

# **EXHIBIT 1**

LAW OFFICES OF  
**DANIEL J. SPIELFOGEL**  
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SUITE 600  
WESTLAKE VILLAGE, CALIFORNIA 91361  
TELEPHONE (805) 373-8907  
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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  
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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.

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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.

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

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)

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.

Ships from Amazon  
Sold by BJ Technology  
Return policy: Eligible for Return, Refund or Replacement within 30 days

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 TS33420, 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

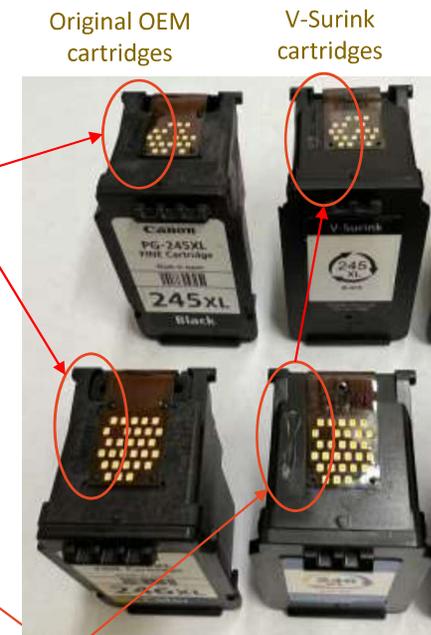


Side by side comparison between an original Canon cartridges and a new built non-OEM clone cartridges labeled as a **remanufactured** product.



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.



**Irktopia 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 Irktopia Store](#)

★★★★☆ 489 ratings

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

Brand	Irktopia
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: Irktopia 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>[90]</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](#)

AMAZON SELLER VIOLATIONS

This article applies to selling in: **United States**

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

## Environmental Marketing Guidelines

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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/oi/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.

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[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](#)

AMAZON SELLER VIOLATIONS

## 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





\*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/B07XTDWT2>
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/RETCHE-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-Replacement-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

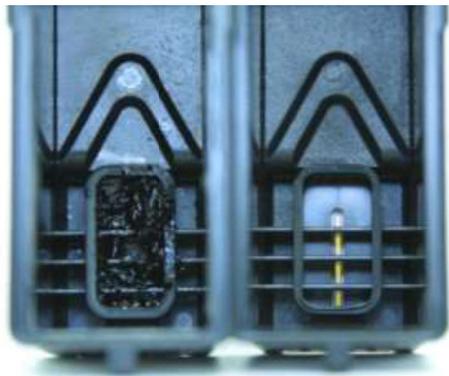


# Leading The Industry

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



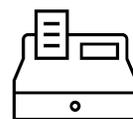
## Direct Delivery Program (Blind Drop Ship)

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.

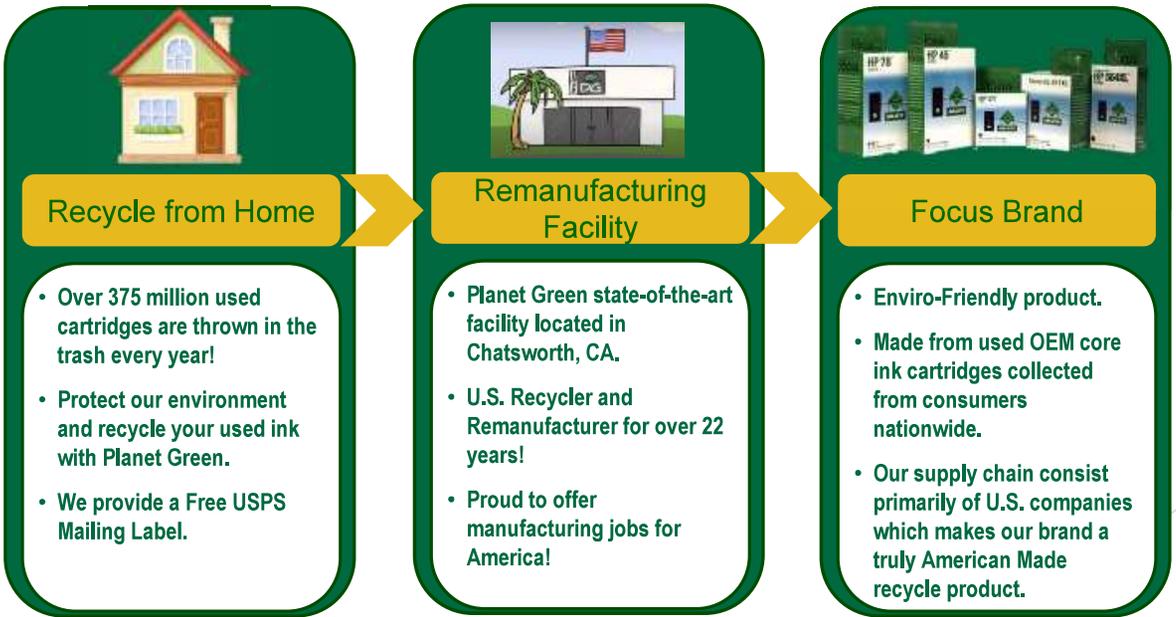


## Multiple Payment Options

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



# 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)



Thank You!

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

# **EXHIBIT 2**

# Amazon Counterfeit Sellers

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SUPPLEMENTAL PRESENTATION B TO THE  
AMAZON SELLER VIOLATION PRESENTATION A

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.

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



## Counterfeit Remanufactured Ink Cartridges

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

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

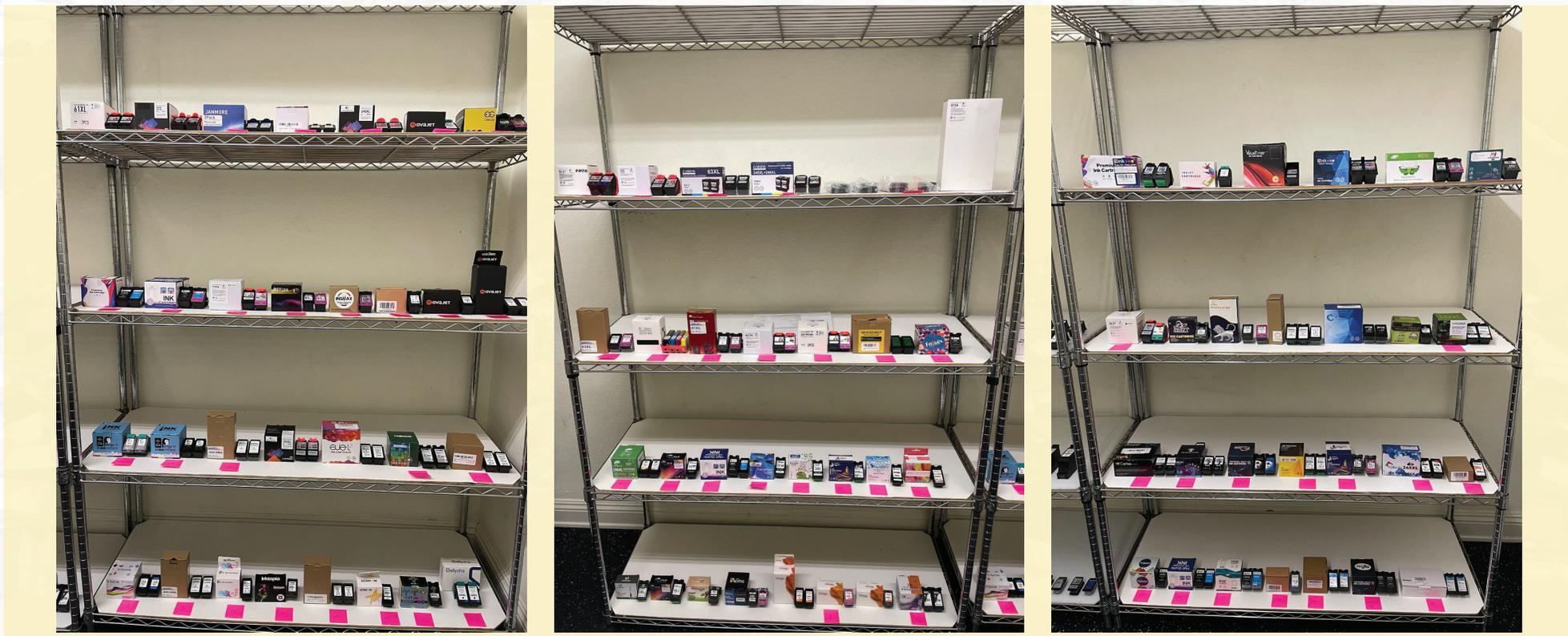
# Exhibit 1A –Images of 82 Counterfeit Sellers Purchased on Amazon

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

Click on any seller to see total number of counterfeit listings  
<https://drive.google.com/drive/folders/1oUfxFCpVn7PDLHispWLFFWjwL4fyRKq2?usp=sharing>

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

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



# 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

**INK-TANK 62XL Premium Color Remanufactured Ink Cartridge For HP62XL For HP62 For HP ENVY 5640 Officejet 5740 Printer**

Price: **\$14.64 - \$14.74** / piece | 10 piece/pieces (Min. order)

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

Supply Ability: 10,000,000 Pieces per Month

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

**Product details** | **Company profile** | Report Suspicious Activity!

**Overview**

**Essential details**

Type:	Ink Cartridge	Feature:	Re-Manufactured
Cartridge's Status:	Full	Bulk Packaging:	Yes
Colored:	Yes	Brand Name:	INK-TANK
Model Number:	H-62XL	Place of Origin:	Guangdong, China
Product Name:	INK-TANK C2P05AN C2P07AN Compatible Inkjet Cartr...	Place of origin:	Zhuhai
Company Type:	Leading manufacturer in China	Certificate:	ISO9001,ISO14001,CE,STMC,RoHS,Reach
Defective Rate:	<0.2%,1:1 replacement for any faulty goods	Ink type:	High Yield Dye Ink pour for hp5547 imprimante
Chip:	Chip 100% Compatible & Stable	Warranty:	12 months
Supply Ability:	10,000,000 Pieces per Month	Delivery Time:	Within 5-7 working days after payment confirmed

**Supply Ability**

Supply Ability: 10000000 Piece/Pieces per Month

**Packaging & delivery**

Packaging Details: INK-TANK box packaging, INK-POWER box packaging, bulk packaging, neutral white box, neutral colour box, customized box

Port: Zhuhai

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. Planet Green has the largest ink cartridge collection programs in the United States. After inspecting millions of empty cores annually, we find it very hard to accumulate certain cores such as HP 62, HP 64, HP 67, Canon 240, Canon 241, Canon 260, Canon 261, Canon 275, and Canon 276. Yet these manufactures on Alibaba offer these cartridges by the millions per month.

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

Click the link and scroll down to see “supply ability”

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

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

**Click on article to view**

1. [Inside The Secretive World Of Counterfeit Printer Ink--And The Raids Used To Fight Back](#)
2. [Head of HP Supplies Says Counterfeit Seizures Soared in H1 2022](#)
3. [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. <https://businesspost.ng/brands-products/hp-police-raid-sellers-of-fake-hp-print-cartridges-in-nigeria/>
15. [ICCE joins forces with Ajman police to seize fake toner cartridges worth \\$40 million – ICCE](#)
16. [Over 72,000 Counterfeit HP Laser and Ink Toner Cartridges Products Seized – Absolute Toner](#)
17. [Raids lead to huge seizures in Lima](#)
18. [Raids reveal counterfeit HP inkjet and laser cartridges-DQWeek](#)
19. [SecuringIndustry.com - HP counterfeit crackdown nets 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.

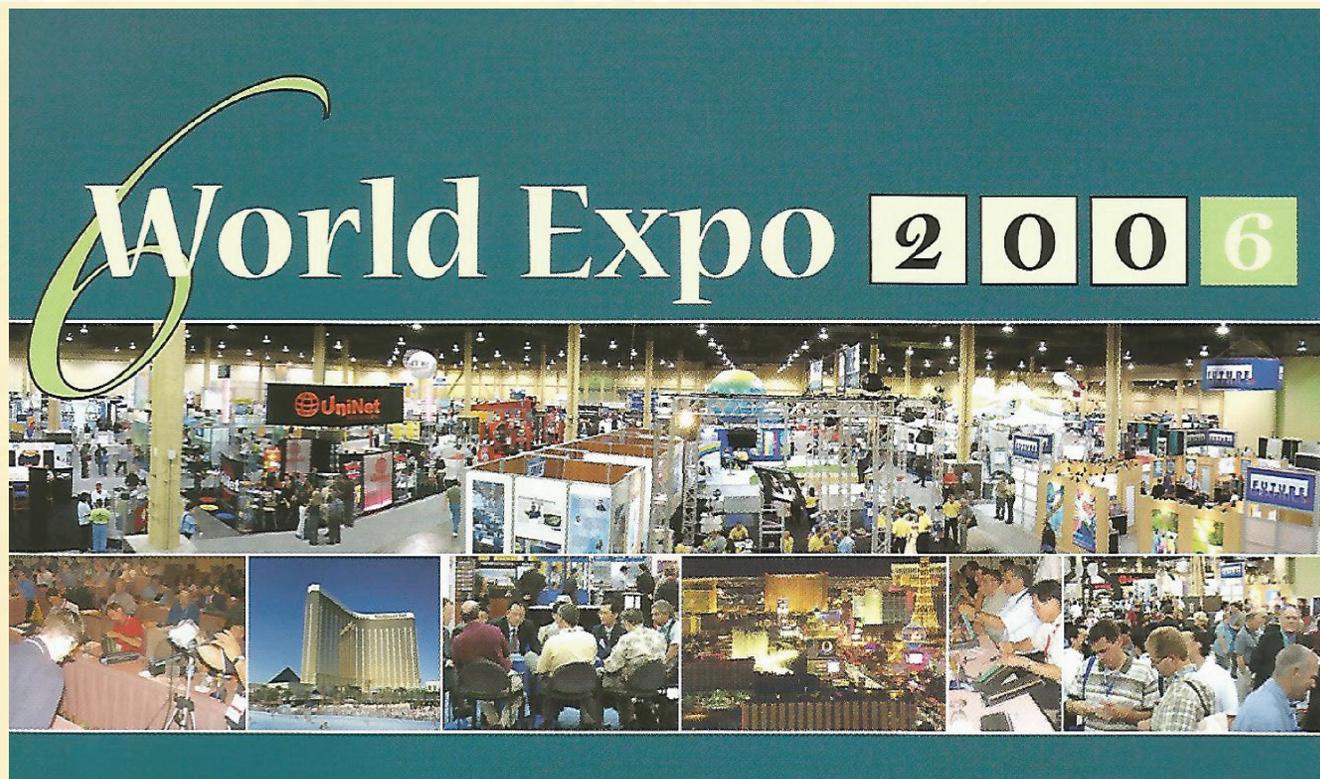
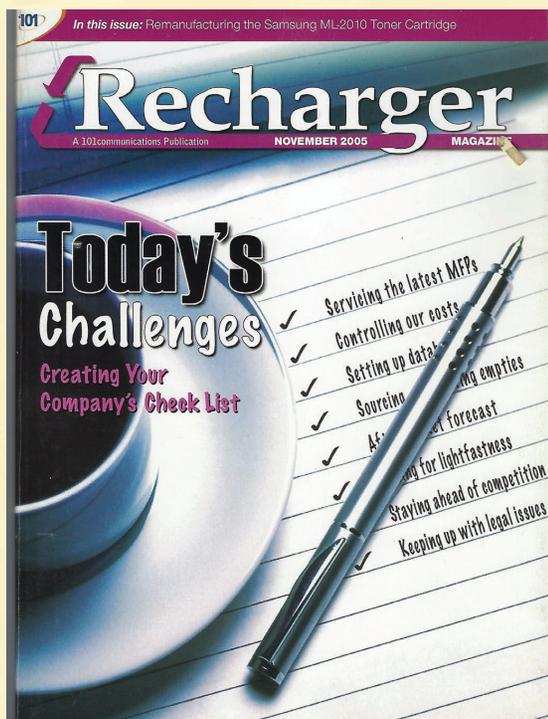
The U.S. printer cartridge remanufacturing industry established in the 1980s grew into a multibillion-dollar circular economy. The industry included remanufacturers, used cartridge collectors, suppliers, resellers, trade publications, and Expos.

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.

**World Expo 2006**

**It's all here!**



**Register Today!**  
[www.rechargermag.com](http://www.rechargermag.com) or call  
 800-280-6216/541-345-3537

**Book Your Hotel**  
[www.rechargermag.com](http://www.rechargermag.com) or call  
 877-632-7800/702-632-7777

*31.4 million visitors come to Las Vegas every year, and 5.8 million are from outside the U.S. There are more than 22,846 convention hotels in Vegas each year - that's more than 62 new ones opening every day!*

**World Expo Attendance**

60% (11,000)	20%
40 (228) Overseas	10%
20 (118) Latin America	6%
20 (118) Other	4%

**Total attendance: 5,900 (rounded figures)**

**Expo Only Pass:**  
 Was Expo only? 90% and you, and 83% consider it good investment of their time and money!

*13% of the annual visitors to Las Vegas come from overseas - more than 4.8 million each year.*

Limited Booth Space Available

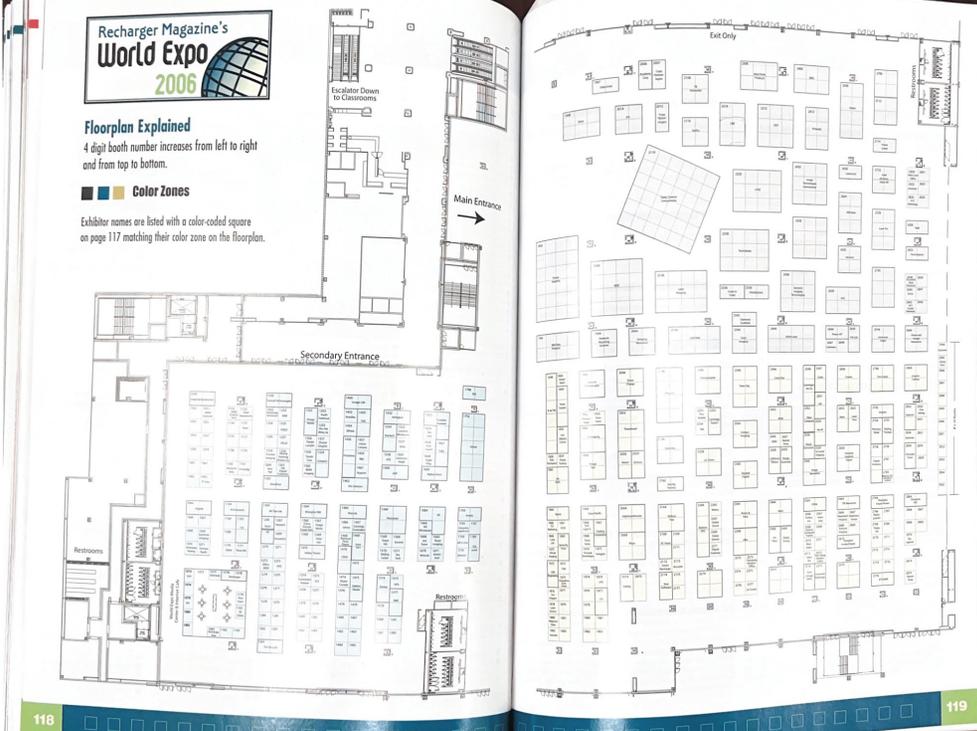


**Recharger Magazine's World Expo 2006**

**Floorplan Explained**  
 4 digit booth number increases from left to right and from top to bottom.

**Color Zones**

Exhibitor names are listed with a color-coded square on page 117 matching their color zone on the floorplan.



118

119

# 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 - 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**

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

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**BUYING SELLING BUYING SELLING BUYING**

**Classified Advertising**

**CARTRIDGES EMPTIES INK**   **CARTRIDGES EMPTIES INK**   **CARTRIDGES EMPTIES INK**

**Virgin Empties For Sale**

HP4, 98A, EX	\$4.00
HPSP	\$4.00
HPSL	\$3.00
HP5S	\$13.00
HP 27X	\$4.50
HP 27A	\$3.50
HP4L, 74A	\$7.00
HP 96A	\$4.50
HP 92A	\$4.00
HP 29X	\$9.00
HP 38A	\$22.00
HP 39A	\$32.00
HP 42A	\$17.00
Canon FX1	\$6.00
Canon FX-2	\$7.00
Canon FX-3	\$6.00
Canon FX-4	\$4.00
Panafax LG3313	\$15.00
HP 11A	\$8.00
HP 12A	\$15.00
HP 49A	\$15.00

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

**VIRGIN EMPTIES FOR SALE**

HP  
Q1338, Q1339, Q5949, C4127X  
DELL  
2500, 2300, 1700  
LEXMARK  
7420, 1530  
SAMSUNG

And much more !!!

- \* Call now for a complete list on virgin inkjet
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- \* We are sell remanufacture toner.
- \* We ship inside of USA
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Contact Carlos Serma  
Reynosa, Mexico  
At 5 min of Border with USA.  
US (956) 212-1574  
MEX 011(52) 899 929-0956  
Mailto:carlav@prodigy.net.mx

**Classified Advertising**

**CARTRIDGES EMPTIES INK**   **CARTRIDGES EMPTIES INK**

**Recycle Tech Solutions**

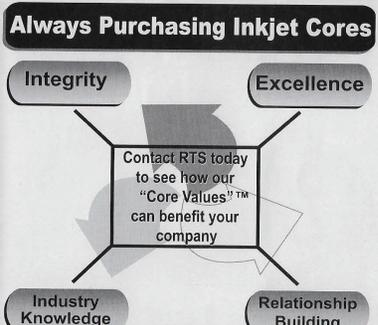
## Your Global Recycling Resource

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@recycltech.org](mailto:press@recycltech.org)

**TOLL FREE 866.836.4114**   **INT'L: 773.277.4800**  
**FAX: 773.277.4801**   **EMAIL:cores@recycltech.org**

INT'LTC  
Proud Member of the INT'LTC

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29X	\$7.00
38A	\$23.00
10A	\$7.00
49A	\$16.00
42A	\$16.00

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ALPHA LASER  
718-317-1263 516-377-9831  
FAX: 718-967-5481 516-377-9831

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INKJETS  
SUPRPLUS OEM

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Phone: 718-886-0346 Fax: 718-480-0117  
Ask for Vinnie or Elliott

**TKH IMAGING**

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**BUYING & SELLING**

For All Your Empty Cartridge, Drum & Fuser Needs!

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- Empty Ink Cartridges
- Surplus OEM Cartridges
- Used Fusers

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Toll Free: 888-EOS-3076

No Minimum Order Required

Phone: 860-291-1900  
Fax: 860-291-1906  
email: eos@snet.net

www.tbargenmagazine.com | May 2006 | 107

## 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](#)
11. [Health Risk from Clone Cartridges](#)
12. [Is this REALLY a remanufactured cartridge?](#)

# Cartridge Waste and the Environment

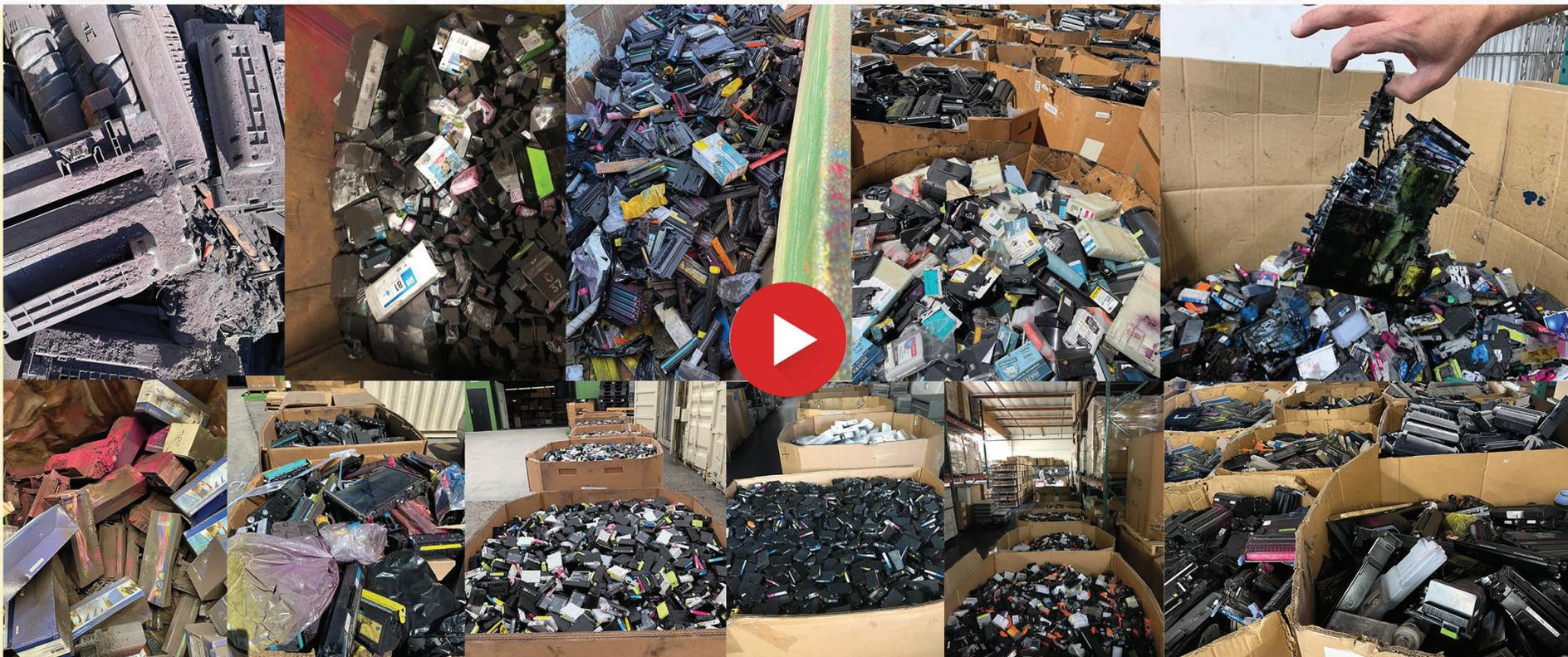
Over 375 million used printer cartridges contaminated with ink and toner residue are ending up in landfills each year and growing. It can take 1,000 years for a printer cartridge to decompose.

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

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

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

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



[Click play button above to view images](#)

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



## Exhibit 3C - List Of Electronic Waste Recyclers

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

Click link to see list of E-waste Recyclers:

[https://drive.google.com/file/d/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/1IhWIBFDUzI2VmQ-45JuP\\_cD87FYdyTdf/view?usp=sharing](https://drive.google.com/file/d/1IhWIBFDUzI2VmQ-45JuP_cD87FYdyTdf/view?usp=sharing)

**Eric Sherman**

---

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

---

**From:** Eric Howell <eric@earthfriendlyrecycling.net>

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

**To:** Eric Sherman <erics@pginkjets.com>

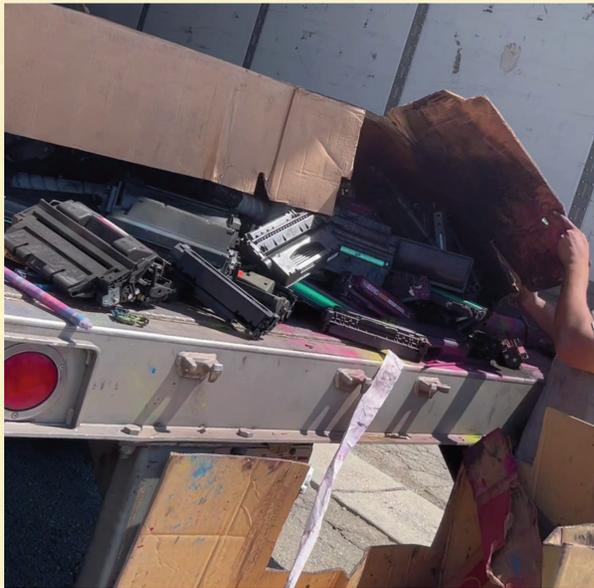
**Subject:** Re: We need your feedback on toner waste

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

---

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

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



# Planet Green and the Remanufacturing Process

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

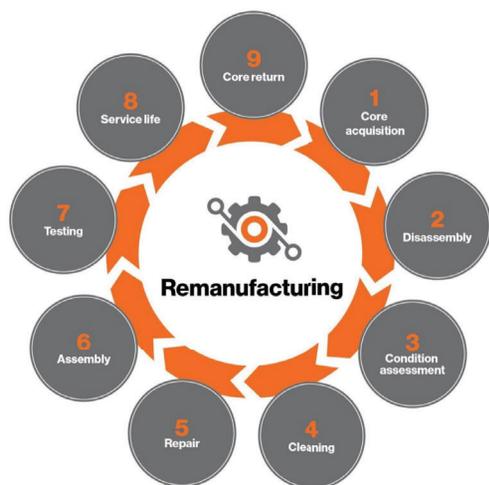
Our remanufacturing process falls within the definition of FTC guidelines for remanufactured products.

[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 \* 20724 Lassen St., Chatsworth, CA 91311

## Planet Green Supply Chain Sourcing Used / Empty Cartridge Cores

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

## Ink Suppliers

- GSC Imaging
- Ink 2000
- Dupont

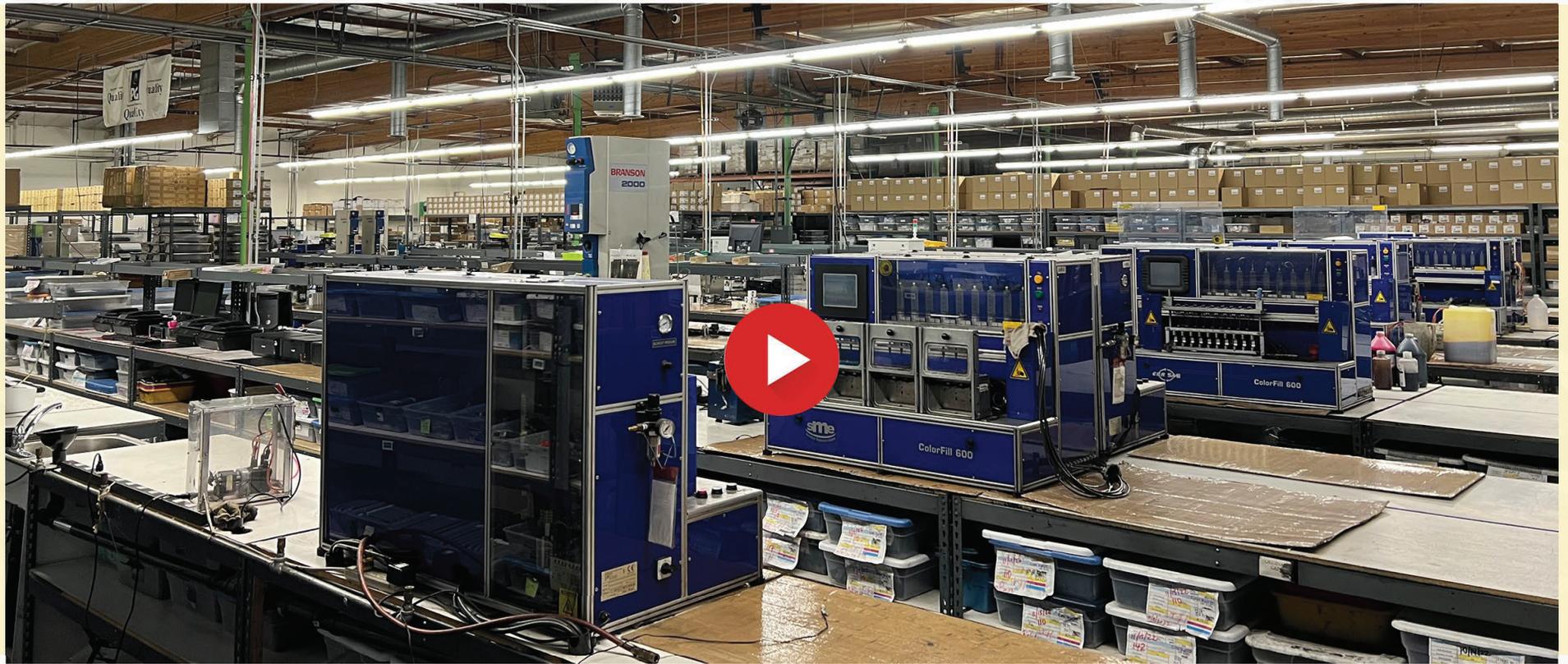
## Chips

- Static Control

## Packaging and labeling

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

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



# 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 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 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 recyclers or remanufacturers; and

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

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

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

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

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

SECONDED BY: 

**ORIGINAL**

kat

SEP 29 2021



HOLLY L. WOLCOTT  
CITY CLERK

PETTY F. SANTOS  
EXECUTIVE OFFICER

March 23, 2022

City of Los Angeles  
CALIFORNIA



ERIC GARCETTI  
MAYOR

OFFICE OF THE  
CITY CLERK

**Council and Public Services Division**  
200 N. SPRING STREET, ROOM 205  
LOS ANGELES, CA 90012  
GENERAL INFORMATION - (213) 978-1133  
FAX: (213) 978-1040

PATRICE Y. LATTIMORE  
DIVISION MANAGER  
CLERK@LACITY.ORG

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

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

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

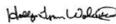
**Agenda Item No.:** 9

**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	Blumenfield	YES	Bonin	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

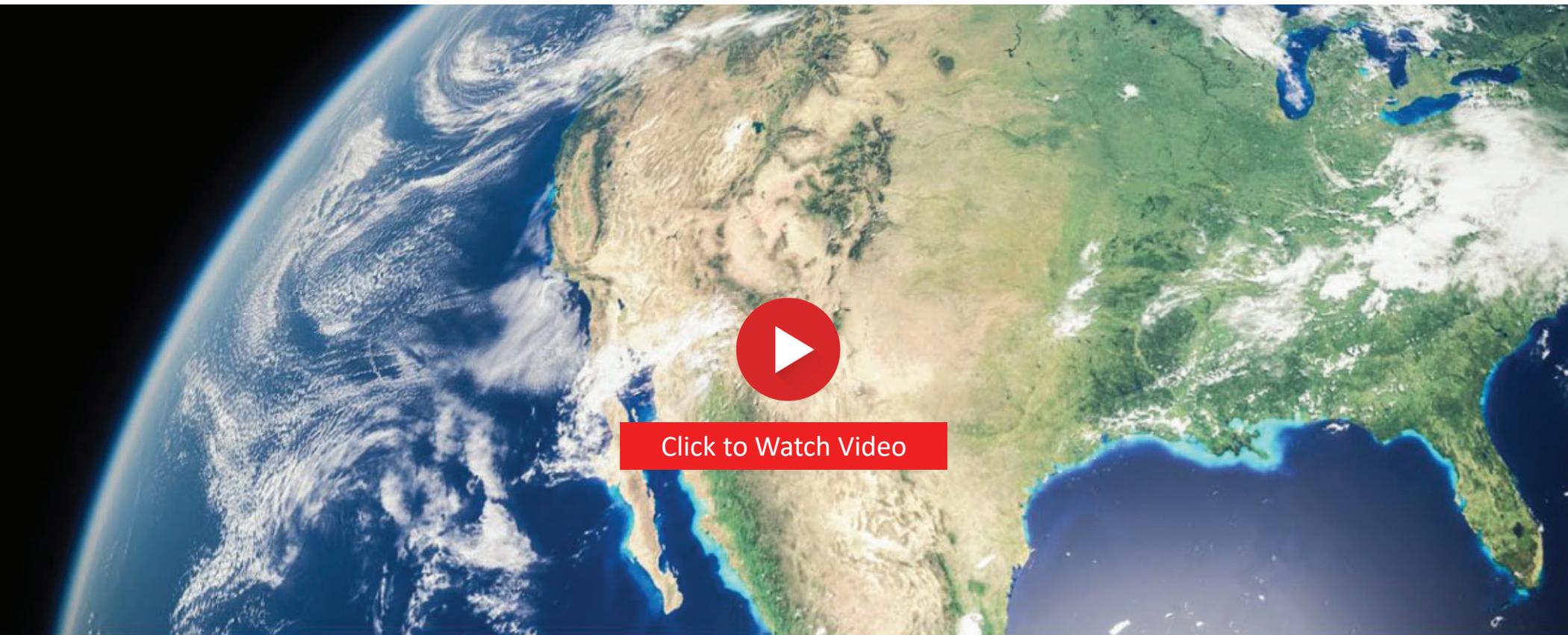
Click link below or copy into browser to see a list of House of Representatives that we are in dialogue with regards to the import of aftermarket printer cartridges that are detrimental our environment.

<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 requiring a seller to be an authorized OEM printer cartridge dealer
3. Remove all counterfeit sellers identified in Exhibit 1A
4. Remove all sellers who cannot verify their environmental claims or use recycling logos, icons or phrases that the product is recycled or can be recycled. This includes cartridges claiming to be “remanufactured.”
5. Required all sellers of aftermarket printer cartridges to take responsibility for their cartridges by providing a verifiable “take back” program for customers to recycle used cartridges. Aftermarket sellers would be prohibited from providing instructions to drop off used cartridges at local e-waste recyclers, major office supply and electronic chain stores, etc.



REDUCE, RECYCLE, REUSE!



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

JEFF BEZOS – NEW YORK TIMES  
2/17/2020