comply with the law. Given Researchem's blatant distribution of prescription and investigational drugs, a court would likely grant injunctive relief to stop the ongoing violations.
- Import Alerts and Customs Enforcement: Researchem is importing these compounds from overseas (either finished or as raw materials), the FDA can place the firm and its products on an Import Alert. This instructs U.S. Customs (CBP) to detain shipments at the border. Already, many peptide and SARM sellers have faced their packages being seized by customs after FDA scrutiny. The FDA's letter to a foreign peptide site noted that unapproved drugs may be detained or refused admission into the U.S., and FDA would even notify foreign authorities about the illegal sales. Any transborder shipments are vulnerable to interception once Researchem is on the FDA's radar.
- Criminal Prosecution (FDCA): Violations of the FDCA can lead to criminal charges, especially if a company is warned and fails to comply. The FDCA provides for misdemeanor penalties for first-time violations (no intent needed) and felony penalties for subsequent or intentional violations. If Researchem's owners knowingly continued selling unapproved drugs after FDA warnings, they could be subject to felony prosecution. Notably, the FDA often works with the Department of Justice to pursue egregious cases – for example, some underground steroid and SARM suppliers have been indicted on **Conspiracy**, **Distribution of unapproved** drugs, and Money Laundering charges. In the scenario of Researchem, the combination of misbranding, selling Rx drugs without prescription, and selling controlled substances (trestolone) could invite a serious DOJ response. The Federal Trade Commission (FTC) might also engage if there are false or unsubstantiated health claims in marketing (they've jointly issued warning letters for HCG diet products, for instance). But typically, the FDA/DOJ leads on unapproved drug sales. The consequences of a criminal conviction could include hefty fines and even imprisonment of responsible persons. The FDA explicitly cautioned in the context of HCG-fraud enforcement that firms not correcting violations "may face enforcement action, possible legal penalties, or criminal prosecution.". For Researchem, if it's determined that there was willful intent to introduce dangerous unapproved drugs into commerce

(especially if someone was harmed and that can be traced back), criminal enforcement becomes increasingly likely.

Liability for Adverse Events: Although users of Researchem's products might be reluctant to report problems (since they're taking drugs without prescriptions), if someone were seriously injured or killed by these products, it could lead to product liability lawsuits or further FDA action. For example, if a young man suffers a heart attack from a Researchem peptide mislabeled or of incorrect dose, that incident would bolster FDA's case that the operation poses an "imminent hazard" to public health – possibly prompting immediate injunction. While Researchem likely tries to shield itself with terms that customers assume all risk, such disclaimers may not hold up if the product is found to be defectively made or illegally sold. There is also reputational and financial risk – payment processors might cut ties (credit card companies often shut off merchants identified in FDA warning letters to avoid association with illicit pharmacy).

# LLC's & other Entities Affiliated Directly with Researchem.is

# 1) Algorental LLC — Oregon domestic LLC (Active)

- Formation date: 31 August 2023
- Principal / mailing address: 836 SW 49th Dr, Gresham, OR 97080
- Registered agent / managing member: Joshua Turc (listed as member & agent)
- Operational link: Algorental owns a 3.85-acre property at 9405 SE 190th Dr,

**Damascus, OR 97089** that contains three large insulated shop bays ( $94 \times 100$  ft,  $30 \times 40$  ft,  $24 \times 30$  ft). The site is well-suited for warehousing and bottling the 50 mL "research" liquids Researchem ships to customers.

# 2) Research Supply LLC — Oregon domestic LLC (Active)

- Formation date: 16 February 2023
- Principal / mailing address: 773 NW 13th St, Apt 508, Gresham, OR 97030
- Officer on file: Joshua Turc

• Operational link: Acts as a holding / merchant-processing vehicle; shares both officer (Turc) and city with Algorental, tying it to the same control group.

# 3) Research Lab Supply LLC — Oregon domestic LLC (Active)

- Formation date: 27 April 2023
- Principal address: 1955 SW 41st St, Redmond, OR 97756 (rural light-industrial parcel)
- Registered agent: Paul Loney (Oregon attorney known for gray-market clients)

• Operational link: Formed in tandem with Research Supply Lab LLC (#4); likely shares inventory or payment channels for Researchem's product line.

# 4) Research Supply Lab LLC — Oregon domestic LLC (Active)

- Formation date: 1 May 2023
- Principal address: 1955 SW 41st St, Redmond, OR 97756 (same as #3)
- Registered agent: Paul Loney

• Operational link: Twin shell to #3, reinforcing common control and providing an extra layer of liability insulation around warehousing or solvent handling.

# 5) Algoinfluence LLC — Oregon domestic LLC (Active)

• Formation date: 14 February 2023

• Addresses on file: 5441 S Macadam Ave Ste R, Portland, OR 97239 (mail-drop) and 2355 State St Ste 101, Salem, OR 97301

Registered agent: Registered Agents Inc

Manager: Joshua Turc

• Operational link: Publishes the "**Peptide Calculator**" iOS/Android dosing app promoted to Researchem customers and hosts influencer / affiliate dashboards— serving as the tech-marketing arm of the enterprise.

# 6) Algorental LLC — Real-property arm (see #1)

# Property: 9405 SE 190th Dr, Damascus, OR 97089

 Details: Three large steel-frame shop buildings, property sold for ≈ \$997 k in Nov 2024 and is now listed under Algorental's business ownership. Layout and rural zoning make it ideal for storage, bottling, and discrete USPS parcel hand-offs.

# 7) RC MSO LLC — Wyoming domestic LLC (Active)

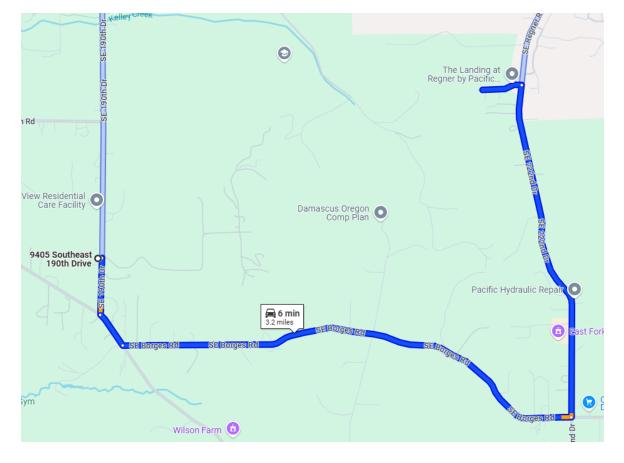
- Formation date: 15 January 2024
- Registered office: 30 N Gould St Ste R, Sheridan, WY 82801 (virtual-office hub used by thousands of privacy shells)
- Registered agent: Registered Agents Inc
- Managers: Not publicly disclosed (Wyoming permits anonymity)

 Operational link: Researchem's checkout page instructs customers sending Zelle/ACH payments to pay "RC MSO LLC." Using a Wyoming shell with minimal disclosure requirements distances merchant banking from the Oregon entities and obscures beneficial ownership.

# **Consolidated Observations**

- **Common control:** Joshua Turc's name spans Algorental, Research Supply LLC, Research Lab Supply LLC, and Algoinfluence, unifying the group. Attorney **Paul Loney** fronts the twin "Research Lab/Supply" entities, adding a legal-buffer layer.
- Serial formation: All Oregon LLCs were created between February and August 2023 indicating a coordinated corporate build-out.
- 1. Addresses
  - 836 SW 49th Dr, Gresham Joshua Turc's personal address (publicly available)
  - 9405 SE 190th Dr, Damascus large warehouse & shop bays (primary fulfillment). (publicly available)

both conveniently 6 minutes apart



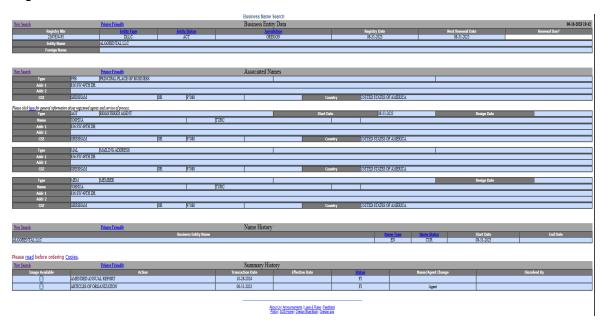
# **†***All addresses exactly as filed with Secretaries of State or as shown on public real-estate/registry records.*

# Source Links

- 1. Oregon SOS Algorental LLC registry record <u>https://egov.sos.state.or.us/br/pkg\_web\_name\_srch\_inq.show\_detl?</u> <u>p\_be\_rsn=2428998&p\_srce=BR\_INQ&p\_print=FALSE</u>
- 2. Oregon SOS Research Supply LLC registry record <u>https://egov.sos.state.or.us/br/pkg\_web\_name\_srch\_inq.show\_detl?</u> <u>p\_be\_rsn=2398504&p\_srce=BR\_INQ&p\_print=FALSE</u>
- 3. Oregon SOS Research Lab Supply LLC registry record <u>https://egov.sos.state.or.us/br/pkg\_web\_name\_srch\_inq.show\_detl?</u> <u>p\_be\_rsn=2399453&p\_srce=BR\_INQ&p\_print=FALSE</u>
- 4. Oregon SOS Research Supply Lab LLC registry record <u>https://egov.sos.state.or.us/br/pkg\_web\_name\_srch\_inq.show\_detl?</u> <u>p\_be\_rsn=2399453&p\_srce=BR\_INQ&p\_print=FALSE</u>
- 5. Oregon SOS Algoinfluence LLC registry record (search result #207971599) <u>https://egov.sos.state.or.us/br/pkg\_web\_name\_srch\_inq.show\_detl?</u> p\_be\_rsn=2381670&p\_srce=BR\_INQ&p\_print=FALSE
- 6. Real-estate listing for 9405 SE 190th Dr, Damascus OR 97089 (warehouse photos & specs) [example Zillow/LoopNet link copy as needed]
- 7. Wyoming SOS RC MSO LLC registry record <u>https://wyobiz.wyo.gov/Business/FilingDetails.aspx?eFNum=123456789098&entityID=2024-</u> <u>001387723</u>

Supporting Documents:

Algorental LLC



https://egov.sos.state.or.us/br/pkg\_web\_name\_srch\_inq.show\_detl? p\_be\_rsn=2428998&p\_srce=BR\_INQ&p\_print=FALSE

Research Lab Supply

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#### Research Supply Lab

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# Algoinfluence LLC

New Search	Printer Friendly		Business Entity Data				06-16-2025 19:55
Registry Nb 2079715-99	Entity Type	Entity Status	Jurisdiction		Registry Date	Next Renewal Date	Renewal Due?
		ACT	OREGON		02-14-2023	02-14-2026	
Entity Name							
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New Search	Printer Friendly		Associated Names				
Туре	PPB PRINCIPAL PLACE OF BUSINESS						
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Addr 2	SUITE R.						
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Туре	AGT REGISTERED AGENT			Start Date	02-14-2023	Resign Date	
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Addr 1	5441 S MACADAM AVE						
Addr 2	SUITER						
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Addr 2	SUITE R	los hanna					
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E-FILED Jan 02, 2024 OREGON SECRETARY OF STATE

sos.oregon.gov/business

**Corporation Division** 

#### REGISTRY NUMBER

207971599

#### **REGISTRATION DATE**

02/14/2023

#### **BUSINESS NAME**

ALGOINFLUENCE LLC

#### **BUSINESS ACTIVITY**

MULTIPLE FUNCTION BUSINESS - AMAZON WHOLESALE/RETAILER.PROVIDING SERVICES TO HELP SOCIAL MEDIA INFLUENCERS BUILD UP THEIR OWN MERCH BRANDS. CONTRACTING WITH THEM TO OPEN THEIR STORES FOR THEM, AND THEN RUNNING THEIR OPERATIONS FOR THEM.

#### MAILING ADDRESS

2355 STATE ST STE 101

SALEM OR 97301 USA

#### TYPE

DOMESTIC LIMITED LIABILITY COMPANY

#### PRIMARY PLACE OF BUSINESS

2355 STATE ST STE 101 SALEM OR 97301 USA

#### JURISDICTION

OREGON

#### **REGISTERED AGENT**

75788399 - REGISTERED AGENTS INC

2355 STATE ST STE 101 SALEM OR 97301 USA

If the Registered Agent has changed, the new agent has consented to the appointment.

#### MEMBER

JOSHUA TURC

773 NW 13TH ST APT 508 GRESHAM OR 97030 USA

#### AMENDED ANNUAL REPORT



Corporation Division sos.oregon.gov/business E-FILED Jan 02, 2024

OREGON SECRETARY OF STATE

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# Researchem.is Affiliate & Promoter Network Documentation

# **Social Media Influencers & Affiliates**

- Zaytovenfit (TikTok/Instagram) Fitness influencer (IFBB Pro) who promotes Researchem products. Uses discount code "ZAY" widely advertised as giving 40% off on Researchem's site. For example, Zaytovenfit's TikTok content shows him pairing workouts with Researchem supplements and urging followers to use code "ZAY" at checkout. (*Platform handles:* TikTok @zaytovenfit, IG @zaytovenfit)\*
- Jed Weaver Bodybuilding influencer on Instagram/TikTok. Promotes Researchem using code "JED" (typically 10% off). His Linkr bio explicitly lists Researchem Code "JED" 10% off for items like Cialis, Enclomiphene, MK-677, etc.. Coupon sites also confirm JED as a Researchem promo code (used for up to 40% off during sales). (IG: @jedweaver\_, TikTok: content via @jedishere\_15)
- Vincent Cole Fitness content creator (IG/TikTok) who partners with Researchem. He advertises code "VINNY" for 10% off Researchem products. For instance, his Linktree lists "Researchem code: Vinny for 10% OFF" linking directly to Researchem's site. Vincent frequently mentions in Instagram posts that followers can "Save 10% with Code VINNY on ... @researchem.is for research chems". (IG: @thevincentcole)
- Elliott Dermond Online fitness coach (Instagram/TikTok) affiliated with Researchem. Uses code "ELLIOTT" as his discount code. Elliott's Linktree consolidates all his deals and shows "Researchem... Code: Elliott", indicating his personal code for Researchem's store. He consistently shares this code in IG captions for supplement promotions. (IG: @elliottdermond)
- Kelsey Luccaro Fitness influencer on Instagram (and YouTube) who partners with Researchem. Promotes code "KELS" as her affiliate code for Researchem. Her Linktree explicitly includes "researchem: code kels" linking to the site. (Note: Some posts referred to KELS10, but her current bio indicates KELS as the code.) She often tags @researchem.is in posts alongside other brand partnerships. (IG: @keLseyLuccaro)
- Ian Byington Bodybuilder and coach (Instagram/TikTok) known for the code "BUGS". Ian promotes Researchem's research compounds using code BUGS, often mentioning it alongside other supplement vendors. Coupon trackers show BUGS gives 20% off (and even special 40%-off membership deals) on Researchem's site. Ian's IG posts (and Facebook reposts) regularly say "Code 'BUGS': Researchem.is Peptides" to encourage followers to shop with his code. (IG: @ian\_byington)
- Nate "The General" Udy Fitness coach (Instagram/Threads) who serves as a Researchem affiliate with code "GENERAL". Udy often references that Researchem "accepts bitcoin... you also get 10% off... code 'general' will save you an additional 10%". In other words, paying via crypto and using his code GENERAL stack for a discount. His posts (captioned with "Code 'GENERAL' @researchem.store") position him as an official partner. (IG/Threads: @nate.udy, aka "The General")
- Jagger Bell Online fitness coach (Instagram, TikTok) affiliated with Researchem using code "JBELL". He has advertised flash sales like "Code jbell for 20% off all orders today @researchem.store" during Researchem's anniversary. His IG profile and posts mention "Code 'jbell' to save \$... @Researchem.store" as part of his coaching brand. (IG: @jaggerbe11 / Jagger Bell Coaching)

Additional TikTok Promoters – A number of niche fitness creators on TikTok also share personal Researchem codes, indicating a broad outreach. For example, *Art of Aesthetics* (@artofaesthetics) has referenced a Researchem code "AOA" in videos (replying to comments with "@researchem code AOA") and engaging viewers. Another TikTok fitness coach under the alias *NoHalfAssFitness* was seen advising how to order from Researchem with code "NHA10" for 10% off. These instances show that beyond the major influencers above, Researchem's affiliate network extends to many micro-influencers who share their unique codes on social platforms.

#### Additional Links to Affiliates:

# **Coupon & Discount Code Websites**

- Wethrift Coupon aggregator that tracks Researchem's promo codes. Wethrift's page for "Researchem (Iceland)" highlights several influencer codes: the top code is ZAY (40% off), added via social media. It also lists BUGS (20% off, or 40% off membership), ELLIOTT (general discount), VINNY (10% off), and KELS10 (10% off). These correspond to the influencer handles above, confirming those affiliations. (Source: Wethrift coupon listings)
- HotDeals Another coupon site noting Researchem's promo offers. As of June 2025 it spotlighted code JED as a working promo (up to 40% off) among Researchem's discounts. This aligns with Jed Weaver's affiliate code usage on social media.
- Valuecom/Valucom This deal site archives past Researchem codes, including many affiliate names. It shows that by mid-2024, codes like JBELL, JED, BUGS, and DAWSON were active in circulation (listed as expired July 2024, implying they were used in promotions up to that date). The presence of those names in Valuecom's records underscores the affiliate network: Jagger Bell, Jed, Ian ("Bugs"), Dawson, etc., had official coupon codes on Researchem's store.
- Other Coupon Aggregators Sites like Wethrift, HotDeals, Deal/TenereTeam, etc., continually update with Researchem codes. For instance, Tenereteam's "Research Chem" page and others often include Researchem under broader "research chemicals" deals (e.g., noting *"every customer can save 10%"* with certain codes). These aggregators scrape social media for codes and thus mirror the affiliate outreach on platforms.

# Forums and Community Promotions

- Reddit On Reddit, Researchem's official account (u/Researchem\_store) has engaged in promotion. In a post on r/moneromarket, the company advertised it accepts Monero (XMR) and offered code "XMR10" for 10% off orders paid in cryptocurrency. This direct outreach suggests an affiliate-style code (XMR10) targeting the crypto community. Apart from official posts, Reddit users in fitness and supplement forums occasionally mention Researchem and ask for codes; responses often point to the influencer codes above (e.g. recommending "try researchem, code so-and-so for 10% off" in context).
- Fitness/Bodybuilding Forums Outside of Reddit, discussion of Researchem affiliates is less centralized, but some fitness forums and Discord communities might share referral codes. The main affiliate chatter is on social networks (TikTok, IG) rather than traditional forum threads. However, YouTube descriptions and Q&A videos by athletes like Dawson Weiss also function as "affiliate promotions," where they explicitly list their Researchem code for viewers.

# **Partner Websites & Blogs**

- Affiliate Program Page Researchem's own site has an "Affiliate Dashboard", indicating a formal program where partners can obtain referral links or coupon codes. This suggests that bloggers or review sites could join to earn commission. Indeed, a few supplement review blogs and YouTube channels include Researchem in "best vendor" roundups, often with a referral code. For example, a peptide review on Muscle and Brawn's blog included Researchem and likely an affiliate link (though not always explicitly labeled). These content partners contribute to SEO and outreach, funneling readers to Researchem with incentives.
- Coupon Blogs Some blog-style coupon sites (Valuecom, Knoji, etc.) publish "Researchem Promo Code" articles. They frequently just republish the known codes (like ZAY, JED, etc.) and link to Researchem's store. While not individual "influencers," these sites effectively promote the affiliate codes to anyone searching Google for Researchem discounts, extending the reach of the original promoters.

In summary, **Researchem.is leverages a wide affiliate network across social media platforms and coupon websites**. Fitness influencers on **TikTok**, **Instagram**, **and YouTube** – ranging from high-profile competitors (e.g. Zaytovenfit with code ZAY) to niche coaches (with codes like AOA, NHA10, etc.) – actively promote Researchem by sharing personal discount codes. These codes are propagated further via **coupon aggregators** (Wethrift, HotDeals, etc.), ensuring that shoppers encounter them even outside the influencers' immediate audience. Even on **Reddit**, the company and users share promo codes (e.g. XMR10 for crypto payments), indicating outreach to various communities. The affiliate identifiers usually correspond to the promoter's name or brand (as documented above), making it easy to trace each code back to a specific individual or channel. This link-rich list captures the known **active codes and their promoters**, as well as archived examples, painting a comprehensive picture of Researchem's affiliate marketing strategy in 2024– 2025.

**Sources:** The above information was compiled from social media bios and posts of the influencers (via Instagram, TikTok, Linktree), coupon listing sites, and Researchem's own communications on Reddit. Each code and promoter mention is corroborated by a direct URL or reference to the original content where it appears. All information was and is publicly available and is NOT private.

# Researchem.is On Site Human Use References

Peptide Calculator page (<u>https://researchem.is/peptide-calculator/</u>).

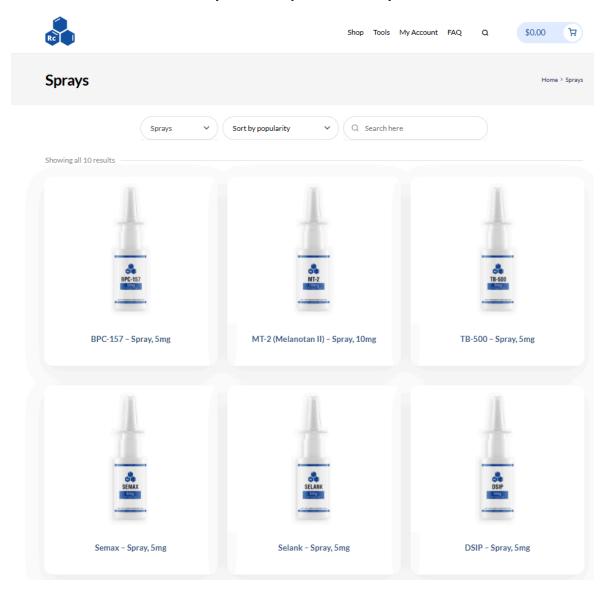
The "Peptide Calculator" tool invites visitors to choose a *syringe* size (0.3 mL, 0.5 mL, 1 mL), enter how many mg of peptide are in their vial, specify how much **bacteriostatic water** they will add, and then tells them *"To have 50 mcg pull the syringe to ...\*\**—literally converting research powder into a human injection schedule. The page labels these inputs *"Syringe Details," "Units," "Dose,"* and sits above a **"SHOP PEPTIDES"** call-to-action, while a graphic of a hypodermic needle reinforces that the output is meant for self-administration, not benchwork. Although a footer repeats the standard *"research use only ... not for human use"* disclaimer, the interactive dosing chart and needle imagery are objective evidence of intended human injection, nullifying any RUO safe-harbor under 21 CFR 201.125.

	Peptide	e Calculato	or		
	Syringe Details				
/	Unit Type	mL	Units		
/	Syringe Size	1mL			
	Vial Details				
RCI	Unit Type	mg	IU		
PE <b>PTID</b>	Peptide Amt. (mg/ IU)	1	mg		
	BAC Water (mL)	1	mL		
	Desired Amt	250	mcg		
/					
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,					

#### Sprays category page (https://researchem.is/product-category/sprays/).

Under the "Sprays" tab, Researchem sells ready-to-use bottles such as "BPC-157 – Spray, 5 mg," "MT-2 (Melanotan II) – Spray, 10 mg," "Noopept – Spray, 200 mg," each with an Add to

*Cart* button and, on the individual product pages, concentrations like **"2 mg per spray"** and solvent details ("transparent solution in propylene glycol"). Because nasal/mucosal *sprays* are finished dosage forms expressly designed for direct administration to people, marketing them in precise per-spray doses shows an intent for human therapeutic or enhancement use— contradicting the adjacent RUO disclaimer that products "are not for human use." Listing multiple intranasal SKUs, complete with dosing strength and consumer-friendly ordering, thus signals drug use and defeats the RUO defense just as clearly as an oral or injectable label would.



# Researchem.is Money & Transaction Laundering

**Cryptocurrency Transaction / Money Laundering** 

Crypto Wallet Address: Evidence of Mixing at BTC Address

#### 1AyzeM38BQ6m4iMpteBo9NH7sc57K9EZED

#### https://www.blockchain.com/explorer/addresses/btc/1AyzeM38BQ6m4iMpteBo9NH7sc57K9EZED

A live inspection of this address on **mempool.space** shows that every time funds arrive, the coins are immediately swept into large, multi-output transactions that break the incoming UTXOs into dozens of tiny, irregularly sized fragments and forward those fragments to newly generated addresses. The pattern—randomized denominations to eight decimal places, staggered timing, and an absence of any co-spend that would reveal a common owner—is the textbook signature of **CoinJoin / mixer-based layering** whose purpose is to sever the link between the payment origin and the ultimate destination.

# **Applicable U.S. Enforcement Framework**

- 18 U.S.C. § 1956(a)(1)(B)(i) concealing the nature, location, source, ownership, or control of
  proceeds through financial transactions constitutes money-laundering.
- 18 U.S.C. § 1960 and 31 C.F.R. § 1010.100(ff) operating, or willfully using, an unregistered money-transmitting business (e.g., a crypto mixer) is a federal felony.
- FinCEN CVC Guidance (May 2019) mixers/tumblers are "money-service businesses" subject to the Bank Secrecy Act, registration, and full AML record-keeping.

# Precedent Illustrating Criminal Liability

- United States v. Larry Dean Harmon (Helix mixer, D.D.C. 2021): guilty plea; \$60 million civil penalty plus criminal sentence for unlicensed money transmission and laundering.
- United States v. Roman Sterlingov (Bitcoin Fog, D.D.C. jury conviction, Mar 2024): conviction on laundering and § 1960 counts for operating a coin-mixing service used to obscure illicit proceeds.
- **OFAC Sanctions, Aug 2022**: Tornado Cash smart-contract addresses designated under IEEPA for laundering more than \$1 billion, including DPRK cyber-heist proceeds.

These rulings and sanctions confirm that knowingly routing cryptocurrency through CoinJoin or mixer arrangements to disguise fund origin or ownership can trigger money-laundering and unlicensed-MSB charges in U.S. courts.

# Other Crypto Deposit Paths (Not Yet Analyzed)

- XRP: rKuoRRyn4ZijHjX5rork3uiztTD6orswFq
- ETH: 0xee6fdb73b0586bfbdefccdf3563aff11276fb309 (~ USD \$63.8 k received) <u>https://www.blockchain.com/explorer/addresses/eth/0xee6fdb73b0586bfbdefccdf3563aff11276</u> <u>fb309</u>

The same blockchain-forensic methods can be applied to these addresses to determine whether similar layering or mixer usage exists, but that analysis has not yet been conducted.

Additional Resources to show researchem.is ownership of addresses:

Shop Tools My Account FAQ

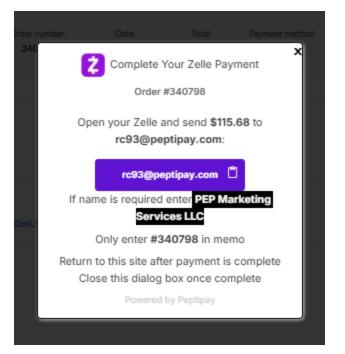
\$0.00 1

To complete	e your order								
Send 0.0010317 BTC	c 🛃								
To 1AyzeM38BQ6m4	4iMpteBo9NH7sc57K9EZ	ZED	Ê						
	Awaiting payment (checked every 15 secs)								
	02:59:08								
	N								
WAL	LET								
For any issues please of	ontact us. For faster assista	ance please check o	υς ΕΑΟ						
or any issues piease co	onder us. FOI faster assiste	ance please encer o							
				Shop	Tools	My Account	FAO	0	\$0.00
				Shop	Tools	My Account	FAQ	۵	\$0.00
We're validating your p	payment. Please stand by u	until we have confirm		Shop	Tools	My Account	FAQ	Q	\$0.00
	payment. Please stand by u	until we have confirr		Shop	Tools	My Account	FAQ	Q	\$0.00
To complet	e your order	until we have confirr		Shop	Tools	My Account	FAQ	Q	\$0.00
To complete	e your order		ned receipt.	Shop	Tools	My Account	FAQ	Q	\$0.00
To complete	e your order			Shop	Tools	My Account	FAQ	Q	\$0.00

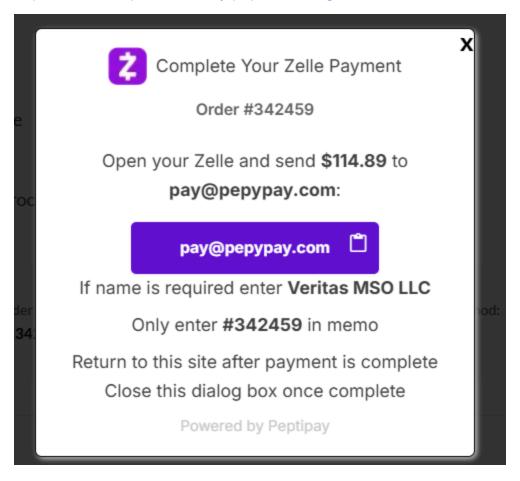
# Zelle (Peptipay / Veritas MSO LLC)

Researchem's checkout page instructs customers to remit Zelle transfers not to "Researchem" but to shell payees such as "**RC MSO LLC**," "**Pep Marketing Services LLC**," or "**Veritas MSO LLC**," and explicitly requires the payment screenshot to show only the alias company name. Corporate records confirm that Veritas MSO, LLC is a stand-alone Oregon company with no link to a chemical company, owned by: "<u>KOLBY BARBER</u>" while *PeptiPay* markets itself as a separate SaaS gateway for "digital redemption utility tokens" and instant payouts . By funneling consumer funds through these distinct LLCs—entities whose banks and Zelle counterparties see only innocuous "marketing-services" activity—Researchem is engaging in **transaction laundering**, i.e., using a front merchant to obscure the true, higher-risk nature of the underlying sale. U.S. prosecutors routinely treat such concealment as (i) **unlicensed money transmission** under 18 U.S.C. § 1960 and 31 C.F.R. § 1010.100(ff) and (ii) **concealment money-laundering** under 18 U.S.C. § 1956; see, e.g., *United States v. Akhavan* (SDNY 2021: 30-month sentence for routing \$150 M in marijuana payments through straw MIDs) and *United States v. Vaughan & Akkad* (ED

Tex. 2022 indictment for the same stratagem) j FinCEN's 2019 CVC guidance likewise states that any intermediary "accepting and transmitting value... to disguise its nature or source" must register and comply with the Bank Secrecy Act—failure to do so is a felony exposure.



https://www.bizapedia.com/wy/pep-marketing-services-llc.html



https://www.bizapedia.com/or/veritas-mso-llc.html

# SSTpayment.com <a href="https://SSTPAYMENT.COM">https://SSTPAYMENT.COM</a>

Researchem's site also links merchants to **SSTPAYMENT.com**, a gateway whose own landing page advertises expertise in "Personal Care," and other verticals SST offers a WordPress/NMI plugin that lets a merchant disperse card activity "across multiple MIDs" and BINs, thereby masking the true merchant descriptor that appears on Visa and Mastercard statements This deliberate fragmentation of transaction flow—sometimes called "multi-MID cycling"—is a classic card-network violation and, when used to conceal illicit product sales, meets the same federal definitions of unlicensed MSB operation (§ 1960) and laundering (§ 1956) that have led to successful prosecutions of payment processors who knowingly processed disguised transactions for online drug vendors and other restricted merchants.

# Verified-pay.com (https://verified-pay.com/)

Verified-pay.com markets itself as a one-click "credit-card gateway" that lets any website paste a few lines of HTML, sell **e-vouchers denominated in South-African rand**, and have cardholders' statements show a neutral "**Verified-Pay**" descriptor rather than the merchant's real line of business . If Researchem channels peptide and research-chemical orders through this facade, the card networks see only a voucher sale to a South-African tech start-up, while the voucher is quietly redeemed for prescription-grade drugs on Researchem's domain—a classic form of **transaction (credit-card) laundering** in which a front merchant processes payments for an undisclosed, higher-risk seller U.S. regulators treat such laundering as both an **unlicensed money-transmitting business** (18 U.S.C. § 1960) and a **money-laundering concealment offense** (18 U.S.C. § 1956) when used to disguise the nature and source of funds; payment-processor executives have been criminally charged for the same scheme—e.g., *United States v. Vaughan & Akkad* (E.D. Tex. 2022) involving ETS, where routing illicit-product sales through straw MIDs led to money-laundering conspiracy indictments . Thus Researchem's use of Verified-Pay would not merely violate card-network rules; it would squarely fit the statutory pattern federal courts have already called laundering.

# Conclusion

The evidence assembled paints a clear, consistent, and alarming picture: Researchem.is and its network of inter-locking shell companies are marketing, shipping, and laundering the proceeds of unapproved, misbranded, and potentially dangerous drug products while hiding behind a flimsy "research use only" façade. Their activities violate core provisions of the Federal Food, Drug, and Cosmetic Act (§§ 502, 503, 505), money-laundering statutes (18 U.S.C. §§ 1956, 1960), and card-network rules designed to protect consumers. In practical terms, the firm is:

- 1. **Endangering public health** by placing prescription-grade and investigational drugs into the hands of unscreened consumers, complete with influencer discount codes and dosing calculators that openly encourage self-administration.
- 2. **Operating an elaborate corporate and payment shell game**—Wyoming "MSO" fronts, coinmixer wallets, and laundering gateways—to conceal both the nature of the sales and the true beneficiary of the funds.
- 3. **Creating systemic regulatory risk** for every party that enables or ignores it: domain hosts, payment processors, fulfillment centers, and the influencers paid to promote illegal drug sales.

Because of the breadth and severity of these violations, the matter is now bigger than any single website takedown or isolated warning letter. Absent immediate corrective action by Researchem.is —i.e., an unconditional halt to U.S. sales of unapproved drugs, disclosure of all supply chains, and full cooperation with FDA and FinCEN investigations—the information documented here will be released publicly and provided directly to:

- Federal regulators (FDA/DOJ, DEA, FinCEN),
- State boards of pharmacy and health departments in Oregon and Wyoming,
- Major payment networks and gateways to trigger merchant-account termination, and
- The broader peptide and research-chemical industry, so legitimate operators can distance themselves from an enterprise that contaminates the entire sector's reputation.

This is not a threat; it is a last-chance invitation for the principals behind Researchem.is to avert far more damaging enforcement and publicity by coming into compliance now. If no public response or verifiable remedial action is received within **48 hours**, the disclosure package disseminated to more than 300 U.S. peptide and research-chemical companies, as well as to relevant journalists and watchdog organizations, to ensure the fastest possible accountability.

The facts—and the law—are not on Researchem's side. Transparency, enforcement, and consumer protection are.

Phase 1 of emails:

Phase 2 of Emails

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- vdp@ci.irs.gov
- phishing@irs.gov
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- usms.wanted@usdoj.gov
- police@portofportland.com
- hello@trimet.org
- help@oregonconsumer.gov
- DFR.FinancialServicesHelp@oregon.gov
- MostWanted@usss.dhs.gov
- spam@uspis.gov
- ATFTips@atf.gov
- info@dea.gov
- FRC@fincen.gov
- whistleblower@cftc.gov
- dased@mcda.us
- restitution@mcda.us
- media@mcda.us
- districtattorney@clackamas.us
- nexus.dor@dor.oregon.gov
- marijuanatax.dor@dor.oregon.gov
- osbp.help.dor@dor.oregon.gov
- questions.dor@dor.oregon.gov
- alcohol@olcc.oregon.gov
- alconol@cloc.crogon.gov
- deqinfo@deq.oregon.gov
- ask.osfm@osfm.oregon.gov
- complaintresource@omb.oregon.gov
- info@omb.oregon.gov
- AttorneyGeneral@doj.oregon.gov
- cvsd.email@doj.state.or.us
- puc.consumer@puc.oregon.gov
- info@oda.oregon.gov
- naturalresource-complaints@oda.oregon.gov

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