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April 1, 2021

Via First Class and Electronic Mail

Jack Dorsey
Chief Executive Officer
Twitter, Inc.
1355 Market St. San Francisco, CA 94103

Tobias Lütke
Chief Executive Officer
Shopify
33 New Montgomery St #750
San Francisco, CA 94105

Jamie Iannone
Chief Executive Officer
eBay, Inc.
2025 Hamilton Avenue
San Jose, California 95125

Re: Deceptive marketing and sales of fake COVID vaccine cards

Dear Messrs. Dorsey, Lütke and Iannone

The undersigned attorneys general are committed to protecting the safety and well-being of the residents of our states. It has come to our attention that your platforms are being used to market and sell blank or fraudulently completed COVID vaccine cards bearing the Centers for Disease Control and Prevention logo.

We are deeply concerned about this use of your platforms to spread false and misleading information regarding COVID vaccines. The false and deceptive marketing and sales of fake COVID vaccine cards threatens the health of our communities, slows progress in getting our residents protected from the virus, and are a violation of the laws of many states. Multiple states' laws provide for injunctive relief, damages, penalties, and other remedies for such conduct.

The use of your platforms to disseminate the deceptive marketing and sales of fake vaccine cards is a threat to residents of our states. As a result, we are asking you to take immediate action to prevent your platforms from being used as a vehicle to commit these fraudulent and deceptive acts that harm our communities. Such action should include, without limitation: (1) monitoring your platforms for ads or links marketing or selling, or otherwise indicating the availability of, blank or fraudulently completed vaccine cards; (2) promptly taking down ads or links identified through that monitoring; and (3) preserving records, such as the content, username, and actual user identity, pertaining to any such ads or links.

We would appreciate a response to this request by April 9, 2021 setting forth how you intend to comply with the foregoing. We are also available for a virtual meeting to further discuss our concerns. We look forward to your timely response.

Sincerely,




Josh Stein
North Carolina Attorney General



Treg R. Taylor
Alaska Attorney General



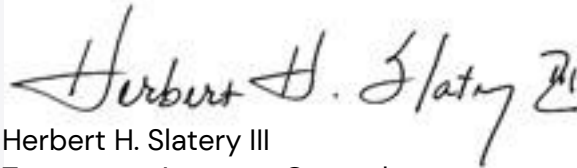
Matthew Rodriguez
Acting California Attorney General



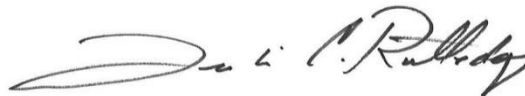
William Tong
Connecticut Attorney General



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Arkansas Attorney General



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Colorado Attorney General



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Delaware Attorney General



Ashley Moody
Florida Attorney General



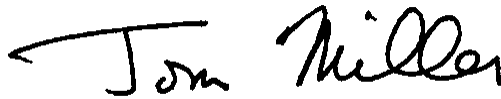
Christopher M. Carr
Georgia Attorney General



Leevin Taitano Camacho
Guam Attorney General



Kwame Raoul
Illinois Attorney General



Tom Miller
Iowa Attorney General



Derek Schmidt
Kansas Attorney General



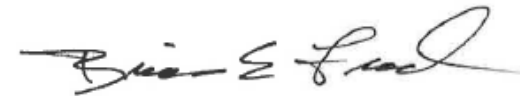
Daniel Cameron
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Maura Healey
Massachusetts Attorney General



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New Jersey Attorney General



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New Mexico Attorney General



Letitia James
New York Attorney General



Wayne Stenehjem
North Dakota Attorney General



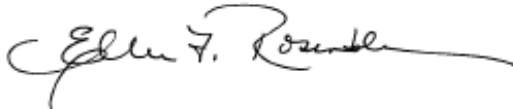
Edward Manibusan
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Ohio Attorney General



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Josh Shapiro
Pennsylvania Attorney General



Peter F. Neronha
Rhode Island Attorney General



Alan Wilson
South Carolina Attorney General



Jason R. Ravensborg
South Dakota Attorney General



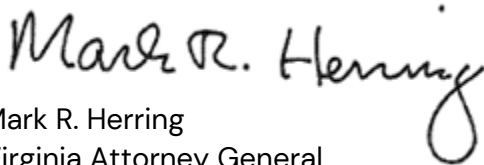
Sean Reyes
Utah Attorney General



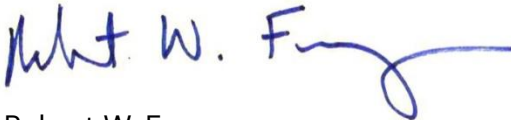
Denise N. George
U.S. Virgin Islands Attorney General



T.J. Donovan
Vermont Attorney General



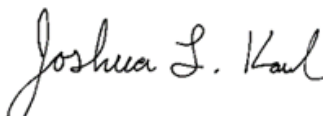
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