

1 JOHN C. ULIN (SBN 165524)  
Email: julin@troygould.com  
2 RUSSELL I. GLAZER (SBN 166198)  
Email: rglazer@troygould.com  
3 ANNMARIE MORI (SBN 217835)  
Email: amori@troygould.com  
4 CHINELO N. IKEM (SBN 343780)  
Email: cikem@troygould.com  
5 TROYGOULD PC  
1801 Century Park East, 16th Floor  
6 Los Angeles, CA 90067-2367  
Telephone: (310) 553-4441  
7 Facsimile: (310) 201-4746

8 Attorney for Plaintiff PLANET GREEN  
9 CARTRIDGES, INC.

10  
11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

13 PLANET GREEN CARTRIDGES, INC., a )  
14 California corporation, ) CASE No.:  
15 )  
16 Plaintiff, ) **COMPLAINT FOR DAMAGES:**  
17 v. ) **1. Violation of the Lanham Act, 15**  
18 ) **U.S.C. § 1125;**  
19 ) **2. Common Law Unfair Competition;**  
20 ) **3. Unfair Competition in Violation of**  
21 ) **California Unfair Competition Law –**  
22 ) **Unlawful and Unfair Prongs (Cal. Bus.**  
23 ) **& Prof. Code § 17200, et seq.);**  
24 ) **4. Violation of California False**  
25 ) **Advertising Law (Cal. Bus. & Prof.**  
26 ) **Code § 17500, et seq.)**  
27 ) **DEMAND FOR JURY TRIAL**  
28 )

---

29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50

COMES NOW Plaintiff, PLANET GREEN CARTRIDGES, INC. (“Plaintiff” or “Planet Green”), with knowledge of its own actions and events, and upon information and belief as to other matters, and alleges as follows against Defendants

1 AMAZON.COM, INC., AMAZON.COM SERVICES LLC, AMAZON ADVERTISING  
2 LLC and DOES 1-25, inclusive (collectively, “Defendants”):

3 **I.**

4 **INTRODUCTION**

5 1. This action arises out of Defendants’ persistent violation of their own  
6 policies, federal and state laws, and stated environmental objectives, by the false claims  
7 of new built clone cartridges as being remanufactured and sold as recycled product on a  
8 mass scale. The products, almost all of which are made in China, are not original  
9 equipment manufacturer (“OEM”), but are new built clone printer ink cartridges, falsely  
10 listed and labeled as remanufactured and sold as recycled product, deceiving millions of  
11 Amazon’s customers in California and throughout the United States.

12 2. Plaintiff presented Defendants with uncontroverted evidence outlining  
13 numerous brands of printer ink cartridges Plaintiff purchased on Amazon as test  
14 purchases, which demonstrated that Defendants were falsely advertising, making  
15 unsubstantiated environmental claims, and selling clone cartridges falsely represented as  
16 remanufactured, in violation of Amazon’s policies, federal and state laws, and engaging  
17 in conduct antithetical to Amazon’s environmental mission and efforts. Defendants’  
18 response to Plaintiff’s evidence was essentially that they are immune from liability for  
19 publishing third-party content on their platform under the Communications Decency Act,  
20 47 U.S.C. section 230. But, as set forth further below, this contention is just wrong.

21 3. Plaintiff requested Defendants, per their own policies, remove or suspend  
22 sellers of misrepresented clone cartridges outlined in Plaintiff’s presentations of evidence  
23 until they authenticated that their cartridges were actually remanufactured. Instead,  
24 Defendants continue to allow unlawful sellers to maintain their accounts, permit them to  
25 advertise, promote their products with Defendants’ endorsement, and Defendants provide  
26 fulfillment services, “sold by Seller and fulfilled by Amazon.” In a Zoom meeting on  
27 May 26, 2023, Defendants told Plaintiff that they had asked brands that could not  
28 substantiate claims of being remanufactured or recyclable to change their product

1 descriptions to continue to sell on the platform. But the deceptive practices have not  
2 changed, and Defendants continue to allow sellers that have deceived millions of  
3 consumers with its false advertising and recyclability claims to sell clone ink cartridges  
4 over Amazon.

5 4. Moreover, Defendants themselves promote, distribute, fulfill, advertise, and  
6 sell the illicit clone cartridges identified in Plaintiff’s presentations of evidence, including  
7 through their Amazon Warehouse Program. Defendants use the same false descriptions  
8 used by other sellers in describing the clone ink cartridges they sell. Defendants’ deep  
9 involvement in the sale, distribution and promotion of these clone cartridges renders them  
10 liable for the unlawful manner in which they are promoted and sold.

11 **II.**

12 **THE PARTIES**

13 5. Plaintiff, PLANET GREEN CARTRIDGES, INC., is a corporation  
14 organized under the laws of the State of California, with its principal place of business in  
15 Chatsworth, California. For the last 23 years, Planet Green has been an industry leader of  
16 wholesale, high-quality, United States remanufactured ink cartridge products. Planet  
17 Green remanufactures ink cartridges using only OEM cores that are collected from  
18 schools, businesses, and consumers throughout the United States. The remanufactured  
19 ink cartridges sold by Planet Green are authentic recycled products.

20 6. Defendant AMAZON.COM, INC. is a corporation organized and existing  
21 under the laws of the State of Delaware, with its principal place of business at 410 Terry  
22 Avenue North, Seattle, Washington 98109-5210. AMAZON.COM, INC. markets and  
23 sells products to retail consumers all over the world through internet websites such as  
24 www.amazon.com, using various trademarks and brand names, including “Amazon.”

25 7. Defendant AMAZON.COM SERVICES LLC is a limited liability company  
26 organized and existing under the laws of the State of Delaware, with its principal place of  
27 business at 410 Terry Avenue North, Seattle, Washington 98109-5210. AMAZON.COM  
28 SERVICES LLC sells products to consumers through Amazon Warehouse that are

1 fulfilled by Amazon.com. Plaintiff is informed and believes that AMAZON.COM  
2 SERVICES LLC is a subsidiary of Defendant AMAZON.COM, INC. Defendants  
3 AMAZON.COM, INC. and AMAZON.COM SERVICES LLC are sometimes  
4 collectively referred to herein as “Amazon.”

5 8. Defendant AMAZON ADVERTISING LLC is a limited liability company  
6 organized and existing under the laws of the State of Delaware, with its principal place of  
7 business at 410 Terry Avenue North, Seattle, Washington 98109-5210. AMAZON  
8 ADVERTISING LLC provides advertising services to third party sellers. Plaintiff is  
9 informed and believes that AMAZON ADVERTISING LLC is a subsidiary of Defendant  
10 AMAZON.COM, INC. Defendants AMAZON.COM, INC., AMAZON.COM  
11 SERVICES LLC and AMAZON ADVERTISING LLC are sometimes collectively  
12 referred to herein as “Amazon.”

13 9. The true names and capacities of Defendants sued herein as DOES 1-25,  
14 inclusive, are unknown to Plaintiff. Plaintiff therefore sues these Defendants by such  
15 fictitious names. Plaintiff will amend this complaint to allege the true names and  
16 capacities of said DOE Defendants when ascertained. Each of these fictitiously named  
17 Defendants are responsible in some manner for the acts and conduct alleged herein and  
18 such Defendants proximately caused Plaintiff harm as alleged herein.

### 19 III.

### 20 JURISDICTION AND VENUE

21 10. This court has original jurisdiction over the subject matter of this matter  
22 under 15 U.S.C. section 1121 and 28 U.S.C. sections 1331 and 1338, because it is a civil  
23 action involving claims arising under the laws of the United States, including the Lanham  
24 Act, 15 U.S.C. section 1051 *et seq.*, and the court has supplemental jurisdiction over  
25 Plaintiff’s state law claims under 28 U.S.C. sections 1338(b) and 1367(a), in that they  
26 form part of the same case or controversy that gives rise to Plaintiff’s claims under the  
27 laws of the United States.

28 11. This court also has original jurisdiction over the subject matter of this

1 action pursuant to 28 U.S.C. section 1332 because the amount in controversy exceeds  
2 \$75,000.00 and the parties are diverse in citizenship.

3 12. Venue is proper in this court pursuant to 28 U.S.C. section 1391(b) because  
4 a substantial part of the events or omissions giving rise to the claims at issue occurred in  
5 this judicial district and division, and because Defendants are subject to the court's  
6 personal jurisdiction with respect to this action.

7 13. The court has personal jurisdiction over each of Defendants because the  
8 causes of action asserted herein arise from Defendants transacting business in the State of  
9 California, contracting to supply and actually supplying services or things in the State of  
10 California and causing tortious injury in the State of California by virtue of their acts and  
11 omissions.

12 14. This court has personal jurisdiction over Defendants because they (a) have  
13 sold numerous products in the State of California and this district; (b) have caused  
14 tortious injury within the State of California and this district; (c) have practiced the  
15 unlawful conduct complained of herein, in part within the State of California and this  
16 district; (d) have regularly conducted and solicited business within the State of California  
17 and this district; (e) have regularly and systematically directed electronic activity into the  
18 State of California and this district with the intent to engage in business within the State  
19 of California and this district, including the sale and/or offer for sale to internet users  
20 within the State of California and this district; and (f) have entered into contracts with  
21 residents of the State of California and this district for the sale of goods.

#### 22 **IV.**

#### 23 **FACTUAL ALLEGATIONS**

24 15. Since 1999, Planet Green has remanufactured ink cartridges in a state-of-  
25 the-art facility utilizing a painstaking process consisting of obtaining used OEM cartridge  
26 cores, thoroughly inspecting, cleaning, refilling the cartridges with new ink, testing for  
27 quality control, and packaging for resale. Planet Green is one of the last remaining printer  
28 cartridge remanufacturers in the United States. The United States once was the epicenter  
of thousands of printer cartridge remanufacturers, suppliers, and resellers. Due to the

1 conduct of Defendants as the primary advertiser and distributor of the sale of inauthentic  
2 products from overseas as alleged herein, the United States printer cartridge  
3 remanufacturing industry has been eviscerated.

4 16. Prior to the filing of this action, Plaintiff put Amazon on notice of the  
5 wrongful conduct alleged in this Complaint. On June 23, 2022, Plaintiff provided a  
6 presentation of evidence to Amazon detailing how 18 brands and their numerous listings  
7 of aftermarket ink cartridges label new built single-use clone ink cartridges as  
8 “remanufactured,” which are sold as a recycled product on their platform (sometimes  
9 referred to herein as “the illicit ink cartridges”). Plaintiff demonstrated that the same  
10 sellers are falsely advertising their listings, products, and packaging. Plaintiff also pointed  
11 out that the same sellers are misusing Amazon’s own defined terms “remanufactured”  
12 and “compatible” for different types of printer cartridges by using them interchangeably,  
13 which is deceptive. Plaintiff offered Amazon an opportunity to do the right thing and stop  
14 the sale of falsely labelled clone printer cartridges that are deceiving consumers, harming  
15 the environment, and that have destroyed the once thriving printer cartridge  
16 remanufacturing industry. The original notice and presentation are attached hereto as  
17 **Exhibit 1.**

18 17. Over the course of five (5) months, Amazon failed to act on any of the 18  
19 brands of illicit clone ink cartridges as they continued to be available for purchase on  
20 Amazon’s website. During this time, Plaintiff continued to purchase more ink cartridges  
21 that were falsely sold as remanufactured ink cartridges from Amazon. On December 9,  
22 2022, Plaintiff sent a second presentation of evidence to Amazon, identifying a total of 82  
23 brands of remanufactured ink cartridges that were purchased by Plaintiff. This  
24 presentation illustrates that Amazon has a category-wide issue with falsely labeled  
25 cartridges, promoted with unsubstantiated environmental claims, in violation of  
26 Amazon’s listing policies, which deceive consumers. In addition, Plaintiff separately  
27 hand delivered its presentation of evidence on November 24, 2022, to Amazon’s Chief  
28 Executive Officer Andy Jassy, through a mutual contact, informing him of the unlawful

1 actions that were taking place on Amazon’s platform. The second presentation of  
2 evidence is attached hereto as **Exhibit 2**.

3 18. Amazon acknowledged receiving the second presentation of evidence  
4 asking for Plaintiff’s test buy results to confirm the factual allegations, a baffling  
5 response considering that Plaintiff’s presentations contained the test buy results. Amazon  
6 took the positions that the Amazon Seller Code of Conduct prohibits sellers from making  
7 false statements about products and that Amazon is not responsible for seller statements  
8 and is immune from liability for publishing third-party content on its platform under  
9 Section 230 of the Communications Decency Act, 47 U.S.C. § 230. These positions  
10 completely ignore the fact that Plaintiff notified Amazon of illicit clone ink cartridges  
11 and that the entire category of remanufactured printer cartridges is overrun by sellers who  
12 unlawfully misrepresent their products. In response, Amazon has provided nothing more  
13 than lip service, claiming, without action, that Amazon will enforce its rules and  
14 investigate.

15 19. The reason for the tremendous loss of an entire United States printer  
16 cartridge remanufacturing industry and Plaintiff’s damages, is due to Amazon’s direct  
17 participation in the unlawful practices detailed in this Complaint, which effectively  
18 prevent legitimate businesses from competing against the overwhelming proliferation of  
19 clone printer cartridges flooding the market through their website, fulfillment centers and  
20 warehouse program. Sellers are allowed to list multiple products claiming to be  
21 remanufactured OEM cartridges, frequently bearing the “recyclable” symbol, when in  
22 fact they are newly manufactured clone cartridges, not OEM product, and not in fact a  
23 recycled or recyclable product.

24 20. The following are some examples that were shared with Amazon, which  
25 illustrate how illicit brands and their sellers are defrauding consumers:

- 26 1) Examples of new built clone ink cartridges falsely labeled as  
27 remanufactured and sold as a recycled product and ships from Amazon:  
28

1 a. Amazon listing for V-Surink.

2

3

4

5

6

7

8

9

10

11

12 **V-Surink listing is describing their product to be remanufactured and ships from Amazon.**

13

14

15 b. Ink cartridges, Plaintiff purchased on Amazon and fulfilled by Amazon.



25

26 **V-Surink is claiming on their product and packaging to be a remanufactured product.**

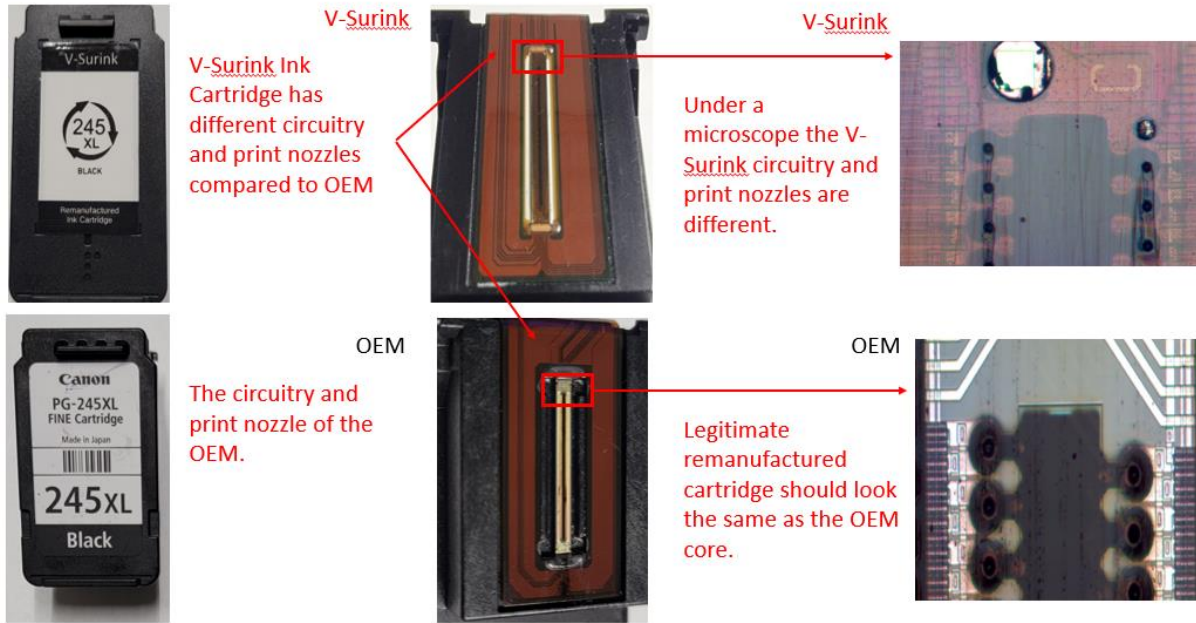
27

28 c. Below is a side-by-side comparison of Canon cartridges and V-Surink

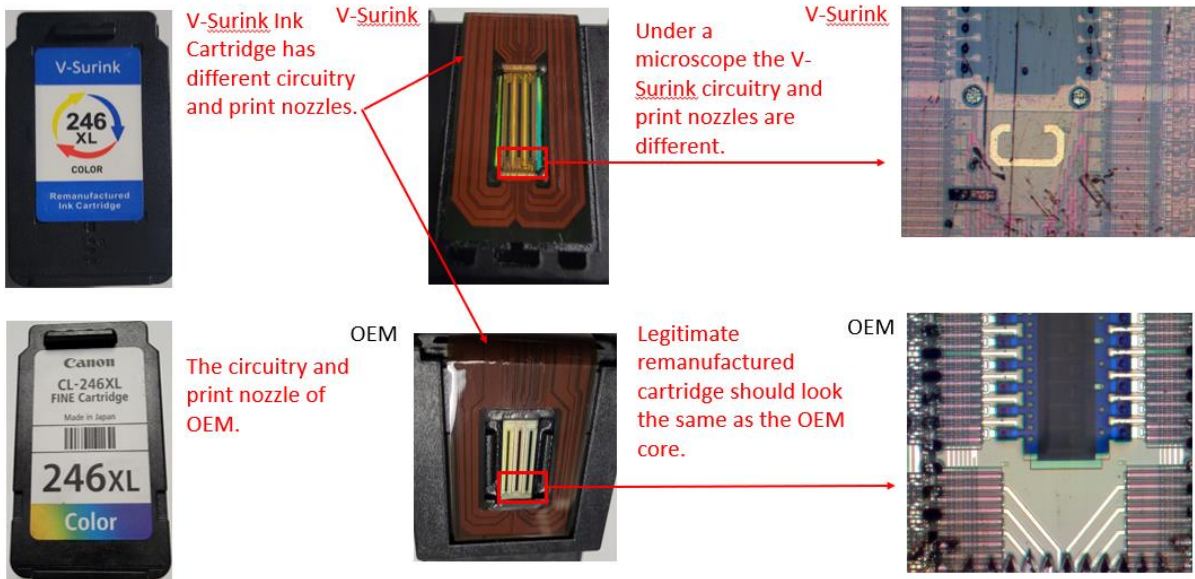


1 ink cartridges. The example shows the differences between OEM cores  
2 and counterfeit remanufactured ink cartridges.

3  
4 Under Microscope V-Surink Cartridge Side-By-Side Comparison with OEM Cartridge Core



15  
16 Under Microscope V-Surink New Built Clone Cartridge Side-By-Side Comparison with OEM Cartridge Core

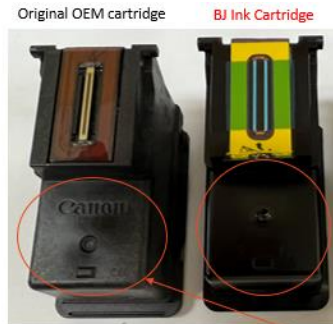


d. Another example of a counterfeit remanufactured ink cartridge

1 purchased from Amazon with side-by-side comparison with an OEM  
2 cartridge;

3  
4 BJ Ink Cartridge listing  
5 describing their product as  
6 remanufactured and ships  
7 from Amazon

8 BJ Ink Cartridge product and  
9 packaging purchased on Amazon  
10 claiming the cartridge is  
11 remanufactured.

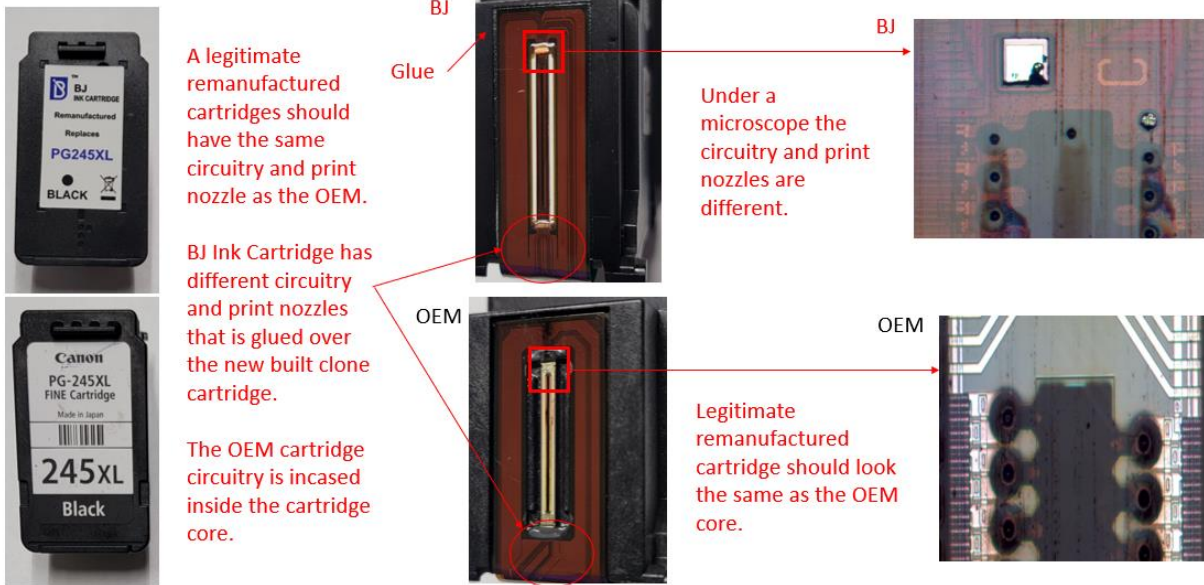


17  
18 Side-by-side comparison  
19 between an original Canon  
20 cartridge and a new built non-  
21 OEM clone cartridge falsely  
22 labeled as a remanufactured  
23 and sold as a recycled product.

24 The OEM cartridge has Canon engraved in the core of the cartridge while the  
25 clone cartridge has no OEM markings and is made from clearly different plastic  
26 material.

27  
28  
///  
///  
///

Under Microscope BJ Cartridge New Built Clone Side-By-Side Comparison with OEM Cartridge Core



2) Example of an inaccurate and deceptive Amazon listing. Sheengo depicts its box to look like a Canon box and claims to be remanufactured.

Sheengo's listing on Amazon depicting itself as a Canon OEM Cartridge and ships by Amazon.

- 1 a. Below is the actual package and product that was received after a test  
 2 purchase from Amazon. The package and product are significantly  
 3 different than what is depicted in Sheengo's Amazon listing.  
 4

5  
 6 The inaccurate depiction of listing and  
 7 what was received is in direct violation of  
 8 Amazon's Ink and Toner listing policy  
 9 where your listing and images must  
 10 accurately describe your product.



- 11  
 12 b. Side-by-side comparison of Canon cartridges and Sheengo's ink  
 13 cartridges show a significant difference between the OEM core and a  
 14 new built non-OEM clone cartridges falsely labelled as a  
 15 remanufactured product.  
 16



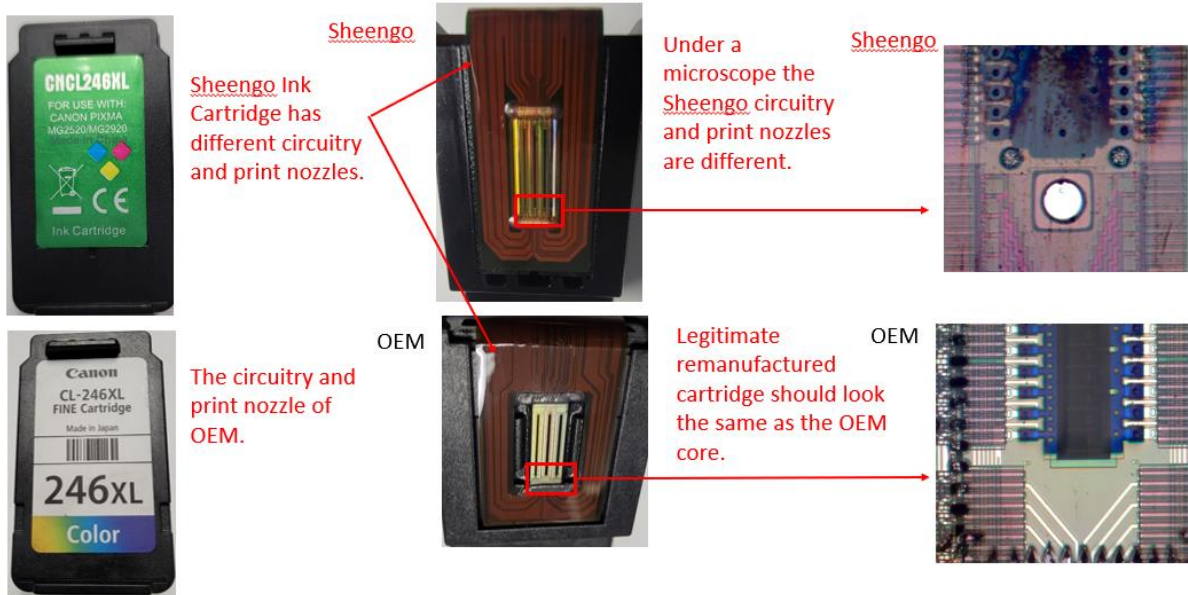
17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25 Side-by-side comparison between an  
 26 original Canon cartridges and Sheengo's  
 27 new built non-OEM clone cartridges  
 28 sold as a remanufactured product.

The OEM cartridge has Canon engraved on the core of the cartridge. Sheengo's cartridges do not have any OEM markings and are clearly made from different plastic material.

Under Microscope Sheengo's New Built Clone Cartridge Side-By-Side Comparison with OEM Cartridge Core



Under Microscope Sheengo New Built Clone Cartridge Side-By-Side Comparison with OEM Cartridge



///

///

///

c. The customer's reviews below are examples of how Amazon strikes-out customers complaints and takes full responsibility for Sheengo's falsely advertised listings because products ship from Amazon.

### Sheengo Reviews



"I ordered the Canon BRAND AND THAT IS WHAT I WANT."

By J Ingram on February 13, 2023.

**Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.



"These cartridges were completely unusable. Based on the picture on Amazon, I thought I was buying actual Canon cartridges. This was a deceptive picture because the product I received was in a completely different-looking box. Check picture of the cartridges for "Canon" on the picture of the product."

Read less

By Thomas Johnson on February 1, 2023.

**Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.

3) Below are examples of ink cartridge sellers making unsubstantiated environmental marketing claims that violate Amazon's policies and FTC Environmental Marketing Green Guides.



V-Surink Ink Cartridges Replacement for Canon PG245XL CL246XL Compatible with PIXMA MX492 TR4520 TS3120 TS3320 MG2420 MG2522 MX490 MG2920 MG2922 MG2520 IP2820 Printer (1 Black 1 Color) (1B1C)

Brand: V-Surink  
★★★★★ 1,562 ratings | 53 answered questions

Price: \$39.99 & FREE Returns

Clip Save \$5 with coupon. Terms

Color: 1B1C



Brand	V-Surink
Color	1B1C
Compatibility Options	Remanufactured
Page Yield	300
Special Feature	Tri Color
Compatible Devices	Printer

#### About this item

- Compatible With: Canon PIXMA MG2420 MG2450 MG2520 MG2522 MG2525 MG2550 MG2555 MG2555 MG2920 MG2922 MG2924 MG2950 MG3020 MG3022 MG3050 MG3051 MG3052 MG3053, PIXMA MX490 MX492 MX495, PIXMA TS202 TS205 TS302 TS305 TS3120 TS3122 TS3150 TS3151 TS3320 TS3322 TS3420, PIXMA TR4500 TR4520 TR4522 TR4550 TR4551, PIXMA IP2800 IP2820 IP2840 IP2850 IP2855.
- Page Yield: Up to 480 Pages Per Black Cartridge, Up to 350 Pages Per Color Cartridge (5% coverage). Providing Many More Pages Than Other Cartridge.
- High Performance: Compatible Canon PG245XL CL246XL Ink Cartridges Show Reliable Performance. Remaining Canon PG245XL CL246XL Ink Levels Accurately Reported for Compatible Printers and Keep Low Carbon Environmental Protection. Easy to Install, Print Out Clear Images and Text Quickly and Easily, With Vivid Colors and Perfect Original Color. Can Display Ink Level.
- Contents: 1 User Guide and 2 Pack V-Surink PG245XL CL246XL Ink Cartridges (1 Black, 1 Tri-Color).
- Note: Confirm Your Printer Model Before Placing An Order.

V-Surink making an environmental claim that their product are environmentally friendly product when they were found to be new built clone printer cartridges.



V-Surink makes an unsubstantiated claim of "keeping low carbon environmental protection"



1 4) The illicit brands of ink cartridges offered for sale on Amazon misuse  
2 recycling logos. The brands use the chasing arrows recycling logo and do not insert the  
3 trash icon on their products and packaging without indicating whether the product or  
4 packaging came from recycled material or is a recyclable product.

5 a. Below are examples of how these symbols are used without support  
6 of their recyclability claims in violation of Amazon's policies and FTC  
7 Environmental Marketing Green Guides.



V-Surink misusing the recycling logo on its packaging and product deceiving customers it is a recycled product.

17 Greencycle Amazon listing uses recycling logos without any way to verify its recyclability claims. This product ships from Amazon.

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



Greencycle side-by-side comparison with Canon cartridge clearly shows the cartridge is not remanufactured from an OEM core. Greencycle has no Canon markings and its clearly made from different plastic material. It is a new built clone cartridge fraudulently labeled as remanufactured.

1  
2  
3 BJ Ink Cartridge deceives consumers that it is a  
4 recyclable product by using no trash icons and  
5 recycling logo on the product and packaging.  
6 There are no instructions on the packaging or  
7 product to indicate how and where to recycle  
8 this product.

9  
10  
11 BJ Ink Cartridge misuses the recycling logo on  
12 its packaging by not providing any clear  
13 understanding if packaging and product are  
14 made from recycled material or that they can  
15 be recycled.



16  
17  
18 5) Sellers misuse Amazon’s defined terms to describe different types of  
19 printer cartridges, “remanufactured” and “compatible.” Defendants in their  
20 listing policies define “compatible” to be a new built cartridge and  
21 “remanufactured,” a used cartridge that has been taken apart, cleaned, and  
22 rebuilt. The example below is how sellers use the terms interchangeably  
23 deceiving consumers.



24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123  
124  
125  
126  
127  
128  
129  
130  
131  
132  
133  
134  
135  
136  
137  
138  
139  
140  
141  
142  
143  
144  
145  
146  
147  
148  
149  
150  
151  
152  
153  
154  
155  
156  
157  
158  
159  
160  
161  
162  
163  
164  
165  
166  
167  
168  
169  
170  
171  
172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276  
277  
278  
279  
280  
281  
282  
283  
284  
285  
286  
287  
288  
289  
290  
291  
292  
293  
294  
295  
296  
297  
298  
299  
300  
301  
302  
303  
304  
305  
306  
307  
308  
309  
310  
311  
312  
313  
314  
315  
316  
317  
318  
319  
320  
321  
322  
323  
324  
325  
326  
327  
328  
329  
330  
331  
332  
333  
334  
335  
336  
337  
338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382  
383  
384  
385  
386  
387  
388  
389  
390  
391  
392  
393  
394  
395  
396  
397  
398  
399  
400  
401  
402  
403  
404  
405  
406  
407  
408  
409  
410  
411  
412  
413  
414  
415  
416  
417  
418  
419  
420  
421  
422  
423  
424  
425  
426  
427  
428  
429  
430  
431  
432  
433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486  
487  
488  
489  
490  
491  
492  
493  
494  
495  
496  
497  
498  
499  
500  
501  
502  
503  
504  
505  
506  
507  
508  
509  
510  
511  
512  
513  
514  
515  
516  
517  
518  
519  
520  
521  
522  
523  
524  
525  
526  
527  
528  
529  
530  
531  
532  
533  
534  
535  
536  
537  
538  
539  
540  
541  
542  
543  
544  
545  
546  
547  
548  
549  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
560  
561  
562  
563  
564  
565  
566  
567  
568  
569  
570  
571  
572  
573  
574  
575  
576  
577  
578  
579  
580  
581  
582  
583  
584  
585  
586  
587  
588  
589  
590  
591  
592  
593  
594  
595  
596  
597  
598  
599  
600  
601  
602  
603  
604  
605  
606  
607  
608  
609  
610  
611  
612  
613  
614  
615  
616  
617  
618  
619  
620  
621  
622  
623  
624  
625  
626  
627  
628  
629  
630  
631  
632  
633  
634  
635  
636  
637  
638  
639  
640  
641  
642  
643  
644  
645  
646  
647  
648  
649  
650  
651  
652  
653  
654  
655  
656  
657  
658  
659  
660  
661  
662  
663  
664  
665  
666  
667  
668  
669  
670  
671  
672  
673  
674  
675  
676  
677  
678  
679  
680  
681  
682  
683  
684  
685  
686  
687  
688  
689  
690  
691  
692  
693  
694  
695  
696  
697  
698  
699  
700  
701  
702  
703  
704  
705  
706  
707  
708  
709  
710  
711  
712  
713  
714  
715  
716  
717  
718  
719  
720  
721  
722  
723  
724  
725  
726  
727  
728  
729  
730  
731  
732  
733  
734  
735  
736  
737  
738  
739  
740  
741  
742  
743  
744  
745  
746  
747  
748  
749  
750  
751  
752  
753  
754  
755  
756  
757  
758  
759  
760  
761  
762  
763  
764  
765  
766  
767  
768  
769  
770  
771  
772  
773  
774  
775  
776  
777  
778  
779  
780  
781  
782  
783  
784  
785  
786  
787  
788  
789  
790  
791  
792  
793  
794  
795  
796  
797  
798  
799  
800  
801  
802  
803  
804  
805  
806  
807  
808  
809  
810  
811  
812  
813  
814  
815  
816  
817  
818  
819  
820  
821  
822  
823  
824  
825  
826  
827  
828  
829  
830  
831  
832  
833  
834  
835  
836  
837  
838  
839  
840  
841  
842  
843  
844  
845  
846  
847  
848  
849  
850  
851  
852  
853  
854  
855  
856  
857  
858  
859  
860  
861  
862  
863  
864  
865  
866  
867  
868  
869  
870  
871  
872  
873  
874  
875  
876  
877  
878  
879  
880  
881  
882  
883  
884  
885  
886  
887  
888  
889  
890  
891  
892  
893  
894  
895  
896  
897  
898  
899  
900  
901  
902  
903  
904  
905  
906  
907  
908  
909  
910  
911  
912  
913  
914  
915  
916  
917  
918  
919  
920  
921  
922  
923  
924  
925  
926  
927  
928  
929  
930  
931  
932  
933  
934  
935  
936  
937  
938  
939  
940  
941  
942  
943  
944  
945  
946  
947  
948  
949  
950  
951  
952  
953  
954  
955  
956  
957  
958  
959  
960  
961  
962  
963  
964  
965  
966  
967  
968  
969  
970  
971  
972  
973  
974  
975  
976  
977  
978  
979  
980  
981  
982  
983  
984  
985  
986  
987  
988  
989  
990  
991  
992  
993  
994  
995  
996  
997  
998  
999  
1000

Inktopia **Compatible** Ink Cartridge Replacement for Canon 246XL CL 246 XL CL-246XL CL-244 (1 Color) for Canon PIXMA MG2520 MG2920 MG2922 MG2420 MG2522 MG2525 MG3020 MG2555 MX490 MX492 Printer

Visit the Inktopia Store  
★★★★☆ 489 ratings

Price: \$23.99 Get Fast, Free Shipping with Amazon Prime & FREE Returns

Brand	Inktopia
Color	Tricolor
Compatibility Options	<b>Remanufactured</b>
Page Yield	300
Special Feature	Tri Color
Compatible Devices	Printer
Ink Color	1 Tri color

About this item

- Package Contents: Inktopia Replacement for Canon CL-246XL 246XL 246 XL CL-244 Ink Cartridges

21. Defendants’ refusal to take meaningful steps to stop the sale of misrepresented clone cartridges has forced Plaintiff to resort to this litigation. Despite



1 being the largest catalog marketer online, with vast resources, Amazon's efforts and  
2 willingness to stop clone cartridge sales have been so incredibly ineffective, rendering it  
3 effectively nonexistent.

4 22. In addition to the presentations to Amazon, Plaintiff offered Defendants an  
5 open invitation to see first-hand the counterfeit cartridges, at Plaintiff's remanufacturing  
6 facility, and how they are being identified as counterfeit. The following photographs  
7 were provided to Defendants of ink cartridges test purchased by Plaintiff:  
8



22 ///

23 ///

24 ///

25

26

27

28

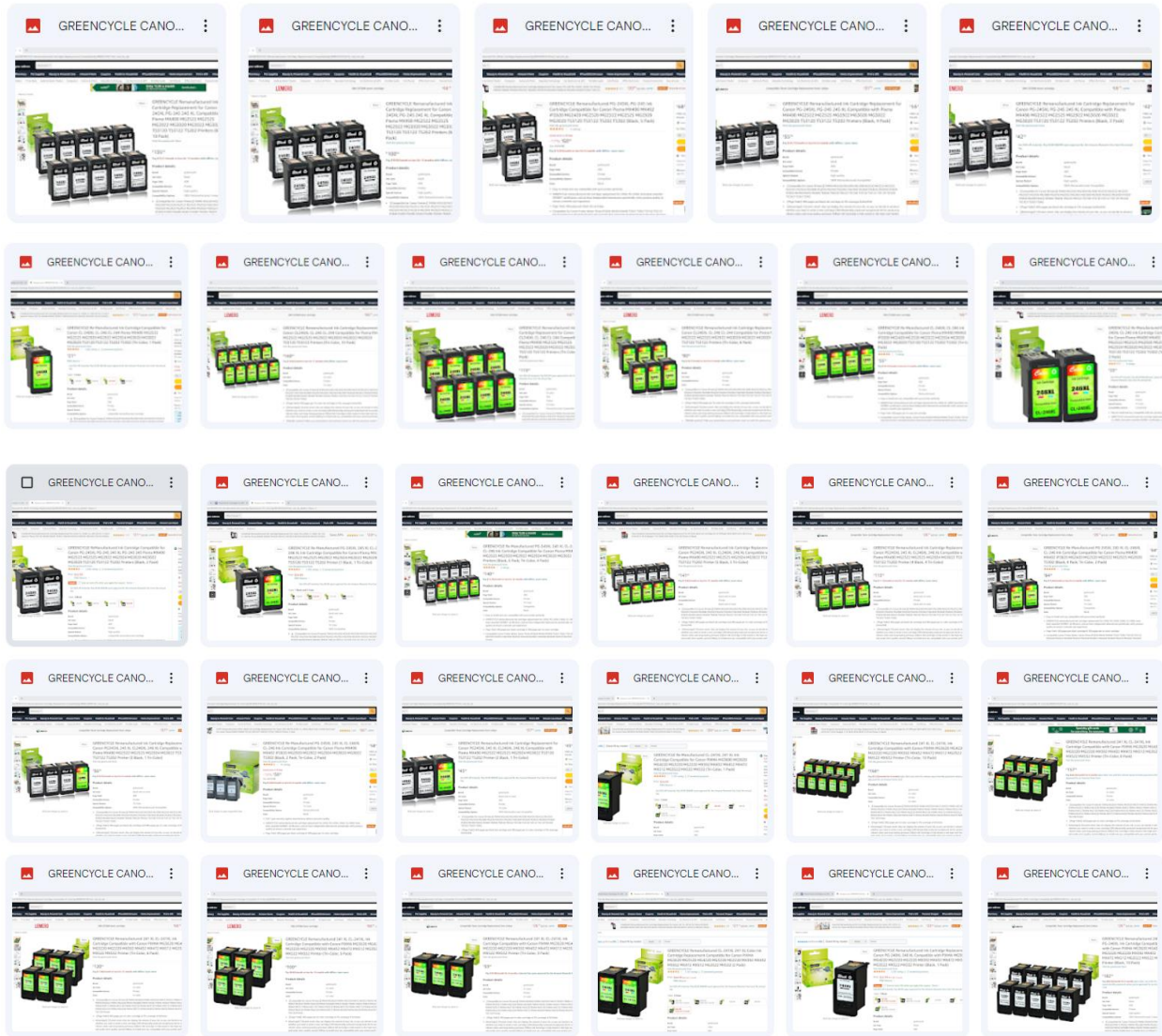
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



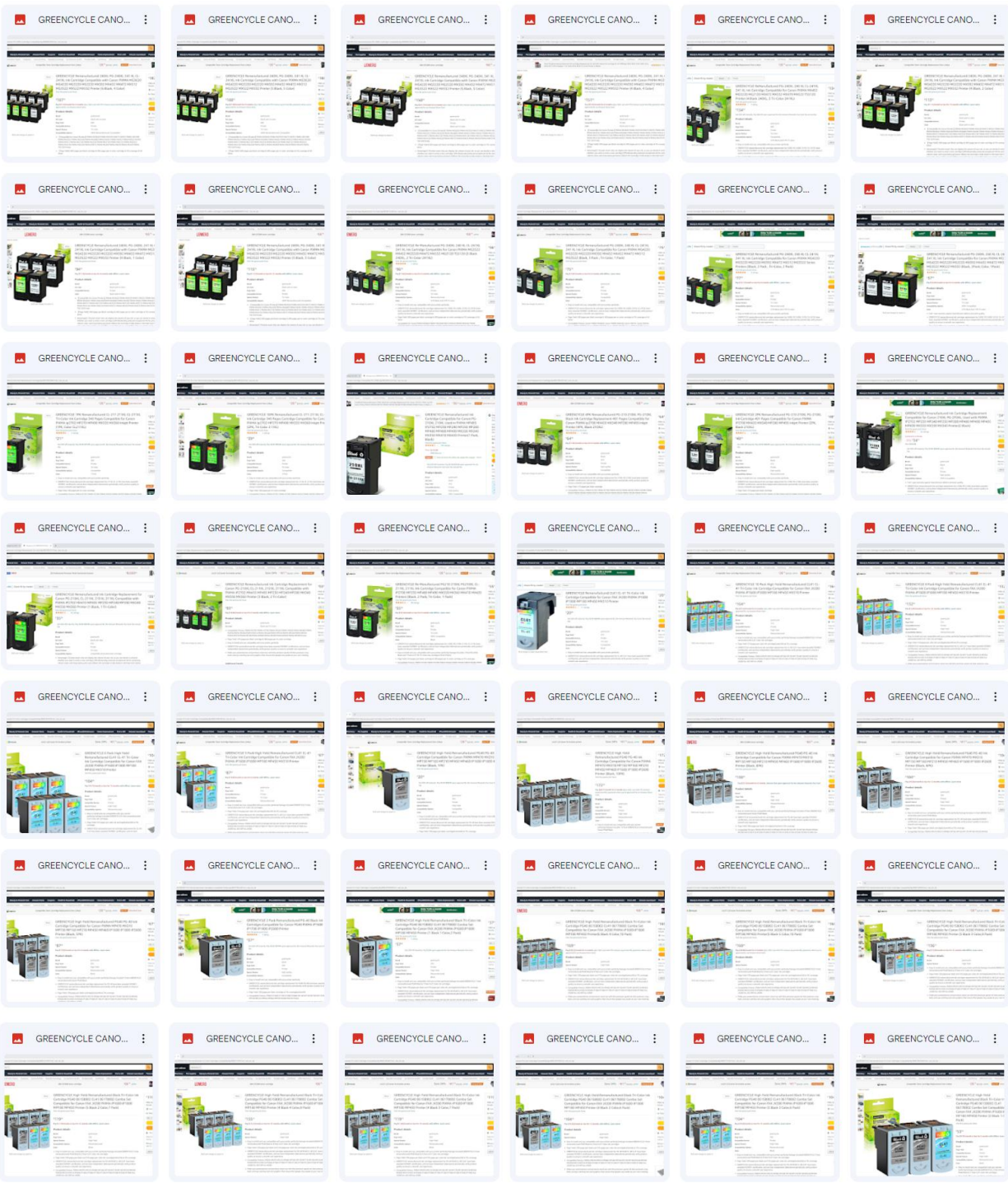
23. The following brands were found to be new built clone cartridges, falsely sold as “remanufactured” and recycled products:

- |                        |                |                    |                     |                |
|------------------------|----------------|--------------------|---------------------|----------------|
| 1. AAKidInk            | 10. FACms      | 19. H&BO<br>Topmae | 28. Kolor<br>Expert | 37. Sellyaha   |
| 2. Ankink              | 11. Fastink    | 20. Inkni          | 29. Lucascolo       | 38. Sheengo    |
| 3. Batuto              | 12. Foiset     | 21. InkSpirit      | 30. Mooho           | 39. Upsek      |
| 4. BJ Ink<br>Cartridge | 13. Forzik     | 22. Inktopia       | 31. Novajet         | 40. Valker     |
| 5. BStink              | 14. Geshine    | 23. Insmax         | 32. OnlyU           | 41. ValueToner |
| 6. CG Chinger          | 15. GPC Image  | 24. Jarbo          | 33. Palmtree        | 42. V-Surlink  |
| 7. ColorKing           | 16. Greenbox   | 25. Janmore        | 34. Reprinpic       | 43. Witop      |
| 8. CSStar              | 17. Greencycle | 26. Jonity         | 35. Retch           | 44. Yatunik    |
| 9. Doreink             | 18. Incwolf    | 27. LxTek          | 36. Teino           | 45. Ejet       |

1           24.     In addition, illicit brands of printer cartridges flood Amazon’s platform  
2 with a variety of single and combo pack listings. Below is an example of how two brands,  
3 Greencycle and Inktopia, are creating multiple listings that saturate the platform:  
4

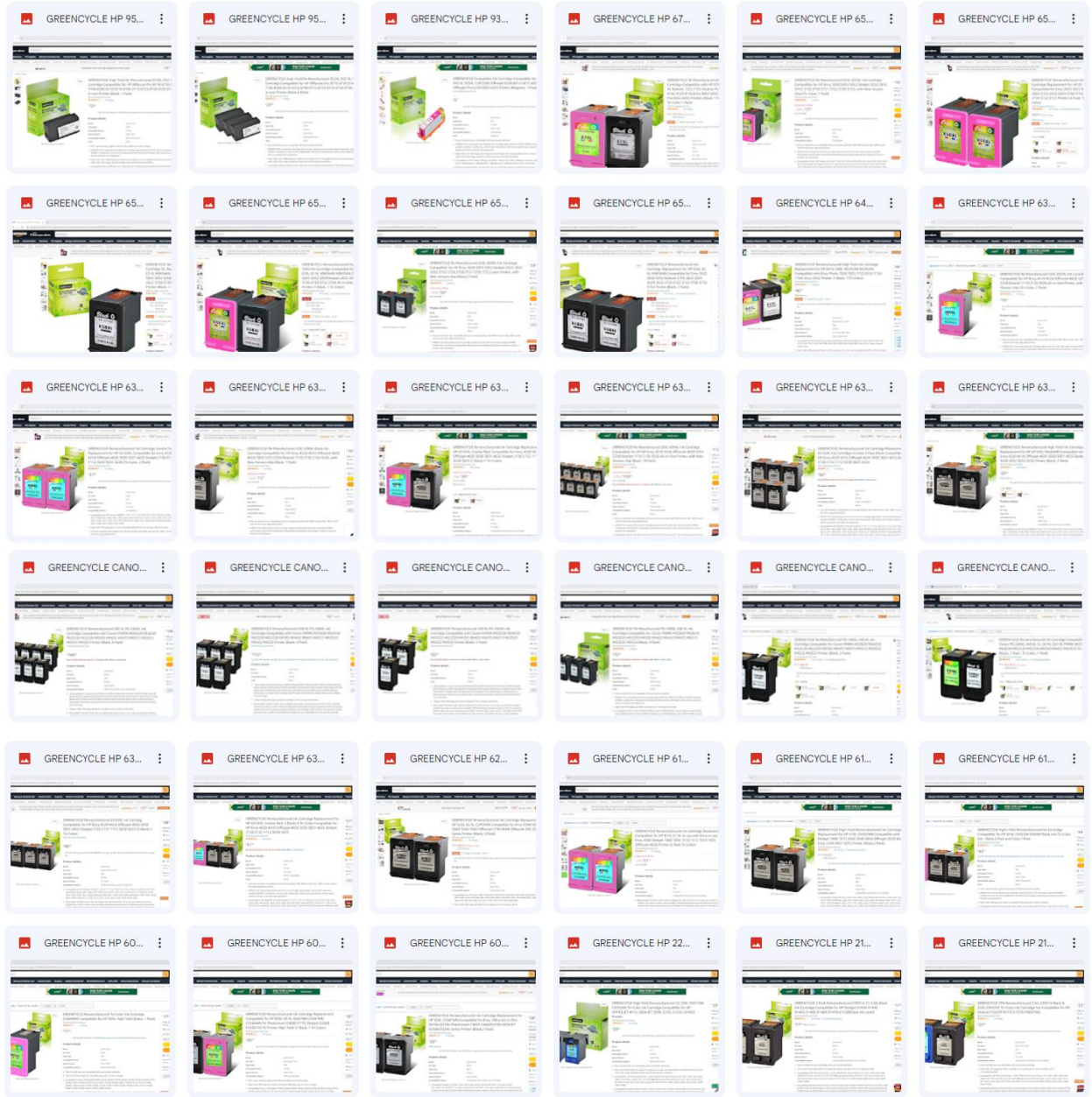


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



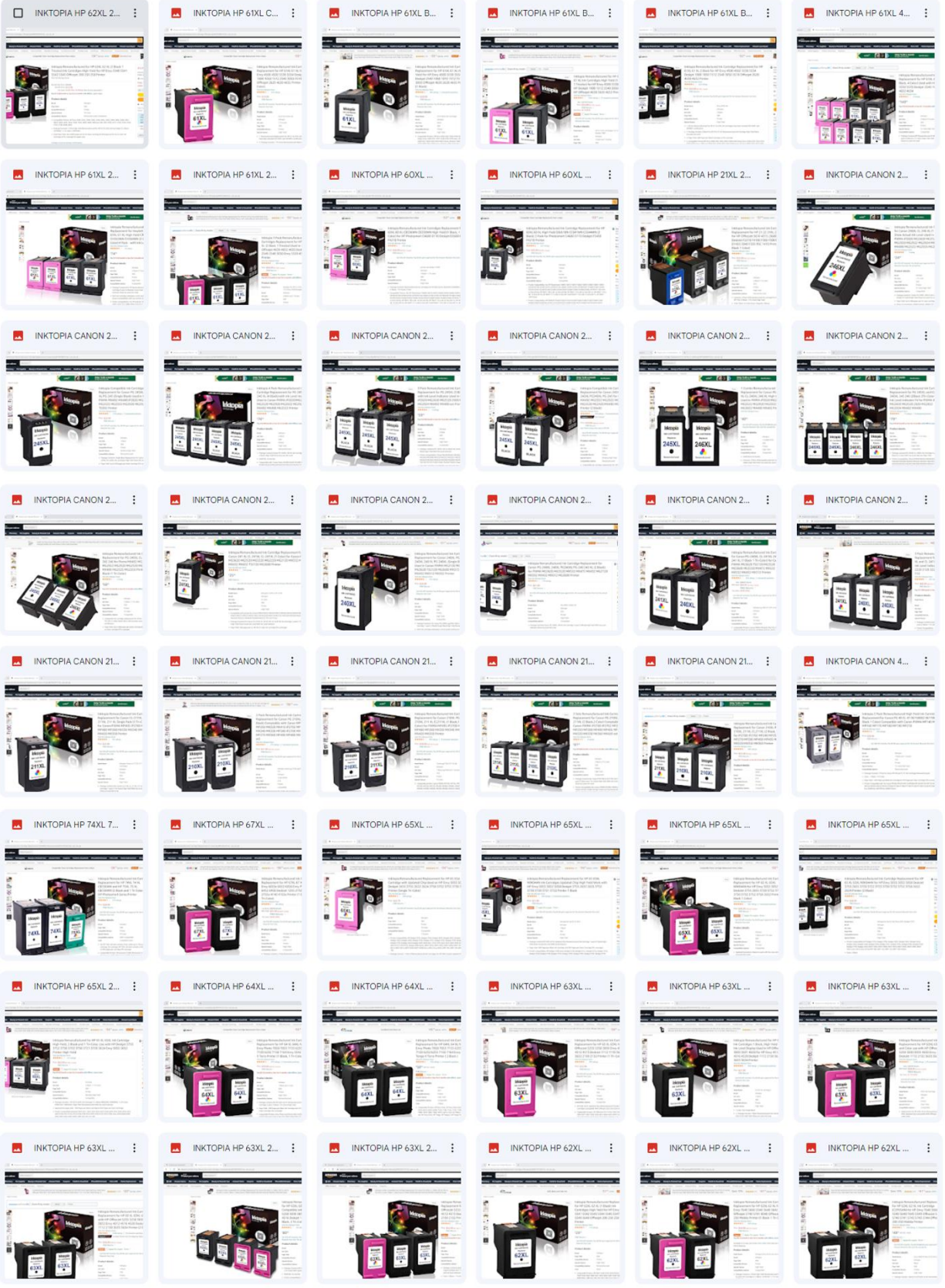
///  
///  
///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



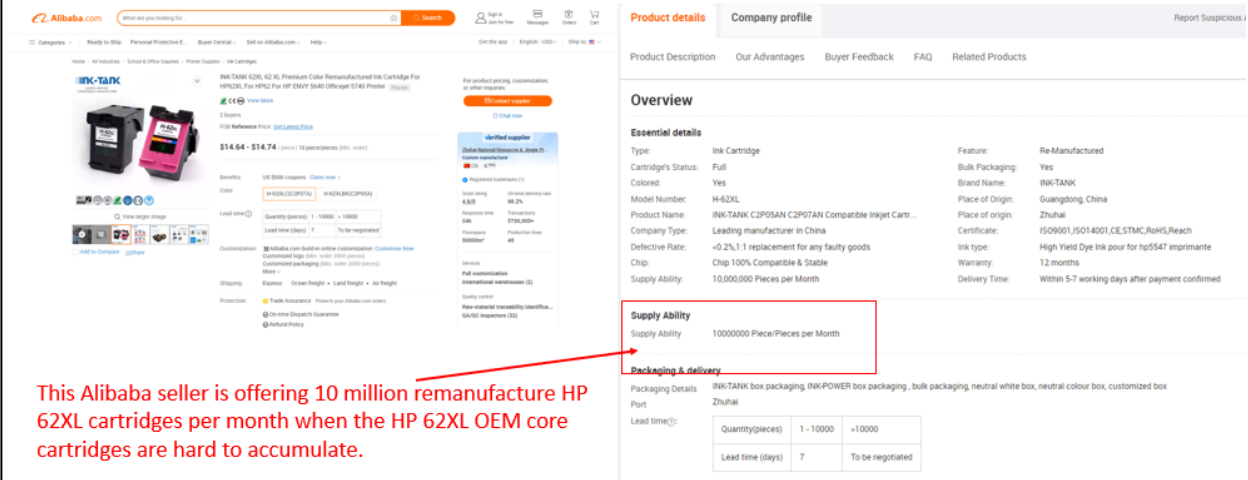
///  
///  
///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



1 25. Most, if not all, illicit clone ink cartridges originate from China. To  
2 remanufacture printer cartridges, you need to obtain viable OEM cores. It was pointed  
3 out to Defendants in the example below, remanufactured ink cartridges with availability  
4 in the millions per month are being sold wholesale on Alibaba for a single model. This is  
5 simply preposterous!

6 Zhuhai National Resources & Jingjie Printing Technology

7 

8

9

10

11

12

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

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

26. To remanufacture printer cartridges, a legitimate remanufacturer needs a significant number of empty viable OEM cores. In 2017, the Chinese government implemented Operation National Sword prohibiting the importation of plastic and solid waste which included empty printer cartridges. On information and belief, based on Plaintiff's 23 years of collecting and remanufacturing OEM cartridge cores, it would be impossible for one individual company to collect a singular specific cartridge model core and offer a remanufactured finished product in the quantity of millions per month.

27. In addition to the above listing on Alibaba, it was shared with Defendants that there are at least nine other sellers with listings on Alibaba that offer suspect remanufactured printer cartridges in absurd quantities, into the millions per month for a single cartridge model. Below are the companies:

27 ///

28 ///

1 A. Zhuhai National  
2 Resources & Jingjie  
3 Printing Technology

4 B. Shenzhen Nolar Trade  
5 Development  
6 Company

7 C. Shenzhen Michsan  
8 Technology Company

9 D. Uniplus Technology  
10 Corporation

11 E. PK Printing  
12 Technology Company

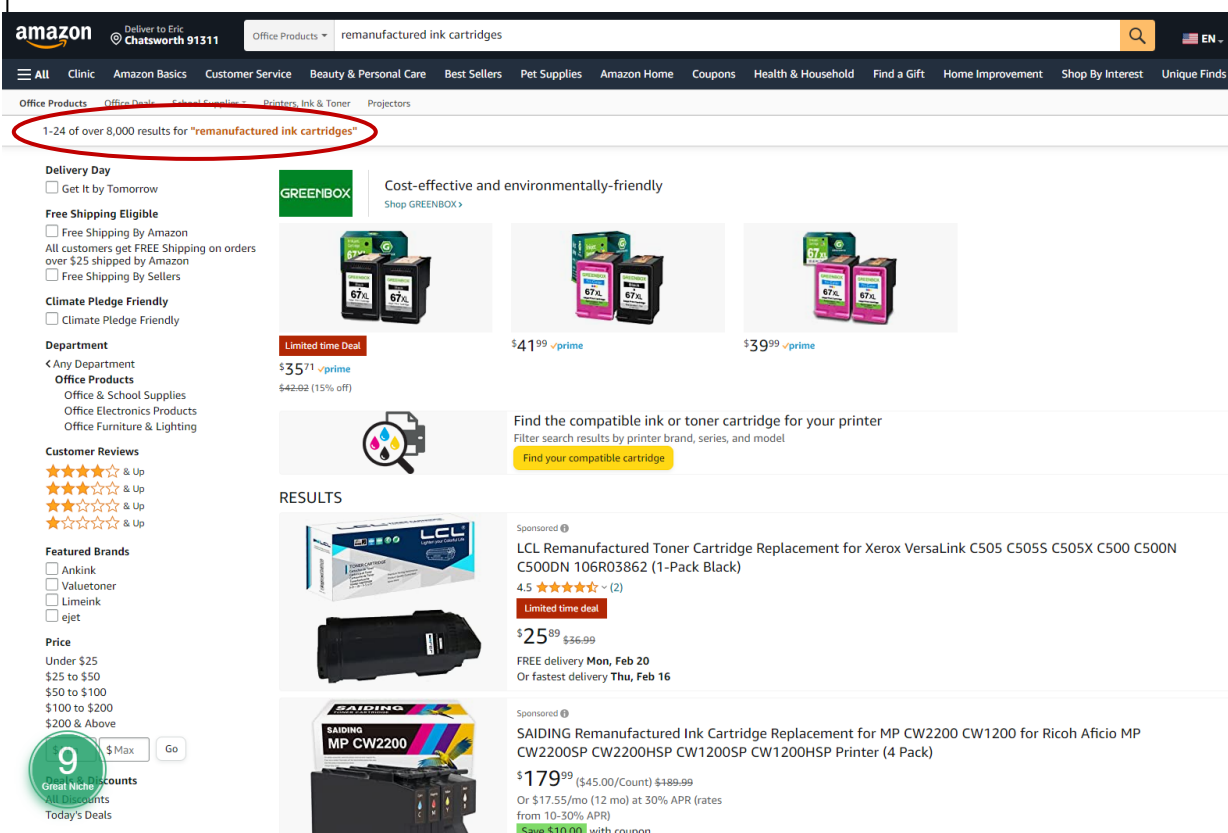
13 F. Ebest Digital  
14 Technology

15 G. Zixingshi Heshun  
16 Technology Printing  
17 Materials Company

18 H. Tatrix International  
19 China Co, Ltd

20 I. Prospect Image  
21 Products Limited of  
22 Zhuhai

23 28. Amazon sells millions of purported remanufactured ink cartridges that  
24 originate from China. When conducting a search for “remanufactured ink cartridges” on  
25 Amazon, 8,000 total results were returned. The total number of remanufactured ink  
26 cartridge listings is actually much greater, based on how Defendants filter their search  
27 results. It is reasonable to say that most remanufactured ink cartridges listed on Amazon  
28 make unsubstantiated claims of being remanufactured or recyclable product.





1           29.     Data captured from Jungle Scout, a third-party application that provides  
2 research and market intelligence on products offered for sale on Amazon, estimates that  
3 remanufactured ink cartridges alone generate \$3,233,555,328 in sales annually.

4           30.     Defendants make it impossible for any legitimate printer cartridge  
5 remanufacturing company to compete when Amazon has a vested interest in keeping  
6 third-party sellers on its platform while facilitating the sale of illegitimate remanufactured  
7 ink cartridges on a mass scale regardless of whether they are misrepresented or violate  
8 federal and state law.

9           31.     In the 1980s, the remanufacturing industry for printer cartridges was  
10 established in the United States. By mid-2000s, United States printer cartridge  
11 remanufacturing grew into an estimated \$7 billion industry boasting thousands of U.S.  
12 companies comprised of remanufacturers, used cartridge collectors, suppliers, resellers,  
13 trade publications and expos. The printer cartridge remanufacturing industry evolved as a  
14 solution to divert millions of used printer cartridges away from U.S. landfills generated  
15 by the original equipment manufacturers of printers and turned the waste into a low-cost,  
16 reusable product for the consumer.

17           32.     Now the U.S. remanufacturing industry is on the verge of extinction. The  
18 anti-competitive behavior of Defendants is the driving force behind the proliferation of  
19 counterfeit remanufactured ink cartridges saturating the U.S. market, deceiving  
20 consumers, undercutting legitimate remanufacturers, and leaving the recycle stream with  
21 an overwhelming amount of plastic waste. This has caused great harm to the Plaintiff's  
22 growth opportunities because Plaintiff is dependent on the industry for the supply chain  
23 of materials needed for its remanufacturing process, as well as its wholesale network of  
24 resellers for their finished products. The blame for the destruction of an entire industry  
25 and direct harm to Plaintiff lies at the feet of Amazon, as a result of the sale of  
26 inauthentic printer cartridges, advertised, sold, and distributed by Defendants through  
27 their website.

28           33.     Further, the unsubstantiated claims that these cartridges being sold by and

1 on Amazon's platform are recyclable are particularly reprehensible, as these generic  
2 single-use clone brand printer cartridges do not offer any service to reclaim their used  
3 cartridges, leaving them to be thrown in the trash. It has been estimated that over 375  
4 million printer cartridges end up in United States landfills each year, creating a massive  
5 amount of plastic waste.<sup>1</sup> Generic branded single-use clone printer cartridges use up  
6 natural resources and release greenhouse gases during the production process. To  
7 manufacture one new printer cartridge, the process emits around 4.8Kg CO2 and uses up  
8 to a gallon of oil.<sup>2</sup>

9 34. Defendants' ecommerce platform has empowered illicit overseas printer  
10 cartridge manufacturers, eliminating thousands of legitimate printer cartridge resellers, by  
11 selling direct to consumers. Since its inception, Plaintiff built a successful wholesale  
12 business as a vast printer cartridge reseller base nationwide. As set forth further below,  
13 Amazon plays an essential role in the sale and distribution of illicit ink cartridges.

14 35. In a traditional supply chain, a distributor, wholesaler, or retailer would  
15 serve as middlemen for overseas manufacturers to bring their products to market. Parties  
16 directly or indirectly involved in the sale of a product and disseminating advertising  
17 claims have a responsibility to ensure the product's claims can be proven. Amazon places  
18 itself between consumers and the third-party seller in the chain of distribution of  
19 products. Amazon approves seller listings, accepts possession of products, and stores it in  
20 its warehouses, attracts the customer to the Amazon website using third-party seller  
21 listings, provides customers with product listings for their searches, processes customer  
22 payments for the product, and ships products in Amazon packaging to customers.

23 36. Moreover, Amazon operates as a co-seller for third-party individuals,  
24 entities, or manufacturers who sell on its website. Amazon sets the terms of its  
25 relationship with the sellers; controls the conditions of the manufacturer's products  
26 offered for sale on Amazon; limits the seller's access to customer information forcing the  
27

---

28 <sup>1</sup> Bob Gorman, Ink Waste: The Environmental Impact of Printer Cartridges, Bob Gorman (March 30,  
2017), <https://energycentral.com/c/ec/ink-waste-environmental-impact-printer-cartridges/>.

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

1 seller to communicate with customers through Amazon; and demands indemnification as  
2 well as substantial fees on each purchase. Regardless of how Amazon labels itself in the  
3 selling process, one cannot help but conclude that they are indeed a seller of illicit clone  
4 ink cartridges to consumers.

5 37. Below are screen shots of Amazon's specific ink and toner selling policies  
6 that Defendants are not enforcing, allowing for deceptive product descriptions to  
7 rampantly take place across the category:  
8

## 9 Selling ink or toner cartridges

10 This page outlines requirements for listing ink or toner cartridges, and explains how to categorize them into appropriate sub categories on Amazon. Please see [Ink or toner listing guidelines](#) for additional information on how to appropriately list these products on Amazon.

### 11 Category requirements

12 Amazon limits the types of ink or toner cartridges that sellers can list to ensure that customers are able to buy with confidence from sellers on Amazon.com. Please note the following requirements:

- 13 • Amazon prohibits sellers from listing ink or toner cartridges in "Refurbished" or "Used" condition. All listings, including remanufactured, refilled and compatible ink or toner, must be in "New" condition.
- 14 • Remanufactured, refilled and compatible ink or toner products must be listed as separate ASINs. You cannot use the same ASINs as the original/OEM ink or toner products. See [Ink or toner listing guidelines](#) for additional details.
- 15 • All ink or toner cartridges must be packaged in unopened retail packaging, and product images must accurately depict the retail packaging the customer will receive. Sellers are prohibited from listing ink or toner cartridges in open box condition or in inner factory foil packaging.
- 16 • All ink or toner products must be fully functional and free from defects that could render them unusable or harmful to printers (for example damaged, dried or leaking cartridges).
- 17 • Sellers may offer custom bundles of ink or toner cartridges (that are not manufacturer-created multipacks), provided each individual cartridge in the bundle is in its original retail packaging. A custom bundle must be listed as its own ASIN, with image, bullet points and product description clearly indicating that it comprises individual packs bundled together.
- 18 • Please refer to the [Product Bundling Policy](#) for additional listing requirements.
- 19 • All major brands require UPCs. See [Product UPCs and GTINs](#) for further details, which includes requirements for products sold as bundles and requirements for products sold as packs.
- 20 • Best Before, Use Before, Use By, and Warranty Ends are all considered expiration dates. Expiration dates are the dates suggested by the manufacturer, and are printed on the product packaging, the product, or both.
- 21 • The expiration date printed by the manufacturer should be clearly visible when the product is shipped. Ink or toner, if they have an expiration date suggested by the manufacturer, should only be shipped to customers when the ink or toner is at least 180 days prior to the date of expiration. FBA sellers should ship their products to FBA reasonably prior to 180 days before the date of expiration.

### 22 Categorizing ink or toner cartridges

23 Categorize ink or toner cartridges according to the definitions below.

#### 24 1. Same-Brand Ink or Toner Cartridge in Retail Packaging

- A same-brand ink or toner cartridge is manufactured under the same brand name as printer in which the cartridge is used (such as, HP, Canon, Epson, Lexmark, Brother, etc.).

#### 25 2. Compatible Ink or Toner Cartridge

- An ink or toner cartridge designed to work with a particular printer, but was not manufactured under the same brand name as the printer in which the cartridge is intended to be used. These cartridges are produced using mostly new or all new parts and components.

#### 26 3. Remanufactured Ink or Toner Cartridge

- A cartridge that has been used, remanufactured, and refilled with ink or toner. To varying degrees, the cartridge may have been taken apart, cleaned, and had parts replaced.

#### 27 4. Refilled Ink or Toner Cartridge

- A cartridge that has been used and refilled with ink or toner. All of the cartridge's current components were manufactured by the same company that manufactured the printer in which the cartridge is intended to be used. The refilling process did not involve any disassembly, cleaning, or replacement of parts.

# Ink or Toner

## On this page

- [Title](#)
- [Brand Name](#)
- [Images](#)
- [Feature bullets](#)
- [Product description](#)

To provide a great customer experience, sellers have to ensure the ASIN title, brand name, images, feature bullets and product description accurately describe the ink or toner product being listed. Failure to follow Amazon's listing guidelines could result in the removal of your listings or the loss of your selling privileges on Amazon. Please follow the below listing specifications as closely as possible, and please see [Selling Ink or Toner Cartridges](#) for details about category requirements, and to learn how to categorize your ink or toner products on Amazon.

## Title

A good title should be descriptive enough for a customer to make the purchase based on the information in the title alone. Avoid marketing content (free, exclusive, bonus, stylish, lightweight, heavy duty, etc.) or use of the title field to list hardware compatibility. Pay attention to title formats listed below for Remanufactured, Refilled and Compatible products to ensure appropriate usage of brand names.

### Refilled Ink or Toner Cartridge

`[Third Party Brand] + "Refilled" + [Product: Ink or Toner Cartridge] + "Replacement for" + [OEM Brand] + [Series Name] + [Model Name] + ([Color(s)], [#-Pack], if app)`

#### Examples

- LD Products + Refilled + Ink Cartridge + Replacement for + HP + 02 + (Black, 5-Pack) = LD Products Refilled Inkjet Cartridge Replacement for HP 02 (Black, 5-Pack)
- Office 66 + Refilled + Toner Cartridge + Replacement for + Brother + TN-350 + (Black) = Office 66 Refilled Toner Cartridge Replacement for Brother TN-350 (Black)

### Remanufactured and Refilled Ink or Toner Cartridge

`[Third Party Brand] + "Remanufactured" + [Product: Ink or Toner Cartridge] + "Replacement for" + [OEM Brand] + [Series Name] + [Model Name] + ([Color(s)], [#-Pack], if app)`

#### Examples

- LD Products + Remanufactured + Ink Cartridge + Replacement for + HP + 02 + (Black, 5-Pack) = LD Products Remanufactured Ink Cartridge Replacement for HP 02 (Black, 5-Pack)
- Office 66 + Remanufactured + Toner Cartridge + Replacement for + Brother + TN-350 + (Black) = Office 66 Remanufactured Toner Cartridge Replacement for Brother TN-350 (Black)

1 38. Most of the illicit ink cartridges sold on Amazon are sold through  
2 Amazon's "FBA" services also known as Fulfillment by Amazon. Through FBA  
3 services, Defendants' store, pick, pack, ship, and deliver the products to customers in  
4 Amazon shipping envelopes and boxes. Amazon controls all customer service and returns  
5 and responds directly to consumers who leave negative reviews for products fulfilled by  
6 FBA.

7 39. Defendants control all aspects of selling and distribution of products  
8 through their FBA services. Amazon's Anti-Counterfeiting Policy, screenshot below,  
9 states "it is each seller's and supplier's responsibility to source, sell, and fulfill only  
10 authentic products." However, when FBA services are utilized, Amazon directly sells and  
11 fulfills inauthentic products.

12 [Seller Central Help](#) > [Policies, agreements, and guidelines](#) > [Program Policies](#) > [Amazon Anti-Counterfeiting Policy](#)

### 13 Amazon Anti-Counterfeiting Policy

14 **Products offered for sale on Amazon must be authentic. The sale of counterfeit products is strictly prohibited. Failure to abide by this policy may result in loss of selling privileges, funds being withheld, and disposal of inventory in our possession.**

15 It is each seller's and supplier's responsibility to source, sell, and fulfill only authentic products. Prohibited products  
16 include bootlegs, fakes, or pirated copies of products or content; products that have been illegally replicated,  
17 reproduced, or manufactured; and products that infringe another party's intellectual property rights. If you sell or  
18 supply inauthentic products, we may immediately suspend or terminate your Amazon selling account (and any related  
19 accounts) and dispose of any inauthentic products in our fulfillment centers at your expense. In addition, we do not pay  
20 sellers until we are confident our customers have received the authentic products they ordered. We may withhold  
21 payments if we determine that an Amazon account has been used to sell inauthentic goods, commit fraud, or engage in  
22 other illegal activity.

19 We work with manufacturers, rights holders, content owners, vendors, and sellers to improve the ways we detect and  
20 prevent inauthentic products from reaching our customers. As a result, we remove suspect listings based on our own  
21 review of products. We also work with rights holders and law enforcement worldwide to take and support legal action  
22 against sellers and suppliers that knowingly violate this policy and harm our customers. In addition to criminal fines and  
23 imprisonment, sellers and suppliers of inauthentic products may face civil penalties including the loss of any amounts  
24 received from the sale of inauthentic products, the damage or harm sustained by the rights holders, statutory and other  
25 damages, and attorney's fees.

22 Amazon strives to ensure a trustworthy shopping experience for our customers. By selling on Amazon, you agree that:

- The sale of counterfeit products is strictly prohibited.
- You may not sell any products that are not legal for sale, such as products that have been illegally replicated, reproduced, or manufactured
- You must provide records about the authenticity of your products if Amazon requests that documentation

25 Failure to abide by this policy may result in loss of selling privileges, funds being withheld, destruction of inventory in our fulfillment centers, and other legal consequences.

### 26 More information

- Sell Only Authentic and Legal Products. It is your responsibility to source, sell, and fulfill only authentic products that are legal for sale. Examples of prohibited products include:
  - Bootlegs, fakes, or pirated copies of products or content
  - Products that have been illegally replicated, reproduced, or manufactured
  - Products that infringe another party's intellectual property rights

- 1 • Maintain and Provide Inventory Records. Amazon may request that you provide documentation (such as invoices) showing  
2 the authenticity of your products or your authorization to list them for sale. You may remove pricing information from  
3 these documents, but providing documents that have been edited in any other way or that are misleading is a violation of  
4 this policy and will lead to enforcement against your account.
- 5 • Consequences of Selling Inauthentic Products. If you sell inauthentic products, we may immediately suspend or terminate  
6 your Amazon selling account (and any related accounts), dispose of any inauthentic products in our fulfillment centers at  
7 your expense, and/or withhold payments to you.
- 8 • Amazon Takes Action to Protect Customers and Rights Owners. Amazon also works with manufacturers, rights holders,  
9 content owners, vendors, and sellers to improve the ways we detect and prevent inauthentic products from reaching our  
10 customers. As a result of our detection and enforcement activities, Amazon may:
  - 6 ○ Remove suspect listings.
  - 7 ○ Take legal action against parties who knowingly violate this policy and harm our customers. In addition to criminal  
8 fines and imprisonment, sellers and suppliers of inauthentic products may face civil penalties including the loss of  
9 any amounts received from the sale of inauthentic products, the damage or harm sustained by the rights holders,  
10 statutory and other damages, and attorney's fees.
- 11 • Reporting Inauthentic Products. We stand behind the products sold on our site with our [A-to-z Guarantee](#), and we  
12 encourage rights owners who have product authenticity concerns to [notify us](#). We will promptly investigate and take all  
13 appropriate actions to protect customers, sellers, and rights holders. You may view counterfeit complaints on the Account  
14 Health page in Seller Central.

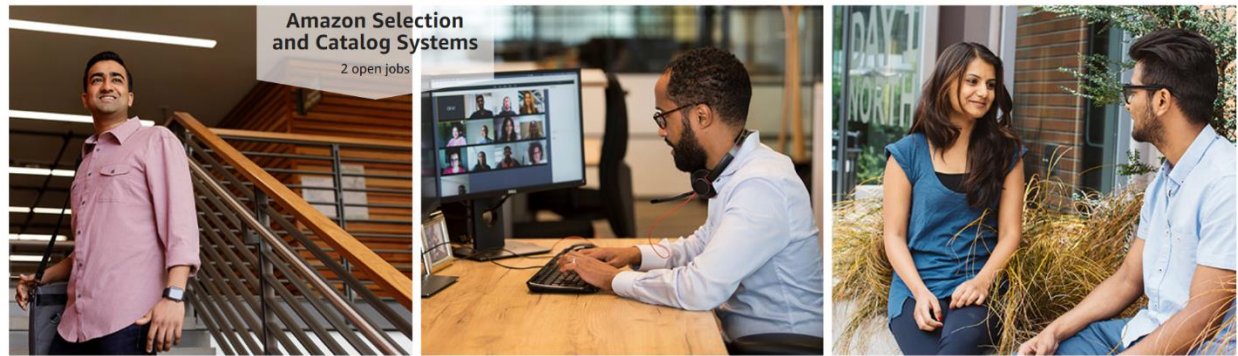
12 40. When Amazon was informed by Plaintiff regarding its category-wide issue  
13 of illicit brand ink cartridges sold on its platform, Defendants did not take any action as  
14 outlined in their own Anti-counterfeiting policy. Almost all of the illicit cartridges are  
15 sold through Amazon's FBA services, which presents a conflict of interest for  
16 Defendants to enforce or abide by their own policy as they profit from each item they  
17 fulfill.

18 41. Amazon is not a passive or neutral ecommerce marketplace; they are an  
19 online catalog marketer, driving traffic, promoting, selling, and distributing products.  
20 Defendants claim to strive to be Earth's most customer-centric company with customer  
21 reviews, one-click shipping, personalized recommendations and Fulfillment by Amazon.  
22 In becoming one of the most successful ecommerce platforms, Defendants have blurred  
23 the lines for the customers as to who is selling them products and, in fact, themselves  
24 become sellers. Below is an example of how Amazon describes itself when it places a job  
25 advertisement. Amazon claims to be the "World's largest e-Commerce products catalog."

26 ///

27 ///

28 ///



Powering the online buying experience for global customers

Amazon Selection and Catalog Systems (ASCS) builds the systems that host and run the world's largest e-Commerce products catalog. We power the online buying experience for worldwide customers, allowing them to find, discover, and buy anything they want. Our massively scaled out systems process hundreds of millions of updates on billions of products across physical, digital, and service offerings. We don't just build systems, we build trust. At any given moment, millions of Amazon customers around the world rely on us to serve up the most up-to-date and complete product information.

Scale is a key component of our success. In order to deliver reliable and accurate product information for customers, we continuously stretch the limits of distributed systems and big data processing to solve some of the hardest technical problems and unprecedented scale challenges. Our team develops technologies spanning parallel processing, storage, machine learning, natural language processing, and image recognition to overcome these challenges. As Amazon businesses continue to grow and diversify, the challenges only get bigger, requiring us to constantly innovate as there are no "textbook solutions." We are the team inventing solutions.

Explore our roles and join us at the center of Amazon's e-Commerce universe, where we encourage you to think big and innovate on behalf of our customers.

42. Defendants define performance targets and policies required to sell on their platform. Seller accounts can be deactivated when they do not comply with the required performance rates that include negative feedback. However, a seller can request the removal of negative feedback if it is related to delivery service provided by Amazon. Outlined in red, Defendants state in their FBA policies, "after reviewing the feedback, we might strike through the negative rating, and it will not reflect on your performance metrics." Whereas, their policy also states, "A merchant-fulfilled order on Amazon, even if submitted as a Multi-Channel Fulfillment order, is not eligible for buyer feedback strike-through."

///

///

///

1 [Seller Central Help](#) > [Get started with Fulfillment by Amazon \(FBA\)](#) > [FBA policies and requirements](#) >

2 Buyers can leave feedback for sellers on orders that are fulfilled by Amazon just as they do for merchant-fulfilled orders.  
3 The [Feedback Manager](#) on the **Performance** tab lets you track buyer satisfaction with your service. You can view short-  
4 term and long-term metrics as well as detailed feedback entries with buyer comments and email addresses.

5 **What happens when I receive a negative feedback on an AFN order?**

6 When a buyer leaves negative feedback that is related to delivery service provided by Amazon, you can request for  
7 [removal of the feedback](#). After reviewing the feedback, we might strike through the negative rating, and it will not  
8 reflect on your performance metrics. The buyer's comment will remain with a note from Amazon that states, "This item  
9 was fulfilled by Amazon, and we take responsibility for this fulfillment experience."

10 However, if we find that any portion of the comment applies to the condition of your product as indicated on your  
11 listing (New, Used, etc.), or any service that you, instead of Amazon, provided or arranged to be provided to the buyer,  
12 the feedback and negative rating will remain without edits.

13 Please note that our policies prohibit any activity that would interfere with our capacity to help other sellers, including  
14 submission of high volumes of incorrect or speculative requests to Seller Support.

15 **Note:** The buyer feedback strike-through only applies to items sold on Amazon and fulfilled through the Amazon  
16 fulfillment network (AFN). A merchant-fulfilled order on Amazon, even if submitted as a Multi-Channel Fulfillment order, is  
17 not eligible for buyer feedback strike-through.

18 43. Defendants violate their own policies, creating content on sellers' listings  
19 by editing negative reviews, and taking responsibility beyond delivery related issues.  
20 Amazon takes responsibility when there is a negative review that relates to product  
21 defects or misrepresentation of product listings. For sellers who use Amazon's FBA  
22 services, the result is a beneficial manipulation of seller's performance metrics. This is  
23 deceptive to consumers as Amazon is acting as a seller of the product by taking  
24 responsibility for the product beyond mere fulfillment.

25 44. Below are examples of Amazon responding on behalf of the sellers selling  
26 the identified illicit brands of ink cartridges that did not have a delivery problem but did  
27 have false advertising and product defect issues:

28 ///

///

///



1 InkTopia Ink Cartridge



"The 21 cartridge does not work on the office jet 5610. Not as advertised, now I'm stuck with useless product."

By Warby on October 8, 2022.

4 **Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.

5 ColorKing Ink Cartridges



"Not original HP 64XL. They were remanufactured 64 black. This was misleading advertising."

7 By Jean M. on December 9, 2022.

8 **Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.

9  
10 EJet Ink Cartridges:



12 "the description said it would work on my HP 6958. It does not. I would like a refund. can you issue this? thanks, cb"

13 By cb on August 12, 2022.

14 **Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.

15 Ankink Ink Cartridges



17 "Black did not work, tried multiple head cleanings....did not try color cartridge but this is poor QC and now i have to drive 60 minutes round trip to return incurring \$15 of my gas n wear n tear to return a defective item this isn't right"

18 [Read less](#)

19 By Thomas Maerz on January 24, 2023.

20 **Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.

21 BJ Ink Cartridges



23 "Does not print in the correct color. I was printing highlighted red text and it printed out black text with greenish highlight. Not satisfied with product which I used once. I would like to send the product back for a full refund."

24 [Read less](#)

25 By HRT on September 30, 2022.

26 **Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.

27 ///

28 ///

///

1           45.     Furthermore, Defendants specifically provide Environmental Marketing  
2 Guidelines, clearly stating sellers “must comply with all the applicable federal laws when  
3 listing and selling products on Amazon.com. You must also comply with state and local  
4 laws applicable to the jurisdiction into which your products are sold.” The following is a  
5 screenshot of Defendants’ Environmental Marketing Guidelines. Outlined in red are key  
6 policies. In its presentations to Amazon, Plaintiff demonstrated that the sellers of the  
7 illicit ink cartridges were blatantly violating Amazon’s guidelines:  
8

9           [Seller Central Help](#) > [Policies, agreements, and guidelines](#) > [Program Policies](#) > [Product guidelines](#) >  
10           Environmental Marketing Guidelines

## 11           Environmental Marketing Guidelines

12           On this page

13           [Highlights from the FTC Green Guides](#)

14           [California Law](#)

15           [Additional Resources](#)

16           **Remember:** You must comply with all applicable federal laws when listing and selling products on Amazon.com. You must  
17           also comply with state and local laws applicable to the jurisdiction into which your products are sold. **Sellers using**  
18           **Fulfillment by Amazon,** please also see [FBA Prohibited Products](#) for additional product restrictions.

19           We want to make it easy for buyers to find, discover, and buy products that are marketed as environmentally friendly or  
20           "green." However, it is also important to provide buyers with information about those products that is accurate and  
21           trustworthy, and that is not misleading about the qualities or characteristics of a product that make it environmentally  
22           friendly or "green." To sell products that are marketed with environmental claims on Amazon.com, you must ensure that the  
23           marketing claims you make on your product packaging and on your product detail page meet not only all federal laws such  
24           as the FTC's *Guides for the Use of Environmental Marketing Claims* (known as the "Green Guides"), but also all applicable  
25           state and local laws that regulate environmental claims. These laws include California's law restricting the use of  
26           compostable- and biodegradable-related claims on plastic products.

27           We're providing the following highlights from the FTC Green Guides and California's law on environmental claims to assist  
28           you in reviewing the environmental claims that you may make about your products. These highlights are not designed to be  
29           comprehensive. You should review the [FTC Green Guides](#) and other applicable laws, regulations, and guidelines, as you  
30           remain responsible for ensuring that the claims made about your products are fully compliant.

### 31           Highlights from the FTC Green Guides

- 32           • Avoid broad, general claims regarding a product's environmental benefits or qualities (ex., avoid "eco-friendly" or  
33           "environmentally friendly" or "green").
- 34           • All claims about a product's environmental benefits or qualities should be specific, and all qualifications (or limitations) to  
35           environmental claims must be specific, clear and prominently displayed (ex., "product is made from 20% recycled materials").
- 36           • Narrowly tailor environmental claims so as not to overstate the environmental benefits or qualities.
- 37           • Avoid making environmental claims if the environmental benefits or qualities are negligible.
- 38           • When making comparative environmental claims, the basis for the comparison must be clearly conveyed.
- 39           • Distinguish between products, packaging and services when making environmental claims (ex., packaging is 100%  
40           biodegradable).
- 41           • Avoid making compostable claims without qualification if the product cannot be composted at home safely or in a timely way.

- A general degradable or biodegradable claim should only be made if the entire product will completely break down and return to nature within a reasonably short period of time after customary disposal (or one year for solid waste products). If the product customarily ends up in landfills, incinerators, or recycling facilities, then a general biodegradable claim should not be made.
- An environmental claim that a product or packaging is made from recycled materials should accurately reflect the portion that is made from recycled materials (ex., "made from 20% recycled materials").
- Carefully consider certifications and seals and include the specific basis or environmental benefit for the certification whenever it is used. For questions regarding certifications, see <http://ftc.gov/os/2009/10/091005revisedendorsementguides.pdf>.

The FTC Green Guides also address other environmental claims, including: (1) Free-Of claims, (2) Non-Toxic claims, (3) Recyclable claims, (4) Renewable Energy claims, and (5) Renewable Materials claims. If you are making these or other environmental claims, please review the FTC Green Guides.

## California Law

- Plastic and bioplastic products sold into California can only be labeled as compostable, home compostable, or marine degradable if they meet the applicable ASTM standard or have the Vincotte OK Compost HOME certification. If your product meets the applicable ASTM or Vincotte standard, it should meet the additional labeling requirements as set forth by California law, and such information should be included on the product detail page.
- Plastic and bioplastic products sold into California may not be labeled as biodegradable, degradable, or decomposable, or imply that the plastic product will break down or decompose.
- Amazon will restrict the sale of plastic and bioplastic products labeled with these prohibited terms into California.
- If you are a seller of a plastic and bioplastic product that meets the applicable ASTM or Vincotte standard, Amazon may require that you provide proof demonstrating that your and bioplastic plastic product meets such standards.

## Additional Resources

- [FTC Green Guide Guidance](#)
- [California Public Resources Code Chapter 5.7 Plastic Products](#)
- [CalRecycle – Degradable Plastic Labeling Requirements](#)

46. The majority of the remanufactured ink cartridges listed and sold on Amazon make unsubstantiated environmental marketing claims violating federal law. Plaintiff has demonstrated to Defendants that new built clone printer cartridges are being misrepresented with false claims that they are remanufactured products, and false use of recycling symbols, icons, and environmental verbiage to deceive consumers into believing they are buying a recycled or a recyclable product. Plaintiff demanded that Amazon act and remove these illegal and deceitful listings, to no avail.

47. The following are examples of common practices used to deceptively describe a product without any way to substantiate the environmental claim.

A) The seller MeetRGB's product slides in its Amazon listing makes an

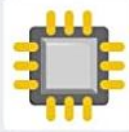
1 overstatement of its environmental attributes with a claim of using high-quality  
2 green materials and there is no way to substantiate this claim.

3  
4 < Back to results



VIDEO

# Advantages



## Latest chip

Provides accurate ink level tracking, while ensuring the optimal compatibility with different printers



## Premium ink

Special ink formulation not only produces high quality content, but also ensures long lasting printouts



## Green life

By carefully recycling and sorting empty original ink cartridge, then use high quality "green" materials in the remanufacturing process



Roll over image to zoom in

21 ///

22 ///

23 ///

24

25

26

27

28

1 B) Greencycle's listing claims it reduces its carbon footprint by using  
2 remanufactured product. Plaintiff has verified Greencycle falsely labels new  
3 manufactured clone cartridges as remanufactured and sells them as  
4 environmentally friendly product.

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16

**Recycle for a better world**  
Reducing carbon footprint by using remanufactured product

greencycle Re-Manufactured PG-245XL 245 XL CL-246XL CL-246 Ink Cartridge Compatible for Canon Pixma MX490 MG2525 MG2920 MG2922 MG2924 MG3020 MG3022 TS302 Printers (Black, 6 Pack; Tri-Color, 4 Pack)

Visit the greencycle Store  
★★★★★ 2 ratings

\$139<sup>95</sup>

Pay \$23.33/month for 6 months (plus S&H, tax) with 0% interest equal monthly payments when you're approved for an Amazon Store Card.

**Enhance your purchase**

Payment plans  
\$13.65/mo (12 mo) at example APR of 30% (rates from 10-30% APR)

Brand	Greencycle
Page Yield	400
Compatible Devices	Printer
Special Feature	Tri Color
Compatibility Options	Remanufactured
Color	Black

**About this item**

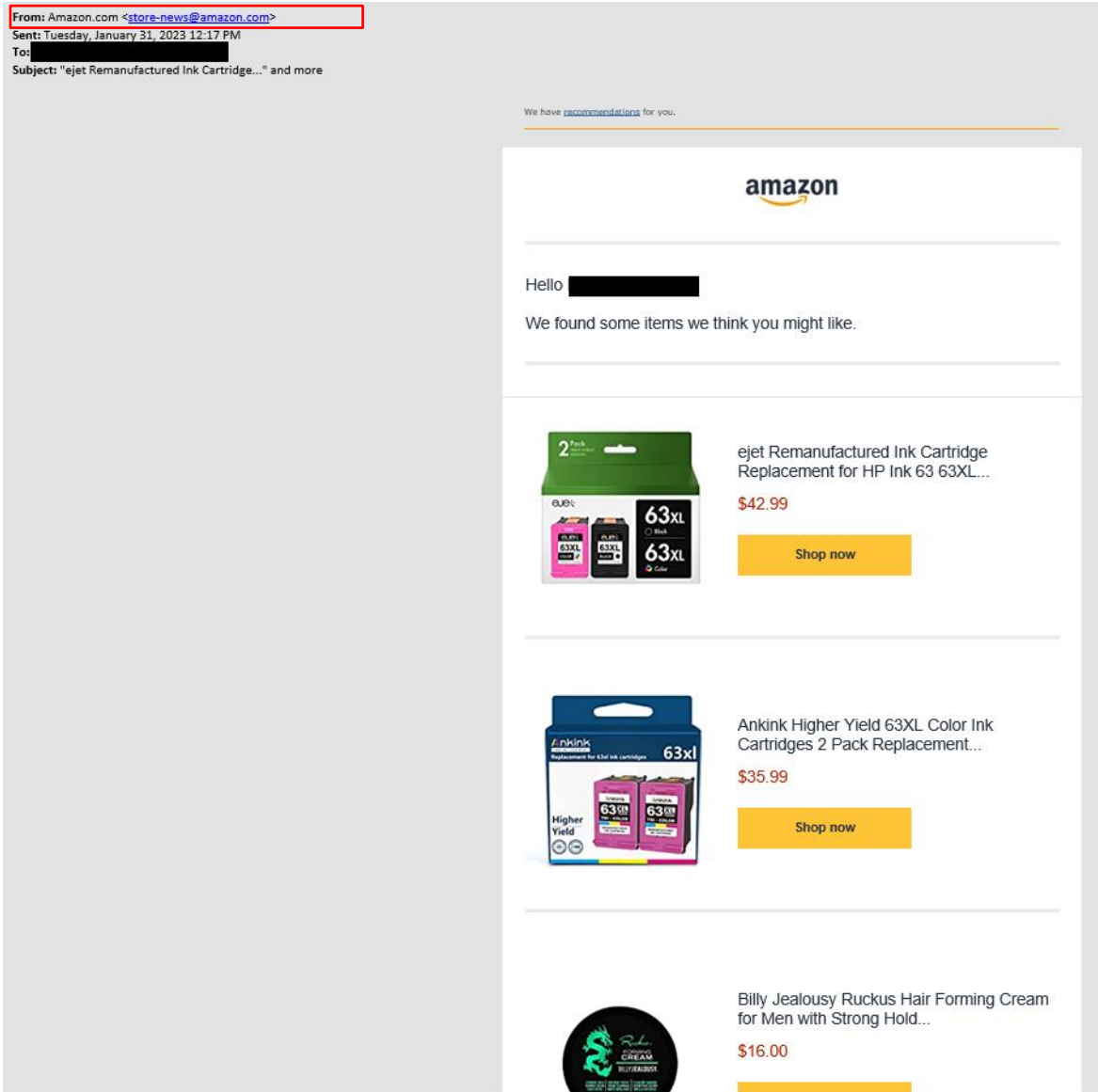
- Easy to install and use, compatible with your printer perfectly.
- GREFCYCL1 F remanufactured ink cartridge replacement for 245XL

Empty Ink Cartridges → Refurbished Refilling Testing → New Ink Cartridges  
Roll over image to zoom in

17 48. Amazon deploys a variety of advertising tools to reach and entice  
18 customers using sponsored ads, retargeting emails, and displaying ads which appear on  
19 search engines outside its platform. Amazon gathers customer data and search history to  
20 create promotional emails and search engine marketing content to drive traffic back to its  
21 website to induce customers to make purchases. In addition, Amazon has a special badge  
22 called Amazon's Choice, which endorses products. Amazon's advertising tools leave the  
23 impression products are being sold by Amazon making Defendants active sellers of the  
24 product.

25 49. Below are examples of content generated by Amazon's advertising services  
26 that promote the sale of illicit products on its platform, through email, and search engines  
27 using customers' digital information that only they hold.  
28

1 A. The following is an Amazon-generated email customized for a customer based  
2 on data collected from their search. This email contains two of the illicit brands  
3 identified by Plaintiff:  
4





22  
23  
24  
25 B. Amazon is one of Google's biggest advertising clients, using search engine  
26 marketing to target customers off its own platform with advertisements to draw  
27 traffic to Amazon's website. Unlike other online ecommerce platforms that sell  
28 third-party products, Amazon's advertisements do not differentiate themselves

1 from the sellers on their platform. To the average consumer it appears Amazon  
2 is the seller of the product. Ejet is one of the brands that has been identified as  
3 one of the illicit brands of ink cartridges.  
4

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

ejet Remanufactured Ink Cartridge Replacement for HP 63XL 63 XL to use with OfficeJet 3830 Envy 4520 4512 OfficeJet 4650 5255 Deskjet 1112 3634 3632

 Amazon.com - Seller	\$42.99
ejet Remanufactured Ink Cartridge Replacement for HP Ink 63 63XL Ink Cartridges for HP Printers OfficeJet 3830 5255 5258...	
Free delivery	
 eBay - nelagarmnts	\$60.48
Ejet Remanufactured Ink Cartridge Replacement For Hp 63 Ink 63xl	
Free delivery	

Details

Color	Multicolor
Brand	E-Z Ink
Maximum Page Yield (Color)	63 page yield (color)

Amazon.com is identified as a Seller for ejet Remanufactured ink cartridges. Whereas on eBay, the seller for the same cartridge is nelagarmnts



Remanufacturer canon 245xl 246xl

Q All Images Maps Shopping More

Home Orders About Google Shopping

Clear all filters

Chatsworth, Los Angeles, CA

Show only

- Available nearby
- On sale

Price

- Up to \$25
- \$25 - \$50
- Over \$50

\$ Min - \$ Max

Type

- Inkjet Cartridges
- Laser

Color

- Multicolor
- Black



Folset Remanufactured Canon Ink PG-245XL CL-246XL 245 246 XL Inkjet PIXMA Mx492 ...  
4.0 ★★★★★ 6  
Inkjet · Multicolor

**\$31.99**  
[Amazon.com - Seller](#)  
Free delivery  
Trusted store



Canon PG-245XL/CL-246XL Original Ink Cartridge/Paper Kit - Combo Pack - Black ...  
4.6 ★★★★★ 5,997  
Multipack · Inkjet

**\$56.00**  
[Walmart - OfficeCrave](#)  
Free delivery



Canon PG-245XL/CL-246XL Original Inkjet Ink Cartridge/Paper Kit - Combo  
4.6 ★★★★★ 5,997  
Multipack · Inkjet

**\$59.95**  
[eBay - ty\\_wholesale](#)  
Free delivery by Tue, Mar 21

Amazon.com portrays itself as a seller. Whereas the other online ecommerce platforms disclose the name of the actual seller on their platform.



Gayiga 245 246xl Plus Remanufactured Printer Ink Cartridge Replacement for Multicolor · Refilled

**\$49.99**  
[Walmart - Nanjingxionguandaokejy...](#)  
Free delivery  
Trusted store



Inkworld Canon PG-245XL CL-246XL Remanufactured High Yield Ink Cartridge Compatible  
5.0 ★★★★★ 1  
Multicolor · Refilled

**\$29.58**  
\$7.39 below typical  
[Amazon.com - Seller](#)  
Free delivery  
Trusted store



Valuetoner Remanufactured Ink Cartridge Replacement for Canon PG-245XL CL-246XL ...  
Inkjet · Multicolor

**\$96.81**  
[eBay - e\\_webster](#)  
\$16.00 delivery



1 C. Defendants endorse products with their Amazon's Choice Badge which is  
2 content created by Amazon and placed on sponsored ads and on product  
3 listings, endorsing products based on customer feedback, highlighting ratings,  
4 price, popularity, availability, and delivery. Amazon controls most of these  
5 metrics when a seller uses Amazon's Fulfillment services. In one of the  
6 examples below, Amazon endorses seller FACms with its "Amazon's Choice"  
7 badge, which was identified by Plaintiff as misrepresented clone ink cartridges.  
8

### 9 More from frequently bought brands

10 Sponsored ⓘ



11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

FACms Remanufactured  
Canon 245XL Black Ink  
Replacement for Canon  
PG-245 PG-245XL PG...

★★★★☆ 370

Amazon's Choice in

Inkjet Printer Ink Cartridges

\$34.99 (\$17.50/Count)

✓prime

Limeink 3 Pack  
Remanufactured PG-  
245XL CL-246XL High  
Yield Ink Cartridges (2...

★★★★☆ 176

\$44.00 ✓prime

///

///

///

# MUST-HAVE INK CARTRIDGES

## Smart Chips

Intelligently recognize printers and record printed pages



## Well-Designed Package

Keep ink cartridge in safe



## Environmentally-Friendly

All Cartridges are recycle and reused



Roll over image to zoom in

FACMS **Remanufactured** Canon 245XL Black Ink Replacement for Canon PG-245 PG-245XL PG 245XL 245 243 Ink Cartridge to use with Pixma MX492 MX490 MG2522 MG2520 MG2420 MG2920 MG2922 MG3022 Printer(2 Black)

Brand: FACMS  
 4.5 stars (375 ratings) 1.8 answered questions  
**Amazon's Choice** for "facms canon 245xl black ink"

Was: \$54.99 Details  
 Deal Price: **\$29.74** (\$14.87 / Count)  
 FREE Returns  
 You Save: \$5.25 (15%)

Get a \$50 Gift Card: Pay \$0.00 \$29.74 upon approval for the Amazon Rewards Visa Card. No annual fee.

Brand	FACMS
Page Yield	400
Compatible Devices	Printer
Special Feature	Tri-Color
Compatibility Options	Remanufactured, Compatible
Color	BLACK and BLACK

### About this item

- Package Contents: 2 Packs of remanufactured black ink cartridges for Canon 245XL ink cartridges (2 Black)

Add your 30-day FREE trial of Prime and get fast, free delivery

One-time purchase: \$29.74 (\$14.87 / Count)  
 FREE Returns  
 FREE delivery **Monday, March 20**

Or fastest delivery **Thursday, March 16**. Order within 3 hrs 54 mins

Deliver to Eric - Chatsworth 91311

In Stock

Qty: 1

Add to Cart  
 Buy Now

Ships from Amazon  
 Sold by JonInk US  
 Returns Eligible for Return, Refund or Replacement within 30 days of receipt

Add a gift receipt for easy returns

Subscribe & Save

1. Unsubstantiated environmental claims
2. False Advertising
3. Endorsed by Amazon and ships from Amazon

Amazon's Choice

Side by side comparison between an original Canon cartridges and an Amazon's Choice remanufactured ink cartridges.

Amazon is promoting a counterfeit remanufactured ink cartridge deceiving customers with their recommendation

Original Canon cartridge

FACMS cartridges

Original Canon cartridge

FACMS cartridges



The OEM cartridge has Canon imprinted on the core of the cartridge.

FACMS cartridges do not have any OEM markings. The body is clearly different than the OEM. FACMS cartridges are new built clone cartridge. FACMS even uses different molds for its cartridges but list them as remanufactured deceiving customers.

D. Amazon's Choice Brand endorsement is awarded to a deceptive product listing that violates Defendants' own listing policies. Palmtree is one of the brands of illicit ink cartridges that Plaintiff identified.

Inspired by your browsing history

Amazon product recommendations including:

- Ankink 246XL Ink Cartridge for Canon 246 CL-246 CL246 XL 246XL CL-244 244XL Color to Canon MX490 MX492... \$42.99
- Palmtree Compatible 245XL Ink Cartridge 2 Black Combo Pack Replacement for Cano... \$45.99 (\$23.00/Count)
- The Original Donut Shop Regular, Single-Serve Keurig K-Cup Pods, Medium Roast Coffee Pods, 24 Count (Pack o... \$37.91 (\$0.39/Count)
- ColoWorld Remanufactured Ink Cartridge Replacement for Canon CL-246XL CL-244 246 XL (1 Color)... \$22.89

Product listing for Palmtree Compatible 245XL Ink Cartridge 2 Black Combo Pack. The listing includes:

- Product Name: Palmtree Compatible 245XL Ink Cartridge 2 Black Combo Pack Replacement for Canon PG 245 245 XL Higher Yield for PIXMA MX490 MX492 MG2922 MG2522 MG2520 MG2920 TS3100 TS3122 TS3300 TR4500 TR4520 Printer
- Price: \$39.99 (\$20.00 / Count)
- Brand: Palmtree
- Ink Color: 2 Black for Canon PG 245/4 black ink cartridge
- Page Yield: 400
- Compatible Devices: Printer
- Special Feature: Compatible
- Compatibility Options: Compatible
- Product Name: This is compatible ink replacement for Canon 245xl ink cartridges
- Package Contents: 2 Black of compatible remanufactured cartridges for Canon pg 245xl
- Page Yield: Up to 400 pages for Canon pg-245 xl 245 xl black ink cartridges
- 245 xl cartridges compatible With: for Canon Pixma MX490 MX492 MG2420 MG2450 MG2520 MG2522 MG2525 MG2555 MG2560 MG2620 MG2922 MG2924 MG2950 MG3020 MG3022 MG3028 TS2402 TS3302 TS3120 TS3122 TR4520 TR4522 PR3820 printer ink cartridges
- Reliable quality: Each ink cartridges 245 and 246 for Canon printers experience a strict quality testing procedure to ensure compatibility with your printer and quality printout
- Easy to install: All Canon PG-245XL CL-246XL ink cartridge combo pack has undergone strict inspections to ensure that each product is perfectly compatible with your printer
- Please Note: Please confirm your Printer Model before placing an order. Make sure your printer use PG245XL CL246XL and PG245XL CL246XL ink cartridges, not other ink cartridge

Amazon's Choice Badge is awarded to a deceptive product listing that violates Amazon's own listing policies.

Palmtree brand claims it is a "compatible," what Amazon defines in its listing policy as a new built cartridge. The image of the cartridge clearly makes the claim it is "remanufactured." This is deceptive to the consumer and a misrepresentation of the character of a remanufactured ink cartridge.

1 Amazon edits Palmtree's customer reviews that do not relate to its fulfillment  
2 services, striking-out negative feedback for product quality issues, manipulating  
3 performance metrics and ratings. This helps Palmtree's metrics to receive Amazon's  
4 endorsement.

#### 5 Palmtree Reviews



"The black ink does not work. I did check it with another ink cartridge and it's not due to my printer not working."

By Drew Martin on February 19, 2023.

7 **Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.



"The color ink cartage malfunction and caused my printer to shut down"

By gary swor on February 17, 2023.

9 **Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.



"Receive an "incompatible cartridge" error message. Cannot use in my HP Officejet 5258"

By T. Germusa on January 25, 2023.

11 **Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.

12 Amazon Awards its Amazon's Choice endorsement based on customer feedback which  
13 includes ratings, product availability, and fast delivery, criteria Amazon can unfairly  
14 manipulate when product is handled through its FBA services.

15 50. When a seller uses Amazon's FBA services, Amazon processes the return  
16 and can determine if the product can be placed back into inventory for resale. Outlined in  
17 Amazon's Reimbursements policy below, if Defendants reimburse a seller for any  
18 damaged, lost or returned product, Defendants can dispose of any item or sell it on the  
19 Amazon Warehouse, listed as "Sold by Amazon Warehouse and Fulfilled by Amazon."

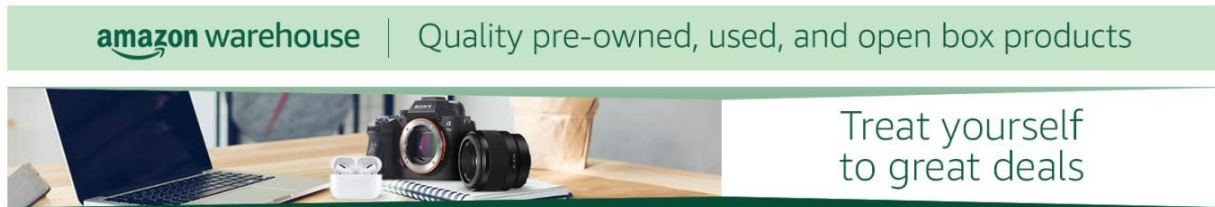
#### 20 Reimbursements

21 If we determine that your reimbursement claim is valid, we will replace the lost or damaged item with a new item of the  
22 same FNSKU or we will reimburse you for it.

23 If a reimbursement was made in error, or if a reimbursed item is later found and returned to your inventory, Amazon  
24 reserves the right to reverse the reimbursement credit that was applied to your account.

25 We may dispose of any item for which we reimburse you under this policy, including by selling it. As a result, such items  
26 — including lost items that are found after reimbursement — may be listed for sale on Amazon Warehouse or other  
27 channels.

1           51. Amazon Warehouse offers deals on quality used, pre-owned, or open box  
2 products. Defendants claim, “For each used product we sell, we thoroughly test the  
3 condition of the item and provide detailed descriptions to make it easier for you to make a  
4 decision.”



## Frequently Asked Questions

### What is Amazon Warehouse?

Amazon Warehouse offers great deals on quality used, pre-owned, or open box products. With all the benefits of Amazon fulfillment, customer service, and returns rights, we provide discounts on used items for customer favorites: such as smartphones, laptops, tablets, home & kitchen appliances, and thousands more. For each used product we sell, we thoroughly test the condition of the item and provide detailed descriptions to make it easier for you to make a decision.

Looking for great discounts on some of your favorite items? Or prefer buying used because it is better for the environment? Discover Amazon Warehouse used offers via our storefront, search bar, or on product detail pages.

### How do you evaluate a product's condition?

All of our products go through a quality check by us prior to being sold. We thoroughly test the functional and physical condition of each item and give the product a specific grade before selling it. We also inspect our products for missing accessories and packaging damage. Based on our quality check, each item will be assigned one of the four evaluations to describe its overall condition: "Like New", "Very Good", "Good", and "Acceptable".

### How can I understand a product's condition?

Since each item is unique, we use detailed descriptions to help you better understand the item condition, by describing its appearance, functional qualities, accessories and packaging condition. We provide all the detailed information on the product condition right on the product detail page, to help you make your decision. Depending on the item condition, you will find that some items have even deeper discounts.

**Used - Like New:** An item in perfect working condition, the packaging may bear some damage. The item fully functions, and all its essential accessories are complete.

**Used - Very Good:** An item in very good condition that may have seen limited use and fully functions. The item may have minor cosmetic imperfections. It may arrive with damaged packaging or be repackaged and could be missing some non-essential accessories. Missing accessories are shown under individual item description.

**Used - Good:** An item in good condition that may show wear from moderate use and fully functions. The item may arrive with damaged packaging or be repackaged. It may have minor cosmetic damage, such as a small scratch. The item may be missing some valuable accessories and it may not be used until those accessories are purchased separately. Missing accessories are shown under individual item description.

**Used - Acceptable:** An item may have clear signs of usage but still serves its main function. Item may arrive with damaged packaging or be repackaged. The item may have cosmetic damages on it or show other signs of previous use. Signs of usage can include scratches, dents, and worn corners or edges. The item may be missing some valuable accessories, components or spare parts, and it may not be used until those parts are purchased separately. Missing parts are shown under individual item description.

### How can I return my product if I am not satisfied?

Your Amazon Warehouse purchases are covered under Amazon's Returns Policy. Just like with any Amazon purchase you make, if you are unsatisfied with the product for any reason, you can return the item in accordance with Amazon's Returns Policy. Since each item at Amazon Warehouse is unique due to its nature, we unfortunately will be unable to replace any item with its exact same condition, but we might have a similar item in stock, so don't forget to check!

### Your inventory keeps changing, is this normal?

Yes. Since we specialize in used, pre-owned, or open box products, we can't predict future availability for any specific item, so check back often and order quickly.

///

///

///

52. Below are examples of identified illicit brands of ink cartridges that were purchased by Plaintiff, sold by Amazon Warehouse and fulfilled by Amazon.

Sellyaha Remanufactured Ink Cartridge Replacement for Canon PG 245XL, Compatible with PIXMA MG2520 MG2924 MG2922 MG2525 MG3020 MG2555 MX490 MX492 Printer

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

Only 1 left in stock - order soon

Size: 2 x Black

Brand: Sellyaha

Ink Color: 2 Black

Page Yield: 300

Compatible Devices: Pixma TR4620, Pixma TR4522, M490, M492, P1200, MG2420, MG2520, MG2522, MG2924, MG2922, MG2924, MG2924, MG3020, MG3022, MG3020, T5110, T5112, T5202, T5302, T5320, T5322 Printer

Special Feature: Wireless

Compatibility Options: Remanufactured

Color: 2 Black

About this item

- Cartridge — 2 Packs of Remanufactured Ink Cartridges for Canon PG-245XL(2 Black)
- Compatible Model — Compatible with Canon Pixma P220, Pixma MG2420, Pixma MG2520, Pixma MG2522, Pixma MG2924, Pixma MG2922, Pixma MG2924, Pixma M490, Pixma M492, Pixma M2555, Pixma M3020, Pixma M3022, Pixma M3020, Pixma M3022, Pixma T5110, Pixma T5112, Pixma T5202, Pixma T5302 Wireless All-in-One Inkjet Printers.
- Page Yield — 400 Pages per Black Cartridge at 5% coverage.
- Warranty — ISO 9001 and ISO 9002 certificates approved. These have been fully refilled with high quality ink, you will be able to meet most normal ink levels.
- All cartridges are strictly tested only to give you a better experience. We are confident the cartridges will be easy to install and can be completely compatible with your printer.

Buy with: \$31.85

FREE delivery Monday, March 27

Or fastest delivery Thursday, March 25. Order within 2 hrs 11 mins

Used Like New (Details)

Sold by Amazon Warehouse

Fulfilled by Amazon

Add to Cart

Add to List

New & Used (1) from \$31.85 & FREE Shipping

Have one to sell? Sell on Amazon

amazon business

Your Account | Amazon.com

Order Confirmation

Order #114-9543806-5197854

PO# sean

Hello Sean Levi,

Thank you for shopping with us. We'll send a confirmation once your item has shipped. Your order details are indicated below. The payment details of your transaction can be found on the order invoice. If you would like to view the status of your order or make any changes to it, please visit Your Orders on Amazon.com.

This order is placed on behalf of DoorStepInk.

Your guaranteed delivery date is: **Monday, March 27**

Your order will be sent to: **CHATSORTH, CA United States**

Your shipping speed: **FREE Shipping**

Order Details

Order #114-9543806-5197854

Placed on today, March 21

Sellyaha Remanufactured Ink Cartridge Replacement for Canon PG 245XL, Compatible with PIXMA MG2520 MG2920 MG2922 MG2924 MG2922 MG2922 MG2925 MG3020 MG2555 MX490 MX492 Printer

Electronics

Sold by Amazon.com Services LLC

Condition: Used - Like New

Moderate packaging damage... See more

Order Total: \$34.85

To learn more about ordering, go to Ordering from Amazon.com. If you want more information or need more assistance, go to Help.

Thank you for shopping with us. Amazon.com

64XL Ink Cartridge Combo Pack Compatible for HP 64 XL Ink Cartridge Replacement for HP Envy Photo 7855 7858 6255 7155 7120 6252 7164; Envy 5542 Printers (1 Black, 1 Tri-Color)

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

Only 1 left in stock - order soon

Color: For HP-64-1B1C

Brand: JANMORE

Page Yield: 600

Compatible Devices: Printer

Special Feature: Tri-Color

Compatibility Options: Compatible

Color: For HP-64-1B1C

Consider a similar item

EQ-Pack Large Capacity | 5000, 5010, M4 Cartridges Combo Pack Replacement for HP 800 95 1XL Ink Cartridges, High Page Yield, Works with Canon Jet Print 2020-05 to 06/20 06/25 Printer (3967/C/1M/1Y)

Buy with: \$43.13

FREE delivery Monday, March 27

Or fastest delivery Thursday, March 25. Order within 1 hr 27 mins

Used Like New (Details)

Sold by Amazon Warehouse

Fulfilled by Amazon

Add to Cart

Add to List

New & Used (1) from \$43.13 & FREE Shipping

Have one to sell? Sell on Amazon

Your Amazon.com order of "64XL Ink Cartridge Combo..."

Amazon.com <auto-confirm@amazon.com>

To Sales DoorstepInk

If there are problems with how this message is displayed, click here to view it in a web browser.

amazon business

Your Account | Amazon.com

Order Confirmation

Order #114-8110157-0591462

PO# sean

Hello Sean Levi,

Thank you for shopping with us. We'll send a confirmation once your item has shipped. Your order details are indicated below. The payment details of your transaction can be found on the order invoice. If you would like to view the status of your order or make any changes to it, please visit Your Orders on Amazon.com.

This order is placed on behalf of DoorStepInk.

Your guaranteed delivery date is: **Monday, March 27**

Your order will be sent to: **CHATSORTH, CA United States**

Your shipping speed: **FREE Shipping**

Order Details

Order #114-8110157-0591462

Placed on today, March 21

64XL Ink Cartridge Combo Pack Compatible for HP 64 XL Ink Cartridge Replacement for HP Envy Photo 7855 7858 6255 7155 7120 6252 7164; Envy 5542 Printers (1 Black, 1 Tri-Color)

Sold by Amazon.com Services LLC

Condition: Used - Like New

Moderate packaging damage... See more

Order Total: \$47.23

To learn more about ordering, go to Ordering from Amazon.com. If you want more information or need more assistance, go to Help.

Thank you for shopping with us. Amazon.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



Roll over image to zoom in

### GREENBOX Remanufactured Ink Cartridge 61XL Replacement for HP 61XL 61 XL for HP Envoy 4500 5530 5534 5535 Deskjet 1000 1056 1010 1510 1512 2540 3050 Officejet 2620 Printer (1 Black 1 Tri-Color)

**Brand:** GREENBOX  
**Rating:** 7,609 ratings | 83 answered questions  
**Price:** \$32.52 (16.26 / Count)  
**FREE Returns** - Available at a lower price from other sellers that may not offer Free Prime shipping.  
**Only 1 left in stock - order soon**  
**Brand:** GREENBOX  
**Ink Color:** 1 Black, 1 Tri-Color  
**Page Yield:** 715  
**Compatible Devices:** HP DeskJet 1000 1010 1012 1018 1510 1512 1056 1056A 1051 1055 1056 1511 1513 1514 2050 2010 2012 2014 2040 2146 2148 2149 2151 2540 2540A 2540 2540A 3050 3050A 3050A 3051 3052 3052A 3050 3056A 3010 3511 3512 1510 Printer  
**See more >**  
**Special Feature:** Tri-Color  
**Compatibility Options:** Remanufactured, Compatible  
**Color:** 1 Black 1 Tri-Color

**About this item**  
• **Compatible With:** HP Envoy 4500 4500 5530 5534 5535 4501 4503 4504 4505 4506 4508 4509 5531 5533 5534 HP OfficeJet 2620 2621 2623 1010 1012 2000 2540 3050 4830 4831 4832 4834 4835 4836 4838 HP DeskJet 1000 1010 1012 1014 1510 1512 1056 1056A 1051 1055 1056 1511 1513 1514 2050 2510 2512 2514 2540 2541 2542 2543 2544 2545 2546 2548 2549 2548 2548 2548 2620 2624 2627 2548 3050 3050A 3051 3052 3052A 3050 3056A 3010 3511 3512 1510 Printer  
• **Package Contents:** 2 Pack Remanufactured Ink Cartridge Replacement for hp 61XL Ink cartridges - 61 XL 1 Black 1 Tri-Color  
• **Page Yield:** 450 Pages per GREENBOX 61XL color ink cartridge  
• **Page Yield:** 715 Pages per GREENBOX 61XL Black ink cartridge  
• **High quality ink cartridges** can provide clear text and graphics, print the color offset you want on the

Buy used: \$32.52  
**FREE** delivery Monday, March 27  
Or faster delivery Saturday, March 26. Order within 13 hrs 36 mins  
**Select delivery location**  
**Used - Like New (Details)**  
Sold by Amazon Warehouse  
Fulfilled by Amazon  
**Add to Cart**  
**Add to List**  
New & Used (3) from \$32.00 & **FREE Shipping**  
**How one to sell?**  
Sell on Amazon

### Your Amazon.com order of "GREENBOX Remanufactured Ink..."

Amazon.com <auto-confirm@amazon.com>  
To Sales Doortepink  
If there are problems with how this message is displayed, click here to view it in a web browser.  
**amazonbusiness** | Your Account | Amazon.com  
**Order Confirmation**  
Order #114-0913494-5048844  
PO# sean

Hello Sean Levi,

Thank you for shopping with us. We'll send a confirmation once your item has shipped. Your order details are indicated below. The payment details of your transaction can be found on the order invoice. If you would like to view the status of your order or make any changes to it, please visit Your Orders on Amazon.com.

This order is placed on behalf of DoorStepInk.

Your guaranteed delivery date is: **Monday, March 27**  
Your shipping speed: **FREE Shipping**  
**Order Details**

Your order will be sent to:  
**CHATSWORTH, CA**  
United States

### Order Details

Order #114-0913494-5048844  
Placed on today, March 21



**GREENBOX Remanufactured Ink Cartridge 61XL Replacement for HP 61XL 61 XL for HP Envoy 4500 5530 5534 5535 Deskjet 1000 1056 1010 1510 1512 2540 3050 Officejet 2620 Printer (1 Black 1 Tri-Color)**  
\$32.52  
**Sold by Amazon.com Services LLC**  
Condition: Used - Like New  
Item will come in original... See more

**Order Total: \$35.61**

To learn more about ordering, go to [Ordering from Amazon.com](#). If you want more information or need more assistance, go to [Help](#).

Thank you for shopping with us. **Amazon.com**



Roll over image to zoom in

### INKNI Remanufactured Ink Cartridge Replacement for HP 63XL 63 XL for Envy 4520 4512 4516 OfficeJet 3830 4650 (Black, Color, 2-Pack)

**Brand:** INKNI  
**Rating:** 149 ratings  
**Price:** \$25.90 (12.95 / Count)  
**FREE Returns** - Available at a lower price from other sellers that may not offer free Prime shipping.  
**Only 1 left in stock - order soon**  
**Brand:** INKNI  
**Page Yield:** 480  
**Compatible Devices:** Printer  
**Special Feature:** High Yield  
**Compatibility Options:** Remanufactured  
**Color:** 63XL BLACK CYAN MAGENTA YELLOW

**About this item**  
• **Compatible With:** HP ENVY 4520 4510 4511 4512 4513 4516 4517 4521 4522 4523 4524 4525; HP OfficeJet 3830 3831 3832 3833 3834 4650 4652 4654 4655 5200 5220 5222 5230 5232 5252 5255 5258 5260 5264 4650 Printer  
• **Compatible With:** HP DeskJet 1110 1112 2130 2131 2132 2133 2134 3630 3631 3632 3633 3634 3636 3637 3639 Printer  
• **Contents:** 63XL Combo Pack Remanufactured Ink Cartridge Replacement for hp 63XL ink cartridges - 63 XL 1 Black, 1 Tri-Color  
• **Page Yield:** 480 Pages per 63 Black cartridge / 130 Pages per 63 Tri-color cartridges

Buy used: \$25.90  
**FREE** delivery Monday, March 27  
Or faster delivery Saturday, March 25. Order within 8 hrs 42 mins  
**Select delivery location**  
**Used - Like New (Details)**  
Sold by Amazon Warehouse  
Fulfilled by Amazon  
**Add to Cart**  
**Add to List**  
New & Used (3) from \$23.00 & **FREE Shipping**  
**How one to sell?**  
Sell on Amazon

### Your Amazon.com order of "INKNI Remanufactured Ink..."

Amazon.com <auto-confirm@amazon.com>  
To Sales Doortepink  
If there are problems with how this message is displayed, click here to view it in a web browser.  
**amazonbusiness** | Your Account | Amazon.com  
**Order Confirmation**  
Order #114-0267370-3802637  
PO# sean

Hello Sean Levi,

Thank you for shopping with us. We'll send a confirmation once your item has shipped. Your order details are indicated below. The payment details of your transaction can be found on the order invoice. If you would like to view the status of your order or make any changes to it, please visit Your Orders on Amazon.com.

This order is placed on behalf of DoorStepInk.

Your guaranteed delivery date is: **Monday, March 27**  
Your shipping speed: **FREE Shipping**  
**Order Details**

Your order will be sent to:  
**CHATSWORTH, CA**  
United States

### Order Details

Order #114-0267370-3802637  
Placed on today, March 21



**INKNI Remanufactured Ink Cartridge Replacement for HP 63XL 63 XL for Envy 4520 4512 4516 OfficeJet 3830 4650 4652 4655 5255 5258 DeskJet 1112 2132 3632 3637 Printer (Black, Color, 2-Pack)**  
\$25.90  
**Sold by Amazon.com Services LLC**  
Condition: Used - Like New  
Item will come in original... See more

**Order Total: \$28.36**

To learn more about ordering, go to [Ordering from Amazon.com](#). If you want more information or need more assistance, go to [Help](#).

Thank you for shopping with us. **Amazon.com**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**62XL Ink Cartridges Replacement for HP 62XL Ink Cartridge Combo Pack for HP Envy 5540 5640 5660 7640 7645 OfficeJet 5740 5745 8040 OfficeJet Mobile 250 200 Printer (1 Black, 1 Tri-Color)**

Visit the **Moocho Store**  
★★★★☆ - 662 ratings | 7 answered questions

**\$41.22** (82557 / Count)

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

**Only 1 left in stock - order soon**

**Color:** ink 62xl black and color combo pack

**Model Name:** For hp 62 ink cartridge combo pack  
**Brand:** Moocho  
**Ink Color:** 62xl ink cartridges black and color  
**Page Yield:** 315  
**Compatible Devices:** Printer  
**Special Feature:** Tri Color  
**Compatibility Options:** Remanufactured

**About this item**

- Package includes: (1 Black, 1 Tri-color) 2 packs of 62xl ink cartridges black and color to work with hp officejet 5740 ink cartridges hp envy 5640 ink cartridges
- Page Yield: About 715 pages for hp 62xl black ink cartridges and 475 pages for hp 62xl color ink cartridges based on A4 Letter at 5 percentage coverage
- Remanufactured HP 62 Ink Kit for HP Envy 5540/5640/5660/7640/7645/8040 OfficeJet 5740/5745/8040 OfficeJet Mobile 250/200 Printer
- Printer Ink for HP 62 Ink Kit: Works on: OfficeJet 5740/5745/8040 OfficeJet Mobile 250/200 Printer
- For HP Ink 62 High Quality: Remanufactured 62 xl hp ink cartridges can provide clear text and graphics, print the color effect you want on the paper. Remanufactured hp 62xl ink provide you with

Buy used: **\$41.22**  
FREE delivery **Monday, March 27**. Order within 9 hrs 57 mins

Or fastest delivery **Saturday, March 25**. Order within 9 hrs 26 mins

**Used - Like New** (Details)  
Sold by Amazon Warehouse  
Fulfilled by Amazon

Add to Cart

Add to List

New & Used (8) from **\$41.14** & FREE Shipping.

Have one to sell?  
Sell on Amazon

414X  
\$179.99  
Save 17%  
\$147.99

Your Amazon.com order of "62XL Ink Cartridges...".

Amazon.com <auto-confirm@amazon.com>  
To Sales Doorstepink

If there are problems with how this message is displayed, click here to view it in a web browser.

amazon business | Your Account | Amazon.com

**Order Confirmation**  
Order #114-4459006-3837022  
PO# sean

**Hello Sean Levi,**  
Thank you for shopping with us. We'll send a confirmation once your item has shipped. Your order details are indicated below. The payment details of your transaction can be found on the order invoice. If you would like to view the status of your order or make any changes to it, please visit [Your Orders](#) on Amazon.com.

This order is placed on behalf of DoorStepink.

Your guaranteed delivery date is:  
**Monday, March 27**

Your order will be sent to:  
**CHATSWORTH, CA  
United States**

Your shipping speed:  
**FREE Shipping**

Order Details

**Order #114-4459006-3837022**  
Placed on today, March 21

	62XL Ink Cartridges Replacement for HP 62XL Ink Cartridge Combo Pack for HP Envy 5540 5640 5660 7640 7645 OfficeJet 5740 5745 8040 OfficeJet Mobile 250 200 Printer (1 Black, 1 Tri-Color)	<b>\$41.22</b>
Sold by Amazon.com Services LLC Condition: Used - Like New Item will come in original. See more		
<b>Order Total:</b>		<b>\$45.14</b>

To learn more about ordering, go to [Ordering from Amazon.com](#).  
If you want more information or need more assistance, go to [Help](#).

Thank you for shopping with us.  
**Amazon.com**

**TEINO 63XL Remanufactured Ink Cartridge Replacement for HP 63XL 63 XL use with HP OfficeJet 3830 4650 5255 5258 4655 4652 3833 Envy 4520 4512 DeskJet 1112 3630 3632 2130 (Black Tri-Color, 2-Pack)**

Visit the **TEINO Store**  
★★★★☆ - 1,918 ratings | 9 answered questions

**\$25.56** (61378 / Count)

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

**Only 1 left in stock - order soon**

**Model Name:** T733XLBKCFY  
**Brand:** TEINO  
**Page Yield:** 480  
**Compatible Devices:** OfficeJet 3830 4650 5255 5258 4655 4652 3833 Envy 4520 4512 4516 DeskJet 1112 3630 3632 2130  
**Special Feature:** Tri Color  
**Compatibility Options:** Remanufactured  
**Color:** 63XL Black Tri-color

**About this item**

- Package Contents: 2 pack remanufactured ink cartridges replacement for HP 63 63XL black tri-color ink cartridges.
- Compatible with HP Envy 4510 4511 4512 4513 4514 4515 4516 4520 4521 4522 4523 4524 4525 4526 4527 4528 DeskJet 1110 1111 1112 1113 1114 2130 2131 2132 2133 2134 2136 2137 3630 3631 3632 3633 3634 3635 3636 3637 OfficeJet 4620 5255 5256 5259 5260 5261 5262 5263 5264 5265 5266 5267 5268 5269 5270 5271 5272 5273 5274 5275 5276 5277 5278 5279 5280 5281 5282 5283 4652 4654 4655 4656 4657 4658 3833
- Page yields of 480 pages for black cartridge and 130 pages for tri-color cartridge at 5% coverage
- Fade-resistant color provides superior results and brilliant, true-to-life images
- Deliver crisp, clear images and text

Buy used: **\$25.56**  
FREE delivery **Monday, March 27**  
Or fastest delivery **Saturday, March 25**. Order within 9 hrs 26 mins

**Used - Very Good** (Details)  
Sold by Amazon Warehouse  
Fulfilled by Amazon

Add to Cart

Add to List

New & Used (3) from **\$25.56** & FREE Shipping.

Have one to sell?  
Sell on Amazon

63XL  
\$179.99  
Save 17%  
\$147.99

Your Amazon.com order of "TEINO 63XL Remanufactured...".

Amazon.com <auto-confirm@amazon.com>  
To Sales Doorstepink

If there are problems with how this message is displayed, click here to view it in a web browser.

amazon business | Your Account | Amazon.com

**Order Confirmation**  
Order #114-6853892-4567457  
PO# sean

**Hello Sean Levi,**  
Thank you for shopping with us. We'll send a confirmation once your item has shipped. Your order details are indicated below. The payment details of your transaction can be found on the order invoice. If you would like to view the status of your order or make any changes to it, please visit [Your Orders](#) on Amazon.com.

This order is placed on behalf of DoorStepink.

Your guaranteed delivery date is:  
**Monday, March 27**

Your order will be sent to:  
**CHATSWORTH, CA  
United States**

Your shipping speed:  
**FREE Shipping**

Order Details

**Order #114-6853892-4567457**  
Placed on today, March 21

	TEINO 63XL Remanufactured Ink Cartridge Replacement for HP 63XL 63 XL use with HP OfficeJet 3830 4650 5255 5258 4655 4652 3833 Envy 4520 4512 DeskJet 1112 3630 3632 2130 (Black Tri-Color, 2-Pack)	<b>\$25.56</b>
Original Product Sold by Amazon.com Services LLC Condition: Used - Very Good Item will come repackaged.		
<b>Order Total:</b>		<b>\$27.99</b>


To learn more about ordering, go to [Ordering from Amazon.com](#).  
If you want more information or need more assistance, go to [Help](#).

Thank you for shopping with us.  
**Amazon.com**

///  
///  
///



Your Amazon.com order of "Valuetoner Supply Ink..".

 Amazon.com <auto-confirm@amazon.com>  
To Sales Doorstepink  
[If there are problems with how this message is displayed, click here to view it in a web browser.](#)

**amazon business** | [Your Account](#) | [Amazon.com](#)

**Order Confirmation**  
Order #114-6529588-3480269  
PO# sean

Hello Sean Levi,

Thank you for shopping with us. We'll send a confirmation once your item has shipped. Your order details are indicated below. The payment details of your transaction can be found on the [order invoice](#). If you would like to view the status of your order or make any changes to it, please visit [Your Orders](#) on Amazon.com.

This order is placed on behalf of DoorStepink.

Your guaranteed delivery date is: <b>Monday, March 27</b> Your shipping speed: <b>FREE Shipping</b>	Your order will be sent to: [REDACTED] <b>CHATSWORTH, CA</b> <b>United States</b>
--	--

[Order Details](#)

**Order Details**

Order #114-6529588-3480269  
Placed on today, March 21



Valuetoner Supply Ink Cartridges Replacement for Canon 275XL 275 XL PG-275 XL PG275 Black Ink Cartridge to use with Canon TS3522 TS3520 TR4720 TR4722 Printer (2 Black) **\$42.44**  
Sold by Amazon.com Services LLC  
Condition: Used - Like New  
Item will come in original... [See more](#)

Order Total: **\$46.47**

To learn more about ordering, go to [Ordering from Amazon.com](#).  
If you want more information or need more assistance, go to [Help](#).

Thank you for shopping with us.  
**Amazon.com**

53. As demonstrated above, sellers on Amazon use deceptive advertising and make unsubstantiated environmental claims regarding their products, and Defendants participate in the selling process, promotion, distribution, and dissemination of deceptively described and falsely labeled remanufactured printer ink cartridges.

54. Defendants are catalog marketers. Catalog marketing is a form of direct marketing in which consumers or business customers select and order products directly from a printed or online catalog, rather than a retail outlet. Defendants offer millions of products broken down in different categories in their online store to sell its many product offerings to consumers at any given time. As an online catalog store, Defendants bear responsibility for verifying the advertising claims and product authenticity of its third-party sellers.

55. Defendants are an advertising agency. Described in their own Amazon Advertising agreement they “govern Customer’s access to and use of the Ad Services,

1 including the Advertising Console, and is made among Amazon, Customer, and each  
2 Advertiser. Defendants per its advertising agreement “may also reject or remove any  
3 Customer Materials or suspend any Campaign if: (a) the Customer Materials or  
4 Campaign violates the Ad Policies or this Agreement; (b) your account has been, or our  
5 controls identify that it may be used for deceptive or fraudulent or illegal activity; (c)  
6 Amazon believes the Customer Materials or Campaign would expose Amazon to  
7 liability; or (d) for other risk management reasons.” Plaintiff identified ink cartridges  
8 falsely advertising themselves and Defendants continued to disseminate the false  
9 information through its Advertising services both on and off its platform.

10         56. While Defendants claim immunity under 47 U.S.C. § 230, this contention  
11 fails, among other reasons, because it ignores their exposure for violating Section 5 of the  
12 Federal Trade Commission Act (FTC Act) (15 U.S.C. 45), which prohibits "unfair or  
13 deceptive acts or practices in or affecting commerce." The prohibition applies to all  
14 persons engaged in commerce, including banks. Under Section 5 of the FTC Act, “third  
15 parties - such as advertising agencies or website designers and catalog marketers - also  
16 may be liable for making or disseminating deceptive representations if they participate in  
17 the preparation or distribution of the advertising or know about the deceptive claims.”<sup>3</sup>  
18 Defendants, in creating listing policies for selling ink and toner as described herein,  
19 clearly distinguish between a “remanufactured” and a “compatible” ink cartridge. In  
20 making this distinction, Defendants must know that any seller listing a product as a  
21 “remanufactured printer cartridge” would need to verify their cartridges are  
22 remanufactured from an empty OEM cartridges core to make such a claim, or otherwise  
23 risk liability for the promotion, sale, and distribution of a deceptively advertised product.

24         57. With direct participation in the sales and promotion processes, Amazon  
25 bears responsibility for the advertising, sale and distribution of illicit clone ink cartridges  
26 that have been destructive to the environment and continue to harm the remanufacturing

---

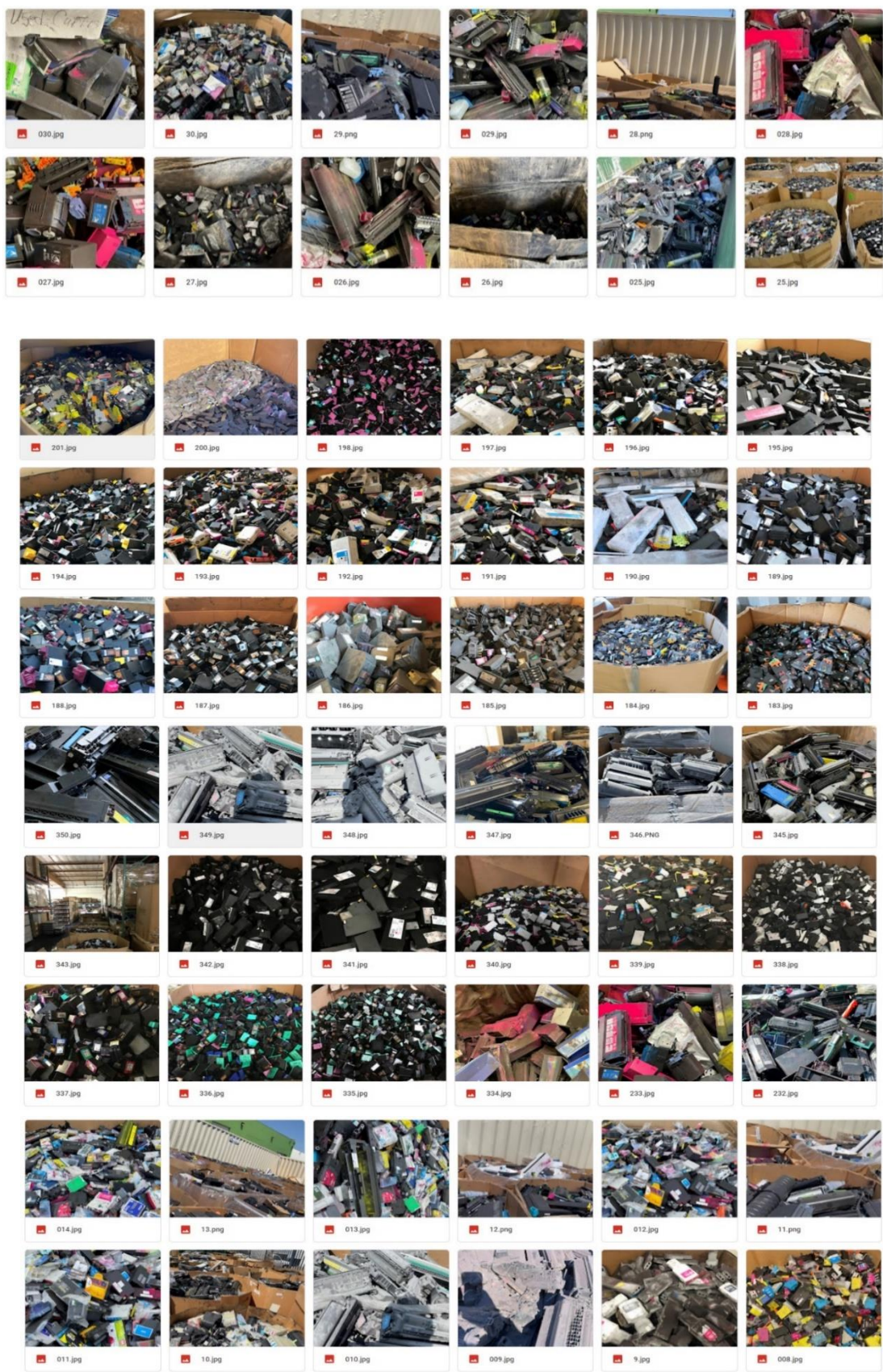
27         <sup>3</sup> Federal Trade Commission Bureau of Consumer Protection, Advertising and Marketing on the Internet,  
28 Rules of the Road, p.2 (Sept. 2000); [https://www.ftc.gov/system/files/ftc\\_gov/pdf/bus28-rulesroad-2023\\_508.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/bus28-rulesroad-2023_508.pdf)

1 printer cartridge market, including Plaintiff. Amazon is undercutting legitimate  
2 remanufactured cartridge sales while simultaneously devaluing used OEM cartridge cores  
3 to the point that it is no longer cost effective to collect, recycle and remanufacture them.  
4 This deceitful business practice directly harms Plaintiff while creating enormous amount  
5 of printer cartridge waste in the United States. If allowed to continue, the inevitable  
6 results will be Plaintiff's loss of its entire business, the annihilation of the printer  
7 cartridge remanufacturing industry, an increase in plastic pollution, and consumers will  
8 no longer have a low-cost, environmentally friendly option for print-consumable  
9 products.

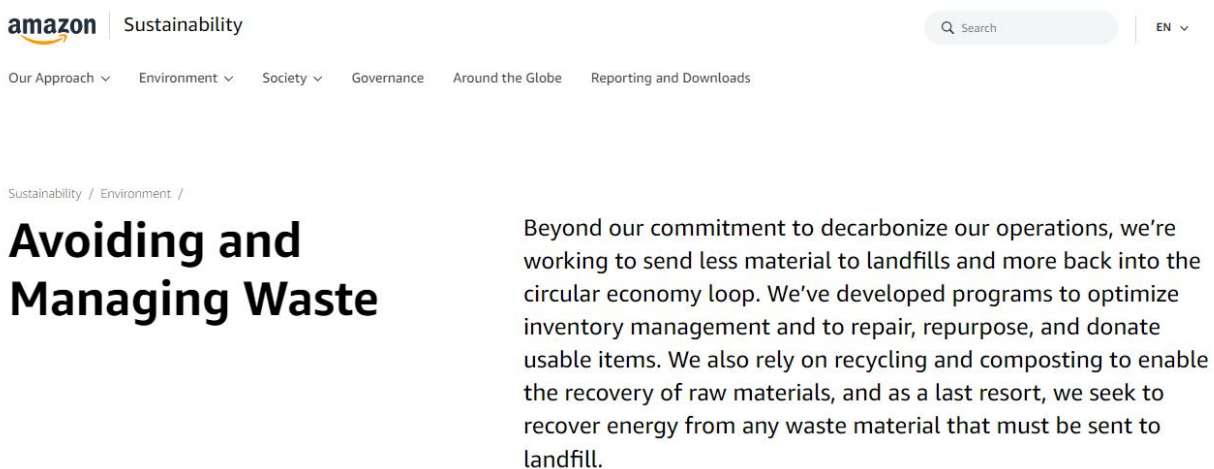
10 58. Without a legitimate printer cartridge remanufacturing industry, consumers,  
11 recyclers, taxpayers, and the environment will continue to bear the cost of handling the  
12 plastic waste.

13 59. Before the sale of illicit printer cartridges, there was a vast market for  
14 remanufacturers to obtain empty OEM cartridge cores to remanufacture. In the United  
15 States there were thousands of cartridge brokers and electronic waste recyclers collecting  
16 and selling used printer cartridges to remanufacturers for upwards of \$32 per empty OEM  
17 cartridge core. Today, most if not all printer cartridge brokers are no longer in business  
18 and electronic waste recycling companies are avoiding collecting used printer cartridges  
19 as they have no monetary value and are considered waste. By contrast, Plaintiff receives  
20 more aftermarket single-use clone printer cartridge waste through its recycling collection  
21 services than viable used OEM cartridge cores to remanufacture, creating a substantial  
22 expense to handle material. Plaintiff made it clear to Defendants that they bear  
23 responsibility for selling and facilitating the sale of single-use clone printer cartridges,  
24 contributing to millions of plastic cartridges ending up in United States landfills each  
25 year. Plaintiff provided the following images to Defendants to illustrate the massive  
26 amount of printer cartridge waste it continually accumulates.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



1  
2 60. Amazon states “it is committed to and invested in sustainability because it’s  
3 a win for the planet, for business, for its customers, and for communities.” Yet,  
4 Defendants do not take any responsibility for millions of imported clone printer  
5 cartridges sold on their platform that are neither recycled nor recyclable. By contrast,  
6 OEM printer manufacturers offer a free “take back” recycling program to reclaim their  
7 used cartridges. Below is a screenshot of Amazon’s stated commitment of “working to  
8 send less material to landfills and more back into the circular economy loop.”  
9 Defendants’ conduct is diametrically opposed to its purported commitment and  
10 constitutes “greenwashing” plastic printer cartridge waste they are responsible for selling,  
11 as well as destroying the remanufacturing industry, which plays a vital role for recycling  
12 cartridge waste in a circular economy.  
13

14  The screenshot shows the Amazon Sustainability website. At the top left is the Amazon logo followed by the word "Sustainability". To the right is a search bar with a magnifying glass icon and the word "Search", and a language dropdown menu set to "EN". Below the navigation bar are several menu items: "Our Approach", "Environment", "Society", "Governance", "Around the Globe", and "Reporting and Downloads". The main content area has a breadcrumb trail "Sustainability / Environment /" followed by a large heading "Avoiding and Managing Waste". To the right of the heading is a paragraph of text: "Beyond our commitment to decarbonize our operations, we're working to send less material to landfills and more back into the circular economy loop. We've developed programs to optimize inventory management and to repair, repurpose, and donate usable items. We also rely on recycling and composting to enable the recovery of raw materials, and as a last resort, we seek to recover energy from any waste material that must be sent to landfill."



1           61. This action seeks to stop Amazon's direct and complicit behavior, which  
2 has caused significant damage to Plaintiff. Plaintiff brings this action under federal, state  
3 and/or common law and seeks damages and injunctive relief arising out of the Lanham  
4 Act for false advertising, California Business and Professions Code section 17200, *et*  
5 *seq.*, for unfair competition, false advertising, misleading environmental claims and  
6 deceptive practices, and for violation of California Business and Professions Code section  
7 17500 for false advertising.

8           62. It is well documented that Amazon is plagued with counterfeit products.  
9 They have an anti-counterfeiting policy. Defendants created a Brand Registry to protect  
10 intellectual, copyright and trademark property rights. Defendants created their own  
11 Amazon Crime Unit (ACU) whose mission is to pursue counterfeiters worldwide.  
12 Conversely, when Plaintiff notified Defendants in great detail that their ecommerce  
13 platform is overrun with illicit printer cartridges, Defendants' efforts to halt the flow of  
14 millions of illegal products distributed from their warehouses across the United States can  
15 be described as meager at best. When illegal products are sold on Amazon, millions of  
16 consumers and businesses worldwide suffer while Defendants profit handsomely, adding  
17 to their multi-billion-dollar annual revenue and reported trillion-dollar valuation. Rather  
18 than enforcing their own policies and stopping the sale of these deceptively promoted  
19 products, Defendants facilitate their sales for profit. Defendants' failure to enforce their  
20 own policies, allowing sellers, and Defendants as sellers themselves, to easily circumvent  
21 their own rules, in violation of federal and state law.

22           63. The proliferation of illicit clone ink cartridges defrauds millions of  
23 customers by deceiving them into believing they are purchasing recycled products. The  
24 unlawful sale of new built clone printer cartridges labeled as remanufactured causes  
25 irreparable harm to legitimate remanufacturers who are committed to selling actual  
26 recycled ink cartridges to resellers worldwide. The sale of illicit clone ink cartridges is  
27 an enormous problem with a wide-spread negative impact. Amazon is not only aware of  
28 the problem of fraudulent or unlawful activities of sellers and warns its investors that

1 Amazon itself may be held liable for them in its 2018 10-K filing (pg. 14), but they  
2 condone it and conspire with sellers in order to make huge profits. Below is a screenshot  
3 from the 10-K report warning of liability concerns:  
4

5 ***We Could Be Liable for Fraudulent or Unlawful Activities of Sellers***

6 The law relating to the liability of online service providers is currently unsettled. In addition, governmental agencies could require changes in the way this business is  
7 conducted. Under our seller programs, we may be unable to prevent sellers from collecting payments, fraudulently or otherwise, when buyers never receive the products they ordered  
8 or when the products received are materially different from the sellers' descriptions. We also may be unable to prevent sellers in our stores or through other stores from selling  
9 unlawful, counterfeit, pirated, or stolen goods, selling goods in an unlawful or unethical manner, violating the proprietary rights of others, or otherwise violating our policies. Under  
10 our A2Z Guarantee, we reimburse buyers for payments up to certain limits in these situations, and as our third-party seller sales grow, the cost of this program will increase and  
11 could negatively affect our operating results. In addition, to the extent any of this occurs, it could harm our business or damage our reputation and we could face civil or criminal  
12 liability for unlawful activities by our sellers.

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

64. On January 24, 2023, Defendants' in-house counsel indicated that Defendants are committed to protecting Amazon customers and ensuring the integrity of its platform. Counsel wrote that Defendants were requesting that sellers of clone cartridges substantiate their claims about their products being remanufactured and would take action as appropriate based on that information. On May 25, 2023, Plaintiff and Defendants met via Zoom. Defendants stated during the meeting that they had asked sellers to substantiate their claims about selling remanufactured and environmentally responsible ink cartridges. Third-party sellers who couldn't substantiate their product claims were instructed to change their product listings. However, sellers were allowed to continue to sell regardless of their history of defrauding consumers, and they were not suspended for falsely using the recycling logo on newly manufactured products, in violation of federal and state law. Below are before and after examples of listings by Sellers who were instructed by Defendants to change their product listings.



**Sellyaha Remanufactured Ink Cartridge Replacement for Canon PG-245XL CL-246XL Compatible with Canon PIXMA IP2820 MG2420 MG2520 MG2522 MG2525 MG2555 MG2920 MG2922 MG2924 MG3020 MX490 MX492 Printer**

Visit the Sellyaha Store  
★★★★★ 1,020 ratings | 9 answered questions

Price: **\$35.99** (\$18.00 / Count) & FREE Returns

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

Size: **1 Black 1 Tricolor**

1 Black \$26.99	1 Color \$22.99	<b>1 Black 1 Tricolor \$35.99 (\$18.00 / Count)</b>	2 x Black \$33.99 (\$17.00 / Count)
2 Black 1 Tricolor \$55.99			

Brand: Sellyaha  
Page Yield: 400  
Compatible Devices: Printer  
Special Feature: Wireless  
Compatibility Options: **Remanufactured**  
Color: Black

**About this item**

- Contents --- 2 Packs of **Remanufactured ink cartridges** for Canon PG-245XL 246XL(1 Black, 1 Tri-Color).
- Compatible Printer Model --- Compatible with Canon Pixma IP2820, Pixma MG2420, Pixma MG2520,

**One-time purchase:**  
\$35.99 (\$18.00 / Count) & FREE Returns

FREE delivery **Tuesday, August 30**

Or fastest delivery **Tomorrow, August 25.** Order within 2 hrs 34 mins

Select delivery location

**In Stock.**

Qty: 1

**Add to Cart**

**Buy Now**

Secure transaction

Ships from **Amazon**

Sold by SELLYAHA INFOT...

Details

Return policy: Eligible for Return, Refund or Replacement within 30 days of receipt

**prime**

Enjoy fast, FREE delivery, exclusive deals and more

Listing was captured on 8.24.22. Sellyaha was claiming to be a "Remanufactured" product and fulfilled by Amazon.



**Sellyaha Ink Cartridge Replacement for Canon PG-245XL CL-246XL Compatible with Canon PIXMA IP2820 MG2420 MG2520 MG2522 MG2525 MG2555 MG2920 MG2922 MG2924 MG3020 MX490 MX492 Printer**

Visit the Sellyaha Store  
4.3 ★★★★★ 1,044 ratings | 9 answered questions

**Amazon's Choice** for "sellyaha"

Price: **\$34.99** (\$17.50 / Count) & FREE Returns

Thank you for being an Amazon customer. Get \$50 off: Pay \$0.00 \$34.99 upon approval for Amazon Visa.

Size: **1 Black 1 Tricolor**

<b>1 Black 1 Tricolor \$34.99 (\$17.50 / Count)</b>	2 x Black \$33.99 (\$17.00 / Count)	2 Black 1 Tricolor \$48.99 (\$16.33 / Count)
---	---	--

Brand: Sellyaha  
Ink Color: Tricolor, Black  
Page Yield: 300  
Compatible Devices: Pixma TR4520, Pixma TR4522, MX490, MX492, IP2820, MG2420, MG2520, MG2522, MG2525, MG2920, MG2922, MG2924, MG3020, MG3022,...

Special Feature: Wireless  
Compatibility Options: **Remanufactured**, Compatible  
Color: Black

**About this item**

- Contents --- 2 Packs ink cartridges for Canon PG-245XL 246XL(1 Black, 1 Tri-Color).
- Compatible Printer Model --- Compatible with Canon Pixma IP2820, Pixma MG2420, Pixma MG2520, Pixma MG2522, Pixma MG2920, Pixma MG2922, Pixma MG2924, Pixma MX490, Pixma

Add your 30-day FREE trial of Prime and get fast, free delivery

Delivery Pickup

**One-time purchase:**  
\$34.99 (\$17.50 / Count)

FREE Returns

FREE delivery **Monday, July 17**

Or fastest delivery **Tomorrow, July 11.** Order within 10 hrs 41 mins

Deliver to Eric - Chatsworth 91311

**In Stock**

Qty: 1

**Add to Cart**

**Buy Now**

Payment: Secure transaction  
Ships from Amazon  
Sold by SELLYAHA INFOTECH  
Returns: Eligible for Return, Refund or Replacement within 30 days of receipt

Add a gift receipt for easy returns

**Subscribe & Save:**  
\$34.99 (\$17.50 / Count)  
First delivery on Jul 17  
Ships from Amazon  
Sold by SELLYAHA INFOTECH

**Add to List**

Listing was captured on 7.10.23. Sellyaha changed its title and some of the description removing most claims about being "remanufactured," but still mentions remanufactured in the listing. In addition to being aware this brand makes false claims about its product, Amazon endorse it with its Amazon's Choice badge. An endorsement that is only available for FBA customers.

65. Contrary to Defendants' statements about protecting its customers and taking the allegations seriously, Defendants protected the offending selling partners instead of suspending them for the fraud that was being perpetrated on its customer and the harm it was causing the Plaintiff. Amazon was obviously more concerned with protecting its



1 profits from the distribution, sale, advertisement, fulfillment, and logistics services  
2 associated with these illicit clone ink cartridges. The fact the Defendants instructed illicit  
3 sellers to change their description further illustrates how actively Amazon is involved in  
4 creating listings and promotional content as a partner of the sellers. It also reveals  
5 Amazon's willingness to allow sellers who have defrauded consumers for years to  
6 continue to escape responsibility and to continue selling clone cartridges and  
7 misrepresenting them.

8         66. Plaintiff seeks to enjoin Amazon's sale of the illicit ink cartridges, recover  
9 actual and statutory damages, a disgorgement of Defendants' profits, and other relief,  
10 including attorneys' fees and costs. Plaintiff also seeks a recall of all the illicit ink  
11 cartridges sold by Amazon along with distribution of a notice to all affected customers  
12 that they received counterfeit, non-recyclable, new manufactured ink cartridges. Plaintiff  
13 seeks this relief because Amazon should be held accountable for facilitating the product  
14 dumping of inauthentic remanufactured ink cartridges, undercutting legitimate  
15 remanufactured cartridges, tarnishing remanufactured products' reputation by allowing  
16 the false labeling and deceptive advertising to take place, and defrauding unsuspecting  
17 customers that they were purchasing a recycled product.

18         67. Inasmuch as Defendants receive, store, pick, pack, ship, and deliver the  
19 illicit ink cartridges to customers, as well as handle transactions, returns, and respond to  
20 customer feedback, they have become part of the chain of distribution.

21         68. The list of items available on Defendants' website – also known as the  
22 Amazon catalog – is vast. Sellers offer their products for sale in a wide range of  
23 categories so that customers are able either to search for specific items or to browse  
24 through departments. Defendants have put in place restrictions, guidelines and policies  
25 for sellers to follow. Defendants control who can sell on its platform and Defendants can  
26 suspend and remove a seller who engages in unlawful acts. "To protect its customers and  
27 safeguard its reputation for trustworthiness, Amazon has invested heavily, both in terms  
28 of time and resources, to prevent fraud and abuse in, and to ensure the quality and

1 authenticity of the products available in, the Amazon Store.” (*See* Complaint,  
2 Amazon.com, etc., et al., v. Dhuog (W.D. Wash March 30, 2023), Case 2:23-cv-00484).

3 69. In light of their own fraud prevention policies, Defendants have the  
4 responsibility to verify all listings that claim to be “Remanufactured,” and to substantiate  
5 any environmental claims being made. After Plaintiff put Defendants on notice about the  
6 deceptive and false labeling and advertising claims arising from the sale of illicit ink  
7 cartridges on the Amazon platform, including those products being promoted, endorsed,  
8 fulfilled and sold by Defendants through their Amazon Warehouse, there has been no  
9 perceptible change in Defendants’ wrongful practices.

10 70. Defendants’ lack of enforcement of their own rules and failure to carry out  
11 any punishment for violating their own policies only invites more bad actors to sell illicit  
12 products using unlawful business practices. Defendants’ complicit behavior is causing  
13 great harm to Plaintiff by facilitating on a mass scale the flooding of falsely labeled  
14 single-use new built clone ink cartridge as “remanufactured” and selling them as recycled  
15 product, undercutting their market, tarnishing the reputation of remanufactured ink  
16 cartridge products, and clogging up the recycle stream with single-use printer cartridge  
17 cores that have no value.

18 71. The sale of the illicit ink cartridges constitutes false advertising, deceptive  
19 practices and unfair competition and violates Amazon’s rules and stated environmental  
20 goals, as well as federal and state laws.

21 ///

22 **CAUSES OF ACTION**

23 **COUNT 1**

24 **(Violation of the Lanham Act, 15 U.S.C. § 1125)**

25 **AGAINST ALL DEFENDANTS**

26 72. Plaintiff hereby incorporates by reference all of the allegations set forth in  
27 paragraphs 1 through 71 as though fully set forth herein.

28 73. Defendants’ conduct as described above constitutes the use of false

1 statements, false descriptions and representations of fact in violation of section 43(a) of  
2 the Lanham Act, 15 U.S.C. section 1125(a), that are likely to deceive and do in fact  
3 deceive the public into falsely believing that the illicit ink cartridges sold on Amazon are  
4 remanufactured, recyclable products.

5 74. Defendants' conduct as described above constitutes the using of false  
6 statements, false description and representations of fact in violation of section 43(a) of  
7 the Lanham Act, 15 U.S.C. section 1125(a), that are likely to deceive and do in fact  
8 deceive the public into falsely believing that the ink cartridges sold on Amazon are made  
9 from OEM cores.

10 75. Defendants' acts as described above constitute the using by each  
11 Defendant, in violation of section 43(a) of the Lanham Act, 15 U.S.C. section 1125(a), of  
12 words, terms, names, symbols and false and misleading descriptions of fact, and false and  
13 misleading representations of fact, which, in commercial advertising or promotion  
14 misrepresents the nature, characteristics or qualities of Defendants' goods, services or  
15 commercial activities.

16 76. As a result of Defendants' false and misleading advertising, Planet Green  
17 has suffered a direct diversion of customers and has been and will be deprived of  
18 substantial revenue in an amount to be determined at trial.

19 77. Defendants have caused and will continue to cause immediate and  
20 irreparable injury to Plaintiff, including injury to its business, for which there is no  
21 adequate remedy at law. As such, Plaintiff is entitled to an injunction under 15 U.S.C.  
22 section 1116, restraining Defendants, their agents, employees, representatives and all  
23 persons acting in concert with them from engaging in further acts in violation of section  
24 43(a) of the Lanham Act, 15 U.S.C. section 1125(a), and ordering removal of the false  
25 advertising.

26 78. Plaintiff is entitled under 15 U.S.C. section 1117, to actual damages to be  
27 determined at trial, to have such damages trebled, to disgorgement of Defendants' profits,  
28 and costs of this action.

1           79. In the course of committing the wrongful acts alleged herein, Defendants  
2 made and are making false or misleading descriptions of fact or representations of fact  
3 and commercial advertisements about its own or another's product that was and is  
4 material, in that it is likely to influence the purchasing decision of consumers. Each such  
5 misrepresentation actually deceives or has a tendency to deceive a substantial segment of  
6 its audience, and each Defendant has placed a false or misleading statement in interstate  
7 commerce. Plaintiff directly competes with the sellers promoted by Amazon, and  
8 Amazon through its FBA services is a direct seller of the illicit ink cartridges. In addition,  
9 Defendants take possession of illicit clone ink cartridges, promotes, distributes, sells and  
10 fulfills the clone cartridges, including through its Amazon Warehouse website. Plaintiff  
11 has been and is likely to be injured as a result of Defendants' misconduct by direct loss  
12 and diversion of sales.

13           80. Defendants' wrongful acts as described herein were knowing, willful and  
14 egregious and continued despite Defendants' knowledge that they were illegal.

15           81. Plaintiff is entitled to injunctive relief, reasonable attorneys' fees and the  
16 costs of this action under sections 34 and 35 of the Lanham Act, 15 U.S.C. sections 1116  
17 and 1117.

## 18                   **COUNT 2**

### 19                   **(Common Law Unfair Competition)**

#### 20                   **AGAINST ALL DEFENDANTS**

21           82. Plaintiff hereby incorporates by reference all of the allegations set forth in  
22 paragraphs 1 through 81 as though fully set forth herein.

23           83. The wrongful conduct of Defendants as alleged herein constitutes unfair  
24 trade practices and unfair competition under the common law.

25           84. Defendants' conduct as described above has at all times been willful and/or  
26 knowing.

27           85. As a direct and proximate result of the actions of Defendants described  
28 herein, Plaintiff has been damaged and will continue to be damaged in an amount

1 according to proof at the time of trial.

2 **COUNT 3**

3 **(Unfair Competition in Violation of California Unfair Competition Law – Unlawful**  
4 **and Unfair Prongs (Cal. Bus. & Prof. Code § 17200, *et seq.*))**

5 **AGAINST ALL DEFENDANTS**

6 86. Plaintiff hereby incorporates by reference all of the allegations set forth in  
7 paragraphs 1 through 85 as though fully set forth herein.

8 87. Defendants have engaged and continue to engage in the acts or practices  
9 described above, including, but not limited to using false statements, false descriptions  
10 and representations of fact that are likely to deceive and do in fact deceive the public into  
11 falsely believing that the illicit ink cartridges sold on Amazon as described above are  
12 remanufactured products. This conduct is unlawful, fraudulent, and unfair, and  
13 constitutes unfair competition within the meaning of section 17200 of the California  
14 Business and Professions Code.

15 88. Additionally, the illicit ink cartridges sold by Defendants as alleged herein  
16 falsely claim they are environmentally sound or recycled products, which also violates  
17 section 17200 of the California Business and Professions Code. In light of the significant  
18 amount of plastic that is labeled as recyclable and instead ends up in landfills,  
19 incinerators, communities, and the natural environment, the Legislature of the State of  
20 California has declared that “it is the public policy of the state that environmental  
21 marketing claims, whether explicit or implied, should be substantiated by competent and  
22 reliable evidence to prevent deceiving or misleading consumers about the environmental  
23 impact of plastic products.” Cal. Pub. Res. Code § 42355.5. The policy is based on the  
24 Legislature’s finding that “littered plastic products have caused and continue to cause  
25 significant environmental harm and have burdened local governments with significant  
26 environmental cleanup costs.” *Id.* § 42355.

27 89. California Business and Professions Code section 17580.5 makes it  
28 “unlawful for any person to make any untruthful, deceptive, or misleading environmental

1 marketing claim, whether explicit or implied.” Pursuant to that section, the term  
2 “environmental marketing claim” includes any claim contained in the Guides for use of  
3 Environmental Marketing Claims published by the FTC (the “Green Guides”). *Id.*; *see*  
4 *also* 16 C.F.R. § 260.1, *et seq.*

5 90. Under the Green Guides, “[i]t is deceptive to misrepresent, directly or by  
6 implication, that a product or package is recyclable. A product or package shall not be  
7 marketed as recyclable unless it can be collected, separated, or otherwise recovered from  
8 the waste stream through an established recycling program for reuse or use in  
9 manufacturing or assembling another item.” 16 C.F.R. § 260.12(a). This definition  
10 encompasses the three prongs of recyclability that are commonly used in the solid waste  
11 industry: (1) accessibility of recycling programs (“through an established recycling  
12 program”); (2) sortability for recovery (“collected, separated, or otherwise recovered  
13 from the waste stream”); and (3) end markets (“for reuse or use in manufacturing or  
14 assembling another item”). The California Public Resources Code similarly defines  
15 recycling as “the process of collecting, sorting, cleansing, treating, and reconstituting  
16 materials that would otherwise become solid waste, and returning them to the economic  
17 mainstream in the form of raw material for new, reused, or reconstituted products which  
18 meet the quality standards necessary to be used in the marketplace.” *Id.* § 40180.

19 91. These definitions are consistent with reasonable consumer expectations.  
20 For instance, the dictionary defines the term “recycle” as: (1) convert (waste) into  
21 reusable material, (2) return (material) to a previous stage in a cyclic process, or (3) use  
22 again. Oxford Dictionary, Oxford University Press 2020. Accordingly, reasonable  
23 consumers expect that products advertised, marketed, sold, labeled, or represented as  
24 recyclable will be collected, separated, or otherwise recovered from the waste stream  
25 through an established recycling program for reuse or use in manufacturing or assembling  
26 another item.

27 92. Defendants’ conduct violates California Business and Professions Code  
28 section 17580.5, which makes it unlawful for any person to make any untruthful,

1 deceptive, or misleading environmental marketing claim. Pursuant to section 17580.5, the  
2 term “environmental marketing claim” includes any claim contained in the Green Guides.  
3 16 C.F.R. § 260.1, *et seq.* Under the Green Guides, “[i]t is deceptive to misrepresent  
4 directly or by implication, that a product or package is recyclable. A product or package  
5 shall not be marketed as recyclable unless it can be collected, separated, or otherwise  
6 recovered from the waste stream through an established recycling program for reuse or  
7 use in manufacturing or assembling another item.” 16 C.F.R. § 260.12(a). By  
8 misrepresenting that the Products are recyclable as described above, Defendants are  
9 violating Business and Professions Code section 17580.5.

10 93. By violating the FTC Act, Business and Professions Code sections 17500  
11 and 17580.5, and the California Public Resources Code, Defendants have engaged in  
12 unlawful business acts and practices which constitute unfair competition within the  
13 meaning of Business and Professions Code section 17200.

14 94. Defendants have engaged and continue to engage in the acts or practices  
15 described herein, which are unlawful, and which constitute unfair competition within the  
16 meaning of section 17200 of the California Business and Professions Code.

17 95. Defendants have engaged and continue to engage in the acts or practices  
18 described above, all of which are unfair, irrespective of the violation of any other law,  
19 and which constitute unfair competition within the meaning of section 17200 of the  
20 Business and Professions Code.

21 96. Under California Business and Professions Code section 17200, *et seq.*,  
22 Plaintiff seeks injunctive and other equitable relief to require Defendants to cease their  
23 anticompetitive conduct, to restore fair competition, to deny Defendants the fruits of their  
24 illegal conduct, specifically, through restitution to prevent the resumption of that conduct  
25 or conduct with the same effect, to impose a civil penalty of \$2,500.00 against  
26 Defendants for each violation of Business and Professions Code section 17200, and to  
27 impose such other relief as may be just and proper for Defendants’ violation of the  
28 California Unfair Competition law.

1 **COUNT 4**

2 **(Violation of California False Advertising Law (Cal. Bus. & Prof. Code § 17500, et**  
3 **seq.))**

4 **AGAINST ALL DEFENDANTS**

5 97. Plaintiff hereby incorporates by reference all of the allegations set forth in  
6 paragraphs 1 through 96 as though fully set forth herein.

7 98. California Business and Professions Code section 17500 states:

8 It is unlawful for any person, firm, corporation or association,  
9 or any employee thereof with intent directly or indirectly to  
10 dispose of real or personal property or to perform services,  
11 professional or otherwise, or anything of any nature  
12 whatsoever or to induce the public to enter into any obligation  
13 relating thereto, to make or disseminate or cause to be made or  
14 disseminated before the public in this state, or to make or  
15 disseminate or cause to be made or disseminated from this state  
16 before the public in any state, in any newspaper or other  
17 publication, or any advertising device, or by public outcry or  
18 proclamation, or in any other manner or means whatever,  
19 including over the Internet, any statement, concerning that real  
20 or personal property or those services, professional or  
21 otherwise, or concerning any circumstance or matter of fact  
22 connected with the proposed performance or disposition  
23 thereof, which is untrue or misleading, and which is known, or  
24 which by the exercise of reasonable care should be known, to  
25 be untrue or misleading, or for any person, firm, or corporation  
26 to so make or disseminate or cause to be so made or  
27 disseminated any such statement as part of a plan or scheme  
28 with the intent not to sell that personal property or those  
services, professional or otherwise, so advertised at the price



1 stated therein, or as so advertised. Any violation of the  
2 provisions of this section is a misdemeanor punishable by  
3 imprisonment in the county jail not exceeding six months, or  
4 by a fine not exceeding two thousand five hundred dollars  
5 (\$2,500), or by both that imprisonment and fine.

6 Cal. Bus. & Prof. Code § 17500.

7 99. Defendants violated Business and Professions Code section 17500 by  
8 making or disseminating or causing to be disseminated before the public in this state,  
9 deceptive, untrue or misleading statements in connection with the sale of goods as alleged  
10 above and Defendants knew or in the exercise of reasonable care should have known  
11 such untrue or misleading statements were deceptive, untrue or misleading concerning  
12 the sale of nonrecyclable, non-OEM ink cartridges, all in a manner that was likely to  
13 mislead or deceive a reasonable consumer.

14 100. By reason of Defendants' deceptive, untrue, and misleading advertising,  
15 Plaintiff has suffered and will continue to suffer irreparable injury unless and until this  
16 Court enters an order enjoining Defendants from any further acts of deceptive, untrue and  
17 misleading advertising. Defendants' continuing acts of deceptive, untrue and misleading  
18 advertising, unless enjoined, will cause irreparable damage to Plaintiff in that it will have  
19 no adequate remedy at law to compel Defendants to cease such acts, and no way to  
20 determine its losses caused by such Defendants. Plaintiff is therefore entitled to a  
21 preliminary injunction and a permanent injunction against further deceptive, untrue and  
22 misleading advertising by Defendants. Brands found to have falsely labeled their  
23 products should be permanently removed and banned from further sale on Defendants'  
24 platform.

25 101. As a direct and proximate result of Defendants' deceptive, untrue and  
26 misleading advertising, Defendants have wrongfully taken Plaintiff's profits and its  
27 substantial investment of time, energy and money. Defendants therefore should disgorge  
28 all profits from the conduct alleged herein and, further, should be ordered to perform full

1 restitution to Plaintiff as a consequence of their deceptive, untrue and misleading  
2 advertising. Defendants' acts as described above constitute false and misleading  
3 descriptions and misrepresentations of fact in California, which, in commercial  
4 advertising and promotion, misrepresent the nature, characteristics and qualities of their  
5 products in violation of the False Advertising law in Business and Professions Code  
6 section 17500, *et seq.*

7 **PRAYER**

8 WHEREFORE, Plaintiff prays for judgment and relief against Defendants, and  
9 each of them, as follows:

10 1. That the Court preliminarily and permanently enjoin Defendants from  
11 conducting their business through unlawful, unfair or fraudulent business acts or  
12 practices, untrue and misleading advertising, and other violations of law described in this  
13 complaint;

14 2. That the Court order Defendants to conduct corrective advertising and an  
15 information campaign advising consumers that the counterfeit ink cartridges do not have  
16 the characteristics, uses, benefits or qualities Defendants have claimed;

17 3. That the Court order Defendants to cease and desist from marketing and  
18 promotion of the illicit clone ink cartridges that state or imply the cartridges are  
19 recyclable;

20 4. That the Court order Defendants to implement all measures necessary to  
21 remedy the unlawful, unfair or fraudulent business acts or practices, untrue and  
22 misleading advertising, and other violations of law described in this complaint;

23 5. That the Court award damages to Plaintiff in a sum not less than  
24 \$500,000,000.00;

25 6. That the Court order Defendants to disgorge all profits from their unlawful,  
26 unfair or fraudulent business acts or practices, untrue and misleading advertising, and  
27 other violations of law described in this complaint, and an award of enhanced or treble  
28 damages, in an amount to be determined at trial;

1           7.       That the Court order Defendants to civil penalties in the amount of  
2 \$2,500.00 for each violation of California Business and Professions Code sections 17200  
3 and 17500 as alleged in this complaint;

4           8.       That the Court grant Plaintiff its reasonable attorneys’ fees and costs of  
5 suit; and

6           9.       That the Court grant such other and further relief as may be just and proper.  
7

8 DATED:                                   TROYGOULD PC

9  
10  
11 \_\_\_\_\_  
12 John C. Ulin  
13 Attorneys for Plaintiff  
14 PLANET GREEN CARTRIDGES, INC.

14                                   **DEMAND FOR JURY TRIAL**

15           Pursuant to Fed. R. Civ. Pro. 38(b), Plaintiff demands a trial by jury for all issues  
16 so triable.

17  
18 DATED:                                   TROYGOULD PC

19  
20  
21 \_\_\_\_\_  
22 John C. Ulin  
23 Attorney for Plaintiff  
24 PLANET GREEN CARTRIDGES, INC.

# **EXHIBIT 1**

LAW OFFICES OF  
**DANIEL J. SPIELFOGEL**  
2660 TOWNSGATE ROAD  
SUITE 600  
WESTLAKE VILLAGE, CALIFORNIA 91361  
TELEPHONE (805) 373-8907  
FACSIMILE (805) 373-8927  
dans@djlaw.com

June 23, 2022

Via Email: [davidz@amazon.com](mailto:davidz@amazon.com)  
and U.S. Mail

David A. Zapolsky  
Amazon.com  
2021 7<sup>th</sup> Avenue  
Seattle, WA 98121-2501

Re: My Client: Planet Green, Inc.  
**Notice of Counterfeit Non-OEM New Built Canon Ink Cartridges Falsely Labeled  
as Remanufactured, False, Deceptive and Misleading Advertising and Unfair  
Competition**

Dear Mr. Zapolsky:

Please be advised that the undersigned represents the interests of Planet Green Cartridges, Inc., a U.S. remanufacturing company of printer inkjet cartridge products, located in Chatsworth, California. Planet Green has been in business for over twenty-two years remanufacturing only used empty OEM core ink cartridges that are collected from consumers throughout the United States and sold as a recycled product.

We have identified counterfeit ink cartridges sold on a mass scale by Amazon sellers. The products in question are non-OEM new built Canon ink cartridges that are listed and labeled as remanufactured and sold as a recycled product. These new built counterfeit cartridges are made to look exactly like the OEM product to mislead consumers into believing that they are buying a recycled OEM product.

The enclosed document substantiates my client's claims. I urge you to review it carefully. The conduct described therein constitutes violations of law, including, but not limited to 1) the Lanham Act for false advertising, 2) California Business and Professions Code §§ 17200, et seq., for unfair competition, false advertising and deceptive practices, 3) California Business and Professions Code § 17580.5 for deceptive and misleading environmental claims and 4) California Public Resources Code § 42355.51 for making untruthful, deceptive and misleading environmental marketing claims in the advertisement and sale of goods. Additionally, these

David A. Zapolsky  
Amazon.com  
June 23, 2022  
Page 2

Amazon Sellers are violating Amazon's policies for listing and selling ink cartridges and making deceitful environmental claims.

These Seller violations are harming my client's business. The illegal and anti-competitive behavior on Amazon's platform has caused significant damage to my client's business. Amazon has been complicit in their Sellers' wrongful conduct, aiding and abetting their illegal activities. Unless Amazon takes immediate action, my client has instructed me to pursue a claim for actual damages, lost profits, disgorgement of profits, corrective advertising, injunctive relief and attorneys' fees.

To avoid litigation, we demand that Amazon take immediate and corrective action to stop the illegal activity by 1) Removing all Sellers identified in the enclosed presentation from the platform; and 2) Removing all Sellers who use the term "compatible" interchangeably with "remanufactured." This includes listings that may state "compatible" but product images claim "remanufactured."

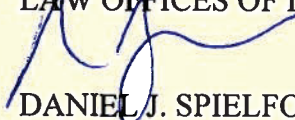
My client will continue to identify Sellers of ink cartridges on Amazon that violate the law and bring them to Amazon's attention. If Amazon wishes to see firsthand the cartridges in question, my client is open to have an Amazon representative visit their facility.

We urge you to take the steps requested above. Amazon cannot ignore its shared responsibility with the Sellers of these counterfeit products, as you continue to allow false and deceptive advertising on your website. Please contact me no later than June 30, 2022, to confirm you will be taking the requested action. Failing that, we will pursue all available legal remedies.

Nothing in this correspondence shall constitute a waiver of Planet Green's rights and remedies, all of which are expressly reserved.

Very truly yours,

LAW OFFICES OF DANIEL J. SPIELFOGEL



DANIEL J. SPIELFOGEL

DJS/bb

Enclosure as stated.

# Amazon Seller Violations

AMAZON'S SELLERS OF NON-OEM SINGLE USE CLONE PRINTER INK CARTRIDGES ARE FALSELY LABELING AND/OR LISTING PRODUCTS AS "REMANUFACTURED" AND SOLD AS A RECYCLED PRODUCT.

- THE SELLING TACTIC IS ANTI-COMPETITIVE & FALSE ADVERTISING.
- THE SELLERS INVOLVED ARE DECEIVING CUSTOMERS, WHILE VIOLATING AMAZON'S POLICIES, FTC GUIDELINES, FEDERAL AND STATE LAWS.
- NON-OEM NEW BUILT SINGLE USE CLONE PRINTER INK CARTRIDGES ARE DESTRUCTIVE TO OUR ENVIRONMENT AND ARE ANTITHETICAL TO AMAZON'S ENVIRONMENTAL MISSION AND EFFORTS.

---

Presentation to inform Amazon about illegitimate ink cartridge sellers on its platform and the environmental impact of their products.

Presented By  
**Planet Green**

# Presentation Overview

We purchased numerous aftermarket ink cartridges from Amazon sellers and discovered they are not remanufactured or recycled products as they claim. We documented the purchase, the ASIN, and took pictures of the product and packaging when they arrived.

This presentation will detail the following:

- New-Bult Cartridges falsely labeled as Remanufactured
  - Examples of brands making false claims as a recycled or remanufactured product on both packaging and cartridge
  - Sellers claiming their products are both a “compatible” and a “remanufactured” ink cartridge in their listings
  - Seller Violations of Federal and California State law
  - Seller Violations of FTC Environmental Marketing Guidelines
  - Seller Violations of Amazon’s Ink Cartridge Listing Policies
- Environmental Impact
  - Amazon’s Environmental Mission & Efforts
- How Amazon can be part of the solution



# Section 1- False Claims Regarding Packaging and Product

The following slides illustrate issues found:

1. False labelling of packaging and product
  - I. Misusing recycling symbol or with other recycling indicators to claim product or packaging is recyclable or made from recycled material.
2. New built non-OEM clone printer cartridges claiming to be a “remanufactured” ink cartridge.
3. The issue of using “compatible” and “remanufactured” interchangeably to describe products was found to be a category-wide problem.
4. Seller Violations
  - I. Federal and California State Law
  - II. Violate FTC Environmental Marketing Claims
  - III. Violate Amazon’s Environmental Claim guidelines
  - IV. Violate Amazon’s Policy for Categorizing Ink Cartridges
  - V. Violate Amazon’s Policy for how to title listing for Ink Cartridges
5. Summary

Seller listing claiming to be a remanufactured product.



BJ Ink Cartridge Replacement for Canon PG 245XL 245 XL Compatible with Canon PIXMA iP2820 MG2420 MG2520 2920 MG2922 MG2924 MX492 MX490 Printer(1 Black)

Visit the BJ Store

★★★★☆ - 188 ratings

Price: \$21.99 Get Fast, Free Shipping with Amazon Prime & FREE Returns

Brand	BJ
Color	1 Black
Compatibility Options	Remanufactured
Page Yield	400
Compatible Devices	Printer
Ink Color	1 Black

#### About this item

- Contents - BJ Ink Cartridges Replacement for Canon PG245XL 245XL 243(1 Black)
- Accurate Ink level - 245XL ink cartridges are conveniently equipped with a smart chip to ensure full working compatibility with your printer and that allows you to monitor and track your ink levels accurately.
- Page Yield - 400 Pages per Black Ink Cartridge (5% coverage)
- Printer Compatibility - Pixma iP2820, Pixma TR4520, Pixma MX490, Pixma MX492, Pixma MG2420, Pixma MG2520, Pixma MG2522, Pixma MG2525, Pixma MG2555, Pixma MG2920, Pixma MG2922, Pixma MG2924, Pixma MG3020, Pixma MG3022, Pixma MG3029, Pixma TS3120, Pixma TS3122, Pixma TS202, Pixma TS302
- Confirm your printer model before placing an order.

#### One-time purchase:

\$21.99

Get Fast, Free Shipping with Amazon Prime & FREE Returns

FREE delivery Sunday, May 22 if you spend \$25 on items shipped by Amazon

Or fastest delivery Wednesday, May 18. Order within 13 hrs 29 mins

Select delivery location

In Stock.

Qty: 1

Add to Cart

Buy Now

Secure transaction

Ships from Amazon

Sold by BJ Technology

Return policy: Eligible for Return, Refund or Replacement within 30 days

Roll over image to zoom in

Seller's product and packaging purchased on Amazon claiming the cartridge is remanufactured.



Our investigation revealed BJ Ink Cartridge is a new built cartridge and not remanufactured from an OEM Core as they claim.

THIS PRACTICE VIOLATES

1. FEDERAL & CALIFORNIA STATE LAW
2. FTC ENVIRONMENTAL MARKETING GUIDELINES

# BJ Ink Cartridge False Recycling Claim

## Example 1

BJ Ink Cartridge is indicating to the consumer its cartridge can be recycled, but there are no instructions on the packaging or product to indicate how and where to recycle this product.

BJ Ink Cartridge uses the recycling logo on its packaging clearly indicating on its packaging and on its product that is a recycled product.



# This is an example of a New Built Ink Cartridge Claiming to be a Remanufactured Product

Original OEM cartridge

BJ Ink Cartridge



Side by side comparison between an original Canon cartridge and a new built non-OEM clone cartridge labeled as a remanufactured and sold as a recycled product.

Original OEM cartridge

BJ Ink Cartridge



The OEM cartridge has Canon imprint in the core of the cartridge. The body of the clone is a new built cartridge.

Original OEM cartridge

BJ Ink Cartridge



BJ Ink Cartridge does not have any OEM mark or markings of any kind to indicate its an original Canon cartridge

V-Surink listing is claiming to be a remanufactured product.

They make an environmental marketing claim in their listing about choosing remanufactured product when their product is not remanufactured.



V-Surink Ink Cartridges Replacement for Canon PG245XL CL246XL Compatible with PIXMA MX492 TR4520 TS3120 TS3320 MG2420 MG2522 MX490 MG2920 MG2922 MG2520 IP2820 Printer (1 Black 1 Color) (1B1C)

Brand: V-Surink  
★★★★★ 1,562 ratings | 53 answered questions

Price: \$39.99 & FREE Returns

Clip Save \$5 with coupon. Terms

Color: 1B1C



Brand	V-Surink
Color	1B1C
Compatibility Options	Remanufactured
Page Yield	300
Special Feature	Tri Color
Compatible Devices	Printer

About this item

- Compatible With: Canon PIXMA MG2420 MG2450 MG2520 MG2522 MG2525 MG2550 MG2555 MG2555S MG2920 MG2922 MG2924 MG2950 MG3020 MG3022 MG3050 MG3051 MG3052 MG3053, PIXMA MX490 MX492 MX495, PIXMA TS202 TS205 TS302 TS305 TS3120 TS3122 TS3150 TS3151 TS3320 TS3322 TS3420, PIXMA TR4500 TR4520 TR4522 TR4550 TR4551, PIXMA IP2800 IP2820 IP2840 IP2850 IP2855.
- Page Yield: Up to 480 Pages Per Black Cartridge. Up to 350 Pages Per Color Cartridge (5% coverage). Providing Many More Pages Than Other Cartridge.
- High Performance: Compatible Canon PG245XL CL246XL Ink Cartridges Show Reliable Performance. Remaining Canon PG245XL CL246XL Ink Levels Accurately Reported for Compatible Printers and Keep Low Carbon Environmental Protection. Easy to Install, Print Out Clear Images and Text Quickly and Easily, With Vivid Colors and Perfect Original Color. Can Display ink level.
- Contents: 1 User Guide and 2 Pack V-Surink PG245XL CL246XL Ink Cartridges (1 Black, 1 Tri-Color).
- Note: Confirm Your Printer Model Before Placing An Order.



Our investigation revealed V-Surink Printer Cartridges are new built cartridges and not remanufactured from an OEM Core as they claim.

THIS PRACTICE VIOLATES

- FEDERAL & CALIFORNIA STATE LAW
- FTC ENVIRONMENTAL MARKETING GUIDELINES

# V-Surink Ink Cartridge False Recycling Claim

## Example 2



V-Surink is making the claim their ink cartridges are remanufactured.

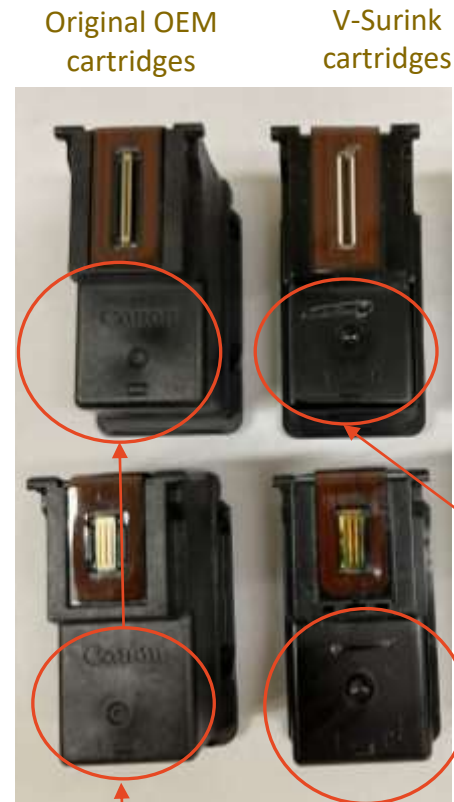


V-Surink uses the recycling logo on its packaging and product clearly indicating to consumers that it is a recycled product.

# Example of New Built Combo Pack of Ink Cartridges Claiming to be a Remanufactured Product

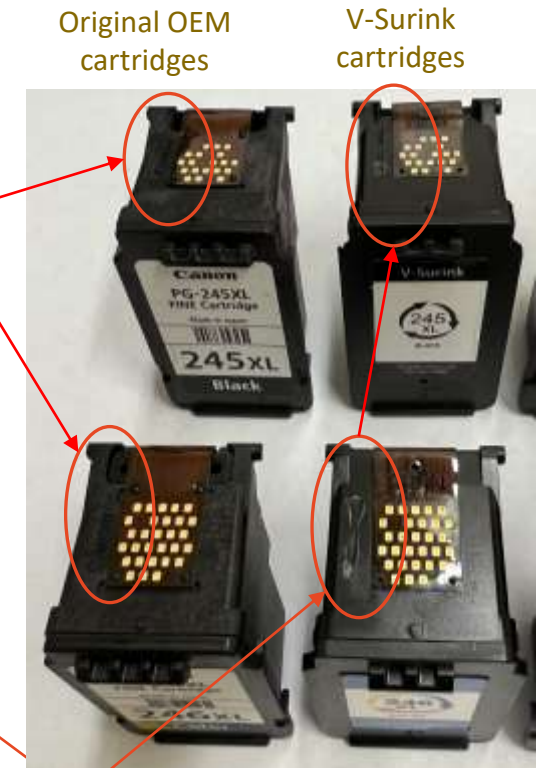


Side by side comparison between an original Canon cartridges and a new built non-OEM clone cartridges labeled as a **remanufactured** product.



The OEM cartridge Canon imprint in the core of the cartridge.

The OEM cartridge Canon imprint in the core of the cartridge.



V-Surink cartridges do not have any OEM markings. The body of the clone is a new build cartridge. V-Surink makes a purposeful attempt to scratch the cartridges as if the OEM markings were edged out to fool consumers.



Inktopia **Compatible** Ink Cartridge Replacement for Canon 246XL CL 246 XL CL-246XL CL-244 (1 Color) for Canon PIXMA MG2520 MG2920 MG2922 MG2420 MG2522 MG2525 MG3020 MG2555 MX490 MX492 Printer

[Visit the Inktopia Store](#)

★★★★☆ 489 ratings

Price: **\$23.99** Get Fast, Free Shipping with Amazon Prime & FREE Returns

Brand	Inktopia
Color	Tricolor
Compatibility Options	<b>Remanufactured</b>
Page Yield	300
Special Feature	Tri Color
Compatible Devices	Printer
Ink Color	1 Tri color

**About this item**

- Package Contents: Inktopia Replacement for Canon CL-246XL 246XL 246 XL CL-244 Ink Cartridges

Circled is one example of how a Seller is listing cartridge as both a “compatible” and “Remanufactured” product.

THIS CLEARLY VIOLATES AMAZON'S POLICY ON HOW TO LIST INK CARTRIDGES



# Violations Of Federal & California Law

## Applicable Statutes

### Lanham Act - §1125 FALSE DESIGNATIONS OF ORIGIN, FALSE DESCRIPTIONS, AND DILUTION FORBIDDEN

(1) Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which—

(A) is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection,

or association of such person with another person, or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by another person, or

(B) in commercial advertising or promotion, misrepresents the nature, characteristics, qualities, or geographic origin of his or her or another person's goods, services, or commercial activities,

- (California) Section 17200 of the Business and Professions Code - Business and Professions Code Section 17200, also known as California's Unfair Competition Law (“UCL”) prohibits any unlawful, unfair or fraudulent business act or practice. It also prohibits unfair, deceptive, untrue or misleading advertising.
- (California) Section 17500 of the business and professions code - Under California Business and Professions Code Section 17500, making false or misleading statements in advertising is a criminal offense that can result in jail sentences
- (California) Section 42355.51 of the California Public Resources Code, CA - A person shall not offer for sale, sell, distribute, or import into the state any product or packaging for which a deceptive or misleading claim about the recyclability of the product or packaging is made.
- (California) Section 17580.5 of the Business and Professions Code, CA- It is unlawful for any person to make any untruthful, deceptive, or misleading environmental marketing claim, whether explicit or implied

# FTC Guide for Use of Environmental Marketing Claims

## Applicable Code for Federal Regulations

### § 260.2 Interpretation and substantiation of environmental marketing claims.

Section 5 of the FTC Act prohibits deceptive acts and practices in or affecting commerce. A representation, omission, or practice is deceptive if it is likely to mislead consumers acting reasonably under the circumstances and is material to consumers' decisions. See FTC Policy Statement on Deception, 103 FTC 174 (1983). To determine if an advertisement is deceptive, marketers must identify all express and implied claims that the advertisement reasonably conveys. Marketers must ensure that all reasonable interpretations of their claims are truthful, not misleading, and supported by a reasonable basis before they make the claims.

### § 260.12 Recyclable claims.

(a) It is deceptive to misrepresent, directly or by implication, that a product or package is recyclable. A product or package should not be marketed as recyclable unless it can be collected, separated, or otherwise recovered from the waste stream through an established recycling program for reuse or use in manufacturing or assembling another item.

(b) Marketers should clearly and prominently qualify recyclable claims to the extent necessary to avoid deception about the availability of recycling programs and collection sites to consumers.

### § 260.13 Recycled content claims.

(a) It is deceptive to misrepresent, directly or by implication, that a product or package is made of recycled content. Recycled content includes recycled raw material, as well as used, <sup>(50)</sup>reconditioned, and re-manufactured components.

(b) It is deceptive to represent, directly or by implication, that an item contains recycled content unless it is composed of materials that have been recovered or otherwise diverted from the waste stream, either during the manufacturing process (pre-consumer), or after consumer use (post-consumer). If the source of recycled content includes pre-consumer material, the advertiser should have substantiation that the pre-consumer material would otherwise have entered the waste stream. Recycled content claims may - but do not have to - distinguish between pre-consumer and post-consumer materials. Where a marketer distinguishes between pre-consumer and post-consumer materials, it should have substantiation for any express or implied claim about the percentage of pre-consumer or post-consumer content in an item.

(c) Marketers can make unqualified claims of recycled content if the entire product or package, excluding minor, incidental components, is made from recycled material. For items that are partially made of recycled material, the marketer should clearly and prominently qualify the claim to avoid deception about the amount or percentage, by weight, of recycled content in the finished product or package.

(d) For products that contain used, reconditioned, or re-manufactured components, the marketer should clearly and prominently qualify the recycled content claim to avoid deception about the nature of such components. No such qualification is necessary where it is clear to reasonable consumers from context that a product's recycled content consists of used, reconditioned, or re-manufactured components.

Source: [Code of Federal Regulations Part 260 Guides for the Use of Environmental Marketing https://www.ecfr.gov/current/title-16/chapter-I/subchapter-B/part-260](https://www.ecfr.gov/current/title-16/chapter-I/subchapter-B/part-260)

# AMAZON POLICY

Amazon specifically gives *Environmental Marketing Guidelines* compelling seller to comply with local, state and federal laws that regulate environmental marketing claims. Refers to *FTC's Guides for the Use of Environmental Marketing Claims* and certain California laws

**Remember:** You must comply with all applicable federal laws when listing and selling products on Amazon.com. You must also comply with state and local laws applicable to the jurisdiction into which your products are sold. **Sellers using Fulfillment by Amazon**, please also see [FBA Prohibited Products](#) for additional product restrictions.

We want to make it easy for buyers to find, discover, and buy products that are marketed as environmentally friendly or "green." However, it is also important to provide buyers with information about those products that is accurate and trustworthy, and that is not misleading about the qualities or characteristics of a product that make it environmentally friendly or "green." To sell products that are marketed with environmental claims on Amazon.com, you must ensure that the marketing claims you make on your product packaging and on your product detail page meet not only all federal laws such as the *FTC's Guides for the Use of Environmental Marketing Claims* (known as the "Green Guides"), but also all applicable state and local laws that regulate environmental claims. These laws include California's law restricting the use of compostable- and biodegradable-related claims on plastic products.

[Source: Help / Policies, agreements, and guidelines / Program Policies / Product guidelines / Environmental Marketing Guidelines](#)

## Environmental Marketing Guidelines

**Remember:** You must comply with all applicable federal laws when listing and selling products on Amazon.com. You must also comply with state and local laws applicable to the jurisdiction into which your products are sold. **Sellers using Fulfillment by Amazon**, please also see [FBA Prohibited Products](#) for additional product restrictions.

We want to make it easy for buyers to find, discover, and buy products that are marketed as environmentally friendly or "green." However, it is also important to provide buyers with information about those products that is accurate and trustworthy, and that is not misleading about the qualities or characteristics of a product that make it environmentally friendly or "green." To sell products that are marketed with environmental claims on Amazon.com, you must ensure that the marketing claims you make on your product packaging and on your product detail page meet not only all federal laws such as the *FTC's Guides for the Use of Environmental Marketing Claims* (known as the "Green Guides"), but also all applicable state and local laws that regulate environmental claims. These laws include California's law restricting the use of compostable- and biodegradable-related claims on plastic products.

We're providing the following highlights from the *FTC Green Guides* and California's law on environmental claims to assist you in reviewing the environmental claims that you may make about your products. These highlights are not designed to be comprehensive. You should review the *FTC Green Guides* and other applicable laws, regulations, and guidelines, as you remain responsible for ensuring that the claims made about your products are fully compliant.

### Highlights from the FTC Green Guides

- Avoid broad, general claims regarding a product's environmental benefits or qualities (ex, avoid "eco-friendly" or "environmentally friendly" or "green").
- All claims about a product's environmental benefits or qualities should be specific, and all qualifications (or limitations) to environmental claims must be specific, clear and prominently displayed (ex, "product is made from 20% recycled materials").
- Narrowly tailor environmental claims so as not to overstate the environmental benefits or qualities.
- Avoid making environmental claims if the environmental benefits or qualities are negligible.
- When making comparative environmental claims, the basis for the comparison must be clearly conveyed.
- Distinguish between products, packaging and services when making environmental claims (ex, packaging is 100% biodegradable).
- Avoid making compostable claims without qualification if the product cannot be composted at home safely or in a timely way.
- A general degradable or biodegradable claim should only be made if the entire product will completely break down and return to nature within a reasonably short period of time after customary disposal (or one year for solid waste products). If the product customarily ends up in landfills, incinerators, or recycling facilities, then a general biodegradable claim should not be made.
- An environmental claim that a product or packaging is made from recycled materials should accurately reflect the portion that is made from recycled materials (ex, "made from 20% recycled materials").
- Carefully consider certifications and seals and include the specific basis or environmental benefit for the certification whenever it is used. For questions regarding certifications, see <http://ftc.gov/ce/2009/10/091005revisedendorsementguides.pdf>.

The *FTC Green Guides* also address other environmental claims, including: (1) Free-Of claims, (2) Non-Toxic claims, (3) Recyclable claims, (4) Renewable Energy claims, and (5) Renewable Materials claims. If you are making these or other environmental claims, please review the *FTC Green Guides*.

### California Law

- Plastic and bioplastic products sold into California can only be labeled as compostable, home compostable, or marine degradable if they meet the applicable ASTM standard or have the Vincotte OK Compost HOME certification. If your product meets the applicable ASTM or Vincotte standard, it should meet the additional labeling requirements as set forth by California law, and such information should be included on the product detail page.
- Plastic and bioplastic products sold into California may not be labeled as biodegradable, degradable, or decomposable, or imply that the plastic product will break down or decompose.
- Amazon will restrict the sale of plastic and bioplastic products labeled with these prohibited terms into California.
- If you are a seller of a plastic and bioplastic product that meets the applicable ASTM or Vincotte standard, Amazon may require that you provide proof demonstrating that your and bioplastic plastic product meets such standards.

### Additional Resources

- [FTC Green Guide Guidance](#)
- [California Public Resources Code Chapter 5.7 Plastic Products](#)
- [CalRecycle - Degradable Plastic Labeling Requirements](#)

### Related articles

[Adult products policies & guidelines](#)[California Proposition 65 \(Prop 65\)](#)[The California eWaste Act](#)[Condition guidelines](#)[CPSIA Choking Hazard Warnings and Material Content Limits](#)[Energy Labeling Rule](#)[Environmental Marketing Guidelines](#)[Food products: USDA Country of Origin Labeling](#)[Product Bundling Policy](#)[Selling ink or toner cartridges](#)[Selling Media Products \(US & CA\)](#)[Sell software](#)[Selling Textbooks](#)[NIOSH-Approved Filtering Facepiece Respirators](#)

### Need more help?

[See more on Seller Central](#)[Visit Seller Forums](#)

# AMAZON POLICY

Amazon specifically gives guidance to sellers on the differences between a “Compatible” (primarily new) and “Remanufactured” (primarily used) Printer Cartridge.

## Categorizing ink or toner cartridges

Categorize ink or toner cartridges according to the definitions below.

### 1. Same-Brand Ink or Toner Cartridge in Retail Packaging

- A same-brand ink or toner cartridge is manufactured under the same brand name as printer in which the cartridge is used (such as, HP, Canon, Epson, Lexmark, Brother, etc.)

### 2. Compatible Ink or Toner Cartridge

- An ink or toner cartridge designed to work with a particular printer, but was not manufactured under the same brand name as the printer in which the cartridge is intended to be used. These cartridges are produced using mostly new or all new parts and components.

### 3. Remanufactured Ink or Toner Cartridge

- A cartridge that has been used, remanufactured, and refilled with ink or toner. To varying degrees, the cartridge may have been taken apart, cleaned, and had parts replaced.

### 4. Refilled Ink or Toner Cartridge

- A cartridge that has been used and refilled with ink or toner. All of the cartridge's current components were manufactured by the same company that manufactured the printer in which the cartridge is intended to be used. The refilling process did not involve any disassembly, cleaning, or replacement of parts.

## Selling ink or toner cartridges

This page outlines requirements for listing ink or toner cartridges, and explains how to categorize them into appropriate sub categories on Amazon. Please see [Ink or toner listing guidelines](#) for additional information on how to appropriately list these products on Amazon.

### Category requirements

Amazon limits the types of ink or toner cartridges that sellers can list to ensure that customers are able to buy with confidence from sellers on Amazon.com. Please note the following requirements:

- Amazon prohibits sellers from listing ink or toner cartridges in "Refurbished" or "Used" condition. All listings, including remanufactured, refilled and compatible ink or toner, must be in "New" condition.
- Remanufactured, refilled and compatible ink or toner products must be listed as separate ASINs. You cannot use the same ASINs as the original/OEM ink or toner products. See [Ink or toner listing guidelines](#) for additional details.
- All ink or toner cartridges must be packaged in unopened retail packaging, and product images must accurately depict the retail packaging the customer will receive. Sellers are prohibited from listing ink or toner cartridges in open box condition or in inner factory foil packaging.
- All ink or toner products must be fully functional and free from defects that could render them unusable or harmful to printers (for example damaged, dried or leaking cartridges).
- Sellers may offer custom bundles of ink or toner cartridges (that are not manufacturer-created multipacks), provided each individual cartridge in the bundle is in its original retail packaging. A custom bundle must be listed as its own ASIN, with image, bullet points and product description clearly indicating that it comprises individual packs bundled together.
- Please refer to the [Product Bundling Policy](#) for additional listing requirements.
- All major brands require UPCs. See [Product UPCs and GTINs](#) for further details, which includes requirements for products sold as bundles and requirements for products sold as packs.
- Best Before, Use Before, Use By, and Warranty Ends are all considered expiration dates. Expiration dates are the dates suggested by the manufacturer, and are printed on the product packaging, the product, or both.
- The expiration date printed by the manufacturer should be clearly visible when the product is shipped. Ink or toner, if they have an expiration date suggested by the manufacturer, should only be shipped to customers when the ink or toner is at least 180 days prior to the date of expiration. FBA sellers should ship their products to FBA reasonably prior to 180 days before the date of expiration.

## Categorizing ink or toner cartridges

Categorize ink or toner cartridges according to the definitions below.

### 1. Same-Brand Ink or Toner Cartridge in Retail Packaging

- A same-brand ink or toner cartridge is manufactured under the same brand name as printer in which the cartridge is used (such as, HP, Canon, Epson, Lexmark, Brother, etc.).

### 2. Compatible Ink or Toner Cartridge

- An ink or toner cartridge designed to work with a particular printer, but was not manufactured under the same brand name as the printer in which the cartridge is intended to be used. These cartridges are produced using mostly new or all new parts and components.

### 3. Remanufactured Ink or Toner Cartridge

- A cartridge that has been used, remanufactured, and refilled with ink or toner. To varying degrees, the cartridge may have been taken apart, cleaned, and had parts replaced.

### 4. Refilled Ink or Toner Cartridge

- A cartridge that has been used and refilled with ink or toner. All of the cartridge's current components were manufactured by the same company that manufactured the printer in which the cartridge is intended to be used. The refilling process did not involve any disassembly, cleaning, or replacement of parts.

[Source: Amazon Seller Central/ Help/Policies, agreement, and guidelines/program Policies/Product Guidelines/Selling ink or toner cartridges](#)

# AMAZON POLICY

Amazon specifically gives guidance on how to title ink or toner cartridges:

## Remanufactured and Refilled Ink or Toner Cartridge

[Third Party Brand] + "Remanufactured" + [Product: Ink or Toner Cartridge] + "Replacement for" + [OEM Brand] + [Series Name] + [Model Name] + ([Color(s)], [#-Pack], if app)

Examples

- LD Products + Remanufactured + Ink Cartridge + Replacement for + HP + 02 + (Black, 5-Pack) = LD Products Remanufactured Ink Cartridge Replacement for HP 02 (Black, 5-Pack)
- Office 66 + Remanufactured + Toner Cartridge + Replacement for + Brother + TN-350 + (Black) = Office 66 Remanufactured Toner Cartridge Replacement for Brother TN-350 (Black)

## Compatible Ink or Toner Cartridge

[Third Party Brand] + "Compatible" + [Product: Ink or Toner Cartridge] + "Replacement for" + [OEM Brand] + [Series Name] + [Model Name] + ([Color(s)], [#-Pack], if app)

Examples

- LD Products + Compatible + Ink Cartridge + Replacement for + HP + 02 + (Black, 5-Pack) = LD Products Compatible Ink Cartridge Replacement for HP 02 (Black, 5-Pack)
- Office 66 + Compatible + Toner Cartridge + Replacement for + Brother + TN-350 + (Black) = Office 66 Remanufactured Toner Cartridge Replacement for Brother TN-350 (Black)

[Source: Amazon Seller Central Help / Increase sales / Reference / Browse & Search / Consumer Electronics / The Consumer Electronics Store Style Guide / Subcategory Specifications / Ink or Toner](#)

## Ink or Toner

To provide a great customer experience, sellers have to ensure the ASIN title, brand name, images, feature bullets and product description accurately describe the ink or toner product being listed. Failure to follow Amazon's listing guidelines could result in the removal of your listings or the loss of your selling privileges on Amazon. Please follow the below listing specifications as closely as possible, and please see Selling Ink or Toner Cartridges for details about category requirements, and to learn how to categorize your ink or toner products on Amazon.

### Title

A good title should be descriptive enough for a customer to make the purchase based on the information in the title alone. Avoid marketing content (free, exclusive, bonus, stylish, lightweight, heavy duty, etc.) or use of the title field to list hardware compatibility. Pay attention to title formats listed below for Remanufactured, Refilled and Compatible products to ensure appropriate usage of brand names.

### Same-Brand Ink or Toner Cartridge in Retail Packaging

[OEM Brand] + [Series Name] + [Model Name] + [Product: Ink or Toner Cartridge] + ([Color(s)], [#-Pack], if app) + "in Retail Packaging"

Examples

- HP + 02 + Ink Cartridge + (Black, 5-Pack) + in Retail Packaging = HP 02 Inkjet Cartridge (Black, 5-Pack) in Retail Packaging
- Brother + TN-350 + Toner Cartridge + (Black) + in Retail Packaging = Brother TN-350 Toner Cartridge (Black) in Retail Packaging

### Refilled Ink or Toner Cartridge

[Third Party Brand] + "Refilled" + [Product: Ink or Toner Cartridge] + "Replacement for" + [OEM Brand] + [Series Name] + [Model Name] + ([Color(s)], [#-Pack], if app)

Examples

- LD Products + Refilled + Ink Cartridge + Replacement for + HP + 02 + (Black, 5-Pack) = LD Products Refilled Inkjet Cartridge Replacement for HP 02 (Black, 5-Pack)
- Office 66 + Refilled + Toner Cartridge + Replacement for + Brother + TN-350 + (Black) = Office 66 Refilled Toner Cartridge Replacement for Brother TN-350 (Black)

### Remanufactured and Refilled Ink or Toner Cartridge

[Third Party Brand] + "Remanufactured" + [Product: Ink or Toner Cartridge] + "Replacement for" + [OEM Brand] + [Series Name] + [Model Name] + ([Color(s)], [#-Pack], if app)

Examples

- LD Products + Remanufactured + Ink Cartridge + Replacement for + HP + 02 + (Black, 5-Pack) = LD Products Remanufactured Ink Cartridge Replacement for HP 02 (Black, 5-Pack)
- Office 66 + Remanufactured + Toner Cartridge + Replacement for + Brother + TN-350 + (Black) = Office 66 Remanufactured Toner Cartridge Replacement for Brother TN-350 (Black)

### Compatible Ink or Toner Cartridge

[Third Party Brand] + "Compatible" + [Product: Ink or Toner Cartridge] + "Replacement for" + [OEM Brand] + [Series Name] + [Model Name] + ([Color(s)], [#-Pack], if app)

Examples

- LD Products + Compatible + Ink Cartridge + Replacement for + HP + 02 + (Black, 5-Pack) = LD Products Compatible Ink Cartridge Replacement for HP 02 (Black, 5-Pack)
- Office 66 + Compatible + Toner Cartridge + Replacement for + Brother + TN-350 + (Black) = Office 66 Remanufactured Toner Cartridge Replacement for Brother TN-350 (Black)

# False Recycling Claims, False Advertising, Misrepresentation of Product

These examples illustrate not only a few ASINs, but a **category wide issue** for ink cartridges being sold on Amazon. Planet Green has identified numerous brands of new built non-OEM ink cartridges falsely labeled and advertised as a remanufactured or a recycled product.

In addition, the identified cartridges deceptively used the recycling logo or icons that imply the cartridges can be recycled or are a recycled product, as well as using the word “compatible” interchangeably with “remanufactured.”

Misrepresenting the characteristics of a product by falsely labelling and advertising it as a recycled or remanufactured product violates:

- Federal and State laws
- FTC Guide for Environmental Marketing Claims
- Amazon’s Policies for Environmental Claims
- Amazon’s Listing Policies for the ink and toner category



**Inktopia Compatible Ink Cartridge Replacement for Canon 246XL CL 246 XL CL-246XL CL-244 (1 Color) for Canon PIXMA MG2520 MG2920 MG2922 MG2420 MG2522 MG2525 MG3020 MG2555 MX490 MX492 Printer**

Visit the Inktopia Store  
★★★★☆ 489 ratings

Price: **\$23.99** Get Fast, Free Shipping with Amazon Prime & FREE Returns

Brand	Inktopia
Color	Tricolor
Compatibility Options	Remanufactured
Page Yield	300
Special Feature	Tri Color
Compatible Devices	Printer
Ink Color	1 Tri color

**About this item**

- Package Contents: Inktopia Replacement for Canon CL-246XL 246XL 246 XL CL-244 Ink Cartridges

# Our purchasing process to identify new built non-OEM cartridges falsely labelled “remanufactured” and false environmental claims

## Proof of Purchase

amazon.com  
Order Placed: March 31, 2022  
Amazon.com order number: 114-8082251-1778618  
Order Total: \$256.53

Ship on April 1, 2022

Items Ordered	Price
1 of 1 V-Surink Ink Cartridge Replacement for Canon PCH136, EC2846, Compatible with HP880 HP880 HP880A HP880B HP880C HP880D HP880E HP880F HP880G HP880H HP880I HP880J HP880K HP880L HP880M HP880N HP880P HP880Q HP880R HP880S HP880T HP880U HP880V HP880W HP880X HP880Y HP880Z HP880AA HP880AB HP880AC HP880AD HP880AE HP880AF HP880AG HP880AH HP880AI HP880AJ HP880AK HP880AL HP880AM HP880AN HP880AO HP880AP HP880AQ HP880AR HP880AS HP880AT HP880AU HP880AV HP880AW HP880AX HP880AY HP880AZ HP880BA HP880BB HP880BC HP880BD HP880BE HP880BF HP880BG HP880BH HP880BI HP880BJ HP880BK HP880BL HP880BM HP880BN HP880BO HP880BP HP880BQ HP880BR HP880BS HP880BT HP880BU HP880BV HP880BW HP880BX HP880BY HP880BZ HP880CA HP880CB HP880CC HP880CD HP880CE HP880CF HP880CG HP880CH HP880CI HP880CJ HP880CK HP880CL HP880CM HP880CN HP880CO HP880CP HP880CQ HP880CR HP880CS HP880CT HP880CU HP880CV HP880CW HP880CX HP880CY HP880CZ HP880DA HP880DB HP880DC HP880DD HP880DE HP880DF HP880DG HP880DH HP880DI HP880DJ HP880DK HP880DL HP880DM HP880DN HP880DO HP880DP HP880DQ HP880DR HP880DS HP880DT HP880DU HP880DV HP880DW HP880DX HP880DY HP880DZ HP880EA HP880EB HP880EC HP880ED HP880EE HP880EF HP880EG HP880EH HP880EI HP880EJ HP880EK HP880EL HP880EM HP880EN HP880EO HP880EP HP880EQ HP880ER HP880ES HP880ET HP880EU HP880EV HP880EW HP880EX HP880EY HP880EZ HP880FA HP880FB HP880FC HP880FD HP880FE HP880FF HP880FG HP880FH HP880FI HP880FJ HP880FK HP880FL HP880FM HP880FN HP880FO HP880FP HP880FQ HP880FR HP880FS HP880FT HP880FU HP880FV HP880FW HP880FX HP880FY HP880FZ HP880GA HP880GB HP880GC HP880GD HP880GE HP880GF HP880GG HP880GH HP880GI HP880GJ HP880GK HP880GL HP880GM HP880GN HP880GO HP880GP HP880GQ HP880GR HP880GS HP880GT HP880GU HP880GV HP880GW HP880GX HP880GY HP880GZ HP880HA HP880HB HP880HC HP880HD HP880HE HP880HF HP880HG HP880HH HP880HI HP880HJ HP880HK HP880HL HP880HM HP880HN HP880HO HP880HP HP880HQ HP880HR HP880HS HP880HT HP880HU HP880HV HP880HW HP880HX HP880HY HP880HZ HP880IA HP880IB HP880IC HP880ID HP880IE HP880IF HP880IG HP880IH HP880II HP880IJ HP880IK HP880IL HP880IM HP880IN HP880IO HP880IP HP880IQ HP880IR HP880IS HP880IT HP880IU HP880IV HP880IW HP880IX HP880IY HP880IZ HP880JA HP880JB HP880JC HP880JD HP880JE HP880JF HP880JG HP880JH HP880JI HP880JJ HP880JK HP880JL HP880JM HP880JN HP880JO HP880JP HP880JQ HP880JR HP880JS HP880JT HP880JU HP880JV HP880JW HP880JX HP880JY HP880JZ HP880KA HP880KB HP880KC HP880KD HP880KE HP880KF HP880KG HP880KH HP880KI HP880KJ HP880KK HP880KL HP880KM HP880KN HP880KO HP880KP HP880KQ HP880KR HP880KS HP880KT HP880KU HP880KV HP880KW HP880KX HP880KY HP880KZ HP880LA HP880LB HP880LC HP880LD HP880LE HP880LF HP880LG HP880LH HP880LI HP880LJ HP880LK HP880LL HP880LM HP880LN HP880LO HP880LP HP880LQ HP880LR HP880LS HP880LT HP880LU HP880LV HP880LW HP880LX HP880LY HP880LZ HP880MA HP880MB HP880MC HP880MD HP880ME HP880MF HP880MG HP880MH HP880MI HP880MJ HP880MK HP880ML HP880MM HP880MN HP880MO HP880MP HP880MQ HP880MR HP880MS HP880MT HP880MU HP880MV HP880MW HP880MX HP880MY HP880MZ HP880NA HP880NB HP880NC HP880ND HP880NE HP880NF HP880NG HP880NH HP880NI HP880NJ HP880NK HP880NL HP880NM HP880NN HP880NO HP880NP HP880NQ HP880NR HP880NS HP880NT HP880NU HP880NV HP880NW HP880NX HP880NY HP880NZ HP880OA HP880OB HP880OC HP880OD HP880OE HP880OF HP880OG HP880OH HP880OI HP880OJ HP880OK HP880OL HP880OM HP880ON HP880OO HP880OP HP880OQ HP880OR HP880OS HP880OT HP880OU HP880OV HP880OW HP880OX HP880OY HP880OZ HP880PA HP880PB HP880PC HP880PD HP880PE HP880PF HP880PG HP880PH HP880PI HP880PJ HP880PK HP880PL HP880PM HP880PN HP880PO HP880PP HP880PQ HP880PR HP880PS HP880PT HP880PU HP880PV HP880PW HP880PX HP880PY HP880PZ HP880QA HP880QB HP880QC HP880QD HP880QE HP880QF HP880QG HP880QH HP880QI HP880QJ HP880QK HP880QL HP880QM HP880QN HP880QO HP880QP HP880QQ HP880QR HP880QS HP880QT HP880QU HP880QV HP880QW HP880QX HP880QY HP880QZ HP880RA HP880RB HP880RC HP880RD HP880RE HP880RF HP880RG HP880RH HP880RI HP880RJ HP880RK HP880RL HP880RM HP880RN HP880RO HP880RP HP880RQ HP880RR HP880RS HP880RT HP880RU HP880RV HP880RW HP880RX HP880RY HP880RZ HP880SA HP880SB HP880SC HP880SD HP880SE HP880SF HP880SG HP880SH HP880SI HP880SJ HP880SK HP880SL HP880SM HP880SN HP880SO HP880SP HP880SQ HP880SR HP880SS HP880ST HP880SU HP880SV HP880SW HP880SX HP880SY HP880SZ HP880TA HP880TB HP880TC HP880TD HP880TE HP880TF HP880TG HP880TH HP880TI HP880TJ HP880TK HP880TL HP880TM HP880TN HP880TO HP880TP HP880TQ HP880TR HP880TS HP880TT HP880TU HP880TV HP880TW HP880TX HP880TY HP880TZ HP880UA HP880UB HP880UC HP880UD HP880UE HP880UF HP880UG HP880UH HP880UI HP880UJ HP880UK HP880UL HP880UM HP880UN HP880UO HP880UP HP880UQ HP880UR HP880US HP880UT HP880UU HP880UV HP880UW HP880UX HP880UY HP880UZ HP880VA HP880VB HP880VC HP880VD HP880VE HP880VF HP880VG HP880VH HP880VI HP880VJ HP880VK HP880VL HP880VM HP880VN HP880VO HP880VP HP880VQ HP880VR HP880VS HP880VT HP880VU HP880VV HP880VW HP880VX HP880VY HP880VZ HP880WA HP880WB HP880WC HP880WD HP880WE HP880WF HP880WG HP880WH HP880WI HP880WJ HP880WK HP880WL HP880WM HP880WN HP880WO HP880WP HP880WQ HP880WR HP880WS HP880WT HP880WU HP880WV HP880WW HP880WX HP880WY HP880WZ HP880XA HP880XB HP880XC HP880XD HP880XE HP880XF HP880XG HP880XH HP880XI HP880XJ HP880XK HP880XL HP880XM HP880XN HP880XO HP880XP HP880XQ HP880XR HP880XS HP880XT HP880XU HP880XV HP880XW HP880XX HP880XY HP880XZ HP880YA HP880YB HP880YC HP880YD HP880YE HP880YF HP880YG HP880YH HP880YI HP880YJ HP880YK HP880YL HP880YM HP880YN HP880YO HP880YP HP880YQ HP880YR HP880YS HP880YT HP880YU HP880YV HP880YW HP880YX HP880YY HP880YZ HP880ZA HP880ZB HP880ZC HP880ZD HP880ZE HP880ZF HP880ZG HP880ZH HP880ZI HP880ZJ HP880ZK HP880ZL HP880ZM HP880ZN HP880ZO HP880ZP HP880ZQ HP880ZR HP880ZS HP880ZT HP880ZU HP880ZV HP880ZW HP880ZX HP880ZY HP880ZZ	

Shipping Address:  
1000 1000  
1000 1000 ST  
CANTON, CALIFORNIA 91301-4807  
91301 4807

Shipping Special:  
FREE Prime Delivery



\*By way of example of a category-wide problem, these brands are new built non-OEM cartridges falsely labelled as “remanufactured,” violate federal & state laws, and Amazon’s Policies

1. V-Surink <https://www.amazon.com/V-Surink-Remanufactured-Cartridge-Replacement-Compatible/dp/B07XTDWTP2>
2. BSTink <https://www.amazon.com/BSTINK-Remanufactured-PG-245XL-Cartridge-Tri-Color/dp/B07DCPBCFT>
3. PalmTree <https://www.amazon.com/Palmtree-Remanufactured-Cartridge-Replacement-Tri-Color/dp/B088TLQCQD>
4. Sellyaha <https://www.amazon.com/Sellyaha-Remanufactured-Cartridge-Replacement-Tri-Color/dp/B07D75J5F7>
5. Inktopia <https://www.amazon.com/Remanufactured-Cartridge-Replacement-Indicator-Printer/dp/B072WR1WL9>
6. Retch <https://www.amazon.com/RETCH-Re-Manufactured-cartridges-245-246/dp/B07SX9T1JW>
7. BJ Ink Cartridges <https://www.amazon.com/dp/B076DRV8D4>
8. KingJet <https://www.amazon.com/Kingjet-Remanufactured-Cartridge-Replacement-PG-245XL/dp/B08GQ5Z8N4>
9. EVINKI <https://www.amazon.com/EVINKI-Manufactured-Cartridge-Replacement-Tri-Color/dp/B07X5VWDP2>
10. Witop <https://www.amazon.com/Witop-Remanufactured-Cartridge-Replacement-Printer/dp/B07X268TDX>
11. Novajet <https://www.amazon.com/Novajet-Remanufactured-Cartridge-Tri-Color-Compatiable/dp/B072XDYKY4>
12. GreenCycle <https://www.amazon.com/GREENCYCLE-Re-Manufactured-PG-245XL-Cartridge-Replacement/dp/B01MY6QG0K>
13. FASTINK <https://www.amazon.com/FASTINK-Compatible-Cartridge-Replacement-Tri-Color/dp/B08SC518BD>
14. LemeroUtrust <https://www.amazon.com/LemeroUtrust-Remanufactured-Cartridge-Replacement-Cartridges/dp/B08SMH1XQG>
15. Mytoner <https://www.amazon.com/MYTONER-Re-Manufactured-Cartridge-Replacement-Tri-Color/dp/B0792TPLWQ>
16. myCartridge PHOEVER <https://www.amazon.com/myCartridge-PHOEVER-245XL-246XL-Black/dp/B0951NC1ZB>
17. MIROO <https://www.amazon.com/MIROO-Remanufactured-Replacement-PG-245XL-Cartridge/dp/B076KDFYWJ>
18. St@r <https://www.amazon.com/ink-Remanufactured-Cartridge-Replaccement-CL-246/dp/B08P1QKGCM>

\* Brands who commit these violations typically do it for all their ASINs within the ink and toner category





# Amazon's Environmental Commitment

THE CLIMATE PLEDGE

SUSTAINABLE OPERATIONS

SUPPLY CHAIN

IMPROVING PACKAGE

# Amazon's "Our Planet," A Noble Endeavor

Amazon – “We are committed to and invested in sustainability because it’s a win all around-it’s good for the planet, for business, for our customers, and for our communities.”

- **The Climate Pledge** – “This is Amazon’s commitment to be net-zero carbon by 2040. In addition, we are on a path to powering our operations with 100% renewable energy by 2025.
- **Sustainable Operations** – “From reducing water usage in data centers to using sustainable aviation fuel, we are committed to building a sustainable business for our customers, communities, and the world.”
- **Our Supply Chain** – “We are committed to ensuring that partners around the world in our supply chain are treated with fundamental dignity and respect.”
- **Improving Packaging** – “We’re working to invent packaging that delights customers, eliminates waste, and ensures products arrive intact and undamaged.”

Source: <https://www.aboutamazon.com/planet>

# Environmental Facts – Printer Cartridges

According to The Energy Collective Group, it's estimated that more than 375 million empty ink and toner cartridges end up in U.S. landfills each year. This means that 11 cartridge per second and over 1 million cartridges are thrown away each day.\*

- To produce one toner cartridge more than three quarts of oil is consumed. One inkjet cartridge three ounces of oil is required\*
- Manufacturing just one single toner cartridge emits around 4.8kg CO2 Greenhouse Gases per cartridge.\*
  - If you take into account a single factory can manufacture 200,000 cartridges per month, you're talking about 640,000 kg of monthly CO2 emissions per factory output. That's the equivalent monthly CO2 output of over 500 average homes.\*

New built non-OEM cartridges cannot be recycled through general recycling and remanufacturing means. These cartridges are unique to the different manufacturers who produce them making it cost-prohibitive to remanufacture on a universal scale. Consequently, putting a major strain on the recycling industry.

Since new built non-OEM clone cartridges cannot be recycled, they have no value. Their abundance in the marketplace has also devalued OEM cartridges to the point many of these cartridges are not being remanufactured. Handling and warehousing the volume of used cartridges has created a huge economic and environmental challenge for Electronic Waste Recyclers. Most recycling facilities no longer accept printer cartridges due to the difficulty of handling the material leaving consumers very little options to recycle.

\*Source <https://energycentral.com/c/ec/ink-waste-environmental-impact-printer-cartridges>



# Unnecessary Strain on the Recycling Industry

Daily, Planet Green is approached by E-Waste Recyclers pleading for us to take their used printer cartridges. These request range from multiple pallets to tractor trailers full of cartridges. Here are two examples of what we hear:

“We were still stuck with about 8,000 lbs. of toners with nowhere to send them. I know that there must be dozens of e-waste recyclers who are facing the same challenges that we are. “

- Megan, Operation Manager  
React Electronic-Cycling, Inc.

“It is hard to find recyclers to accept empty toner and empty ink cartridges - especially non-OEM cartridges. I am throwing some items in the trash because of the volume of empties we receive from our customers that wish to recycle.”

- Daniel, President  
Rapid Refill Ink



# Amazon's "Our Planet" Mission Runs Contrary to Products Sold on it's Platform

The Printer Cartridge Remanufacturing Industry was established in the 1980s to recycle the plastic waste generated by consumable printer cartridges sold by printer manufacturers (OEMs). Working hand-in-hand with E-Waste recyclers, the industry became a shining example of a circular economy diverting plastic waste from landfills and recycling it for reuse.

Consumers benefitted by having a low-cost alternative to the more expensive OEM brands and the planet benefitted as less plastic was ending up in landfills, polluting ground water and soil.

Today, the once thriving printer cartridge remanufacturing industry is almost extinct in large part because of new built single use plastic clone printer cartridges that are flooding the U.S. market. Overseas manufacturers have been using online marketplaces to sell direct to consumers, putting downward pressure on remanufacturers to the point a used OEM cartridge is no longer cost-effective to remanufacture.

The world is facing a plastic pollution crisis and used printer cartridges are now dramatically adding to the problem. New built non-OEM clone printer cartridges not only add unnecessary plastic waste to our environment, but they contribute to the increased use of fossil fuel and production of greenhouse gases.

# Amazon Consideration

As Amazon pushes forward with its environmental mission to Net-Zero Carbon and being a worldwide leader in reducing its carbon footprint, the company should also consider the products it allows to be sold through its platform.

While leading the way to reaching Amazon's environmental goals, Amazon needs to recognize it is at the same time allowing the proliferation of consumable single use plastic products to be sold through its marketplace daily. New built non-OEM clone printer cartridges are a perfect example of unnecessary plastic waste and pollution.

Remanufactured printer cartridges, offer consumers an environmentally friendly, low-cost alternative to OEM brand cartridges. If Amazon wants to continue to offer all kinds of aftermarket printer cartridges, it should consider requiring its sellers to take responsibility for their products. Sellers of aftermarket printer cartridges should have a service in place to recycle their own cartridges.

This will invite innovation and ingenuity in bringing more sustainable products to market. Amazon being the largest online marketplace can truly make a global impact on the environment outside of its own walls by pushing its sellers to do better.

# Amazon Can Be Part of the Solution

Amazon can help reduce unnecessary plastic waste and not be a conduit for it.

Steps Amazon can take:

- Enforce listing policy so all sellers of ink cartridges are following Amazon's rules, FTC guidelines, and the law.
  - Take down listings that use "remanufactured" and "compatible" interchangeably as it is deceiving.
  - Take down listings of sellers who cannot verify their environmental marketing and recycling claims.
- Ban sellers from the platform that are identified for selling falsely labelled new built printer cartridges as "remanufactured."
  - Planet Green welcomes the opportunity to assist Amazon with identifying new built cartridges falsely labeled as remanufactured.
  - For over the past 22 years, we have recycled and remanufactured millions of printer cartridges in our state-of-the-art facility in Chatsworth, CA.
- Unlike the OEMs who offer a return recycling service for their used cartridges, most aftermarket sellers of ink and toner do not offer such a service to handle their used cartridge waste. This is an opportunity for Amazon to show good environmental stewardship by requesting aftermarket sellers of ink and toners to take responsibility for their own products by having a recycling service in place to return used cartridges.

If Amazon is truly committed to and invested in sustainability because it's good for the planet, for business, for its customers, and for its communities, then it should consider the negative impact new built non-OEM aftermarket ink and toner printer cartridges have on our environment and act.



# Planet Green

---

**100% USA Remanufactured Inkjet Printer Cartridges**  
**If we don't make it, we don't sell it!**

HP® | Canon® | Epson® | Dell® | Brother® | Lexmark® | Pitney Bowes®

*Quality.*  
*Quality.*  
*Quality.*



# About Planet Green

Planet Green is an industry leader of wholesale high-quality U.S. remanufactured inkjet cartridge products. Since the company's creation over 20 years ago, quality has been and continues to be the focus of every single activity in the company.

Our mission is to create quality products, quality services and quality relationships. With these guiding values, Planet Green continues to be the partner of choice for customers who expect nothing but the best.

Our certified state-of-the-art 35,000-square foot facility, based in Chatsworth, California, exemplifies streamlined production and remanufacturing excellence. We continue to create our own manufacturing techniques and production equipment.



Utilizing leading-edge technology and top-quality supplies enables us to uphold our high standards of quality. Our passion for continuous research, development and innovation keeps us among the best of the best in an industry full of poor-quality non-OEM compatible products and sub-par remanufacturers.

Our professional management team, well-trained technicians and dedicated staff are yet another reason for our continued growth and success. They are the cornerstone for producing and delivering top-quality products and superb service to satisfied customers all over the world.

Choose Planet Green and entrust your future with a company that has a true image of quality.

Planet Green's Focus Brand remanufactured Inkjet Cartridges epitomize the quality and performance that your customers expect and count on. The Focus Brand conveys a clear-cut message of high standards with a commitment to environmental responsibility.

Focus Brand Cartridges are the result of continuous investment, improvement and advancement of our employees, technology, systems & procedures as well as today's customer expectations. We are tireless in discovering and innovating new ways to produce a better inkjet cartridge, and the Focus Brand Cartridges are the result of that effort.



Brand Inkjets

## Performance

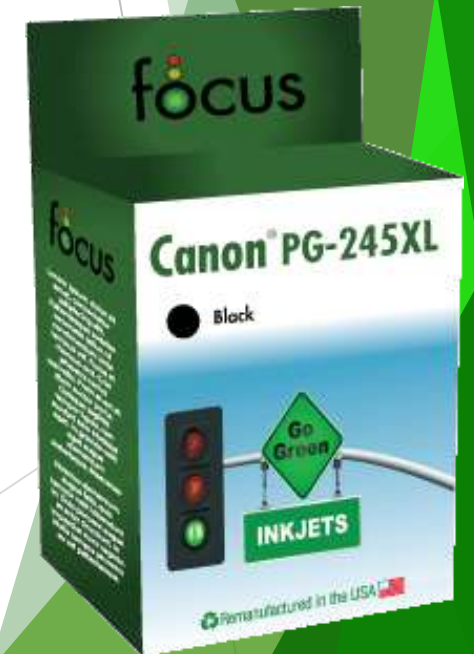
Focus Brand Inkjet Cartridges provide consistent and reliable performance down to the last ink drop. After all, our quality control and testing departments do not work for us; they work for our customers and have their full satisfaction in mind all the time. Our focus on remanufacturing just inkjet cartridges allows us to perfect the remanufacturing process which results in a quality product.

## Quality

When it comes to our main philosophy, "Quality, Quality, Quality" would be it, and the proof is on the printed page. Focus Brand inkjet cartridges are produced under stringent quality-control procedures and strict testing guidelines. We have the best remanufactured inkjet cartridges on the market.

## Value

For many years now Planet Green's Inkjet Cartridges have been considered an effective alternative to the expensive OEM cartridges, as well as the flood of sub-par and unreliable remanufactured cartridges on the market today. Focus Brand Inkjet cartridges meet the quality & performance of the OEM's at substantial savings to your customers.



# State-of-the-Art Manufacturing

## Production

- 35,000 sq ft advanced remanufacturing facility
- Five separate departments with designated staff for empties, cleaning, filling, testing and packaging
- Efficient workflow and production planning
- Rigorous training program for production staff & line managers

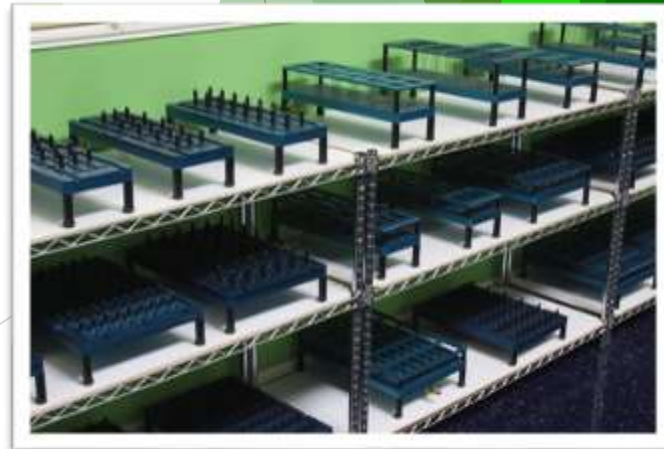
Organized and spotless production floor

## Stringent Production Procedures and Guidelines

- Strict production policy of using ONLY Virgin cores that must pass visual & circuit testing
- Using cartridge-specific inks formulated in the USA
- All cartridge caps are ultra-sonic welded
- Extensive testing procedures for every cartridge

## Leading-Edge Equipment & Technology

- Colorfill 600 vacuum-filling machines for every cartridge station
- Dedicated in-house machine shop creating our own PG-Innovation line of automated equipment including:
  - High-tech cartridge cap removal
  - Black & color flushing systems
  - Automated filter/screen remover
  - Automated filter welders
  - Cartridge foam dryers
  - Centrifuge systems
  - Multiple custom-built Delran cleaning sinks
  - Numerous task-specific hand-held tools

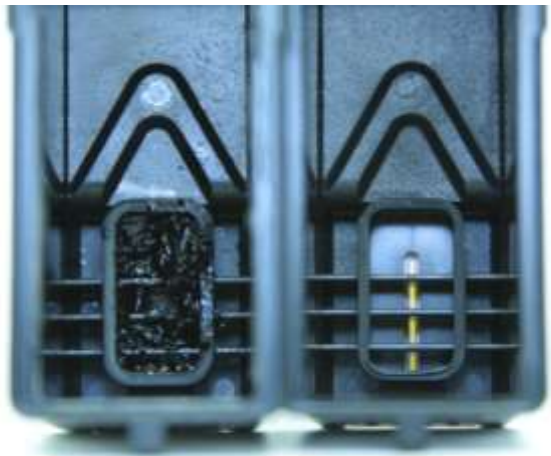
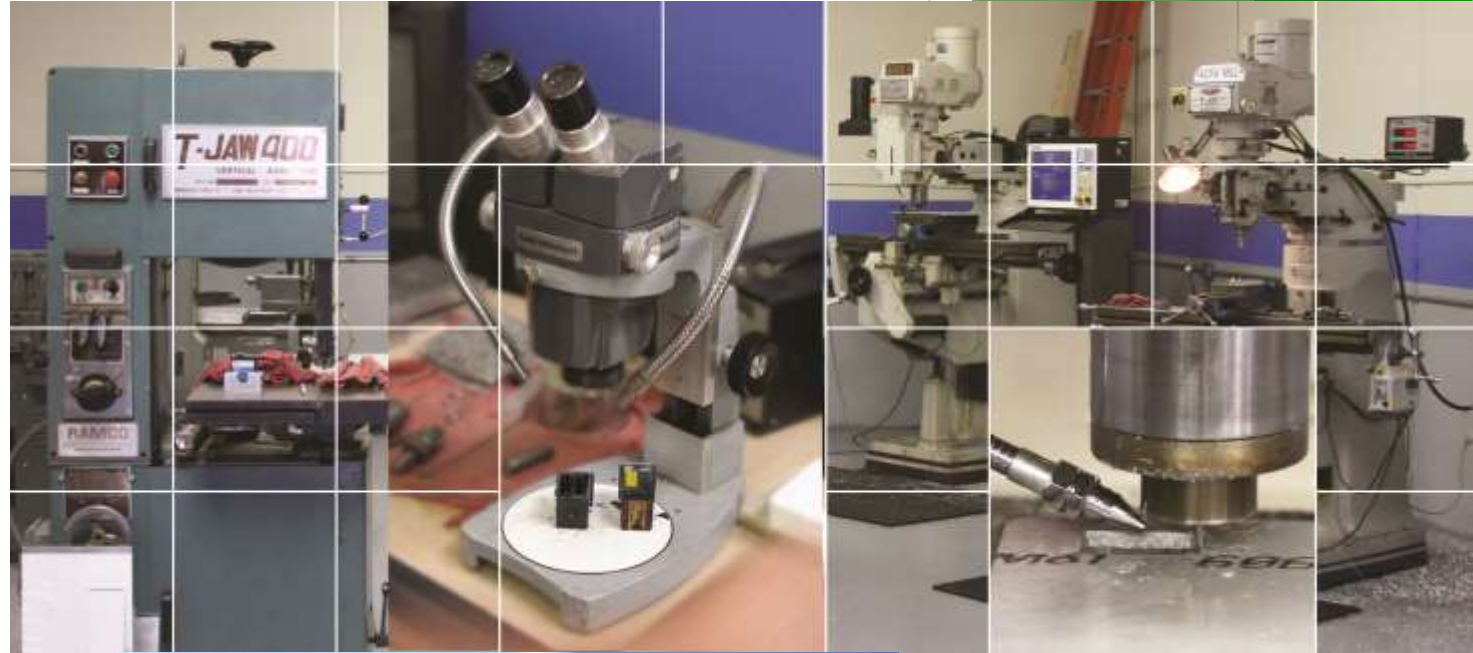


# Leading The Industry

Here at Planet Green, we have a long history of innovation. To produce the highest quality inkjets, we have taken control of our own technological destiny.

Our in-house technology center researches, designs and creates our own equipment, tools and production systems.

A passion for improvement drives our dedicated engineers to ensure proper remanufacturing of our inkjets and stay informed about the original equipment manufacturer's new releases. To produce the highest quality products, we are committed to investing and taking charge of our own technology needs.



Planet Green has revolutionized the screen replacement process in our industry.



We emphasize the importance of cleaning cartridges thoroughly and getting underneath the ink reservoir channel. This can only be done by replacing the filter screen.

Our Quality Assurance team ensures that quality is consistent and guaranteed. The QA team is set up as an independent department with only the interest and expectations of the customer in mind. The proof of this set-up is demonstrated in every printed sheet that uses Planet Green cartridges.

Having solid knowledge of the inner workings of every cartridge allows us to construct our QA & testing procedures to make certain our cartridges perform to the same specifications as the original equipment manufacturer brand. Testing includes lifetime performance, duration, color breadth, and page yields.



# Quality Assurance

- Independent Equipment Development
- Impartial Laboratory Testing
- Pre-Certification of Vendor Supplies and Material
- Lot Inspections of Supplies and Materials
- Every Cartridge is print-tested before Packaging In-House Production of all Inkjets
- No Outsourcing of Units
- Monthly Quality and Procedural Evaluations
- Yearly Vendor Re-Qualification Testing



- ✓ We back every cartridge with a 100% satisfaction guarantee. We uphold our standards of quality to such a high level that we confidently guarantee, under normal use and storage conditions, your product will not only meet but exceed your expectations. You can confidently offer Planet Green's Focus Brand cartridges and watch your sales, profits and customer base grow.
- ✓ Additionally, we warrant 100% that our equipment and supplies, under normal use and service conditions, are free from defects in both material and workmanship. Planet Green products will not cause damage, abnormal wear, or deterioration to units used within the standard manufacturer's specification.

# Customer Care & Support

Planet Green knows that each customer's business and loyalty must be earned. We work hard to provide our customers with the highest quality service & care possible. We endlessly train & test our staff on effective customer care techniques.

It's important for our staff to be knowledgeable about the industry's current trends so they can keep you informed and on the leading edge of your business. We are here for you; so, consider our customer care department a part of your own team.

- Account-specific sales & customer care representatives
- Cartridge & printer model technical support
- Marketing support
- Blind drop ship programs
- Same-day shipping
- Net payment terms with approved credit application
- Secured online ordering & account management
- Online empties purchasing and selling system
- Generic 4-color high-gloss boxes available
- Private labeling



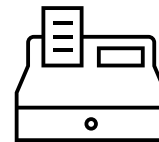
## Direct Delivery Program (Blind Drop Ship)

Planet Green can provide direct delivery that ships our products to your customers without any reference to Planet Green. Our direct delivery programs reduce delivery time and eliminate the need to hold inventory at your location.



## Personalized Service

We value our customers and ensure that we are always available to answer your questions. Every single account, small or large, will receive the absolute best service and attention. When you establish an account with Planet Green, we will allocate to you one of our professional and experienced account managers who will ensure your complete satisfaction.



## Multiple Payment Options

For easy & efficient service we accept Visa, MasterCard, American Express as well as C.O.D. and wire transfers. Net Terms are available upon request and submission of a completed credit application.



# Free Mail-in Ink Recycling Service



## Recycle from Home

- Over 375 million used cartridges are thrown in the trash every year!
- Protect our environment and recycle your used ink with Planet Green.
- We provide a Free USPS Mailing Label.



## Remanufacturing Facility

- Planet Green state-of-the-art facility located in Chatsworth, CA.
- U.S. Recycler and Remanufacturer for over 22 years!
- Proud to offer manufacturing jobs for America!



## Focus Brand

- Enviro-Friendly product.
- Made from used OEM core ink cartridges collected from consumers nationwide.
- Our supply chain consist primarily of U.S. companies which makes our brand a truly American Made recycle product.

# We Pay Top Dollar for Empty Ink Cartridges

We continuously need empty ink cartridges to meet our production demands.

As a remanufacturer, we have the power to pay more for the cores we need.

This is an opportunity for you to make top dollar on your entire empty inkjet cartridge inventory.

**If You've Got Empties...We Want them!**

**Call Us Today: 800.377.1093**



- No need to count and sort
- We pay shipping
- Prompt Payment process



No pick-up is too big or too small!

We will pick-up your ink cartridges by the box or by the pallet.

[info@Pginkjets.com](mailto:info@Pginkjets.com)

[www.pginkjets.com](http://www.pginkjets.com)



amazon

The Amazon logo, featuring a thick orange arrow that curves from the bottom of the letter 'a' to the bottom of the letter 'n', pointing to the right.

Thank You!

We look forward to your help and support! Together, we can make a difference!

# **EXHIBIT 2**

# Amazon Counterfeit Sellers

---

SUPPLEMENTAL PRESENTATION TO THE  
AMAZON SELLER VIOLATION PRESENTATION

Presented by  
Planet Green

# DAMAGES

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 action needed.

# Counterfeit Remanufactured Ink Cartridges

Since our first presentation, we have purchased more ink cartridge from suspect Amazon sellers. From 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 of counterfeit cartridges

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

1. [AAKidInk](#)
2. [ActualColor](#)
3. [Ankink](#)
4. [AtopInk](#)
5. [AtopolyJet](#)
6. [Batuto](#)
7. [BJ Ink Cartridges](#)
8. [Bstink](#)
9. [Cartlee](#)
10. [CG Chinger](#)
11. [Clorisun](#)
12. [Coloretto](#)
13. [ColorKing](#)
14. [ColoWorld](#)
15. [CMTOP](#)
16. [CRTBOTW](#)
17. [CSStar](#)
18. [Doreink](#)
19. [Economink](#)
20. [Ejet](#)
21. [Eston](#)
22. [Evinki](#)
23. [Ezink](#)
24. [Facms](#)
25. [Fastink](#)
26. [Foiset](#)
27. [Forzik](#)
28. [Geshine](#)
29. [GPC Image](#)
30. [Greenbox](#)
31. [Greencycle](#)
32. [HavaTek](#)
33. [H&BO Topmae](#)
34. [IdealSeal](#)
35. [Incwolf](#)
36. [InkCloud](#)
37. [InkMate](#)
38. [Inkni](#)
39. [InkSpirit](#)
40. [Inktopia](#)
41. [InkWorld](#)
42. [Insmax](#)
43. [Janmore](#)
44. [Jarbo](#)
45. [JICDHBIW](#)
46. [Jonity](#)
47. [Kamoink](#)
48. [Kingjet](#)
49. [Kogain](#)
50. [Kolor Expert](#)
51. [Lemeroustrust](#)
52. [Lucascolo](#)
53. [LxTek](#)
54. [Meetrgb](#)
55. [Miroo](#)
56. [Mooho](#)
57. [Mycartridgephoever](#)
58. [Mytoner](#)
59. [Neiber](#)
60. [Novajet](#)
61. [OA100](#)
62. [OnlyU](#)
63. [Palmtree](#)
64. [Penguin](#)
65. [Pfkink](#)
66. [Reprinpic](#)
67. [Retch](#)
68. [Sailner](#)
69. [Sellyaha](#)
70. [Sheengo](#)
71. [SmartInk](#)
72. [St@r Ink](#)
73. [Teino](#)
74. [Toner Kingdom](#)
75. [Ubinki](#)
76. [Upsek](#)
77. [Vaker](#)
78. [ValueToner](#)
79. [V-Surink](#)
80. [Witop](#)
81. [Yatunink](#)
82. [YesInk](#)

Click on any seller to see counterfeit listings or Copy link into browser  
<https://drive.google.com/drive/folders/1oUfxFCpVn7PD LHispWLFfwjwL4fyRKq2?usp=sharing>

We have identified other suspect counterfeit sellers which we will confirm at a later date.

# Exhibit 1B - Images of Counterfeit Cartridges That We Purchased



# Exhibit 1B - Images of Counterfeit Cartridges Collected Through 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

Alibaba.com listing for INK-TANK 62XL remanufactured ink cartridges. The listing includes product images, a price range of \$14.64 - \$14.74, and a quantity range of 1 to 10,000 pieces. A 'Verified supplier' badge is present, and a red arrow points from the text below to the 'Supply Ability' field in the product details.

Not feasible to remanufacture 10 million HP 62XL cartridges per month when the HP 62XL core cartridges are hard to accumulate.

Product details page for INK-TANK 62XL remanufactured ink cartridges. The 'Supply Ability' field is highlighted with a red box and contains the text '10,000,000 Pieces per Month'. Other details include 'Type: Ink Cartridge', 'Color: Yes', and 'Model Number: H-62XL'.

Quantity(pieces)	1 - 10000	>10000
Lead time (days)	7	To be negotiated

# 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. Plant Green has one of 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 cartridges by the millions, especially the newest models which takes time for cores to penetrate the market and accumulate for remanufacturing.

# Exhibit 1C - List of Manufacturers on Alibaba who offer remanufactured printer cartridges in quantities by the millions per month

Click to links to see Alibaba listings

1. [Zhuhai National Resources & Jingjie Printing Technology](#)
2. [Shenzhen Nolar Trade Development Company](#)
3. [Shenzhen Michsan Technology Company](#)
4. [Uniplus Technology Corporation](#)
5. [PK Printking Technology Company](#)
6. [Ebest Digital Technology](#)
7. [Zixingshi Heshun Technology Printing Materials Company](#)
8. [Hitek Image](#)
9. [Tatrix International China Co, Ltd](#)
10. [Prospect Image Products Limited of Zhuhai](#)
11. [Ink Power](#)

# 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. [HP Seized Over 3.5 Million Fake Print Products Across The World](#)
4. [Fake HP goods seized in China – CNET](#)
5. [HP has confiscated over \\$10 million worth counterfeit cartridges in India this year — and that involved 170 raids and 144 arrests — Business Insider India](#)
6. [HP And Saudi Authorities Successfully Shut Down Counterfeit Cartridge Manufacturer In Major Raid — Al Bawaba](#)
7. [HP partners with authorities in Uganda for double raid on counterfeit print supplies - Press releases and news about Africa and the surrounding area](#)
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. [HP, police close down counterfeiting facilities in major seizure – Vanguard](#)
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. [HP, Police Raid Sellers of Fake HP Print Cartridges in Nigeria — Business Post 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 seizures 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.

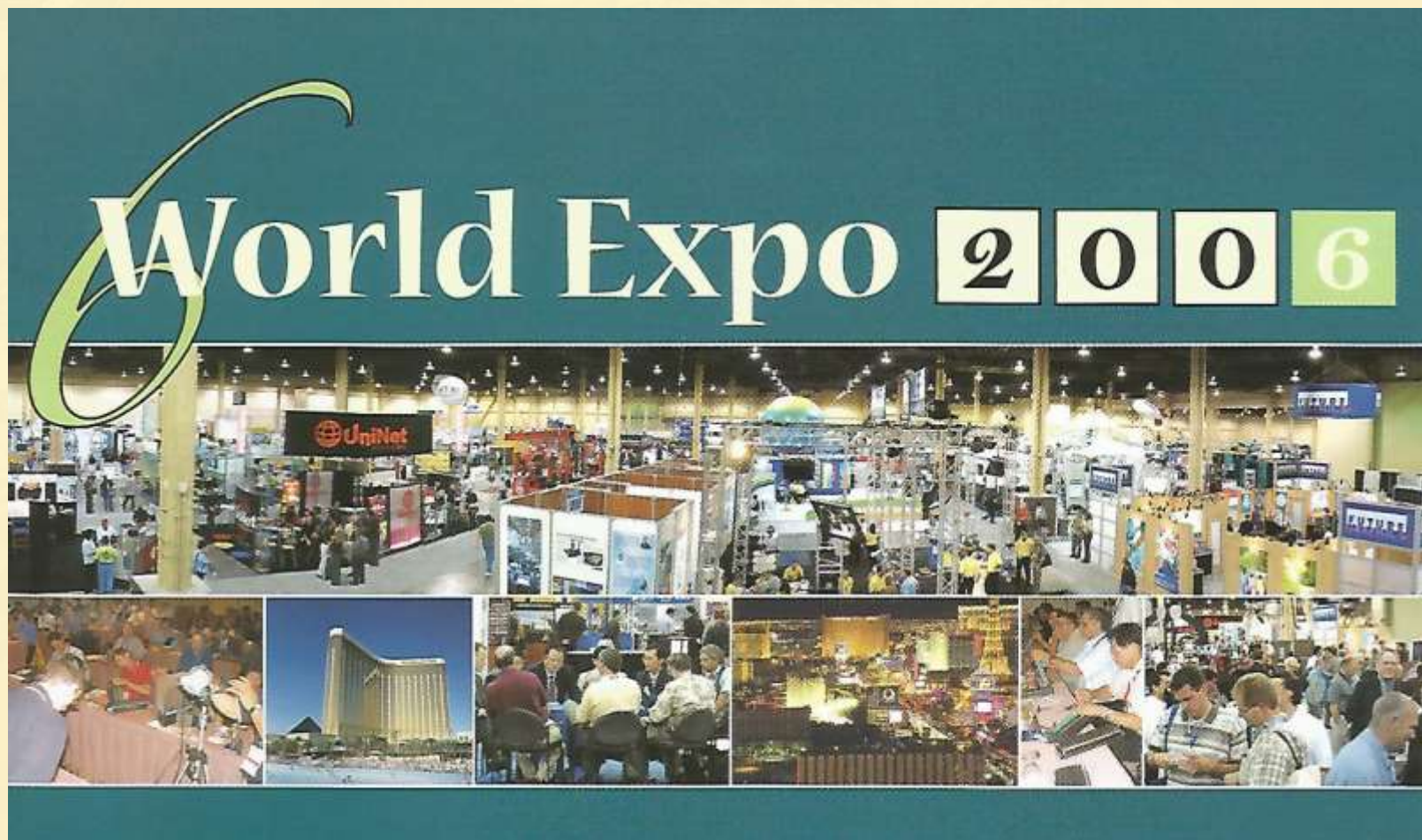
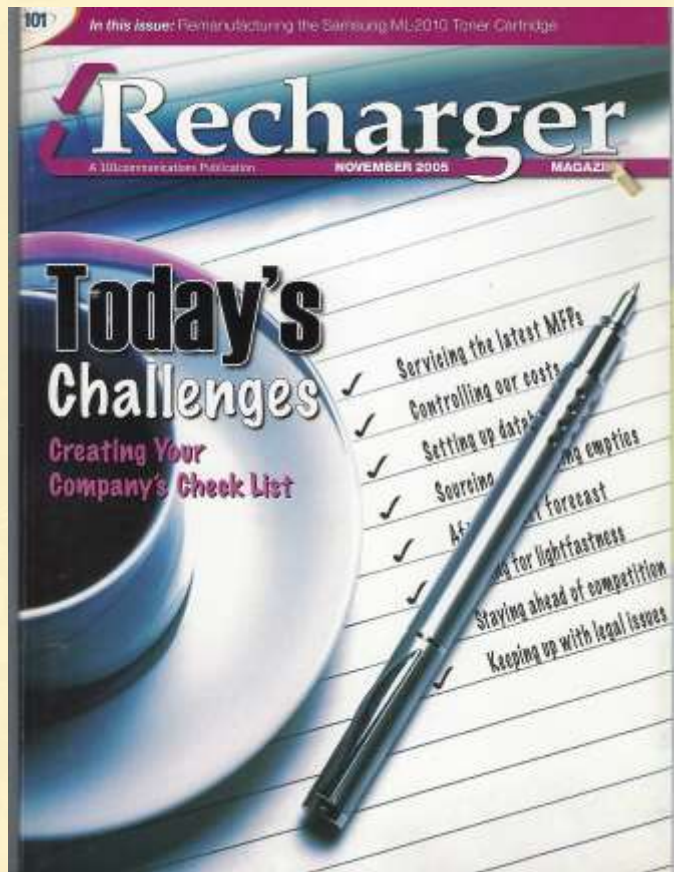
The U.S. printer cartridge remanufacturing industry established in the 1980s grew into a multibillion-dollar circular economy. The industry included remanufacturers, used cartridge collectors, suppliers, resellers, trade publications, and Expos.

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 <https://www.rtmworld.com/the-challenges-of-remanufacturing-in-china/>

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.

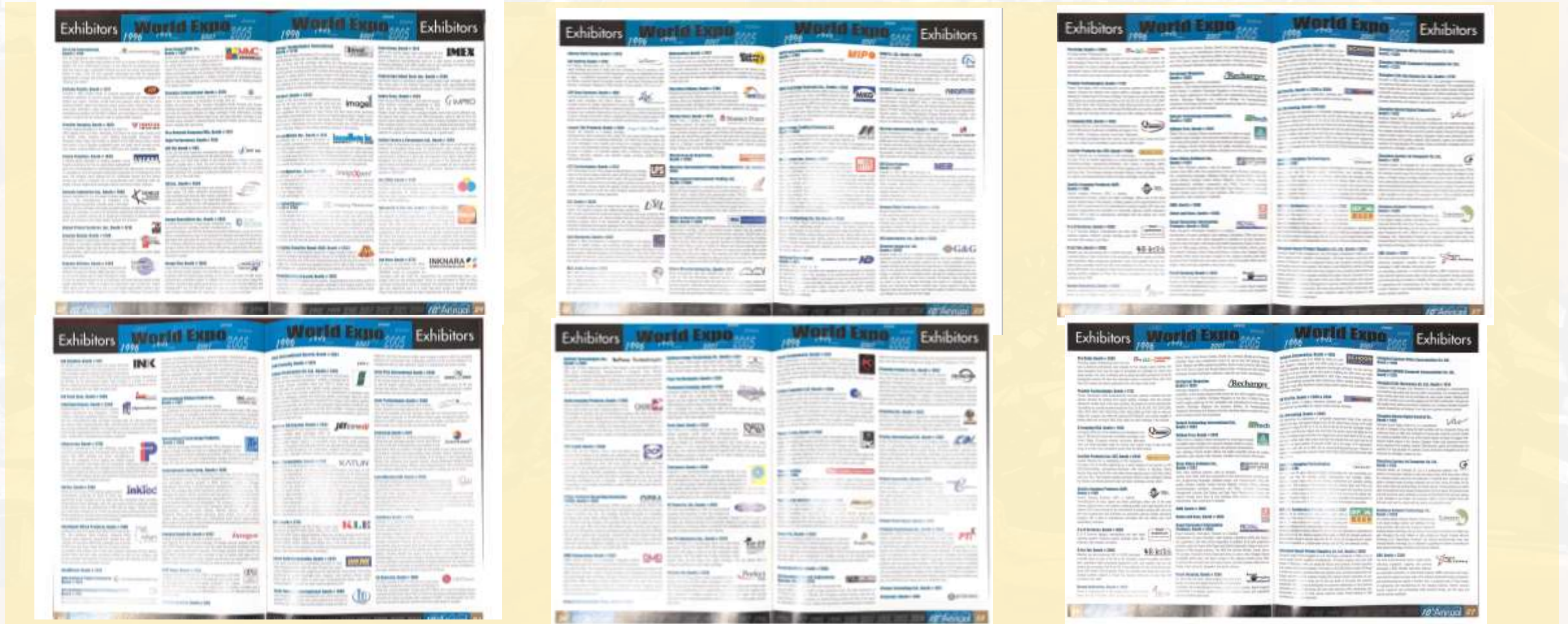




Exhibit 2B - Images of advertisements for companies collecting and selling empty printer cartridges. The collection of used printer cartridges became a primary business for the remanufacturing industry. Counterfeit cartridges saturated the market destroying the value of used printer cartridges to the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

In this issue: Remanufacturing the HP 2605 Black and Color Toner Cartridges

# Recharger

JULY 2008 MAGAZINE

Meeting the Demands of  
**Business Color**

Distinctive Color for Business:  
Digital Communication

Survey Shows More Remanufacturers  
Testing Than Ever Before

New HP Patent Details  
Expanded Chip Capabilities

Readers  
Choice  
Awards Voting  
Page 72

Classified Advertising

### CARTRIDGES EMPTIES TONER

**Southwest Cartridge  
GEORGIA**

9127A/FX-2 ..... \$1.50  
9127A/FX-1 ..... \$1.50  
92201A ..... \$4.50  
92298A ..... \$3.50  
C1003A OLD STYLE ..... \$5.50  
C1003A NEW STYLE ..... \$2.00  
C4125A-100 ..... \$2.00  
C800A-100 ..... \$2.00  
Q138 ..... \$1.00  
Q168A ..... (70's) \$6.00  
Q201A/X ..... (70's) \$6.00  
C710A ..... (70's) \$7.75  
C402A ..... \$4.00  
C4120X ..... (100) \$8.50  
C402X ..... (100) \$4.50  
C402X NON-VIR ..... (100) \$5.25  
FX4 ..... (100) \$5.50  
FXV ..... \$4.00  
DR250/250 ..... \$7.50  
META LDC-600 ..... \$3.50  
E1010/950 ..... \$3.00  
E1210/150 ..... \$3.00  
E1101/130 ..... \$3.00  
60823M/57-OPTRA "E" ..... \$4.50  
RICOH 103 ..... \$2.00  
RICOH T159 ..... \$3.00  
OTHERS, CALL...GDDBALLS...CALL

**PRICES ARE SUBJECT TO  
CHANGE WITHOUT NOTICE!!!**

**SOUTHEAST CARTRIDGE**  
MIN. ORDER \$150.00  
COD/VISA/MC/AMEX  
DANNY @ 800-213-4118  
C790107-4796 FAX 770-287-1813  
WWW.VIRGINEMPTIES.COM

### CARTRIDGES EMPTIES TONER

**Kartridges For Kidz**  
Selling Quality, Inspected  
Virgin Cores  
Securely Wrapped and  
Ready for Shipment  
Visa/Master Card  
American Express/ Discover

**100% Guaranteed**

27X	4.00	12A	112.00
98A	3.50	24A	14.00
15A	3.00	75A	72.00
15X	5.00	38A	118.00
99A	11.00	39A	128.00
82X	7.00	42A	111.00
13A	2.00	42X	130.00
13X	8.00	49A	111.00
74A	6.00	10A	6.00
11A	28.00	03A	4.00
82A	3.00	FX2	6.00
88A	3.00	FX6	5.00
88A	3.50	150	10.00
28X	6.00	540	111.00

Many other cartridges available  
Call for a Quote

Phone 800-543-9405  
Fax 800-454-5438  
E-mail: kartridgesforkidz@yahoo.com

### CARTRIDGES EMPTIES TONER

**VIRGIN EMPTIES FOR SALE**

CT105A	.....	\$3.00
CT105N	.....	\$7.00
CT417N	.....	\$6.00
C3066A	.....	\$0.40
PH901	.....	\$15.00
EN300/600	.....	\$5.00
XEROX U3R00446	.....	\$5.00

**NON VIRGIN EMPTIES**

C3066A	.....	\$2.00
91298A	.....	\$ 3.50
C4086A	.....	\$2.00
OPTRA 5	.....	\$1.00
PH900	.....	\$3.00
XEROX U3R00446	.....	\$2.00

**LASETECH INTERNATIONAL, INC.**  
Call:  
800-289-8421  
lery@laseotechintl.com

### CARTRIDGES EMPTIES TONER

**VIRGIN EMPTIES FOR SALE**  
Buy at Broker Prices

- NO HASSLE 100% GUARANTEE
- Hand Selected, Inspected & Packed
- LASER, INKJET, COPPER CARTRIDGES
- In Stock / Ready to ship Today
- ALL VIRGINS

C3066A	.....	6.00
C3066N	.....	4.00
CT105A / N	.....	7.00
CR96A	.....	6.00
CR92A	.....	4.50
C4127N	.....	6.00
C4202X	.....	7.00
C4120N	.....	8.00
SL105(A)	.....	4.50
SP105(A)	.....	4.00
Q201A	.....	7.00
4 (98A)	.....	5.00
4V100(A)	.....	7.00
78A / Color PN	.....	7.00
27A	.....	4.50
FX1	.....	7.00
FX2	.....	7.00
FX3	.....	7.00
FX4	.....	6.00
FX5	.....	6.00
FX6	.....	6.00
FO7M5 (NICK870)	.....	8.00
OPTRA T320/T520	.....	12.00
OPTRA 5 920/925	.....	12.00
100050	.....	11.00
100150	.....	12.50
OPTRA E / T320/T545	.....	2.00
OPTRA E (DRUM)	.....	5.00
LEN-ALL OTHERS	.....	CALL
Non Virgin 27X	.....	2.00
Non Virgin 98A	.....	2.00

Most Other Brands and Models Avail.

**ALL MAJOR CREDIT  
CARDS ACCEPTED**

- \* Thousands of cartridges credit to you today.
- \* IN BUSINESS 19 YEARS / FAMILY OWNED.
- \* All Cartridges Collected from End Users.
- \* Cleanest control workstation in Birmingham, AL.

**CALL TODAY  
TOLL FREE IN THE U.S.  
1-800-482-8128**  
Monday-Friday  
Non-Spin Control Toner (US)  
OUTSIDE US: 1-205-433-2704  
Email: dlmagecraft@aol.com  
FAX YOUR ORDER: 1-205-433-6448  
Image Craft  
1151 Golden Highway-Birmingham,  
AL 35235

### CARTRIDGES EMPTIES TONER

**EMPTIES FOR SALE**

C402X	.....	\$5
CT105A/X	.....	\$4
C3066X	.....	\$6
Q201A	.....	\$12
QO38A	.....	CALL
Q1902A/X	.....	CALL
UG-311	.....	\$10
UG-3520	.....	\$14
92298A	.....	\$4
FX7	.....	\$6

**OTHERS AVAILABLE**  
CANTON OFFICE SOLUTIONS  
800-858-6425  
FAX: 940-858-6417  
cantonoffice@aol.com

**Virgin Empties**

96A	.....	\$3.50
10A	.....	\$7.50
13A/X	.....	\$5.50
15A/X	.....	\$3.75
27X	.....	\$4.50
38A	.....	\$54.75
42A	.....	\$18.00
49A	.....	\$12.00

JetSupply: 800-576-9374

**INKJET & LASER EMPTIES  
BOTH VIRGIN & NON VIRGIN**

**Specials**  
Q-651A/N-827.00  
OPTRA-T-615-818.00  
E-336-832.00  
667-87.50  
TOLL FREE: (800)598-9123  
800772-5594  
FAX: (817)72-5698  
EMAIL: Duan@soppy@yahoo.com

**SALE! SALE! SALE!**  
27X Non Virgin @ \$ 5  
Misc. Remanufactured  
Cartridges 50% off  
**CALL 888-EOS-3076**  
for more information

## BUYING & SELLING

For All Your Empty Cartridges, Drums & Power Brackets!

• Empty Toner Cartridges - Surplus OEM Cartridges  
• Empty Ink Cartridges - Used Fusers

**Call EOS Today**  
Toll Free: 888-EOS-3076

No Minimum Order Required

# 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.

Example of an empty core with a value of \$32

Classified Advertising

**CARTRIDGES**  
EMPTIES INK

**CARTRIDGES**  
EMPTIES INK

**CARTRIDGES**  
EMPTIES INK

**BUYING SELLING BUYING SELLING BUYING**

## ANNOUNCEMENT

**MB SALES will meet or beat ANYONE'S prices**

**MB Sales is Always BUYING and SELLING empties**

Toll Free: 877-998-6637  
Phone: 818-710-0000 Fax: 818-710-9770  
www.mbsales.com



**BUYING SELLING BUYING SELLING BUYING**

**CARTRIDGES**  
EMPTIES INK

**Virgin Empties For Sale**

HP4, 9A, EX	\$4.00
HP5P	\$4.00
HP5L	\$3.00
HP5N	\$13.00
HP 27X	\$4.70
HP 27A	\$3.30
HP4L, 74A	\$7.00
HP 96A	\$4.50
HP 92A	\$4.00
HP 24X	\$9.00
HP 36A	\$32.00
HP 39A	\$33.00
HP 42A	\$17.00
Canon FX-1	\$7.00
Canon FX-2	\$7.00
Canon FX-3	\$8.00
Canon FX-4	\$4.00
Panafax CG311	\$15.00
HP 11A	\$8.00
HP 12A	\$15.00
HP 49A	\$15.00

**Big Apple Cartridge**  
Toll-Free 877-843-2775  
Ph: 1783 486-0346  
Fax: (718) 686-0347  
Ask for Vinny or Bill

**VIRGIN EMPTIES FOR SALE**

HP  
Q139, Q139, Q594, C427X  
D111  
2500, 5200, 1700  
LENMARK  
T420, 1530  
SAMSUNG  
And much more !!!

- \* Call now for a complete list on virgin ink-jet
- \* Low Price in empties and remanufactured cartridges
- \* We are self-manufacture toner.
- \* We ship inside of USA
- \* Small to Large orders

Contact Carlos Sierra  
Remosa, Mexico  
At 5 mile of Border with USA.  
US: (956) 212-1574  
MEX: 011(52) 499 929-0956  
Madsimon1@prodigy.net.mx

**CARTRIDGES**  
EMPTIES INK

**CARTRIDGES**  
EMPTIES INK

**Your Global Recycling Resource**  
See you at Remax 2006

**Always Purchasing Inkjet Cores**

**Integrity Excellence**

Contact RTS today to see how our "Core Values"™ can benefit your company

**Industry Knowledge Relationship Building**

For Your FREE Subscription of RTS News  
Email: [press@recyclotech.org](mailto:press@recyclotech.org)

**TOLL FREE 866.836.4114**  
**FAX: 773.277.4801**

**INT'L: 773.277.4800**  
**EMAIL: [cores@recyclotech.org](mailto:cores@recyclotech.org)**

**VIRGIN EMPTIES FOR SALE WE BUY SURPLUS OEM**

29X	\$7.00
38A	\$23.00
18A	\$7.00
49A	\$16.00
42A	\$16.00

MANY OTHERS AVAILABLE

ALPHA LASER  
710-317-1263 318-377-9831  
FAX: 710-967-6481  
318-377-9831

CALL US TODAY! CALL US TODAY! CALL US TODAY! CALL US TODAY! CALL US TODAY!

**BUYING** EMPTY CARTRIDGES INKJETS SUPRPLUS OEM

**BIG APPLE TONER**  
Toll-Free: 877-843-2775  
Phone: 718-686-0346 Fax: 718-686-0347  
Ask for Vinny or Bill

**TKH IMAGING**

**TRUST**

LOWER THAN CHINA PRICES  
800-850-6266

**BUYING & SELLING** For All Your Empty Cartridge, Drum & Power Needs!

Empty Toner Cartridges Surplus OEM Cartridges  
Empty Ink Cartridges Used Fusers

**Call EOS Today**  
Toll Free: 888-EOS-3076

No Minimum Order Required

Phone: 800-291-1900  
Fax: 560-291-1906  
email: [eos@enet.net](mailto:eos@enet.net)

180 | May 2006 | [www.recyclingtoday.com](http://www.recyclingtoday.com) 187

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

1. [State of China's remanufacturing Industry RT News](#)
2. [Forces Shaping Today's Cartridge Remanufacturing Industry – Actionable Intelligence](#)
3. [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. [THE COUNTERFEIT ECONOMY: HOW PRINTER CARTRIDGES GET FAKED, AND WHY 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. [Amazon Turning a Blind Eye to Counterfeit Ink Cartridges Falsely Being Labelled and Sold as Remanufactured.](#)

# 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 that have been collected from different sources such as E-waste recyclers, office supply companies, and our nationwide recycling services.
- Exhibit 3B - 55 pallets is a video of a shipment from one 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 - Images of used cartridges with ink and toner residue that make up the more than 375 million cartridges that end up in landfills.



Copy link into browser <https://drive.google.com/drive/folders/17-SZvDfYw5zu-jODb2s9OWd6F772wibS?usp=sharing>

Exhibit 3B - 55 pallets is a video of a shipment from one E-waste company that couldn't find an outlet source to handle their printer cartridge waste.



# 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.

Click link or copy into browser to see list of E-waste Recyclers:  
[https://drive.google.com/file/d/1g52AGC7W-  
wsJrFIG6GvdcQDApo8GZJN0/view?usp=sharing](https://drive.google.com/file/d/1g52AGC7W-wsJrFIG6GvdcQDApo8GZJN0/view?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

<https://drive.google.com/file/d/16-QuTX6ZoEwOWTc7uOO-BI28DwcOYjGt/view?usp=sharing>

**Eric Sherman**

---

**Subject:** FW: We need your feedback on toner waste

---

**From:** [REDACTED]

**Sent:** Wednesday, November 9, 2022 8:38 AM

**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.

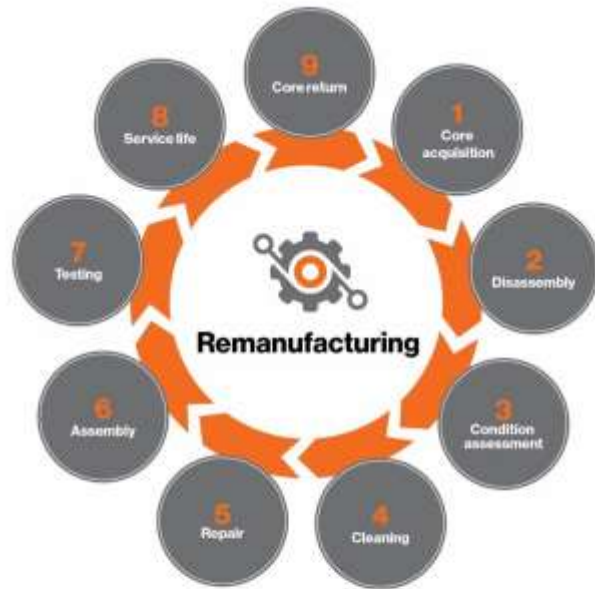
Our remanufacturing process falls within the definition of FTC guidelines for remanufactured products.

**Operation National Sword** 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  
PlanetGreenRecycle.com \* 30724 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 remanufacturing facility and process



# 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
  - Actionable Intelligence
  - Toner News
  - RT Image
  - Image Supply Coalitions

# Exhibit 5A - List of environmental groups and media

Click here or copy into browser to see list of environmental groups activists who may take up the cause to stop printer cartridge waste:

<https://drive.google.com/file/d/1rekRC-IWTpm0wnHottQMzga8nmaWK8U9/view?usp=sharing>



Click here or copy into browser to see list of environmental journalists:

[https://drive.google.com/file/d/1gfRtZfLC3-aZ\\_OxuV6z\\_5B4GQzrwPGP/view?usp=sharing](https://drive.google.com/file/d/1gfRtZfLC3-aZ_OxuV6z_5B4GQzrwPGP/view?usp=sharing)



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

**RESOLUTION** *RULES, ELECTIONS & INTERGOVERNMENTAL RELATIONS*

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 recycle or remanufacture; 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 2021-2023 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.

PRESENTED BY:   
JOHN S. LEE  
Councilmember, 12<sup>th</sup> District

SECONDED BY: 

**ORIGINAL**

SEP 29 2021 

HOLLY L. WOLCOTT  
CITY CLERK

City of Los Angeles  
CALIFORNIA

OFFICE OF THE  
CITY CLERK

PETTY F. SANTOS  
EXECUTIVE OFFICER



ERIC GARCETTI  
MAYOR

**Council and Public Services Division**  
200 N. SPRING STREET, ROOM 300  
LOS ANGELES, CA 90012  
GENERAL INFORMATION: (213) 978-1133  
FAX: (213) 978-1960

PATRICE Y. LATTIMORE  
DIVISION MANAGER  
CLERK.LACITY.ORG

March 23, 2022

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

**Council File No.:** 21-0002-S173

**Council Meeting Date:** March 23, 2022

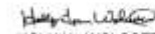
**Agenda Item No.:** 9

**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 cartridges since they are harmful to the environment and cannot be recycled or remanufactured.

**Council Action:** RULES, ELECTIONS, AND INTERGOVERNMENTAL RELATIONS COMMITTEE REPORT AND RESOLUTION - ADOPTED FORTHWITH

**Council Vote:**

YES	Blumenfeld	YES	Borin	YES	Buscaino
ABSENT	Cedillo	ABSENT	de León	YES	Harris-Dawson
ABSENT	Koretz	ABSENT	Krekorian	YES	Lee
YES	Martinez	YES	O'Farrell	YES	Price
YES	Raman	YES	Rodriguez	YES	Wesson, Jr.

  
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

03/23/2022
04/04/2022

APPROVED

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

# 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.

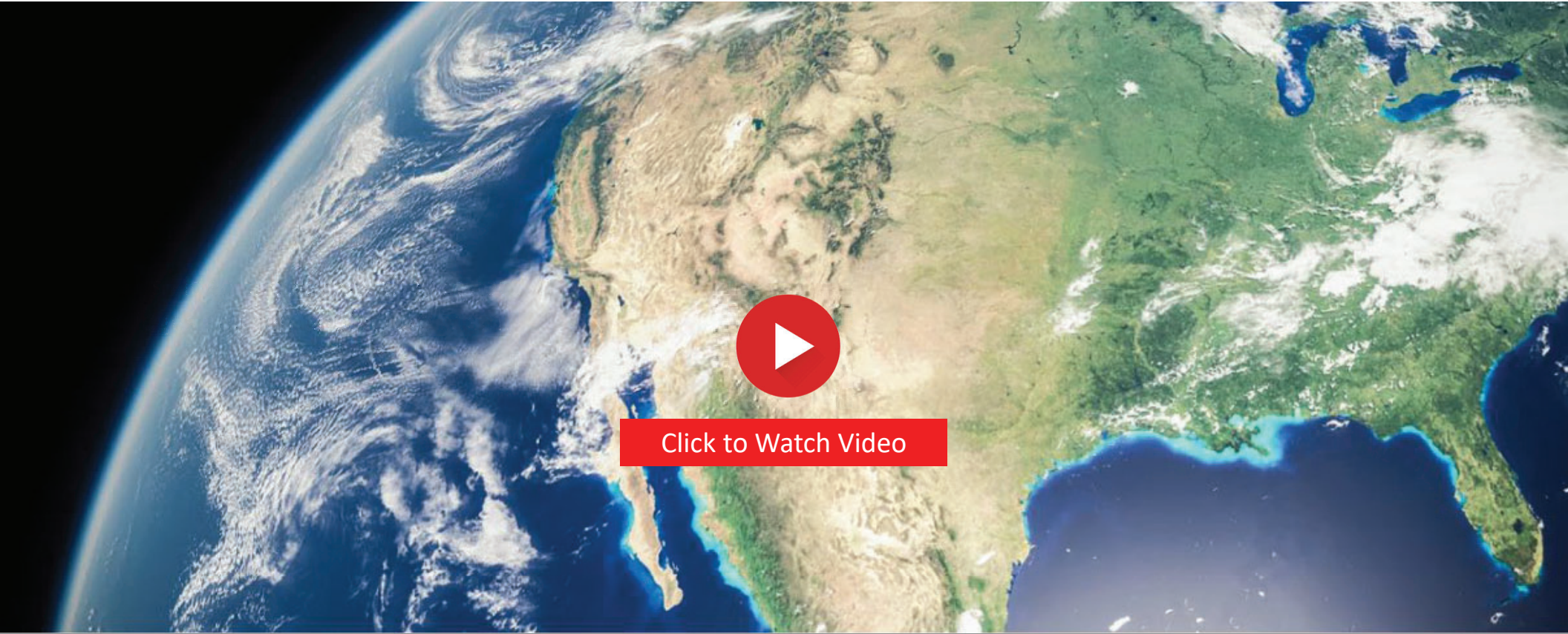
<https://drive.google.com/file/d/1ZljEOH1T-Je4BL9xpSGtNbAFasOIGupi/view?usp=sharing>





# 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](http://i-itc.org)) should be the body to seek verification and police printer cartridge remanufacturers. This would be a similar policy to 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



Click to Watch Video

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