



DAVID CHIU  
City Attorney

Phone: (415) 554-4700  
Email: cityattorney@sfcityatt.org

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.”<sup>1</sup> Moreover, product

<sup>1</sup> *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.<sup>2</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 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.

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<sup>2</sup> *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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Page 3  
November 1, 2023

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  
Director, Public Policy & Community Affairs  
Amazon.com, Inc.  
jencrui@amazon.com

Savanna Olson  
Senior Manager, State & Local Public Policy  
Amazon.com, Inc.  
savols@amazon.com

Amazon.com Services LLC  
c/o CSC-Lawyers Incorporating Service  
2710 Gateway Oaks Drive, Suite 150N  
Sacramento, CA 95833

Amazon.com, Inc.  
c/o Corporation Service Company  
300 Deschutes Way SW, Suite 208 MC-CSC1  
Tumwater, WA 98501  
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 1<sup>1</sup>

[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%** \$47<sup>99</sup>  
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**  
\$47<sup>99</sup>


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


**Buy new:**  
\$59<sup>99</sup>  
FREE delivery: Sunday, July 16  
Ships from: Amazon  
Sold by: Skyyee-blue

**Save with Used - Good**  
\$49<sup>57</sup>  
FREE delivery: Sunday, July 16  
Ships from: Amazon  
Sold by: Amazon Warehouse

[Add to List](#)

New & Used (5) from \$49<sup>37</sup> & 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

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

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



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

\$120<sup>00</sup>

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

# License Plate Frame Covers 2 Pack

- High quality
- Remote retractable
- Hidden flip fins invisible



**SOLRIMANA**

**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

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

## II. Tinted License Plate Covers

### A. Example 1<sup>3</sup>

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.

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

## B. Example 2<sup>4</sup>

[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

**\$10<sup>95</sup>**

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

<b>Material</b> Polycarbonate	<b>Fit Type</b> Universal Fit
----------------------------------	----------------------------------

<b>Color</b>	Tinted
<b>Brand</b>	BLVD-LPF OBEY YOUR LUXURY
<b>Vehicle Service Type</b>	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

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**\$10<sup>95</sup>**

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](#)

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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](#)

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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](#)

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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](#)

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

### III. Vinyl Wrap License Plate Covers<sup>5</sup>



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


**\$29<sup>99</sup>**

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

**About this item**

**\$29<sup>99</sup>**

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

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





DAVID CHIU  
City Attorney

Phone: (415) 554-4700  
Email: cityattorney@sfcityatty.org

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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November 1, 2023

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

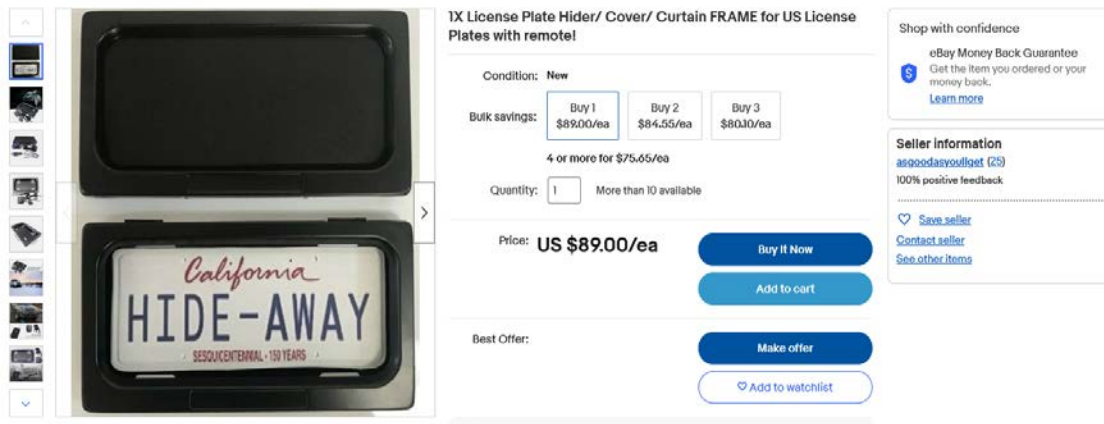
CC: eBay, Inc.  
c/o CT Corporation System  
330 N. Brand Blvd  
Glendale, CA 91203

**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.

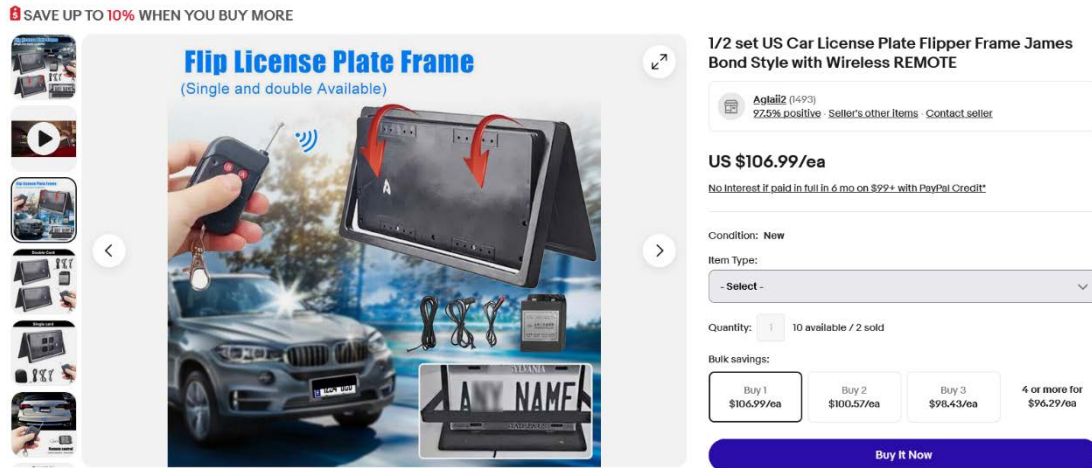
**I. Electronic License Plate Covers**

**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, a quantity of 1, 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, a quantity of 1, and a "Buy It Now" button. The seller information shows a 77.5% positive feedback rating.

**Product Description**

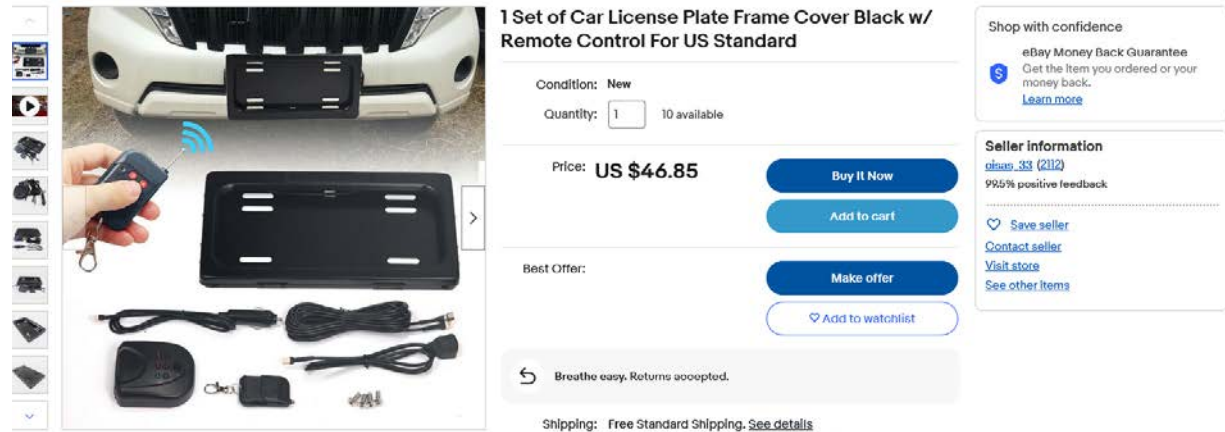
Description:

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](#)

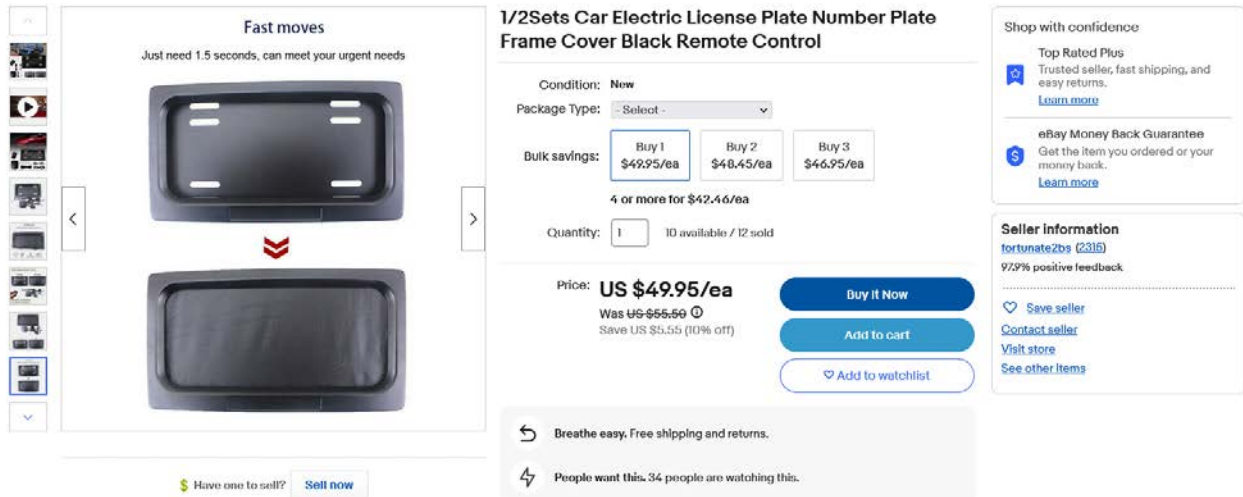
**Shop with confidence**  
eBay Money Back Guarantee  
Get the item you ordered or your money back. [Learn more](#)

**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 \$55.50~~  
Save US \$5.55 (10% off)

**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](#)

**Fast moves**  
Just need 1.5 seconds, can meet your urgent needs

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

**Breathe easy.** Free shipping and returns.

**People want this.** 34 people are watching this.

#### Features:

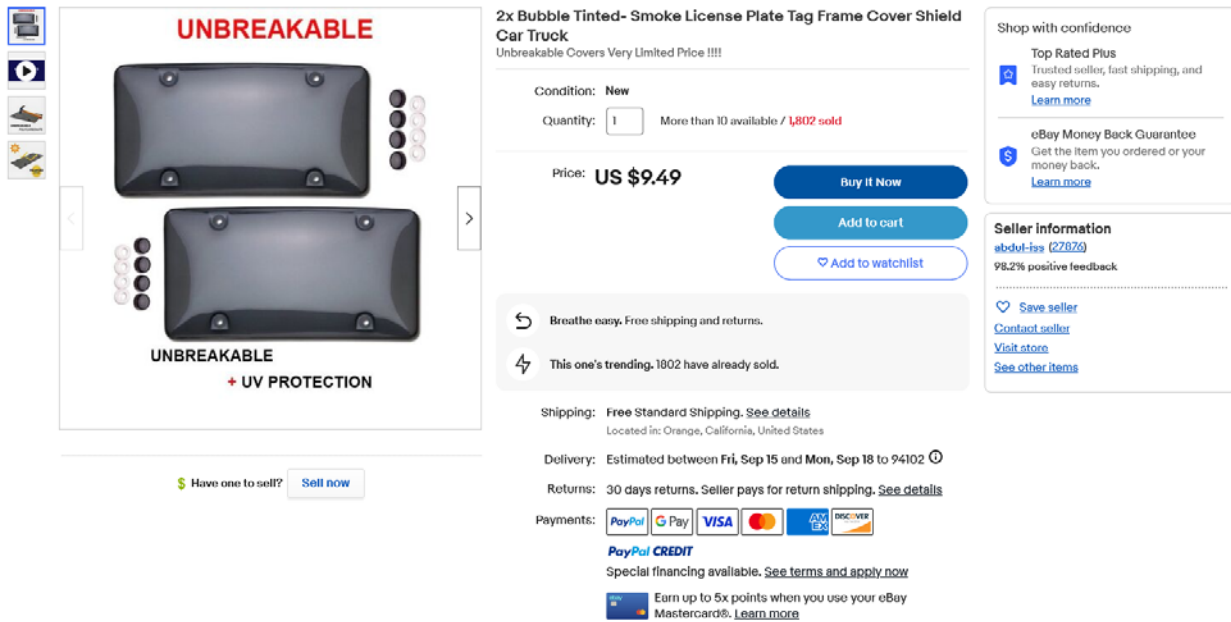
- Anti-concealed camera;
  - Safeguarding the personal privacy;
  - Same as the common car license plate, pretty appearance and covert;
  - Anti-rust, stable quality, for long term use.
  - Fast moves, just need 1.5 seconds, can meet your urgent needs
- The license frame was made by high quality car 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>



**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](#)

**UNBREAKABLE**  
**UNBREAKABLE**  
**+ UV PROTECTION**

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 CREDIT**  
Special financing available. [See terms and apply now](#)  
Earn up to 5x points when you use your eBay Mastercard®. [Learn more](#)

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



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

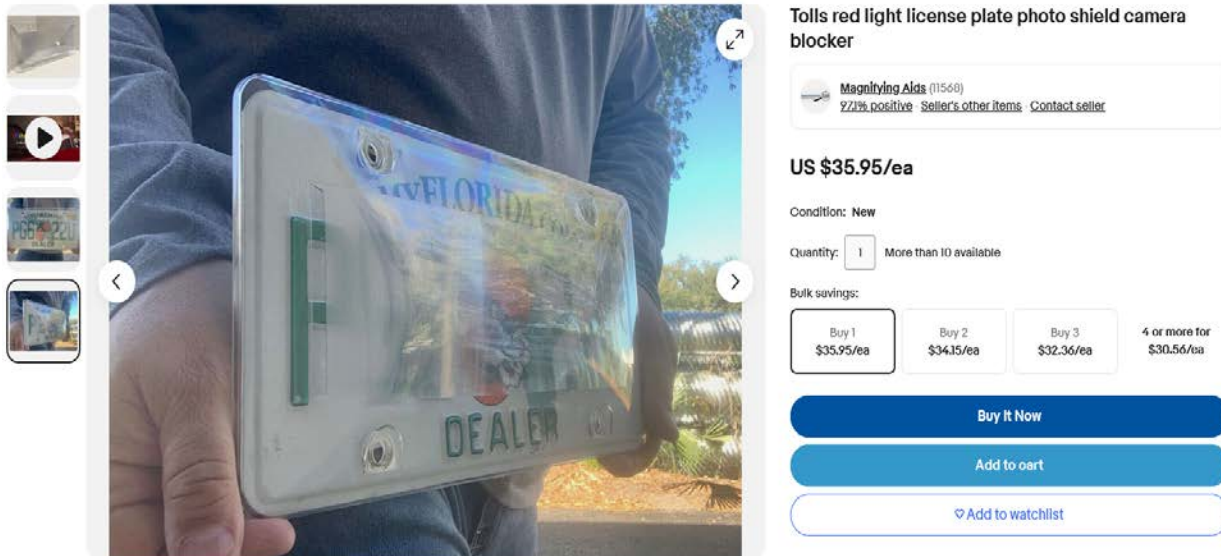
The product is good but it is **illegal** in California, too bad.

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).

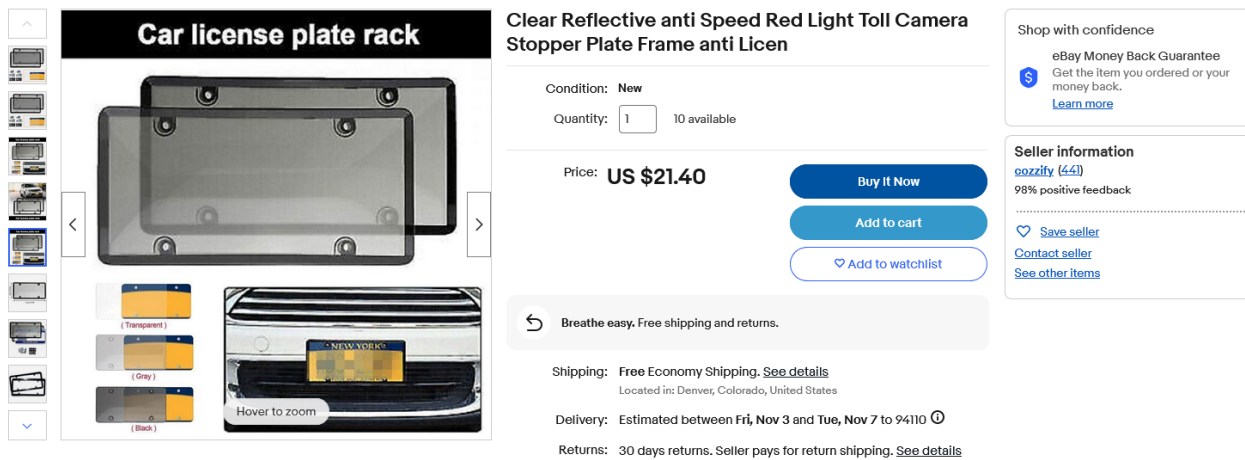
## B. Example 2<sup>6</sup>



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 that says 'DEALER'. 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'. A 'Bulk savings' table shows: 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'.

Quantity	Price/ea
Buy 1	\$35.95/ea
Buy 2	\$34.15/ea
Buy 3	\$32.36/ea
4 or more for	\$30.56/ea

## 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. To the right, the product title is 'Clear Reflective anti Speed Red Light Toll Camera Stopper Plate Frame anti Licen'. 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, it says 'Breathe easy. Free shipping and returns.' The shipping is 'Free Economy Shipping. See details' and is located in 'Denver, Colorado, United States'. The delivery is 'Estimated between Fri, Nov 3 and Tue, Nov 7 to 94110'. The returns policy is '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'. The seller information is 'cozzity (44)'.

Condition: **New**

Quantity:  10 available

Price: **US \$21.40**

Shipping: **Free Economy Shipping. See details**  
Located in: Denver, Colorado, United States

Delivery: **Estimated between Fri, Nov 3 and Tue, Nov 7 to 94110**

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

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

Seller information  
**cozzity (44)**  
98% positive feedback  
[Save seller](#)  
[Contact seller](#)  
[See other items](#)


<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	Buy 2
\$22.99/ea	\$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](#)

[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](#)

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

#### 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	Buy 2	Buy 3
\$24.99/ea	\$23.74/ea	\$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](#)

[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](#)

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

<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).





DAVID CHIU  
City Attorney

Phone: (415) 554-4700  
Email: cityattorney@sfcityatty.org

November 1, 2023

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

Colin Stretch  
Chief Legal Officer  
Etsy, Inc.  
117 Adams Street  
Brooklyn, NY 11201  
cstretch@etsy.com

Re: Sales of Illegal License Plate Covers

Dear Mr. Stretch:

It has come to my attention that Etsy, Inc. (“Etsy”) 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 Etsy 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 Etsy—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.

Etsy is aware that these license plate covers are illegal and being used to facilitate illegal conduct and evade law enforcement. Etsy has a stated policy prohibiting the sales of illegal products and devices—including specifically “license plate covers” that “are intended to evade the detection of illegal activity.”<sup>1</sup> Moreover, product descriptions and reviews on Etsy’s website openly state that the products are illegal. For example, one electronic license plate cover is advertised as allowing the user to “be extra stealth[y] . . . with the police,” while another claims that it can “Hide[] Your License Plate in seconds.” Attachment A at pp. 2-3. Several tinted

<sup>1</sup> *Prohibited Items Policy*, Etsy.com, <https://www.etsy.com/legal/prohibited/#Q5> (last visited Oct. 31, 2023).

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Page 2  
November 1, 2023

covers are described as being effective at evading red light, speed, and toll cameras. *Id.* at pp. 4-5. Nevertheless, these and numerous other illegal license plate covers continue to be available for sale on Etsy's website—despite Etsy's stated policy of removing content it has reason to believe is unlawful.<sup>2</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 Etsy 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 Etsy 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 Etsy will stand by its pledge not to sell illegal license plate covers intended to evade the detection of 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 Etsy does not continue to sell these illegal products to California residents.

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<sup>2</sup> *Ibid.*

Letter to Colin Stretch  
Page 3  
November 1, 2023

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: Etsy, Inc.  
c/o CSC-Lawyers Incorporating Service  
2710 Gateway Oaks Drive, Suite 150N  
Sacramento, CA 95833

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

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

**I. Electronic License Plate Covers**

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

← Back to search results

**Fast moves**  
Just need 1.5 seconds, can meet your urgent needs

**\$181.00**  
License Plate Flipper Switcher  
760AutoEcommere

- Ships from California
- Arrives soon! Get it by Sep 16-23 if you order today
- Exchanges accepted

Pay in 4 installments of \$45.25. **Klarna**. [Learn more](#)

**Add to cart**

<sup>1</sup> <https://www.etsy.com/listing/1505322633/license-plate-flipper-switcher> (last visited Oct. 31, 2023)

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

← Back to search results



Low in stock, only 3 left

**\$100.00**

Jdm car license plate flipper electric  
CR4PyouN333D

Pay in 4 installments of \$25.00. [Klarna](#). [Learn more](#)

Add to cart

### Item details

👉 Handmade

Plate flipper! Now u can be extra stealth and fuck with the police and confuse people on the road

<sup>2</sup> <https://www.etsy.com/listing/1531471295/jdm-car-license-plate-flipper-electric> (last visited Oct. 31, 2023).

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

← Back to search results



**Hides Your License  
Plate in seconds**



5 views in the last 24 hours

**\$180.00**

Motorcycle License Plate hider | Curtain Shutter | USA  
Motorcycle 140\*200\*25mm (7x4inches) Stealth Plates  
760AutoEccommere

📍 Ships from California

✓ Arrives soon! Get it by Sep 16:23 if you order today

Pay in 4 installments of \$45.00. **Klarna**. [Learn more](#)

Add to cart

<sup>3</sup> <https://www.etsy.com/listing/1545820742/motorcycle-license-plate-hider-curtain> (last visited Oct. 31, 2023).

## II. Tinted License Plate Covers

### A. Example 1<sup>4</sup>

← Back to search results

Bestseller

Only 6 left and in 15 carts

**\$28.95**

2023 License Plate Cover - Clear Blocker for Red Light and Speed Cameras

PrimoParts ★★★★★

✓ Arrives soon! Get it by ~~Sep 14, 22~~ if you order today

✓ Returns & exchanges accepted

Add to cart

**- SAY NO TO TICKETS -**  
Equip your car with  
Plate works for : Anti Toll, Speed, Red light Camera

★★★★★

I bought twice from this seller is legit No more paid tollways or speed cameras Satisfied with my order. Received my package early and fast.

Response from Collin

That's wonderful you have found our camerastopper cover/lens system so useful to protect against those annoying speed cameras! We aim to provide an exceptional product and an equally exceptional customer experience. Best Wishes!

Purchased item: [2023 License Plate Cover - Clear Blocker for R...](#)

Item quality 5.0

Shipping 5.0

Customer service 5.0

<sup>4</sup> <https://www.etsy.com/listing/1475556437/2023-license-plate-cover-clear-blocker> (last visited Oct. 31, 2023).

## B. Example 2<sup>5</sup>



Only 6 left and in 14 carts

**\$35.99**

2023 License Plate Cover Against Red Light/Speeding Cameras

Scameraofficial ★★★★★

✓ Arrives soon! Get it by Sep 14:21 if you order today

✓ Returns accepted

Add to cart



### Item details

 Handmade

Please note, this listing is for 1 cover. Should you need for 2 license plates, please order quantity 2.

Our product will protect you from red-light cameras and speeding cameras.

We have put a lot of time into testing our product to make sure it stands up for what it claims. So rest assured you will be receiving a product that works.

Some things to understand before buying; this is a plastic license plate cover with a lens inside, it will be seen a bit when it is attached to your license plate. If it were completely see through then it would not work, it has distorting properties so it is visible to a minimal extent. However, we have designed it and placed it in a way that when you look at it directly it is relatively hard to notice it. (If you have any issues or questions about this, reach out to us so we can avoid confusion)

However when your license plate is viewed from directly behind it is clear and legible.

<sup>5</sup> <https://www.etsy.com/listing/1436230028/2023-license-plate-cover-against-red> (last visited Oct. 31, 2023).



### III. Vinyl Wrap License Plate Covers<sup>6</sup>

← Back to search results



In demand. 3 people bought this in the last 24 hours.

**\$29.99**

California License Plate Vinyl Wrap Custom License plate DIY kit

wrappyourplate ★★★★★

📍 Ships from California

✓ Arrives soon! Get it by Nov 3, 10 if you order today

Background color \*

Select an option ▼

Numbers/letters color \*

Select an option ▼

Add your personalization \*

Please leave a NOTE: Your License Plate # and which color of California do you prefer, for example - (California blue Cursive) or (California 1960s yellow)

256

Add to cart

Item details ^

★★★★★

Comes out nice but don't get it I got a ticket for having it and it's 1200 here in California



[Rene Talome](#) Mar 18, 2023

👍 Helpful?

Item quality



Shipping



Customer service



<sup>6</sup> <https://www.etsy.com/listing/1317205851/california-license-plate-vinyl-wrap> (last visited Oct. 31, 2023).



DAVID CHIU  
City Attorney

Phone: (415) 554-4700  
Email: cityattorney@sfcityattorney.org

November 1, 2023

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

Rachel Brand  
Executive Vice President & Chief Legal Officer  
Walmart Inc.  
702 S.W. 8th Street  
Bentonville, AR 72716  
rachel.brand@walmart.com

Re: Sales of Illegal License Plate Covers

Dear Ms. Brand:

It has come to my attention that Walmart, Inc. and Wal-mart.com USA LLC (collectively “Walmart”) is selling license plate covers that obscure or are intended to obscure license plate numbers to California residents through its Walmart.com website. 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 Walmart 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 Walmart.com—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 and covers with a dark or smoked tint.

Walmart is aware that these license plate covers are illegal and being used to facilitate illegal conduct and evade law enforcement. Walmart has a stated policy prohibiting the sales of illegal products and devices—including a specific policy prohibiting “[p]roducts intended to conceal or obscure a license plate.”<sup>1</sup> Moreover, product descriptions and reviews on Walmart.com openly state that the products are illegal. For example, one electronic license plate cover is advertised as a “Hide-Away Shutter License Plate” and is described as “[a]nti-concealed camera,” “just need 1.5 seconds, can meet your urgent needs.” Attachment A at p. 1. A

<sup>1</sup> *Prohibited Products Policy for Marketplace Sellers*, Walmart.com, [https://sellerhelp.walmart.com/seller/s/guide?language=en\\_US&article=000006005](https://sellerhelp.walmart.com/seller/s/guide?language=en_US&article=000006005) (last visited Oct. 31, 2023) (click on “Auto and Motor Vehicles” under “Prohibited Product Policy by Category”).

Letter to Rachel Brand  
Page 2  
November 1, 2023

reviewer for a tinted license plate cover notes that it “[w]orks against speed camera[s]” and is a “hard to read plate,” while other reviews highlight that the product is illegal in states like California that prohibit drivers from obscuring their license plates. *Id.* at p. 3. Nevertheless, these and numerous other illegal license plate covers continue to be available for sale on Walmart.com—despite Walmart’s claim that it removes any product that it determines violates its prohibited products policy.<sup>2</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 Walmart 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 Walmart 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 Walmart will stand by its pledge not to sell illegal license plate covers intended to conceal or 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 Walmart does not continue to sell these illegal products to California residents.

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<sup>2</sup> *Ibid.*

Letter to Rachel Brand  
Page 3  
November 1, 2023

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: Wal-mart.com USA LLC  
c/o CT Corporation System  
330 N. Brand Blvd  
Glendale, CA 91203

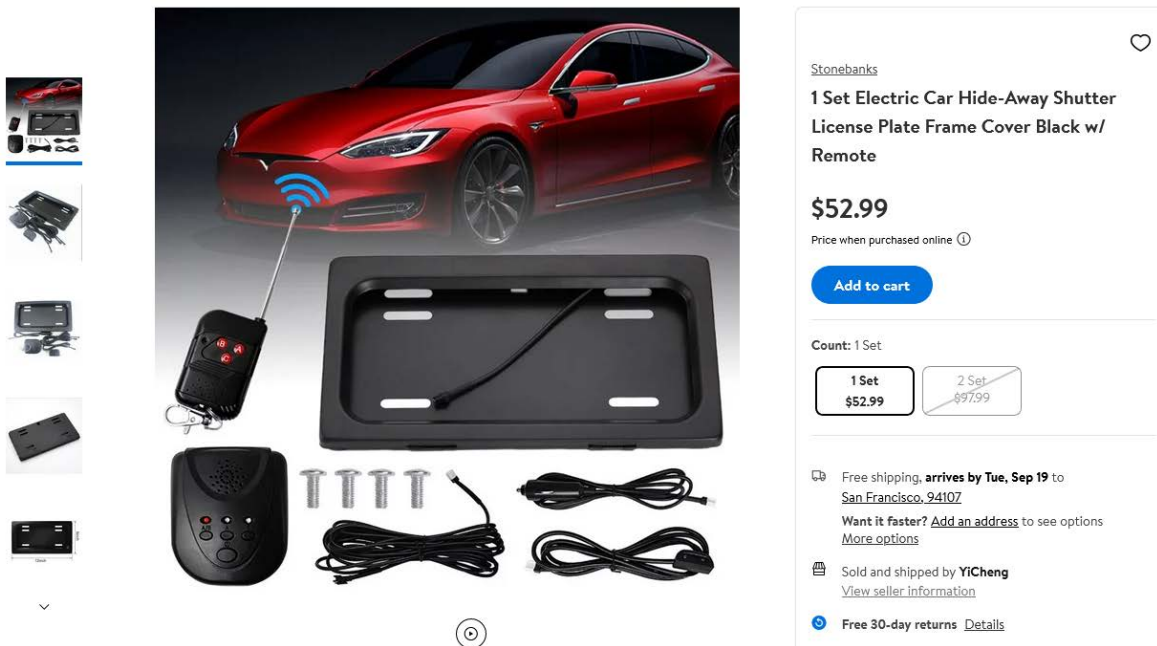
Walmart, Inc.  
c/o CT Corporation System  
330 N. Brand Blvd  
Glendale, CA 91203

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

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

**I. Electronic License Plate Covers**

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



Stonebanks

1 Set Electric Car Hide-Away Shutter License Plate Frame Cover Black w/ Remote

**\$52.99**  
Price when purchased online ⓘ

Add to cart

Count: 1 Set

1 Set \$52.99	2 Set <del>\$97.99</del>
------------------	-----------------------------

Free shipping, arrives by Tue, Sep 19 to San Francisco, 94107  
Want it faster? Add an address to see options  
[More options](#)

Sold and shipped by YiCheng  
[View seller information](#)


Free 30-day returns [Details](#)

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

<sup>1</sup> <https://www.walmart.com/ip/1-Set-Electric-Car-Hide-Away-Shutter-License-Plate-Frame-Cover-Black-w-Remote/1318215178> (last visited Oct. 31, 2023).

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



DERCLIVE  
DERCLIVE License Plate Holder Frames  
Car License Plate Cover, Universal US Car  
Black License Plate Bracket Holder with  
Remote  
★★★★★ (5.0) 2 reviews  
Now \$45.99 ~~\$53.99~~  
You save \$8.00  
Price when purchased online ⓘ  
Add to cart

Free shipping, arrives by Wed, Sep 13 to  
San Francisco, 94107  
Want it faster? [Add an address](#) to see options

Sold by **DERCLIVE** Pro Seller  
Fulfilled by Walmart  
★★★★☆ 8 seller reviews  
[View seller information](#)

Free 90-day returns [Details](#)

Roll over image to zoom in

### Features:

This is a license plate with remote control rolling shutter.

Fits over any standard US 6x12 Inch license plate.

Made of premium iron and plastic, anti-rust and durable to use.

1. High quality car board material, High intensity, Durable, Anti-rust, can completely afford the sunshine, rain, frost and any high-low temperature or worse environment.

2. Same as the common car license plate, pretty appearance and covert.

<sup>2</sup> <https://www.walmart.com/ip/DERCLIVE-License-Plate-Holder-Frames-Car-License-Plate-Cover-Universal-US-Car-Black-License-Plate-Bracket-Holder-with-Remote/1383141542> (last visited Oct. 31, 2023).

## II. Tinted License Plate Covers

### A. Example 1<sup>3</sup>



Roll over image to zoom in



Best seller



[Auto Drive](#)

#### Auto Drive Universal Black Smoke Automotive License Plate Frame and Cover

★★★★★ (4.5) 28 reviews

**\$9.88**

Price when purchased online ⓘ

Add to cart

Shipping, arrives by **Wed, Sep 13** to [San Francisco, 94107](#)  
Want it faster? [Add an address](#) to see options

Pickup **not available** at San Leandro Store  
[Check availability nearby](#)

Sold and shipped by Walmart.com

Free 90-day returns [Details](#)

This item is gift eligible [Learn more](#)

[Add to list](#)

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★★★★★

2/18/2022

#### Practical

I love that this comes in a two pack because we have to have a license plate on the front and the back. They look really good on my Yukon but in VA they are illegal to have smoke license plate covers on. But over all they do really well and give the vehicle the extra little touch of class!

JP [Incentivized Review](#) ⓘ

0 0

★★★★★

2/14/2022

#### Great license shade cover

Works against speed camera's and hard to read plate. I only to have plates at both ends of by cars, so i have them both covered with shaded plastic cover. I had cop pull be over once about 10 years ago fort having a plate cover he couldn't see numbers. Will there is a law in my state that reads i can cover plate with any kind and shade i-of cover so cop lost in court.. All my cars and trucks now have shaded license covers.

Smokeum [Incentivized Review](#) ⓘ

0 0

★★★★★

2/13/2022

#### Hard to see

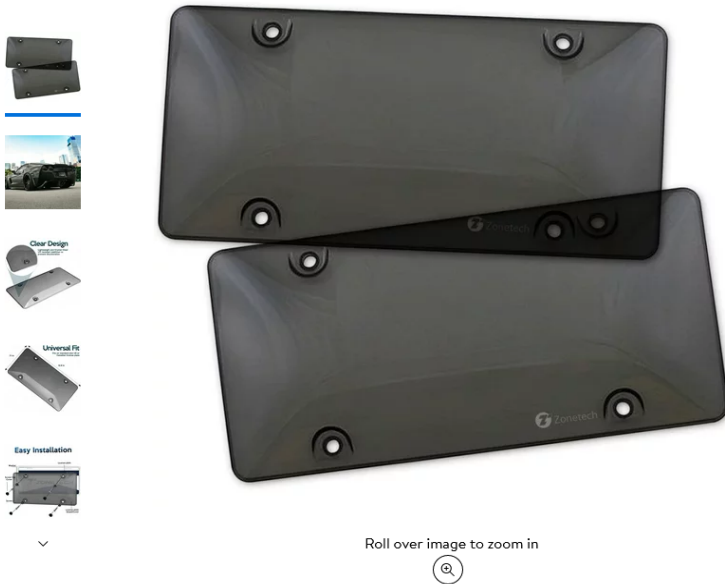
This is illegal in Texas therefore I will not use. Hard to see plate and I don't want to risk a ticket. It looks like is durable and will last . It's hard plastic too.

Gloren [Incentivized Review](#) ⓘ

0 0

<sup>3</sup> <https://www.walmart.com/ip/Auto-Drive-Universal-Black-Smoke-Automotive-License-Plate-Frame-and-Cover/856934451> (last visited Oct. 31, 2023).

## B. Example 2<sup>4</sup>



**Similar items you might like**  
Based on what customers bought

Best seller ♥

Zone Tech

**Zone Tech Standard Fit Clear Frame Smoked License Plate Protector Cover, 2-Pack**

★★★★☆ (4.3) [22 reviews](#)

**\$11.93**

Price when purchased online ⓘ

[Add to cart](#)

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Actual Color: Smoked Unbreakable

Clear Unbreakable \$10.95	<b>Smoked Unbreakable \$11.93</b>
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🚚 Shipping, **arrives by Tue, Jul 18** to **San Francisco, 94112**  
Want it faster? [Add an address](#) to see options

📦 Sold by **Zone Tech Auto** Pro Seller  
Fulfilled by Walmart  
★★★★☆ 774 seller reviews  
[View seller information](#)

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<sup>4</sup> <https://www.walmart.com/ip/Zone-Tech-Standard-Fit-Clear-Frame-Smoked-License-Plate-Protector-Cover-2-Pack/358065629> (last visited Oct. 31, 2023).