

CITY AND COUNTY OF SAN FRANCISCO



DAVID CHIU
City Attorney

OFFICE OF THE CITY ATTORNEY

KARUN TILAK
Deputy City Attorney

Direct Dial: (415) 355-3308
Email: karun.tilak@sfcityatty.org

April 29, 2024

VIA E-MAIL

Serena Orloff
Corporate Counsel, Litigation & Regulatory
Amazon, Inc.
535 14th Street, South
Arlington, VA 22202
sorloff@amazon.com

Re: Sales of Illegal License Plate Covers

Dear Ms. Orloff:

I write regarding City Attorney David Chiu's November 1, 2023 letter to Amazon.com Inc. and Amazon.com Services LLC (collectively "Amazon") concerning Amazon's sales of illegal license plate covers, and your subsequent response on November 29, 2023.

Our Office appreciates Amazon's collaboration in removing electronic and vinyl wrap license plate covers from its platform and prohibiting sales of smoked and tinted license plate covers to customers in the United States. Amazon's cooperation with our Office meaningfully contributes to enhancing the ability of San Francisco's law enforcement officers to investigate and apprehend individuals engaged in criminal activities, including sideshows, thefts, and robberies.

Based on our review of relevant listings on Amazon.com, we have determined that additional enforcement measures against Amazon are not presently warranted. Nevertheless, Amazon has an ongoing responsibility to ensure that illegal license plate covers and other devices that are intended to obscure or imitate a valid state-issued license plate are not available for sale through your online marketplace. By declining to pursue enforcement now, the City Attorney's Office does not waive the right to pursue all available legal remedies in the event that Amazon fails to take adequate measures to prohibit sales of these products in the future.

Thank you for reaffirming Amazon's commitment to protecting public safety in San Francisco and throughout California by making sure that illegal license plate covers are not sold through Amazon.com. Should you have any questions, please contact me or my colleague David Louk at 415-554-4700.

Letter to Serena Orloff
Page 2
April 29, 2024

Very truly yours,

DAVID CHIU
City Attorney

/s/ Karun Tilak

KARUN TILAK
Deputy City Attorney

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

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April 29, 2024

VIA E-MAIL

Mike Carson
Senior Director, Regulatory Policy Group
eBay, Inc.
2025 Hamilton Ave.
San Jose, CA 95125
mcarson@ebay.com

Re: Sales of Illegal License Plate Covers

Dear Mr. Carson:

I write regarding City Attorney David Chiu's November 1, 2023 letter to eBay, Inc. ("eBay") concerning eBay's sales of illegal license plate covers, and your subsequent response on November 10, 2023.

Our Office appreciates eBay's collaboration in removing electronic, vinyl wrap, and smoked and tinted license plate covers from its platform. eBay's cooperation with our Office meaningfully contributes to enhancing the ability of San Francisco's law enforcement officers to investigate and apprehend individuals engaged in criminal activities, including sidseshows, thefts, and robberies.

Based on our review of relevant listings on eBay.com, we have determined that additional enforcement measures against eBay are not presently warranted. Nevertheless, eBay has an ongoing responsibility to ensure that illegal license plate covers and other devices that are intended to obscure or imitate a valid state-issued license plate are not available for sale through your online marketplace. By declining to pursue enforcement now, the City Attorney's Office does not waive the right to pursue all available legal remedies in the event that eBay fails to take adequate measures to prohibit sales of these products in the future.

Thank you for reaffirming eBay's commitment to protecting public safety in San Francisco and throughout California by making sure that illegal license plate covers are not sold through eBay.com. Should you have any questions, please contact me or my colleague David Louk at 415-554-4700.

Letter to Mike Carson
Page 2
April 29, 2024

Very truly yours,

DAVID CHIU
City Attorney

/s/ Karun Tilak

KARUN TILAK
Deputy City Attorney



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Deputy City Attorney

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Email: karun.tilak@sfcityatty.org

April 29, 2024

VIA E-MAIL

Allie Droz
Director, Assistant General Counsel,
Regulatory and Competition
Etsy, Inc.
117 Adams Street
Brooklyn, NY 11201
adroz@etsy.com

Re: Sales of Illegal License Plate Covers

Dear Ms. Droz:

I write regarding City Attorney David Chiu's November 1, 2023 letter to Etsy, Inc. ("Etsy") concerning Etsy's sales of illegal license plate covers, and your subsequent response on November 28, 2023.

Our Office appreciates Etsy's collaboration in removing electronic, vinyl wrap, and smoked and tinted license plate covers from its platform. Etsy's cooperation with our Office meaningfully contributes to enhancing the ability of San Francisco's law enforcement officers to investigate and apprehend individuals engaged in criminal activities, including sideshows, thefts, and robberies.

Based on our review of relevant listings on Etsy.com, we have determined that additional enforcement measures against Etsy are not presently warranted. Nevertheless, Etsy has an ongoing responsibility to ensure that illegal license plate covers and other devices that are intended to obscure or imitate a valid state-issued license plate are not available for sale through your online marketplace. By declining to pursue enforcement now, the City Attorney's Office does not waive the right to pursue all available legal remedies in the event that Etsy fails to take adequate measures to prohibit sales of these products in the future.

Thank you for reaffirming Etsy's commitment to protecting public safety in San Francisco and throughout California by making sure that illegal license plate covers are not sold through Etsy.com. Should you have any questions, please contact me or my colleague David Louk at 415-554-4700.

Letter to Allie Droz
Page 2
April 29, 2024

Very truly yours,

DAVID CHIU
City Attorney

/s/ Karun Tilak

KARUN TILAK
Deputy City Attorney

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April 29, 2024

VIA E-MAIL

Carrie Farthing
Managing Counsel, Government Response Team
Walmart, Inc.
702 SW 8th Street
Bentonville, AR 72716
carrie.farthing@walmartlegal.com

Re: Sales of Illegal License Plate Covers

Dear Ms. Farthing:

I write regarding City Attorney David Chiu's November 1, 2023 letter to Walmart Inc. and Wal-mart.com USA LLC (collectively "Walmart") concerning Walmart's sales of illegal license plate covers, and your subsequent response on November 29, 2023.

Our Office appreciates Walmart's collaboration in removing electronic license plate covers from its platform and prohibiting sales of smoked and tinted license plate covers to customers in California. Walmart's cooperation with our Office meaningfully contributes to enhancing the ability of San Francisco's law enforcement officers to investigate and apprehend individuals engaged in criminal activities, including sideshows, thefts, and robberies.

Based on our review of relevant listings on Walmart.com, we have determined that additional enforcement measures against Walmart are not presently warranted. Nevertheless, Walmart has an ongoing responsibility to ensure that illegal license plate covers and other devices that are intended to obscure or imitate a valid state-issued license plate are not available for sale through your online marketplace. By declining to pursue enforcement now, the City Attorney's Office does not waive the right to pursue all available legal remedies in the event that Walmart fails to take adequate measures to prohibit sales of these products in the future.

Thank you for reaffirming Walmart's commitment to protecting public safety in San Francisco and throughout California by making sure that illegal license plate covers are not sold through Walmart.com. Should you have any questions, please contact me or my colleague David Louk at 415-554-4700.

Letter to Carrie Farthing
Page 2
April 29, 2024

Very truly yours,

DAVID CHIU
City Attorney

/s/ Karun Tilak

KARUN TILAK
Deputy City Attorney