



May 9, 2022

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, SW, Room 112-A
Washington, DC 20436

*Re: Certain Plant-Derived Recombinant Human Serum Albumins (“rHSA”) and Products
Containing Same, Inv. No. 337-TA-1238*

Dear Secretary Barton:

The Kansas Chamber of Commerce respectfully submits these comments to the U.S. International Trade Commission (ITC) in relation to the above-referenced proceeding. Headquartered in Topeka, the Kansas Chamber is the leading statewide, member-driven organization that serves as the most credible policy voice for the Kansas business community. The Kansas Chamber strives to improve the economic climate for the benefit of every business and citizen. The Kansas Chamber has fought for businesses, both large and small, since 1924.

In response to the Commission’s notice of April 8, 2022, I write to convey the significance of the Complainant in this case—Ventria Bioscience Inc.—to our state of Kansas and to the U.S. economy more broadly. Ventria is a privately held company based in Junction City, Kansas and Aurora, Colorado. Ventria is a recognized leader in the field of plant-based expression of recombinant proteins. Ventria has invested enormous resources in not only developing this novel technology, but also in establishing the industry itself and achieving commercial acceptance of the resulting products. Ventria’s products are all developed and made entirely in the United States; thus, the company is advancing scientific progress while creating good-paying American jobs.

Ventria has faced repeated unfair competition and economic espionage from China, with one instance even resulting in a high-profile criminal prosecution of individuals who stole the company’s proprietary rice seeds. In the instant case, I understand that the Administrative Law Judge found that Respondent Wuhan Healthgen Biotechnology Corp.—which I understand was

founded by a former Ventria employee—and its U.S. distributors have violated Section 337 by importing and selling rHSA products that infringe one of Ventria’s U.S. patents.¹

The Kansas Chamber submits that exclusion of the infringing products from the U.S. market would **advance** the U.S. public interest. First, it is crucial to protect innovative American companies from unfair foreign competition. Second, the challenges faced by Ventria dovetail with broader U.S. policy concerns relating to China.² Third, the Kansas Chamber understands that Ventria is fully prepared to replace the excluded products with its domestically manufactured rHSA, and that ample alternative products exist. In sum, I respectfully encourage the ITC to issue robust remedial relief for Ventria.

Thank you very much for considering this submission. Please feel free to contact me with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Alan Cobb'.

Alan Cobb
Kansas Chamber
President & CEO

¹ I further understand that Wuhan Healthgen’s distributors were found in default, and that the Administrative Law Judge also recommended remedial orders against those entities in relation to violations of the Lanham Act for failing to label the accused products as being Made in China.

² See “The Threat Posed by the Chinese Government and the Chinese Communist Party to the Economic and National Security of the United States,” Speech by FBI Director Christopher Wray, July 7, 2020, available at <https://www.fbi.gov/news/speeches/the-threat-posed-by-the-chinese-government-and-the-chinese-communist-party-to-the-economic-and-national-security-of-the-united-states>.