May 20, 2026

The Honorable Markwayne Mullin
Secretary
U.S. Department of Homeland Security
Washington, DC 20528

Cc:

The Honorable Marco Rubio
Secretary
U.S. Department of State
Washington, DC 20451

Dear Secretaries Mullin and Rubio,

We write jointly to bring to your attention compelling new evidence that Pop Mart, the Chinese consumer-products company whose "Labubu" plush dolls are among the fastest-growing collectible toys in the United States, is selling merchandise made with cotton sourced directly from the Xinjiang Uyghur Autonomous Region. Xinjiang is a territory where the U.S. Department of State has formally determined that genocide and crimes against humanity are occurring, and which the Victims of Communism Memorial Foundation has identified as the world's largest contemporary system of state-imposed forced labor. There, up to three million Uyghurs and other ethnic groups are at risk of coerced work.

An independent laboratory conducted isotopic analysis, verified by The New York Times, of twenty Labubu dolls sourced in the United States, and it found that sixteen of them contained cotton traceable to Xinjiang farms.

This finding is consistent with Pop Mart's public posture on Xinjiang cotton. When Adidas pledged to avoid sourcing from the region due to forced labor concerns, Pop Mart, under CEO Wang Ning, terminated its partnership with Adidas and defended Xinjiang cotton in Chinese court filings, accusing Adidas of having "baselessly smeared Xinjiang for violations of human rights" and "seriously hurt the feelings of the Chinese people." Pop Mart's Xinjiang nexus is not incidental; it is a matter of corporate record.

The forced labor system that feeds Pop Mart's supply chain is setting records. In 2025 alone, Chinese authorities carried out 3.36 million "labor transfers" — forced relocations of Uyghurs and other ethnic groups to farms and factories — the highest annual figure ever recorded and exceeding the government's own quota by 22 percent. Refusal to participate is punished with short-term detention under conditions that a former Han Chinese police officer who supervised the system described as "intentionally subjected to hardship and suffering" until compliance is obtained. Worker consent is rendered structurally impossible by the system's design.

Xinjiang produces over 90 percent of China's cotton and roughly 20 percent of the global supply. Textile hubs in Guangdong and Hebei, where Pop Mart concentrates production, are fed by regular cotton trains from Xinjiang. Under these conditions, a genuinely clean cotton supply chain within the People's Republic of China is all but impossible to maintain.

Far from retreating under Western pressure, Beijing has doubled down. When Chen Xiaojiang took over as Xinjiang's party secretary in July 2025, his first factory visit was to Aksu Huafu Color Spinning — a company already sanctioned under the Uyghur Forced Labor Prevention Act. There he called for expanding the cotton and textile sectors to increase "employment capacity" and spoke of the need to "control the belly and the mind" of the population. Under Chen's predecessor Ma Xingrui, Xinjiang's direct exports to the United States, Canada, the United Kingdom, and the European Union surged 465 percent from 2021 to 2025, rising a further 71 percent between 2024 and 2025 alone. Xinjiang's yarn output rose 20 percent in 2025, and fabric production jumped 36 percent.

The scale of Pop Mart's U.S. market makes the urgency acute. Pop Mart has announced plans to expand its U.S. retail footprint and membership base over the next years. This should serve as a warning sign of an intensifying flow of goods into American retail channels and consumers' homes—all with presumptive exposure to forced labor.

Recommended Enforcement Actions

The Department of Homeland Security has clear statutory authority to act. We urge that:

1. Under the Uyghur Forced Labor Prevention Act (UFLPA), U.S. Customs and Border Protection (CBP) should immediately detain and test all Pop Mart shipments tied to manufacturing hubs in Guangdong, Hebei, and Zhejiang, applying UFLPA's rebuttable presumption against goods with any Xinjiang nexus.
2. Based on the independent isotopic testing results, Xinjiang sourcing patterns, and Pop Mart's own public defense of Xinjiang cotton, the Forced Labor Enforcement Task Force (FLETF) should add Pop Mart to the UFLPA Entity List under Section 2(d)(2)(B) of the Act.

These actions fall within your established enforcement authority and would protect American consumers, retailers, and manufacturers from unwitting participation in forced labor supply chains, while signaling that consumer novelty goods are not exempt from U.S. law.

We stand ready to work with the Department, U.S. Customs and Border Protection, and the Forced Labor Enforcement Task Force to provide additional investigative detail and support public awareness efforts. Dr. Adrian Zenz, Senior Fellow and Director in China Studies at the Victims of Communism Memorial Foundation, and our research team are available to brief Department staff on the underlying forensic methodology and evidence at your earliest convenience.

Thank you for your attention to this urgent matter.

Respectfully,

Dr. Eric Patterson
President and CEO
Victims of Communism Memorial Foundation

Michael Lucci
CEO
State Armor