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November 1, 2023

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

Marie Oh Huber  
Senior Vice President & Chief Legal Officer  
eBay, Inc.  
2025 Hamilton Ave.  
San José, California 95125  
mhuber@ebay.com

Re: Sales of Illegal License Plate Covers

Dear Ms. Huber:

It has come to my attention that eBay, Inc. (“eBay”) 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 sidseshows, thefts, and robberies. As such, by this letter, I demand that eBay 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 eBay—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.

eBay should already be aware that these license plate covers are illegal and being used to facilitate illegal conduct and evade law enforcement, because product descriptions and reviews on its website openly state so. For example, electronic license plate covers available on eBay are described as “license plate hider[s],” as providing a “[r]olling shutter [that] helps hide your license plate numbers,” and as “covert” and needing “just . . . 1.5 seconds” to deploy. Attachment A at pp. 1-2. Several tinted license plates are explicitly advertised as evading red light, speed, and toll cameras. See, e.g., *id.* at p. 4. Yet despite eBay’s stated policy prohibiting the sales of illegal products and devices—including products that “might enable or encourage

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illegal activity”—and the company’s policy of removing listings it determines to be illegal, these and numerous other illegal license plate covers continue to be available for sale on its website.<sup>1</sup>

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 eBay 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 eBay 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 eBay will stand by its pledge not to sell products that enable or encourage illegal activity 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 eBay does not continue to sell these illegal products to California residents.

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<sup>1</sup> *Encouraging Illegal Activity Policy*, eBay.com, <https://www.ebay.com/help/policies/prohibited-restricted-items/encouraging-illegal-activity-policy?id=4339> (last visited Oct. 31, 2023); *User Agreement*, eBay.com, <https://www.ebay.com/help/policies/member-behaviour-policies/user-agreement?id=4259> (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: eBay, Inc.  
c/o CT Corporation System  
330 N. Brand Blvd  
Glendale, CA 91203

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

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

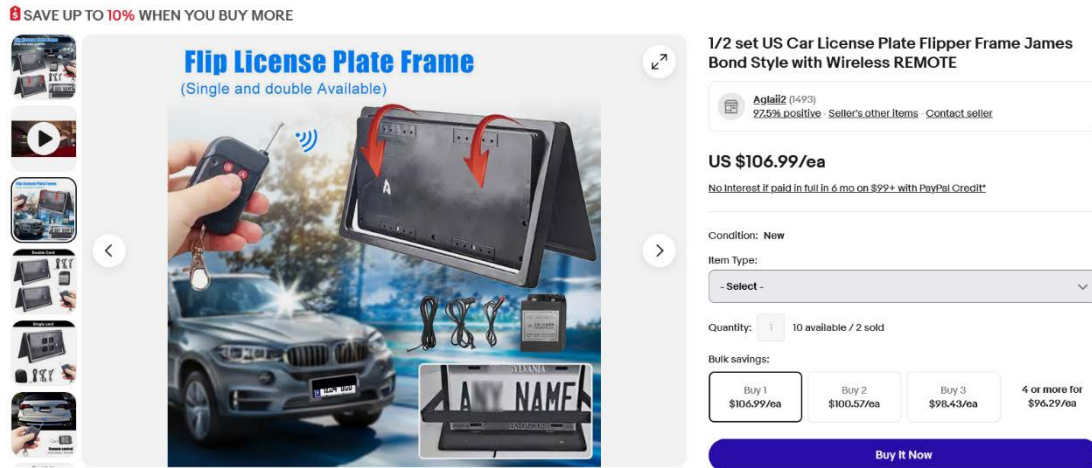
**I. Electronic License Plate Covers**

**A. Example 1<sup>1</sup>**



The screenshot shows an eBay listing for a "TX License Plate Hider/ Cover/ Curtain FRAME for US License Plates with remote!". The product is shown in two states: one with a black cover and one with a California license plate that says "HIDE-AWAY". The listing includes a price of US \$89.00/ea, bulk savings options, and a "Buy It Now" button. The seller information shows a 100% positive feedback rating.

**B. Example 2<sup>2</sup>**



The screenshot shows an eBay listing for a "1/2 set US Car License Plate Flipper Frame James Bond Style with Wireless REMOTE". The product is shown in a "Flip License Plate Frame" state, which is "Single and double Available". The listing includes a price of US \$106.99/ea, bulk savings options, and a "Buy It Now" button. The seller information shows a 77.5% positive feedback rating.

**Product Description**

Description:

1. [Electric License Plate] This electric license plate contains shutters, which can quickly cover your license plate and protect your personal privacy.
2. [Remote Control Function] Equipped with a remote control, it is very convenient to control the shutter switch of the license plate with a single touch from a distance.

<sup>1</sup> <https://www.ebay.com/itm/314674601481> (last visited Oct. 30, 2023).

<sup>2</sup> <https://www.ebay.com/itm/364489231406> (last visited Oct. 30, 2023).

### C. Example 3<sup>3</sup>

**1 Set of Car License Plate Frame Cover Black w/ Remote Control For US Standard**

Condition: New  
Quantity: 1 10 available

Price: **US \$46.85**

Best Offer:

Shipping: Free Standard Shipping. [See details](#)

Shop with confidence  
eBay Money Back Guarantee  
Get the item you ordered or your money back.  
[Learn more](#)

Seller information  
[pinas\\_333](#) (2112)  
99% positive feedback  
[Save seller](#)  
[Contact seller](#)  
[Visit store](#)  
[See other items](#)

#### Product Highlights

- This is a license plate with remote control rolling shutter.
- Fits over any standard US 6x12 Inch license plate.
- Rolling shutter helps hide your license plate numbers and is easily controlled by included remote.
- Fast moves in seconds, designed for safeguarding personal privacy.
- Made of premium iron and plastic, anti-rust and durable to use.

### D. Example 4<sup>4</sup>

**1/2Sets Car Electric License Plate Number Plate Frame Cover Black Remote Control**

Condition: New  
Package Type: - Select -  
Bulk savings: Buy 1 \$49.95/ea, Buy 2 \$48.45/ea, Buy 3 \$46.95/ea, 4 or more for \$42.46/ea  
Quantity: 1 10 available / 12 sold

Price: **US \$49.95/ea**  
Was ~~US \$55.59~~  
Save US \$5.55 (10% off)

Shipping: Free shipping and returns.

People want this. 34 people are watching this.

Shop with confidence  
Top Rated Plus  
Trusted seller, fast shipping, and easy returns.  
[Learn more](#)

eBay Money Back Guarantee  
Get the item you ordered or your money back.  
[Learn more](#)

Seller information  
[fortunate2bs](#) (2315)  
99% positive feedback  
[Save seller](#)  
[Contact seller](#)  
[Visit store](#)  
[See other items](#)

#### Features:

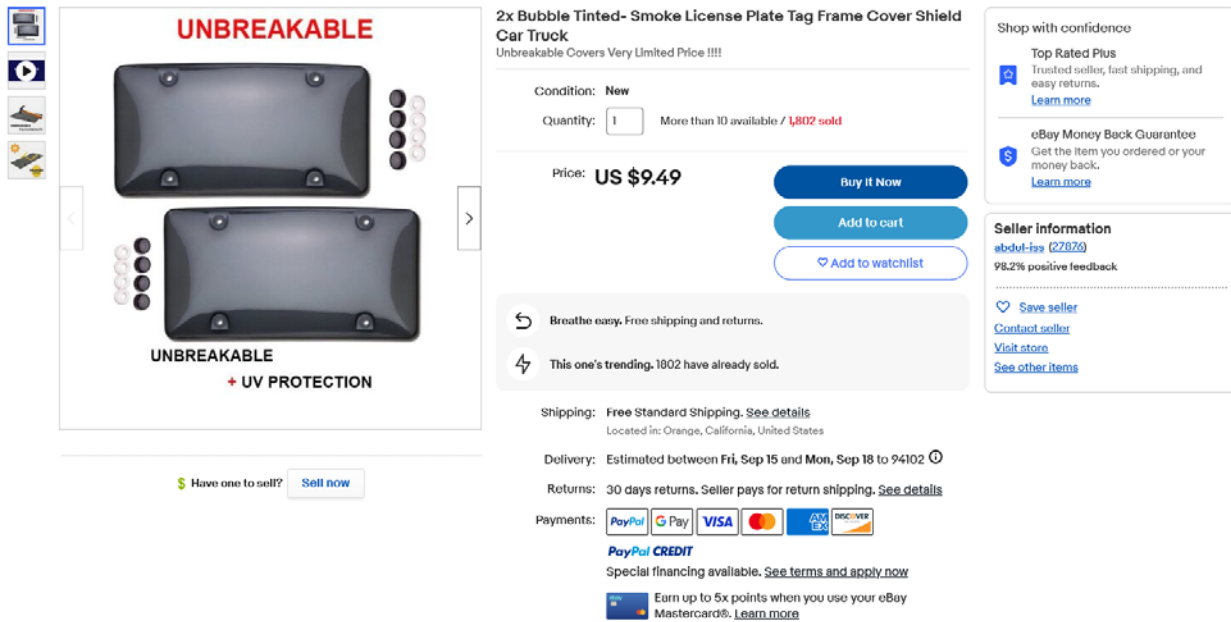
- Anti-concealed camera;
- Safeguarding the personal privacy;
- Same as the common car license plate, pretty appearance and covert;
- Anti-rust, stable quality, for long term use.
- Fast moves, just need 1.5 seconds, can meet your urgent needs
- The license frame was made by high quality car board material, high intensity, never get rust. The cushion use aging-prevent army used canvas, can completely afford the sunshine, rain, frost and any high-low temperature or worse environment.

<sup>3</sup> <https://www.ebay.com/itm/204471892082> (last visited Oct. 30, 2023).

<sup>4</sup> <https://www.ebay.com/itm/334956096294> (last visited Oct. 30, 2023).

## II. Tinted License Plate Covers

### A. Example 1<sup>5</sup>



**UNBREAKABLE**

2x Bubble Tinted- Smoke License Plate Tag Frame Cover Shield Car Truck  
Unbreakable Covers Very Limited Price !!!!

Condition: **New**

Quantity:  More than 10 available / **1,802 sold**

Price: **US \$9.49**

[Buy it Now](#)

[Add to cart](#)

[Add to watchlist](#)

[Have one to sell?](#) [Sell now](#)

**Shop with confidence**

**Top Rated Plus**  
Trusted seller, fast shipping, and easy returns.  
[Learn more](#)

**eBay Money Back Guarantee**  
Get the item you ordered or your money back.  
[Learn more](#)

**Seller information**  
**abdul-iss** (27076)  
98.2% positive feedback

[Save seller](#)  
[Contact seller](#)  
[Visit store](#)  
[See other items](#)

[Breathe easy. Free shipping and returns.](#)

[This one's trending. 1802 have already sold.](#)

Shipping: **Free Standard Shipping. See details**  
Located in: Orange, California, United States

Delivery: **Estimated between Fri, Sep 15 and Mon, Sep 18 to 94102** ⓘ

Returns: **30 days returns. Seller pays for return shipping. See details**

Payments: [PayPal](#) [iPay](#) [VISA](#) [MasterCard](#) [AM EX](#) [discover](#)

**PayPal CREDIT**  
Special financing available. [See terms and apply now](#)

[Earn up to 5x points when you use your eBay Mastercard®. Learn more](#)



by [jlyndre](#)

Aug 28, 2018

#### Incognito

Perfect. Does the job! 😊 Just... found out **illegal** in MN... The hard way. 😊😊

Verified purchase: Yes | Condition: New | Sold by: abdul-iss



by [tambey2004](#)

Oct 12, 2021

#### Illegal in CA

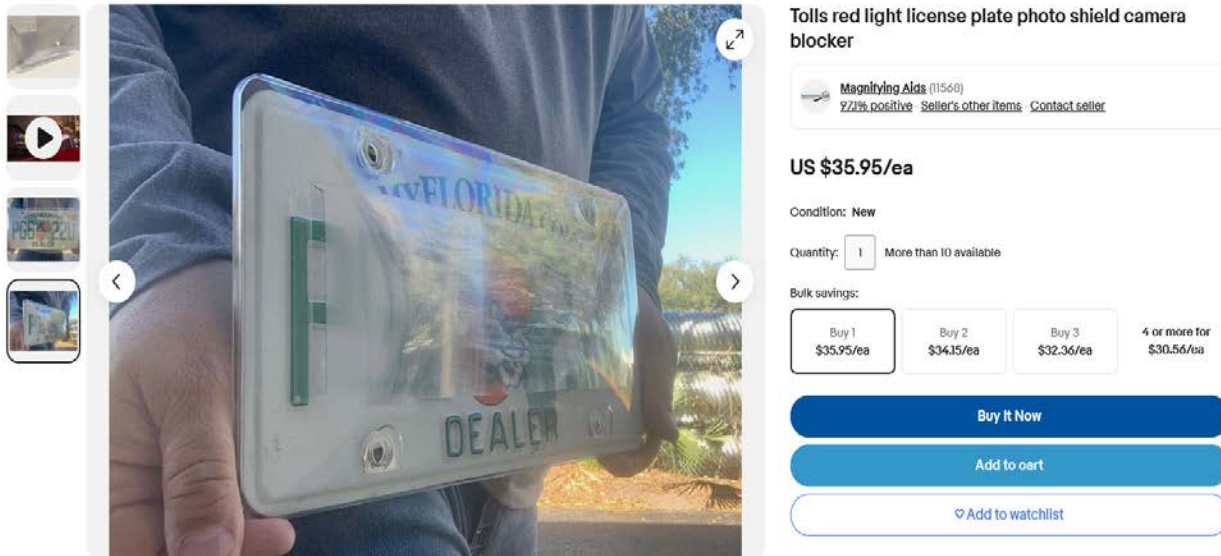
The product is good but it is **illegal** in California, too bad.

Verified purchase: Yes | Condition: New | Sold by: abdul-iss



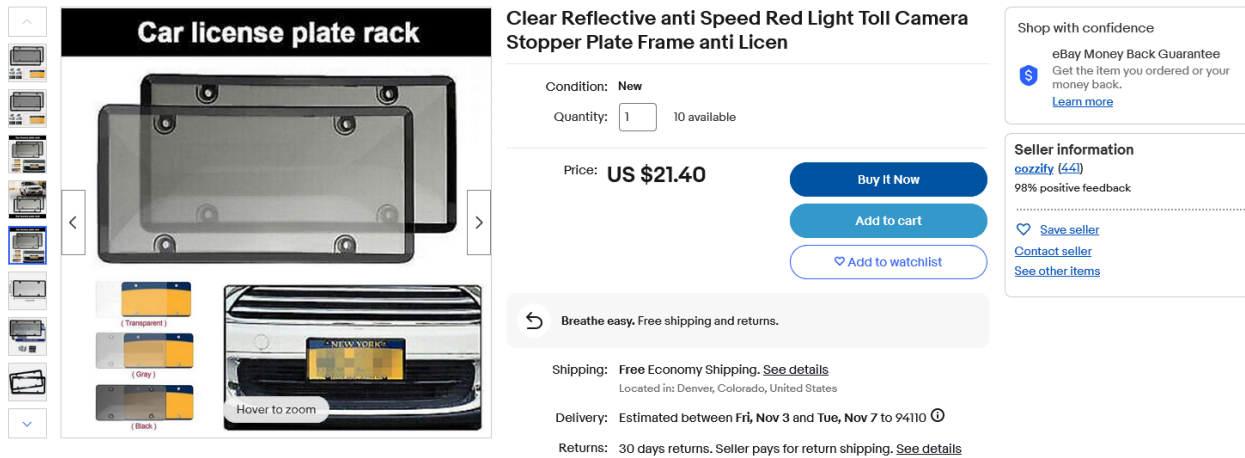
<sup>5</sup> <https://www.ebay.com/itm/2x-Bubble-Tinted-Smoke-License-Plate-Tag-Frame-Cover-Shield-Car-Truck/302719501217> (last visited Oct. 30, 2023).

## B. Example 2<sup>6</sup>



The screenshot shows an eBay product page for a 'Tolls red light license plate photo shield camera blocker'. The main image shows a person holding a clear plastic shield over a Florida license plate. The shield has a green vertical bar on the left and the word 'DEALER' at the bottom. To the right of the image, the product title is 'Tolls red light license plate photo shield camera blocker'. The seller is 'Magnifying Aids (11568)' with a 97% positive feedback rating. The price is 'US \$35.95/ea'. The condition is 'New'. The quantity is '1' with 'More than 10 available'. Bulk savings are listed: Buy 1 (\$35.95/ea), Buy 2 (\$34.15/ea), Buy 3 (\$32.36/ea), and 4 or more for \$30.56/ea. There are three buttons: 'Buy It Now', 'Add to cart', and 'Add to watchlist'.

## C. Example 3<sup>7</sup>



The screenshot shows an eBay product page for a 'Car license plate rack'. The main image shows a clear, reflective license plate rack. Below the main image are three smaller images showing the rack in 'Transparent', 'Gray', and 'Black' colors. To the right of the image, the product title is 'Clear Reflective anti Speed Red Light Toll Camera Stopper Plate Frame anti Licens'. The condition is 'New'. The quantity is '1' with '10 available'. The price is 'US \$21.40'. There are three buttons: 'Buy It Now', 'Add to cart', and 'Add to watchlist'. Below the buttons is a banner that says 'Breathe easy. Free shipping and returns.' Shipping information: 'Free Economy Shipping. See details' and 'Located in: Denver, Colorado, United States'. Delivery information: 'Estimated between Fri, Nov 3 and Tue, Nov 7 to 94110'. Returns information: '30 days returns. Seller pays for return shipping. See details'. On the right side, there is a 'Shop with confidence' section with 'eBay Money Back Guarantee' and '98% positive feedback'. Seller information: 'cozzify (44)'.


<sup>6</sup> <https://www.ebay.com/itm/115959196512> (last visited Oct. 30, 2023).

<sup>7</sup> <https://www.ebay.com/itm/225782000612> (last visited Oct. 30, 2023).

### III. Vinyl Wrap License Plate Covers

#### A. Example 1<sup>8</sup>

SAVE UP TO 5% WHEN YOU BUY MORE



DIY California Legacy License Plate Vinyl Wrap Sticker Decal  
BLACK YELLOW WHITE

Condition: **New**

Text Color: **- Select -**

Background Color: **- Select -**

California Style: **- Select -**

Bulk savings: Buy 1 \$22.99/ea Buy 2 \$21.84/ea  
2 or more for \$21.84/ea

Quantity:  More than 10 available / 73 sold

Price: **US \$22.99/ea**

[Buy It Now](#)  
[Add to cart](#)  
[Add to watchlist](#)

[Have one to sell?](#) [Sell now](#)


[This one's trending, 73 have already sold.](#)

Shop with confidence  
eBay Money Back Guarantee  
Get the item you ordered or your money back.  
[Learn more](#)

**Seller information**  
[cheaptackdeals](#) (1184)  
100% positive feedback  
[Save seller](#)  
[Contact seller](#)  
[See other items](#)

#### B. Example 2<sup>9</sup>

SAVE UP TO 15% WHEN YOU BUY MORE



California License Plate Decal Sticker Font Vinyl Wrap Custom Kit Cursive

Condition: **New**

Color: **- Select -**

Bulk savings: Buy 1 \$24.99/ea Buy 2 \$23.74/ea Buy 3 \$22.49/ea  
4 or more for \$21.24/ea

Quantity:  More than 10 available / 136 sold

Price: **US \$24.99/ea**

[Buy It Now](#)  
[Add to cart](#)  
[Add to watchlist](#)

[This one's trending, 136 have already sold.](#)

Shop with confidence  
eBay Money Back Guarantee  
Get the item you ordered or your money back.  
[Learn more](#)

**Seller information**  
[getoutdoors7](#) (11085)  
98.6% positive feedback  
[Save seller](#)  
[Contact seller](#)  
[Visit store](#)  
[See other items](#)

<sup>8</sup> <https://www.ebay.com/itm/175621043141> (last visited Oct. 30, 2023).

<sup>9</sup> <https://www.ebay.com/itm/275361686033> (last visited Oct. 30, 2023).