Case 2:23-cv-06647 Document 1-2 Filed 08/14/23 Page 1 of 33 Page ID #:106

## EXHIBIT 2

# Amazon Counterfeit Sellers

SUPPLEMENTAL PRESENTATION B TO THE AMAZON SELLER VIOLATION PRESENTATION A Presented by Planet Green



SINCE OUR CALL FOR AMAZON TO TAKE CORRECTIVE ACTION ON JUNE 23, 2022, TO REMOVE SELLERS OF ILLICIT CARTRIDGES HAVE GONE UNANSWERED. IT IS CLEAR, AMAZON IS NOT ONLY COMPLICIT BUT AIDING AND ABETTING THE ILLEGAL ACTIVITY.

WE NOW ARE SEEKING DAMAGES OF \$500 MILLION AND IMMEDIATE CORRECTIVE ACTION TO PREVENT FURTHER HARM TO OUR BUSINESS.

This Presentation further outline the evidence of widespread counterfeit sellers on Amazon and the detrimental effect it has had on the printer cartridge remanufacturing industry, the environment, and the corrective actions needed.

#### Counterfeit Remanufactured Ink Cartridges

Since our first presentation, we have purchased more ink cartridge from suspect Amazon sellers. The evidence we gathered, it is clear there is a category wide issue of counterfeit ink cartridges falsely labeled as remanufactured and sold as recycled product.

- Exhibit 1A Listings of illicit sellers on Amazon
- Exhibit 1B Images of counterfeit cartridges that we purchased
- Exhibit 1C Alibaba listings for remanufactured printer cartridges offered in quantities by the millions per month
- Exhibit 1D Articles about counterfeit cartridges seizures worldwide

### Exhibit 1A – Images of 82 Counterfeit Sellers Purchased on Amazon

1.	AAKidInk	25.	<u>Fastink</u>
2.	ActualColor	26.	<u>Foiset</u>
3.	Ankink	27.	<u>Forzik</u>
4.	AtopInk	28.	<u>Geshine</u>
5.	AtopolyJet	29.	GPC Image
6.	Batuto	30.	Greenbox
7.	BJ Ink Cartridges	31.	Greencycle
8.	Bstink	32.	HavaTek
9.	Cartlee	33.	H&BO Topmae
10.	CG Chinger	34.	IdealSeal
11.	Clorisun	35.	Incwolf
12.	Coloretto	36.	InkCloud
13.	ColorKing	37.	InkMate
14.	ColoWorld	38.	Inkni
15.	CMTOP	39.	InkSpirit
16.	CRTBOTW	40.	<u>Inktopia</u>
17.	<u>CSStar</u>	41.	InkWorld
18.	<u>Doreink</u>	42.	<u>Insmax</u>
19.	Economink	43.	<u>Janmore</u>
20.	<u>Ejet</u>	44.	<u>Jarbo</u>
21.	Eston	45.	<b>JICDHBIW</b>
22.	<u>Evinki</u>	46.	<u>Jonity</u>
23.	Ezink	47.	Kamoinc
24.	<u>Facms</u>	48.	<u>Kingjet</u>

49.	<u>Kogain</u>
50.	Kolor Expert
51.	Lemeroutrust
52.	<u>Lucascolo</u>
53.	<u>LxTek</u>
54.	Meetrgb
55.	Miroo
56.	<u>Mooho</u>
57.	<b>Mycartridgephoever</b>
58.	Mytoner
59.	Neiber
60.	<u>Novajet</u>
61.	<u>OA100</u>
62.	OnlyU
63.	<u>Palmtree</u>
64.	Penguin
65.	<u>Pfkink</u>
66.	<u>Reprinpic</u>
67.	<u>Retch</u>
68.	Sailner
69.	<u>Sellyaha</u>
70.	<u>Sheengo</u>
71.	<u>SmartInk</u>
72.	<u>St@r Ink</u>

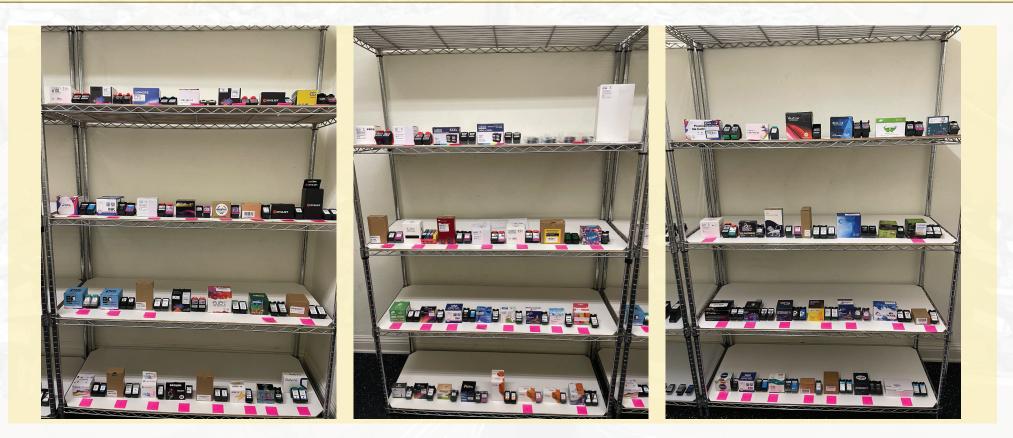
73.	<u>Teino</u>
74.	Toner Kingdom
75.	<u>Ubinki</u>
76.	<u>Upsek</u>
77.	<u>Vaker</u>
78.	<u>ValueToner</u>
79.	<u>V-Surink</u>
80.	Witop
81.	Yatunink
82.	YesInk

> Click on any seller to see total number of counterfeit listings https://drive.google.com/d rive/folders/1oUfxFCpVn7P DLHispWLFFWjwL4fyRKq2? usp=sharing

We have identified other suspicious sellers which we are in the process of confirming if they are remanufactured as they claim.

AMAZON COUNTERFEIT SELLER PART2

# Exhibit 1B - Images of Ink Cartridges We Purchased and Identified as Counterfeit.

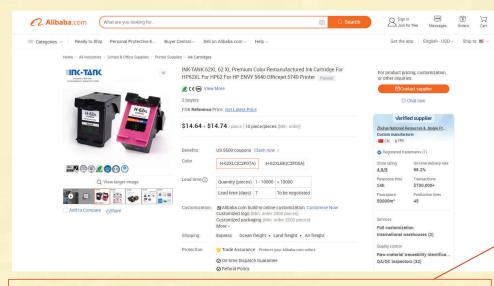


## Exhibit 1B - Images of Counterfeit Cartridges Collected Though Our Recycling Services



# Exhibit 1C - Alibaba listings for remanufactured printer cartridges offered in quantities by the millions per month

#### Zhuhai National Resources & Jingjie Printing Technology



This sellers is offering 10 million remanufacture HP 62XL cartridges per month when the HP 62XL OEM core cartridges are hard to accumulate.

Product Description	on Our Advantage	s Buy	ver Feedback	FAQ	Related Products				
Overview									
Essential details									
Type:	Ink Cartridge				Feature:	Re-Manufactured			
Cartridge's Status:	Full				Bulk Packaging:	Yes			
Colored:	Yes				Brand Name:	INK-TANK			
Model Number:	H-62XL				Place of Origin:	Guangdong, China			
Product Name:	INK-TANK C2P05AN C2P	07AN Con	npatible Inkjet Car	tr	Place of origin:	Zhuhai			
Company Type:	Leading manufacturer in China				Certificate:	ISO9001,ISO14001,CE,STMC,RoHS,Reach			
Defective Rate:	<0.2%,1:1 replacement for any faulty goods				Ink type:	High Yield Dye Ink pour for hp5547 imprimante			
Chip:	Chip 100% Compatible 8	Stable		_	Warranty:	12 months			
Supply Ability:	10,000,000 Pieces per N	lonth			Delivery Time:	Within 5-7 working days after payment confirmed			
Supply Ability									
Supply Ability	10000000 Piece/Pieces	per Month							
Deckening & deli									
Packaging & deliv			ER box packaging	bulk na	ckaging neutral white ho	x, neutral colour box, customized box			
Packaging Details Port	Zhuhai	y, mix-r Ow	ET BOX packaging	, our par	skaging, neutral white bo	A, neutral colour box, customized box			
Lead time(?):		1 - 10000	>10000						
Lead time ().	Quantity(pieces)	1 - 10000	210000						

AMAZON COUNTERFEIT SELLER PART2

Exhibit 1C - Alibaba sellers offering millions of ink cartridges for models which are very hard to accumulate cores

The United States is the biggest consumer of printer cartridges in the world. Planet Green has the largest ink cartridge collection programs in the United States. After inspecting millions of empty cores annually, we find it very hard to accumulate certain cores such as HP 62, HP 64, HP 67, Canon 240, Canon 241, Canon 260, Canon 261, Canon 275, and Canon 276. Yet these manufactures on Alibaba offer these cartridges by the millions per month. Exhibit 1C - List of Manufacturers on Alibaba who offer remanufactured printer cartridges in quantities by the millions per month

Click the link and scroll down to see "supply ability"

- 1. Ink Power
- 2. Zhuhai National Resources & Jingjie Printing Technology
- 3. <u>Shenzhen Nolar Trade Development Company</u>
- 4. Shenzhen Michsan Technology Company
- 5. Uniplus Technology Corporation
- 6. <u>PK Printking Technology Company</u>
- 7. Ebest Digital Technology
- 8. Zixingshi Heshun Technology Printing Materials Company
- 9. Tatrix International China Co, Ltd
- 10. Prospect Image Products Limited of Zhuhai

**Exhibit 1D** - Articles below indicate the worldwide issue with counterfeit OEM printer cartridges. Due to the challenges of importing OEM counterfeit cartridges into the U.S., Illicit sellers are relabeling cartridges as remanufactured to import them into the U.S. undetected.

#### Click on article to view

- 1. Inside The Secretive World Of Counterfeit Printer Ink--And The Raids Used To Fight Back
- 2. Head of HP Supplies Says Counterfeit Seizures Soared in H1 2022
- 3. <u>HP Seized Over 3.5 Million Fake Print Products Across The World</u>
- 4. Fake HP goods seized in China CNET
- 5. <u>HP has confiscated over \$10 million worth counterfeit cartridges in India this year and that involved 170 raids and 144 arrests</u><u>Business</u><u>Insider India</u>
- 6. HP And Saudi Authorities Successfully Shut Down Counterfeit Cartridge Manufacturer In Major Raid \_ Al Bawaba
- 7. <u>HP partners with authorities in Uganda for double raid on counterfeit print supplies Press releases and news about Africa and the surrounding area</u>
- 8. HP partners with UAE authorities to seize approximately 1.5 million illicit items and shut sources of counterfeit cartridges Arabian Business
- 9. HP Successfully Seized Over 4.5 Million Counterfeit Print Products Enterprise IT World
- 10. Canon stops counterfeits entering Canada The Recycler
- 11. <u>HP, police close down counterfeiting facilities in major seizure Vanguard</u>
- 12. HP, Police Seize 67,000 Fake Printer Cartridges in Nigeria Business Post Nigeria
- 13. 57 listings removed from Amazon in Canada, Mexico and the United States of America after Canon files infringement reports
- 14. https://businesspost.ng/brands-products/hp-police-raid-sellers-of-fake-hp-print-cartridges-in-nigeria/
- 15. ICCE joins forces with Ajman police to seize fake toner cartridges worth \$40 million ICCE
- 16. Over 72,000 Counterfeit HP Laser and Ink Toner Cartridges Products Seized Absolute Toner
- 17. Raids lead to huge seizures in Lima
- 18. Raids reveal counterfeit HP inkjet and laser cartridges-DQWeek
- 19. SecuringIndustry.com HP counterfeit crackdown nets seizes millions of fake products
- 20. Combating Trafficking in Counterfeit and Pirated Goods Report to the President of the United States

## The Destruction of the Printer Cartridge Remanufacturing Industry

The printer cartridge remanufacturing industry evolved as a **solution** to divert millions of used printer cartridges away from landfills generated by the original equipment manufacturers of printers and turned the waste into a new reusable product.

The U.S. printer cartridge remanufacturing industry established in the 1980s grew into a multibillion-dollar circular economy. The industry included remanufacturers, used cartridge collectors, suppliers, resellers, trade publications, and Expos.

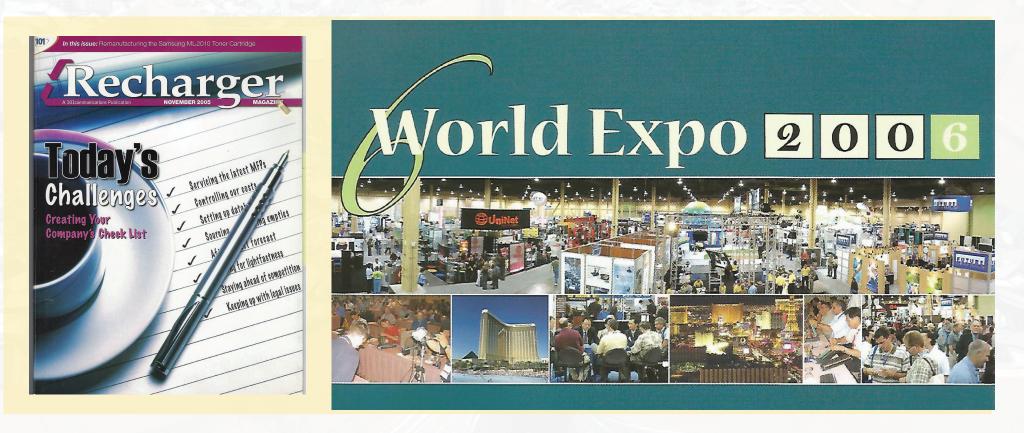
Counterfeit remanufactured printer cartridges have destroyed the industry by saturating and undercutting the market using Amazon's platform. Amazon's lack of enforcement of its own listings policies and allowing counterfeit remanufactured cartridges to undercut legitimate remanufactured cartridges bears responsibility for lost businesses that were once part of this booming industry.

- Exhibit 2A Recharger Magazine was the primary source for the printer cartridge remanufacturing industry with advertising and trade shows. This exhibit shows how big the industry was and the different companies that participated in the circular economy of reducing used printer cartridge waste and turning it into a new reusable product.
- Exhibit 2B Images of advertisements for companies collecting and selling empty printer cartridges. The collection of used printer cartridges became a primary business for the remanufacturing industry. Counterfeit cartridges saturated the market destroying the value of used printer cartridges to the point it became unprofitable to collect and recycle.
- Exhibit 2C Articles
  - State of China's Remanufacturing industry RT News
     <a href="https://www.rtmworld.com/the-challenges-of-remanufacturing-in-china/">https://www.rtmworld.com/the-challenges-of-remanufacturing-in-china/</a>

Collecting used printer cartridges was a great way for thousands of schools nationwide to raise funds for much needed programs.

Exhibit 2B - Recharger Magazine was the primary source for the printer cartridge remanufacturing industry with advertising and trade shows. This exhibit shows how big the industry was and the different companies that participated in

the circular economy of reducing used printer cartridge waste and turning it into a new reusable product.



#### Exhibit 2A - Floor Plan of the World Expo held in Las Vegas annually.

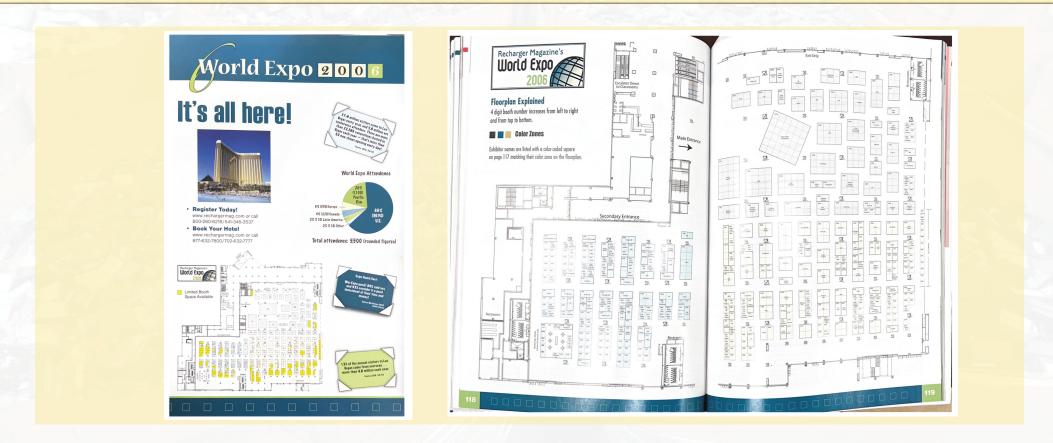


Exhibit 2A - List of exhibitors who made up the printer cartridge industry. As the industry shrunk due to unfair competition the magazine and expo shut down in 2014.



**Exhibit 2B** – Images of advertisements for companies collecting and selling empty printer cartridges. The collection of used printer cartridges became a primary business for the remanufacturing industry. Counterfeit cartridges saturated the market destroying the value of used printer cartridges to the point it became unprofitable to collect and recycle.

In this issue: Remanufacturing the HP 2600 Black and Color Toner Cartridges	Classified Adverti CARTRIDGES Empties Toner	CARTRIDGES EMPTIES TONER Southeast Cartridge GEORGIA	CARTRIDGES EMPTIES TONER Kartridges For Kidz	CARTRIDGES EMPTIES TONER VIRGIN EMPTIES FOR SALE	Class CARTRIDGES EMPTIES TONER URBIN EMPTIES FOR SALE Buy at Broker Prices • NO HASSE LOWG GURARATIEE • NO HASSE LOWG GURARATIEE	CARTRIDGES EMPTIES TONER EMPTIES FOR SALE C4182X
Recharger JULY 2006 MAGAZINE	We are remainfunctions and the set of the se	92214A/FX-2         \$5:50           92275A/FX-1         \$5:50           92291A         \$5:50           92298A         \$5:50           C3903A OLD \$TYLE         \$5:00           C3903A OLD \$TYLE         \$2:00           C407A-100+         \$2:00           C4010-         \$2:00	Selling Quality, Inspected Virgin Cores Securely Wrapped and Ready for Shipment Visa/Master Card American Express/ Discover	C 115X	Hand Selected, Inspected & Packed     LASER, INVIET, COPER     CARTRIDGES     In Stock / Ready to ship Today     ALL VIRGINS     C8661X. 6.00     C8561X. 6.00     C8561X. 6.00     C115A / X 6.00     C4092A 6.00     C4092A 6.00     C4092A 6.00     C4092A	C7115AX \$4 C8061X \$6 Q2612A \$6 Q2612A \$12 Q1338A CALL Q3392AYX CALL UG-3313 \$10 UG-5520 \$14 UG-5520 \$14
Business	115002224A.515 5LC3096A.55 1200C7115A58 5000C4128X.510 1300C2115A.58 5000C4128X.510 229S2275A56 FX256 2100C4096A39 FX356 2200C4096A.139 FX356 4000C4096A.312 FX454 451	Q138. \$15.00 Q2610A. (50+).55.00 Q2613A. (50+).55.00 C115A. (50+).53.75 C4022A. \$4.00 C4129X. (100+)55.50 C4182X. (100+)55.50 C4182X. NON-VIR. (100+)55.50 C4182X. NON-VIR. (100+)55.50	100% Guaranteed 27X 44.00 12A 112.00 96A 13.50 24A 14.00 15A 13.00 75A 12.00 15X 15.00 38A 116.00 09A 111.00 39A 128.00 82X 1700 42A 111.00	C3009A	C4002A	FX7
Color	420001338.328 PB.9900\$15 430001339.428 Optra 5\$15 9492284.34 Optra 1\$15 9492284.35 Optra 1520\$12 47\$12 47\$12 55\$12 55\$12 Call for a compate lat Call Howard at Laser Save 732-431-3339	FXV         54.00           DR250/200         \$5.50           MITA LDC600         \$5.30           IS8050/950         \$5.00           IS82100/500         \$5.00 </th <th>33         12.00         42X         13000           13X         18.00         49A         11.00           74A         16.00         10A         16.00           11A         128.00         03A         14.00           92A         13.00         FX2         16.00           06A         13.00         FX2         16.00           98A         13.50         L50         180.0           28X         16.00         E40         11.00</th> <th>LASERTECH INTERNATIONAL, INC. Call: 860-289-8521 terry@lasertechind.com</th> <th>FX1         7.00           FX2         7.00           FX3         7.00           FX6         4.00           FX76         8.00           FX707D (NEC870)         8.00           OPTRA 5320/7620         12.00           OPTRA 520/7620         12.00           D130950         11.00           D130950         22.00           OPTRA 520/7620         12.00           OPTRA 520/7620         12.00           OPTRA 520/7620         12.00           OPTRA 600         22.00           OPTRA 800         20.00           OPTRA 800         20.00</th> <th>Virgin Empties 064 - 83.50 104 - 87.50 134/X - 48.50 154/X - 83.75 27X - 94.450 38/A - 512.00 49/A - 512.00</th>	33         12.00         42X         13000           13X         18.00         49A         11.00           74A         16.00         10A         16.00           11A         128.00         03A         14.00           92A         13.00         FX2         16.00           06A         13.00         FX2         16.00           98A         13.50         L50         180.0           28X         16.00         E40         11.00	LASERTECH INTERNATIONAL, INC. Call: 860-289-8521 terry@lasertechind.com	FX1         7.00           FX2         7.00           FX3         7.00           FX6         4.00           FX76         8.00           FX707D (NEC870)         8.00           OPTRA 5320/7620         12.00           OPTRA 520/7620         12.00           D130950         11.00           D130950         22.00           OPTRA 520/7620         12.00           OPTRA 520/7620         12.00           OPTRA 520/7620         12.00           OPTRA 600         22.00           OPTRA 800         20.00           OPTRA 800         20.00	Virgin Empties 064 - 83.50 104 - 87.50 134/X - 48.50 154/X - 83.75 27X - 94.450 38/A - 512.00 49/A - 512.00
Distinctive Color for Business: Brillen Communication	VIRGIN EMPTIES FOR SALE           SPECIALS           05442         \$59.00           02613X/15s         \$53.00           PX6/10X/PK7         \$35.00           ALL LASER/IFT COLORS         \$64.10           NON-SPLIT NON-VIRGIN TONERS         \$11.00	OTHERS.CALL.ODDBALLS.CALL PRICES ARE SUBJECT TO CHANGE WITHOUT NOTICE::::: SOUTHEAST CARTRIDGE MIN. OKDER \$150.00 COD-VISA-MIC-AMEX (700/02/0-706 FAX 770-207.1613 (700/02/0-706 FAX 770-207.1613 WWW.VIRGINEMPTIES.COM	Many other cartridges available Call for a Quote Phone 868-543-9405 Fax 868-454-5439 E-mail: kartridgesforkidzeyahoo.com	NEW ONLINE CLASSIFIEDS www.rechargermag.com/classifieds www.rechargermag.com/classifieds www.rechargermag.com/classifieds www.rechargermag.com/classifieds www.rechargermag.com/classifieds	LEX-ALL OTTHERSCALL Non Virgin 96A	JetScape: 800-576-9376 INKJET & LASER EMPTIES BOTH VIRGIN & NON VIRGIN <b>Specials</b> Q-6511-4/X-932-815.00 OPTRA-16432-815.00 E-339-532.00
Survey Shows More Remanufacturers Testing Than Ever Before New HP Patent Details	C4127X/0X	BUYING & SELL	Phone: 800-201-1000 Fax: 860-201-1000 email: con@enu(.net	www.rechargermag.com/classifieds www.rechargermag.com/classifieds www.rechargermag.com/classifieds www.rechargermag.com/classifieds	End Users. * Climate control warehoused in Birmingham,AL. CALL TEYA TOLL FREE IN THE U.S.	6657:87:50 TOLL FREE: (800)558-9123 (800)772-8594 FAX: (818)772-8598 EMAIL:Dunritesupply@yahoo.com
Expanded Chip Capabilities Awards Voting Page 72	Ribbons Express, Inc. NJ Ribbons Express, Inc. NJ 800-533-9949 Ask for Jim x25 <u>ipowers@ribbons-express.com</u> "E-MAIL JIM FOR MAYY ODD-BALL TONERS" We buy Surplus Supplies Call for Printer Sale Specials	Empity Toner Cartridges Surpl Empity Ink Cartridges Used Call EOS Today Toll Free: 888-E0S-30 Ne Minimum Ord	us OEM Cartridges Fusers 176	www.rechargermag.com/classifieds www.rechargermag.com/classifieds Christina Conrad Classified Sales Manager P: 702-438-4025 christina@rechargermag.com	1-800-482-8128 Monday-Frida 8am-5pm Central Time (US) OUTSIDE US: 1-205-833-2704 E-mili alimagecraft@sol.com FAX YOUR ORDER: 1-205-833-6448 Inage Craft 1151 Gadøden Highwa-Birmingham, AL 35235	SALE! SALE! SALE! 27X Non Virgin @ \$.5 Misc. Remanufactured Cartridges 50% off CALL 888-EOS-3076 for more information

**Exhibit 2B** - The product dumping of imported aftermarket printer cartridges devalued empty cores to the point there was no value for used cartridges to be collect driving cartridge collectors out of business.

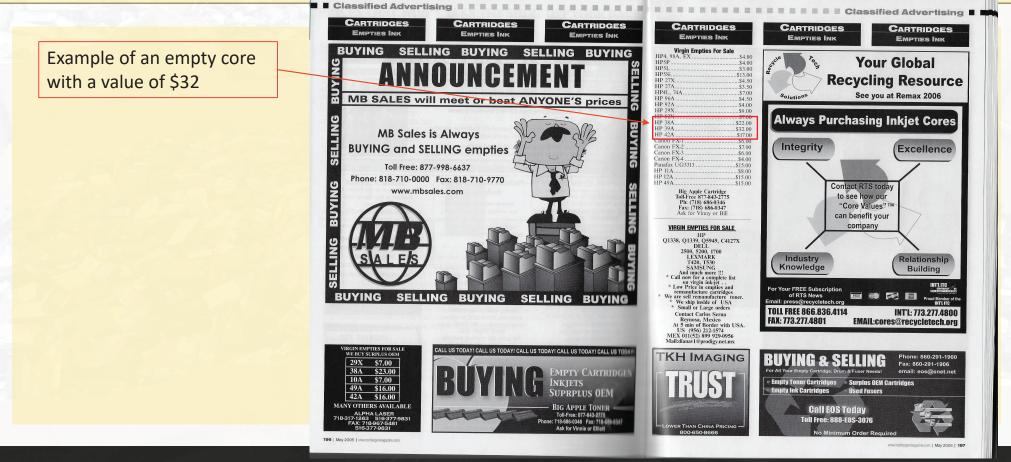


Exhibit 2C - Articles of how counterfeit and compatible printer cartridges effect the industry and the environment.

- 1. <u>State of China's remanufacturing Industry RT News</u>
- 2. Forces Shaping Today's Cartridge Remanufacturing Industry Actionable Intelligence
- Premium Compatibles Poised to Fundamentally Change Third-Party Printer Supplies Market Actionable Intelligence
- 4. Infringing Cartridges Still Pose a Clear and Present Danger to the Consumable Market
- 5. Why Knockoff Print Cartridges Should Concern the Channel
- 6. <u>THE COUNTERFEIT ECONOMY: HOW PRINTER CARTRIDGES GET FAKED, AND WHY</u> YOU SHOULD CARE
- 7. Three reasons you shouldn't buy counterfeit
- 8. Chinese ink and toner clones counterfeiters run free online all over Amazon unimpeded
- 9. China is Again Passing Off Counterfeit Ink Cartridges as Remanufactured
- 10. <u>Amazon Turning a Blind Eye to Counterfeit Ink Cartridges Falsely Being Labelled and Sold as</u> <u>Remanufactured</u>
- 11. Health Risk from Clone Cartridges
- 12. Is this REALLY a remanufactured cartridge?

### Cartridge Waste and the Environment

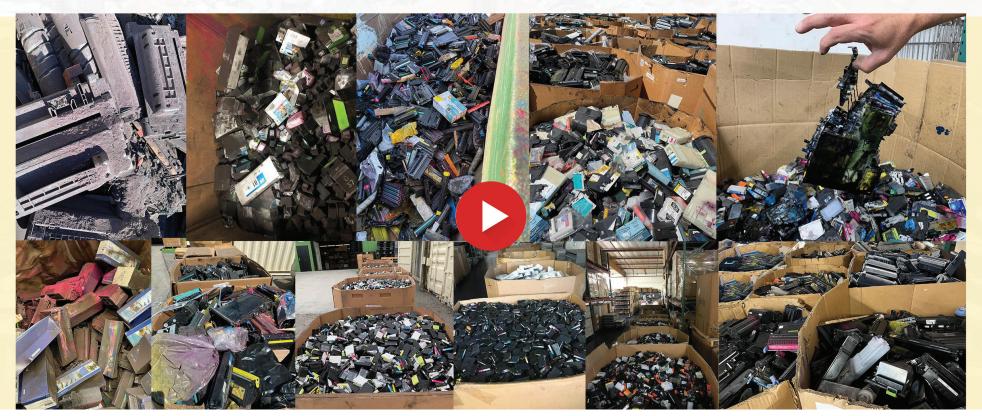
Over 375 million used printer cartridges contaminated with ink and toner residue are ending up in landfills each year and growing. It can take 1,000 years for a printer cartridge to decompose.

The World Health Organization classifies toner waste as **class 2B carcinogen** due to its potential health hazard. Without a remanufacturing industry to properly handle printer cartridge waste, an enormous amount of plastic will enter our environment with toner dust and ink residue that will affect all those who handle the cartridge from the end-user to its final end-of-life destination, landfills.

Amazon bears responsibility for being the biggest contributor for millions of printer cartridges ending up in landfills each year.

- Exhibit 3A Images of used printer cartridges which have been collected from different sources such as E-waste recyclers, office supply companies, and our nationwide recycling services.
- Exhibit 3B Video <u>55 Pallets</u> is a shipment from an E-waste company that couldn't find an outlet source to handle their printer cartridge waste.
- Exhibit 3C In the U.S. alone there are thousands of electronic waste recyclers who handle printer cartridge waste. Most of which have no resource outlet to recycle used printer cartridges.
- Exhibit 3D Examples of letters from E-waste companies asking if we are able to take their printer cartridge waste or if we know of anyone willing to take their materials. We receive requests like this daily, and because of shipping rates and the low value of the cartridges many companies are stuck having to handle the material.
- Exhibit 3E Transportation and handling of inks and toner cartridges present a major health and environmental issue. Toner dust and ink spillage is a common occurrence when cartridge waste is transported.

Exhibit 3A - 350 Images of used cartridges with ink and toner residue that make up the more than 375 million cartridges that end up in landfills.



Click play button above to view images

AMAZON COUNTERFEIT SELLER PART2

### Exhibit 3B - Video of 55 Pallets from one E-waste Company



AMAZON COUNTERFEIT SELLER PART2

#### Exhibit 3C - List Of Electronic Waste Recyclers

In the U.S. alone there are thousands of electronic waste recyclers who handle used printer cartridges. Most of which have no outlet to recycle used toners and are reaching out to us. Since we only remanufacture ink, there is nothing we can do to help with toner cartridges.

Click link to see list of E-waste Recyclers: https://drive.google.com/file/d/1g 52AGC7WwsJrFIG6GvdcQDApo8GZJN0/vi ew?usp=sharing



#### Exhibit 3D - E-Waste Letters

Examples of letters from E-waste companies asking if we can take their used toner cartridges. We receive requests like this daily.

Click to read what E-waste recyclers have shared about printer cartridges <u>https://drive.google.com/file/d/1IhWIBFD</u> <u>Uzl2VmQ-</u> <u>45JuP\_cD87FYdyTdf/view?usp=sharing</u>

#### **Eric Sherman**

Subject:

FW: We need your feedback on toner waste

From: Eric Howell <eric@earthfriendlyrecycling.net> Sent: Wednesday, November 9, 2022 8:38 AM To: Eric Sherman <erics@pginkjets.com> Subject: Re: We need your feedback on toner waste

We have had a problem with toner cartridges. We once had great pricing and would get quite a bit for each cartridge. Then, a couple years ago, we'd get \$100 for a full gaylord. 6 months later, 4 gaylords go out and after shipping, we got \$100 for all 4. Since then, we've stopped collecting toner cartridges for recycling and just throw them in the trash when we pull them.

# Exhibit 3E - Transportation and Handling of Used Printer Cartridges.

Transportation and handling of used printer cartridges present a major health and environmental issue. The disbursement of toner dust and ink spillage is a common occurrence when cartridges are transported nationwide.



### Planet Green and the Remanufacturing Process

Planet Green has been remanufacturing printer ink cartridges for over 22 years at its state-of-the-art facility in Chatsworth, CA. Our remanufacturing process starts with core acquisition, disassembly, condition assessment, cleaning, repair, assembly, testing, service life, and core return.

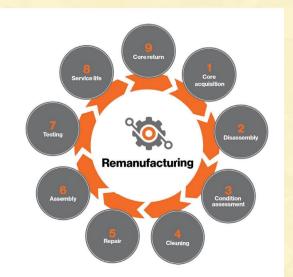
Our remanufacturing process falls within the definition of FTC guidelines for remanufactured products.

<u>Operation National Sword</u> is a policy initiative launched in 2017 by the Government of China to monitor and more stringently review recyclable waste imports. This would include a ban on used printer cartridge cores as it is considered solid waste.

Therefore, Amazon sellers who sell remanufactured printer cartridges from China would not be able to obtain the number of cores needed to sell the quantities of remanufactured cartridges available on Amazon.

- Exhibit 4A Remanufacturing Chart, Planet Green Cartridge Recycling Services, Planet Green Supply Chain
- Exhibit 4B Video of Planet Green's remanufacturing facility and process

## Exhibit 4A – Remanufacturing Chart, Planet Green Cartridge Recycling Services, Planet Green Supply Chain



Remanufacturing is a process where a particular product is taken, apart, cleaned, repaired and then reassembled to be used again.



To learn more call 800-377-1093 GreenRecycle.com \* 20724 Lassen St., Chatsworth, CA 91311 Planet Green Supply Chain Sourcing Used / Empty Cartridge Cores • Schools

- Residential
- Businesses
- Government Agencies
- Non-profits
- Electronic Waste Recyclers

#### **Ink Suppliers**

- GSC Imaging
- Ink 2000
- Dupont

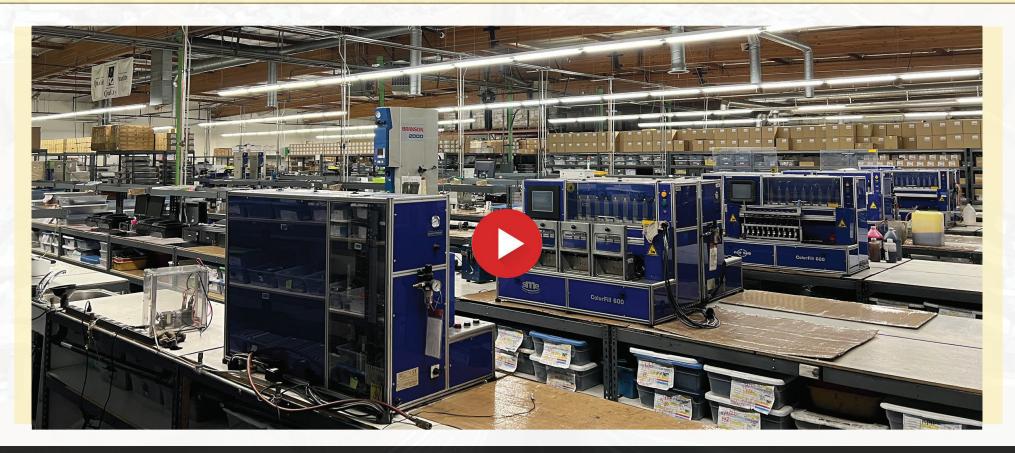
#### Chips

Static Control

#### Packaging and labeling

- Sermo Plastic caps and clips
- R-Jet Tek Protective Tape
- Associated Bags Sealed bags
- Pacobond Boxes
- AAA Label Factory Labels

# Exhibit 4B – Video of Planet Green's ink cartridge remanufacturing facility



AMAZON COUNTERFEIT SELLER PART 2

#### Outreach

Amazon's lack of action to hold sellers accountable for selling illegitimate products while contributing to our nation's plastic waste will not go unnoticed.

- Exhibit 5A List of environmental groups and media
- Exhibit 5B City of Los Angeles Resolution
- Law enforcement FTC, ITC, CA Attorney General, U.S. Customs and Border Protection, CalRecycle
- Exhibit 5C List of Policy makers Break free from plastic Act co-sponsors
- Exhibit 5D Industry Resources
  - International Imaging Technology Council
  - <u>Actionable Intelligence</u>
  - Toner News
  - <u>RT Image</u>
  - Image Supply Coalitions

### Exhibit 5A - List of environmental groups and media

Click here to see list of environmental groups activists who may take up the cause to stop printer cartridge waste: <u>https://drive.google.com/file/d/1rekRC-</u> <u>IWTpm0wnHottQMzga8nmaWK8U9/view?usp=</u> sharing

> BEZOS EARTH FUND

Click here to see list of environmental journalists: <u>https://drive.google.com/file/d/1gfRtZfLC3-</u> aZ OxuV6z 5B4GQzrwPGP/view?usp=sharing



## Exhibit 5B - City of Los Angeles Passed a Resolution to ban the import aftermarket printer cartridges.

#### RESOLUTION KULES, ELECTIONS & INTERGOVERNMENTAL RELATION:

WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before a local, state or federal governmental body or agency must have first been adopted in the form of a Resolution by the City Council with the concurrence of the Mayor: and

WHEREAS, over 375 million plastic ink and toner printer cartridges are thrown away each year sending over 150 million pounds of plastic waste to landfills; and

WHEREAS, this number is growing rapidly due to the increase flow of aftermarket, new built, single-use printer cartridges imported from foreign manufacturers; and

WHEREAS, printer cartridges are classified as a consumable product, which consumers use repeatedly until spent, discard it, and purchase another to continue operating their printer; and

WHEREAS, imported, aftermarket, new built, single-use printer cartridges cannot be recycled or remanufactured for reuse due to the materials and manufacturing process used in their production; and

WHEREAS, when these imported single-use printer cartridges are removed from printers, they are not classified as e-waste but rather just waste with no value for recyclers or remanufactures; and

WHEREAS, imported single-use printer cartridges use 40% more energy to produce, 54% more fossil fuels when consumed, and generate a 55% larger carbon footprint than recycled or remanufactured printer cartridges; and

WHEREAS, imported single-use printer cartridges generate 16 times more paper waste from reprints due to their inconsistent print quality; and

WHEREAS, single-use printer cartridges can take between 450 and 1,000 years to decompose in a landfill while leaching toxins into the soil and groundwater;

NOW, THEREFORE, BE IT RESOLVED, with the concurrence of the Mayor, that by the adoption of this Resolution, the City of Los Angeles hereby includes in its 2021-2022 State and Federal Legislative Programs SUPPORT for any legislation and/or administrative action that would ban the import and sale of aftermarket, single-use, new built printer cartridges since they are harmful to the environment and cannot be recycled or remanufactured.

PF

built printer cartridges since they are harmful to the	ie
ESENTED BY: JOIN S. LEE Councilmember, 12 <sup>th</sup> District	ORIG
CONDED BY: Mt. D. Zurit	

kat SEP 2 9 2021

#### HOLLY L. WOLCOTT CITY CLERK

March 23, 2022

CALIFORNIA PETTY F. SANTOS EXECUTIVE OFFICER

ERIC GARCETT

#### OFFICE OF THE CITY CLERK

Council and Public Services Division

200 N. SPRING STREET, ROOM 395 LOS ANGELES, CA 90012 GENERAL INFORMATION - (213) 978-1133 FAX: (213)978-1040

PATRICE Y. LATTIMORE DIVISION MANAGER CLERK.LACITY.ORG

#### OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

City of Los Angeles

MAYOF

Council File No		21-0002-S1	73						
Council Meetin			March 23, 2022						
Agenda Item Ne		9	022						
Agenda Description:		RULES, ELECTIONS, AND INTERGOVERNMENTAL RELATIONS COMMITTEE REPORT and RESOLUTION relative to including in the City's 2021-2022 State and Federal Legislative Program, its position for any legislation and/or administrative action that would ban the import and sale of aftermarket, single-use, new built printer cartificges since they are harmful to the environment and cannot be recycled or remanufactured.							
Council Action:			ELECTIONS E REPORT	8, AND AND RESO		VERNMEN DOPTED F			
Council Vote: YES ABSENT ABSENT YES YES	Blumenfi Cedillo Koretz Martinez Raman		YES ABSENT ABSENT YES YES	Bonin de León Krekorian O'Farrell Rodriguez		YES YES YES YES YES	Buscaino Harris-Dawson Lee Price Wesson, Jr.		
Herenty Willing									

HOLLY L. WOLCOTT CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 231(h)

FILE SENT TO MAYOR LAST DAY FOR MAYOR TO ACT

APPROVED

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

04/04/2022

AMAZON COUNTERFEIT SELLER PART2

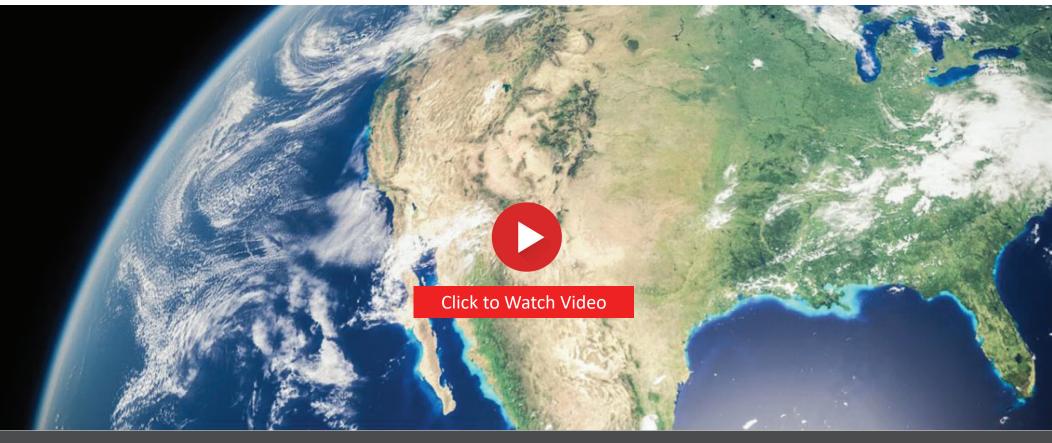
#### Exhibit 5C - List of Policy Makers – Break Free From Plastic Act Co-sponsors

Click link below or copy into browser to see a list of House of Representatives that we are in dialogue with regards to the import of aftermarket printer cartridges that are detrimental our environment. https://drive.google.com/file/d/1ZljEOH1T-Je4BL9xpSGtNbAFasOIGupi/view?usp=sharing



#### **Corrective Action**

- 1. Pay damages
- 2. Require sellers of remanufactured printer cartridges to provide proof of the following
  - a) Third-party verification of cartridge remanufacturing facility
  - b) Third-party verification of a cartridge core collection program
  - c) Remanufactured cartridges should only be sold within the region the cartridge cores are collected to reduce waste
  - d) A third-party entity, such as the International Imaging Technology Council (i-itc.org) should be the body to seek verification and police printer cartridge remanufacturers. This would be a similar policy requiring a seller to be an authorized OEM printer cartridge dealer
- 3. Remove all counterfeit sellers identified in Exhibit 1A
- 4. Remove all sellers who cannot verify their environmental claims or use recycling logos, icons or phrases that the product is recycled or can be recycled. This includes cartridges claiming to be "remanufactured."
- 5. Required all sellers of aftermarket printer cartridges to take responsibility for their cartridges by providing a verifiable "take back" program for customers to recycle used cartridges. Aftermarket sellers would be prohibited from providing instructions to drop off used cartridges at local e-waste recyclers, major office supply and electronic chain stores, etc.



## REDUCE, RECYCLE, REUSE!



"CLIMATE CHANGE IS THE BIGGEST THREAT TO OUR PLANET. I WANT TO WORK ALONGSIDE OTHERS BOTH TO AMPLIFY KNOWN WAYS AND TO EXPLORE NEW WAYS OF FIGHTING THE DEVASTATING IMPACT OF CLIMATE CHANGE ON THIS PLANET WE ALL SHARE"

JEFF BEZOS – NEW YORK TIMES 2/17/2020