PATIENTS RISING

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November 18, 2026

Dr. Heidi Overton
Deputy Assistant to the President for Domestic Policy
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Re: Enforcement Against the Black Market for Experimental Weight-Loss Compounds

Dear Dr. Overton,

I am writing on behalf of Patients Rising and the patients and caregivers in our community about a danger that is growing faster than the rules meant to stop it: the online black market for experimental weight-loss compounds that have not yet finished clinical trials. The FDA has received at least two reports of deaths this year and more than a dozen reports of hospitalizations involving products sold under the name of one of these investigational therapies, and the nation's poison centers logged nearly twice as many exposures to that product in the three months ending in September as in the three months before. Those reports are unverified and the cause is not yet known, but testing already tells us enough to act. Australia's drug regulator found a vial sold under this name that held a different weight-loss drug and none of the compound on its label, and a recent news investigation found a vial, bought at a corner store, with no active drug at all, only a cosmetic filler and bacterial contamination.

Patients Rising works on behalf of patients and caregivers to make health care safer, more affordable, and easier to reach. On this issue, safety and access cannot be separated. Patients deserve real, tested medicine from a source they can trust, under the care of a clinician who knows them, which is exactly why this market alarms us. When a promising therapy is still in trials, or when an approved one is out of reach because of cost, coverage, or a long wait, people go looking for another way. Overseas suppliers and domestic resellers are ready for them, selling unapproved injectables under thin "research use only" labels and marketing them through social media, influencers, wellness clinics, and even corner stores. The patient who buys one has no way of knowing what is in the vial, and every sale undercuts the clinical trials that exist to tell patients whether a therapy is safe and whether it works.

Our concern here is specific: investigational drugs that are still in clinical trials, and products sold as "research use only" that are plainly meant for people. We take no position in this letter on the separate question of which wellness peptides licensed pharmacies may compound. The tools to protect patients from this market already exist, and we would welcome your leadership in seeing that they are put to full use.

First, enforce the statutes already on the books. The FDA has sent more than a dozen warning letters to sellers of this one compound since 2024, and the trade has kept growing. Selling an unapproved new drug violates section 505(a) of the Federal Food, Drug, and Cosmetic Act, and products labeled "research use only" but plainly intended for people lack the adequate directions for use required under section 502(f)(1). When vendors keep selling after a warning, FDA should refer them to the Department of Justice, so that the "research use" label stops working as a shield.

Second, secure the supply chain at the border. Much of this product originates with overseas manufacturers, and import records show shipments of this compound entering the country this year. Closer coordination among FDA, Customs and Border Protection, and federal law enforcement could stop those shipments before they reach American doorsteps.

Third, bring accountability to the people doing the selling. That includes the affiliate marketers and influencers who promote these products and the clinics and practitioners who supply them to patients outside of a clinical trial. We would also encourage the administration to work with the online platforms where these products are promoted to help keep them off those sites and get investigators what they need.

Enforcement is only half the answer. Black markets grow where patients feel shut out of the legitimate one, so the surest long-term protection is a system that gets safe, proven therapies to patients without needless delay or cost barriers. Patients Rising would welcome the chance to meet with you and your Domestic Policy Council colleagues to share what we hear from patients and to work with your office on both halves of that solution.

Yours in Advocacy,

Terry Wilcox

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