



DAVID CHIU
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November 1, 2023

**VIA FIRST CLASS MAIL, EMAIL, AND
PERSONAL SERVICE ON REGISTERED AGENT**

David A. Zapolsky
Senior Vice President & General Counsel
Amazon.com, Inc.
410 Terry Ave. North
Seattle, Washington 98109
david.zapolsky@amazon.com
davidz@amazon.com

Re: Sales of Illegal License Plate Covers

Dear Mr. Zapolsky:

It has come to my attention that Amazon.com, Inc. and Amazon.com Services LLC (collectively “Amazon”) is selling license plate covers that obscure or are intended to obscure license plate numbers to California residents. The sale of such license plate covers is prohibited by California law—and for good reason. License plate covers that obscure the plate numbers impede the ability of law enforcement to investigate and apprehend individuals engaged in criminal activities, such as sideshows, thefts, and robberies. As such, by this letter, I demand that Amazon cease and desist from offering these illegal license plate covers for sale to residents of California.

California law criminalizes selling any “product or device that obscures, or is intended to obscure, the reading or recognition of a license plate by visual means, or by an electronic device.” Veh. Code § 5201.1(a). Several products for sale on Amazon—illustrative examples of which are included in Attachment A—are clearly intended to, and do, obscure the reading and recognition of the license plates they cover. These products include electronic plate covers that hide a license plate at the press of a button, kits that allow users to wrap their official license plates with vinyl and change the numbering, and covers with a dark or smoked tint.

Amazon is aware that these license plate covers are illegal and being used to facilitate illegal conduct and evade law enforcement. Amazon has a stated policy prohibiting the sales of illegal products and devices—including a specific policy prohibiting “license plate covers intended to obscure the reading or recognition of a license plate.”¹ Moreover, product

¹ *Restricted Products*, Amazon.com, <https://sellercentral.amazon.com/help/hub/reference/external/200164330> (last visited October 30, 2023); *Automotive and powersports*, Amazon.com, <https://sellercentral.amazon.com/help/hub/reference/external/G200164410> (last visited Oct. 31, 2023).

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descriptions and reviews on Amazon’s website openly state that the products are illegal. For example, a user of one electronic license plate cover available on Amazon’s website boasts that it “[w]orks well for running from cops,” while another reviewer notes that they have “gotten out of a lot of tickets and [sic] red light cameras.” Attachment A at p. 1. One electronic license plate cover is described as hiding a license plate in “just . . . 1.5 seconds” to “meet your urgent needs.” *Id.* at p. 2. And reviews of tinted plate covers are replete with users noting that the covers are illegal, including in California, because they obscure the vehicle’s license plate. *Id.* at pp. 3-4. Nevertheless, these and numerous other illegal license plate covers continue to be available for sale on Amazon’s website—despite Amazon’s claim that it has systems in place to review and prevent the sales of illegal products.²

The sale of these illegal license plate covers endangers the public welfare in San Francisco and throughout California by promoting illegal conduct and obstructing law enforcement investigations. The San Francisco Police Department routinely encounters license plate covers like the ones Amazon offers for sale on cars involved in illegal sideshows—demonstrations of illegal stunt driving that are frequently accompanied by gun violence and property damage, and which pose serious public safety hazards to the community. Illegal license plate covers have also been affixed to vehicles involved in thefts, robberies, and toll evasion in California. The use of such license plate covers prevents law enforcement from identifying and tracking drivers who participate in these illegal activities and contributes to criminal conduct in San Francisco and throughout California. The sale of each of the kinds of license plate covers identified in this letter and the accompanying Attachment A is illegal under the California Vehicle Code and actionable under California’s Unfair Competition Law (“UCL”), Bus. & Prof. Code §§ 17200 *et seq.*, which prohibits any unlawful, unfair, or fraudulent business act or practice. Under the UCL, my Office is authorized to seek statewide relief for unlawful business practices, including civil penalties of up to \$2,500 per violation.

In an effort to address this unlawful conduct without the need for litigation, please confirm that Amazon will stop selling any license plate covers that obscure or are intended to obscure the reading or recognition of a license plate to California addresses. This includes: (1) electronic license plate covers that flip over, retract, or deploy a drop-down screen to obscure the license plate, (2) kits that facilitate the wrapping of license plates in vinyl, and (3) smoked or tinted license plate covers. Please provide the requested confirmation within twenty-eight (28) days of the date of this letter to Deputy City Attorneys David Louk and Karun Tilak, 1390 Market Street, 7th Floor, San Francisco, CA 94102 (david.louk@sfcityatty.org; karun.tilak@sfcityatty.org). I anticipate that Amazon will stand by its pledge not to sell illegal license plate covers intended to obscure license plates and will provide the requested confirmation. However, if it does not, we reserve the right to pursue all legal remedies, including enforcement actions, to ensure that Amazon does not continue to sell these illegal products to California residents.

² *Restricted Products*, *supra* n. 1; *Additional information and resources for sellers about our Restricted Products Policy*, Amazon.com, <https://sellercentral.amazon.com/help/hub/reference/external/G201567350> (last visited Oct. 30, 2023).

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Should you have any questions, please contact Mr. Louk or Mr. Tilak at 415-554-4700. I appreciate your prompt attention to this matter.

Very truly yours,



DAVID CHIU
City Attorney

Encl.: Attachment A

CC: Jennifer Cruickshank
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Attn: Legal Department – Legal Process


Attachment A Examples of Illegal License Plate Covers Available on Amazon.com

Below are examples of illegal license plate covers available on Amazon.com. This list is not intended to be exhaustive, and we are aware of additional similar products offered for sale on Amazon.

I. Electronic License Plate Covers

A. Example 1¹

[Back to results](#)



Withstand the sunshine, rain, and any tough environment.
Roll over image to zoom in

Withstand the sunshine, rain, and any tough environment.
Roll over image to zoom in

Tutor Auto Car License Plate, Electric License Plate Holder for US Universal License(Black)

Visit the Tutor Auto Store
4.0 ★★★★★ 88 ratings | 3 answered questions

-24% \$47⁹⁹
Typical price: \$62.99

FREE Returns
Prime Day Deal Join Prime to buy this item at \$47.99

Get \$100 off instantly: Pay \$0.00 upon approval for the Amazon Store Card.

Available at a lower price from other sellers that may not offer free Prime shipping.

Color	Black
Brand	Tutor Auto
Material	Iron, Plastic
Vehicle Service Type	Car
Item Dimensions LxWxH	12.4 x 6.7 x 0.01 inches

About this item

- FITMENT** - Fit ANY US standard vehicle that has a flat surface under the bumper cover, the size of this license plate frame is 12 x 6x 1 inches, and comes with all hardware.
- EASY TO INSTALL**- This electric license plate frame can be installed in only takes 5-10 minutes.(Please feel free to contact us via email if you need user's manual)
- PREMIUM QUALITY** - Made of iron and plastic, never get rust.The cushion use aging-prevent army used canvas, can withstand the sunshine, rain, and any tough environment.
- AFTER-SALE SERVICE**- Order from Tutor Auto, if you have any problem please feel free to contact us we will solve it , offer you true hassle-free shopping experience.
- EASY TO USE**-Very convenient and easy to use.

[See more product details](#)

Prime Exclusive Deal
\$47⁹⁹


Prime Exclusive Deal
This deal is exclusively for Amazon Prime members.
[Join Prime](#)
Cancel anytime
Already a member? [Sign in](#)


Buy new:
\$59⁹⁹
FREE delivery: Sunday, July 16
Ships from: Amazon
Sold by: Skyyee-blue

Save with Used - Good
\$49⁵⁷
FREE delivery: Sunday, July 16
Ships from: Amazon
Sold by: Amazon Warehouse

[Add to List](#)

New & Used (5) from \$49³⁷ & **FREE Shipping**

 **Adel**
★★★★★ **Works well for running from cops!**
Reviewed in the United States on May 31, 2023
Verified Purchase
Works well for running from cops! Press a single button then disappear knowing they won't come to your house!

 **Joey**
★★★★★ **Works awesome super cool**
Reviewed in the United States on May 11, 2023
Verified Purchase
Works really good and smooth worked in all types of weather super slick and discreet gotten out of a lot of tickets nd red light cameras speed cameras

¹ <https://www.amazon.com/Tutor-Auto-License-Electric-Universal/dp/B09VX7NPWT/> (last visited Oct. 31, 2023).

B. Example 2²



SOLRIMANA Auto Car License Plate,2 Pack Black Car License Plate Cover,Universal US Car Electric License Plate Bracket Holder with Remote Control,Durable Weather-Proof Automatic License Plate,Black

Brand: SOLRIMANA
5.0 ★★★★★ 1 rating

\$120⁰⁰

Coupon: Apply \$10 coupon Shop items > | Terms

Get \$60 off instantly: Pay \$60.00 ~~\$120.00~~ upon approval for the Amazon Store Card. No annual fee.

Brand	SOLRIMANA
Vehicle Service Type	Car
Product Dimensions	6.8"L x 13.4"W

About this item

An advertisement for SOLRIMANA License Plate Frame Covers. The left side features a dark background with the text "License Plate Frame Covers 2 Pack" in white and red. Below this, there are three bullet points: "High quality", "Remote retractable", and "Hidden flip fins invisible". A small inset image shows the product components. The right side of the advertisement shows a blue BMW car with the license plate area covered by the product. The SOLRIMANA logo is in the top right corner.

Universal US Car Electric License Plate Bracket Holder with Remote Control

Features:


- Fast moves,just need 2 seconds
- Safeguarding the personal privacy;
- Same as the common car license plate, pretty appearance and covert;
- Anti-rust,stable quality,for long term use.
- Fast moves,just need 1.5 seconds,can meet your urgent needs

² <https://www.amazon.com/SOLRIMANA-Universal-Electric-Weather-Proof-Automatic/dp/B0CG5V78TS/> (last visited Oct. 31, 2023).

II. Tinted License Plate Covers

A. Example 1³

Automotive › Exterior Accessories › License Plate Covers & Frames › Covers



EWBN, 2 Pcs License Plates Cover Black Unbreakable Dark Design, Fits All Standard 6x12 Inches License Plates, Protect Your Front & Back License Plates

Brand: EWBN
4.5 ★★★★★ 1,512 ratings
Amazon's Choice in License Plate Covers by EWBN
2K+ bought in past month

\$11.97

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Coupon: Apply 5% coupon Shop items | Terms

Get \$50 off instantly: Pay \$0.00 ~~\$44.97~~ upon approval for Amazon Visa. No annual fee.

Color: Black

Color: Black \$11.97
Color: Silver \$10.97
Color: White \$11.97

Color	Black
Brand	EWBN
Vehicle Service Type	Car, Truck
Item Dimensions LxWxH	12 x 6 x 0.01 inches
Fit Type	Standard

prime
Enjoy fast, FREE delivery, exclusive deals and award-winning movies & TV shows with Prime
Try Prime and start saving today with Fast, FREE Delivery

Delivery Pickup

\$11.97

Get Fast, Free Shipping with Amazon Prime
FREE Returns

FREE delivery Sunday, September 17 on orders shipped by Amazon over \$35
Or fastest delivery Wednesday, September 13. Order within 7 hrs 39 mins

Choose location for most accurate options

In Stock

Qty: 1

Add to Cart Buy Now

Jennie Robertson

★★★★★ You'll get pulled over

Reviewed in the United States on August 29, 2023

Color: Black | Verified Purchase

Bought this plate, had it on my car for less than 48 hours and got pulled over 😬 didn't get a ticket but I was told I needed to remove the plate cover. I'm in NC. But other than that the plate is perfect, it's sturdy and dark just as it shows! Not dark enough you can't see the numbers though

One person found this helpful

Helpful

Report

Alessandra R.

★★★★★ Dark Dark

Reviewed in the United States on August 26, 2023

Color: Black | Verified Purchase

These license plates covers are extremely dark. I got pulled over by a cop because he said he couldn't see them within a certain distance. I'll agree. It's very hard to see, but that's why I bought them. 😊

4 people found this helpful

Helpful

Report

Goth Batty

★★★★★ Illegal in Georgia

Reviewed in the United States on August 20, 2023

Color: Black | Verified Purchase

Got pulled over. These are illegal in Georgia. I'll sell it online to someone else.

Helpful

Report

Alex C.

★★★★★ Super dark...looks great.

Reviewed in the United States on July 20, 2023


Color: Black | Verified Purchase

Quality martial and darker than the pictures make it seem. You literally can't read your license plate unless you're right behind it, or if there's a ton of sun hitting it. Much better than I expected.

³ <https://www.amazon.com/License-Plates-Unbreakable-Standard-Protect/dp/B0B8NRBZ13/> (last visited Oct. 31, 2023).

B. Example 2⁴

← Back to results



Roll over image to zoom in

BLVD-LPF OBEY YOUR LUXURY Unbreakable License Plate Shields - [Pack of 2] Tinted, Novelty Plate Covers with Fastening Screws, Screw Driver | Automotive Accessories

Visit the BLVD-LPF OBEY YOUR LUXURY Store
4.6 ★★★★★ 11,348 ratings | 96 answered questions

\$10⁹⁵

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Get \$100 off instantly. Pay \$0.00 ~~\$40.00~~ upon approval for the Amazon Store Card. No annual fee.

Available at a lower price from other sellers that may not offer free Prime shipping.

Local Business

Material	Polycarbonate
Fit Type	Universal Fit

Color	Tinted
Brand	BLVD-LPF OBEY YOUR LUXURY
Vehicle Service Type	Car

About this item

- **TINTED LICENSE PLATE COVER:** Secure your car license plate using this tinted cover flaunting a gloss finish. It protects your car plate from weather elements and adds a desired sporty look to your automotive and ensures security of your unique number.
- **UNBREAKABLE LICENSE SHIELD:** Crafted from highly durable and unbreakable polycarbonate material, this number plate cover is a smart addition to any car. Securely fasten the license plate shield to your car and drive along.
- **ENHANCED UV PROTECTION:** The unbreakable plate cover features a clear UV protection coating that prevents fading of the license plate even when the car is parked in direct sunlight. The polarized lens plate cover is made to withstand regular car wash and weather conditions.
- **COMPATIBILITY:** This polycarbonate number plate cover is designed to fit all standard license plates in the United States. It effortlessly fits standard Canada and Mexico sized license plates.
- **PRODUCT SPECIFICATIONS:** The novelty plate cover kit includes 2 Tinted License Plate Covers including screws, screw caps, and screw driver.

[See more product details](#)

prime

Enjoy fast, FREE delivery, exclusive deals and award-winning movies & TV shows with Prime
Try Prime and start saving today with Fast, FREE Delivery

\$10⁹⁵

Get Fast, Free Shipping with Amazon Prime
FREE Returns

FREE delivery Wednesday, July 19 on orders shipped by Amazon over \$25

Or fastest delivery Sunday, July 16. Order within 15 hrs 18 mins

Select delivery location

In Stock

Qty: 1

Add to Cart

Buy Now

Payment: Secure transaction
Ships from: Amazon
Sold by: BLVD-LPF COM
Returns: Eligible for Return, Refund or Replacement within 30 days of receipt

Add a gift receipt for easy returns

Add to List

Amazon Customer

★★★★★ **Might get stopped**
Reviewed in the United States on May 3, 2021
Verified Purchase

...for both me and my boyfriend because he really wanted them, unfortunately I got pulled over because it's "not readable" to the cops in my town. but I have many cops and state troopers behind my car and they never pulled me over. [Read more](#)

Helpful | Report

Brian Perez

★★★★☆ **Not legal in FL**
Reviewed in the United States on June 30, 2022
Verified Purchase

I had this for like 2 weeks and got pulled over for it at 3am in Miami Florida, I do like that no cops or tolls can see ur plate but it came with the risk of being pulled over and I got a citation for it

Helpful | Report

Eddie

★★★★★ **This product is illegal atleast in california got pulled over lol**
Reviewed in the United States on February 18, 2022
Verified Purchase

this product is very good, looks good, easy to install and sturdy! Also illegal so be careful around cops otherwise great product

Helpful | Report

Annette

★★★★★ **Illegal in Converse, Texas**
Reviewed in the United States on May 7, 2023
Verified Purchase

...is the perfect shade....Downside is after 2 months of having it on my truck I got pulled over. I was given NO warning and blessed with a lovely citation. The ticket was \$175 and the officer said its illegal. [Read more](#)

3 people found this helpful

Helpful | Report

Matt K

★★★★★ **Nice set but know your local laws**
Reviewed in the United States on January 8, 2023
Verified Purchase


...smoked. Unfortunately if you live in an area with strict license plate enforcement, you will be risking a ticket. I didn't realize that until I got pulled over. Keep this in mind before purchasing. [Read more](#)

5 people found this helpful


Helpful | Report

⁴ <https://www.amazon.com/BLVD-LPF-OBEY-YOUR-LUXURY-Unbreakable/dp/B07RYJK4W9> (last visited Oct. 31, 2023).

III. Vinyl Wrap License Plate Covers⁵



Roll over image to zoom in



California License Plate Wrap Kit Black & White 50 States Customizable 50 Unique Color Options 3M Vinyl Wrap Custom Decal DIY Kit Weather Resistant 6"x12" Universal Fit

Brand: Generic
5.0 ★★★★★ 3 ratings


\$29⁹⁹

Get \$60 off instantly: Pay \$0.00 upon approval for the Amazon Store Card.

Local Business

Size: California

Color: Black/White



Brand	Generic
Color	Black/White
Item Dimensions LxWxH	15 x 7 x 0.5 inches
Room Type	Bedroom
Cartoon Character	Bubble
Special Feature	Weatherproof

See more

Installation Type	Self-Adhesive	Shape	Rectangular
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About this item

\$29⁹⁹

FREE delivery **Monday, September 18.** [Details](#)

Or fastest delivery **September 13 - 14.** [Details](#)

Choose location for most accurate options

In Stock

This product needs to be customized before adding to cart.

[Customize Now](#)

By clicking "Customize", you agree to these [Terms and Conditions](#).

Payment: [Secure transaction](#)


Ships from: [PlateWrapsUS](#)

Sold by: [PlateWrapsUS](#)

Returns: [Eligible for Refund or Replacement if damaged or defective](#)

[Add to List](#)

Have one to sell?
[Sell on Amazon](#)



Wrapping Your Car in 10 Minutes

⁵ <https://www.amazon.com/California-License-Customizable-Resistant-Universal/dp/B0CDKGR192/> (last visited Oct. 31, 2023).