



NATIONAL
ASSOCIATION OF
ATTORNEYS GENERAL

PRESIDENT

Karl A. Racine
District of Columbia
Attorney General

PRESIDENT-ELECT

Tom Miller
Iowa
Attorney General

VICE PRESIDENT

Josh Stein
North Carolina
Attorney General

IMMEDIATE PAST
PRESIDENT

Jeff Landry
Louisiana
Attorney General

Chris Toth
Executive Director

1850 M Street NW
12th Floor
Washington, DC 20036
(202) 326-6000
www.naag.org

April 19, 2021

Nathan Garnett
General Counsel
OfferUp.com
1745 114th Ave SE
Bellevue, WA 98004

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 some users on the OfferUp platform are marketing and selling blank or fraudulently completed COVID vaccine cards bearing the logos of both the Centers for Disease Control and Prevention (the CDC) and the Department of Health and Human Services (HHS). An example of such posting is attached to this letter.

We are deeply concerned about this use of your platform 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. Allowing users of your platform to market and sell fake vaccine cards is a threat to residents of our states. As a result, we demand you take immediate action to prevent your platform 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 platform 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 23, 2021 setting forth how you intend to comply with the foregoing. We are also available for a virtual meeting to discuss our concerns. We look forward to your timely response.

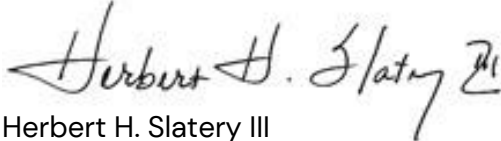
Sincerely,



Kwame Raoul
Illinois Attorney General



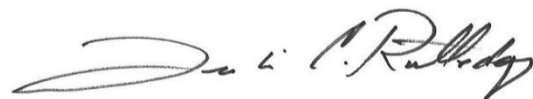
Josh Stein
North Carolina Attorney General



Herbert H. Slatery III
Tennessee Attorney General




Treg R. Taylor
Alaska Attorney General



Leslie Rutledge
Arkansas Attorney General



Matthew Rodriquez
Acting California Attorney General



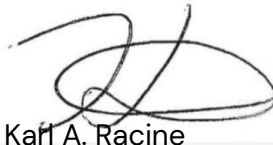
Phil Weiser
Colorado Attorney General



William Tong
Connecticut Attorney General



Kathleen Jennings
Delaware Attorney General



Karl A. Racine
District of Columbia Attorney General



Christopher M. Carr
Georgia Attorney General



Leevin Taitano Camacho
Guam Attorney General



Clare E. Connors
Hawaii Attorney General



Tom Miller
Iowa Attorney General



Derek Schmidt
Kansas Attorney General



Daniel Cameron
Kentucky Attorney General

Jeff Landry
Louisiana Attorney General

Aaron M. Frey
Maine Attorney General

Brian Frosh
Maryland Attorney General

Maura Healey
Massachusetts Attorney General

Dana Nessel
Michigan Attorney General

Keith Ellison
Minnesota Attorney General

Douglas Peterson
Nebraska Attorney General

Aaron D. Ford
Nevada Attorney General

Jane E. Young
New Hampshire Deputy Attorney General

Gurbir S. Grewal
New Jersey Attorney General

Hector Balderas
New Mexico Attorney General

Letitia James
New York Attorney General

Wayne Stenehjem
North Dakota Attorney General

Mike Hunter
Oklahoma Attorney General

Ellen F. Rosenblum
Oregon Attorney General

Josh Shapiro
Pennsylvania Attorney General

Peter F. Neronha
Rhode Island Attorney General

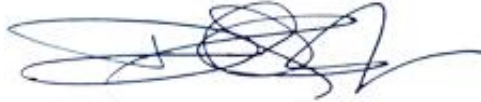
Jason R. Ravensborg
South Dakota Attorney General



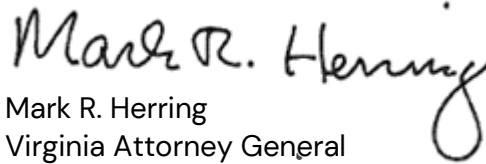
Sean Reyes
Utah Attorney General



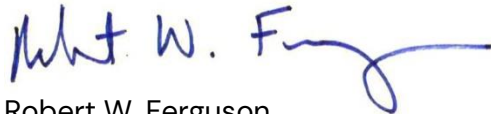
T.J. Donovan
Vermont Attorney General



Denise N. George
Virgin Islands Attorney General



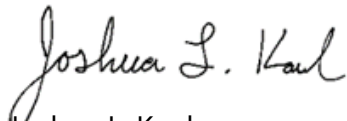
Mark R. Herring
Virginia Attorney General



Robert W. Ferguson
Washington Attorney General



Patrick Morrissey
West Virginia Attorney General



Joshua L. Kaul
Wisconsin Attorney General

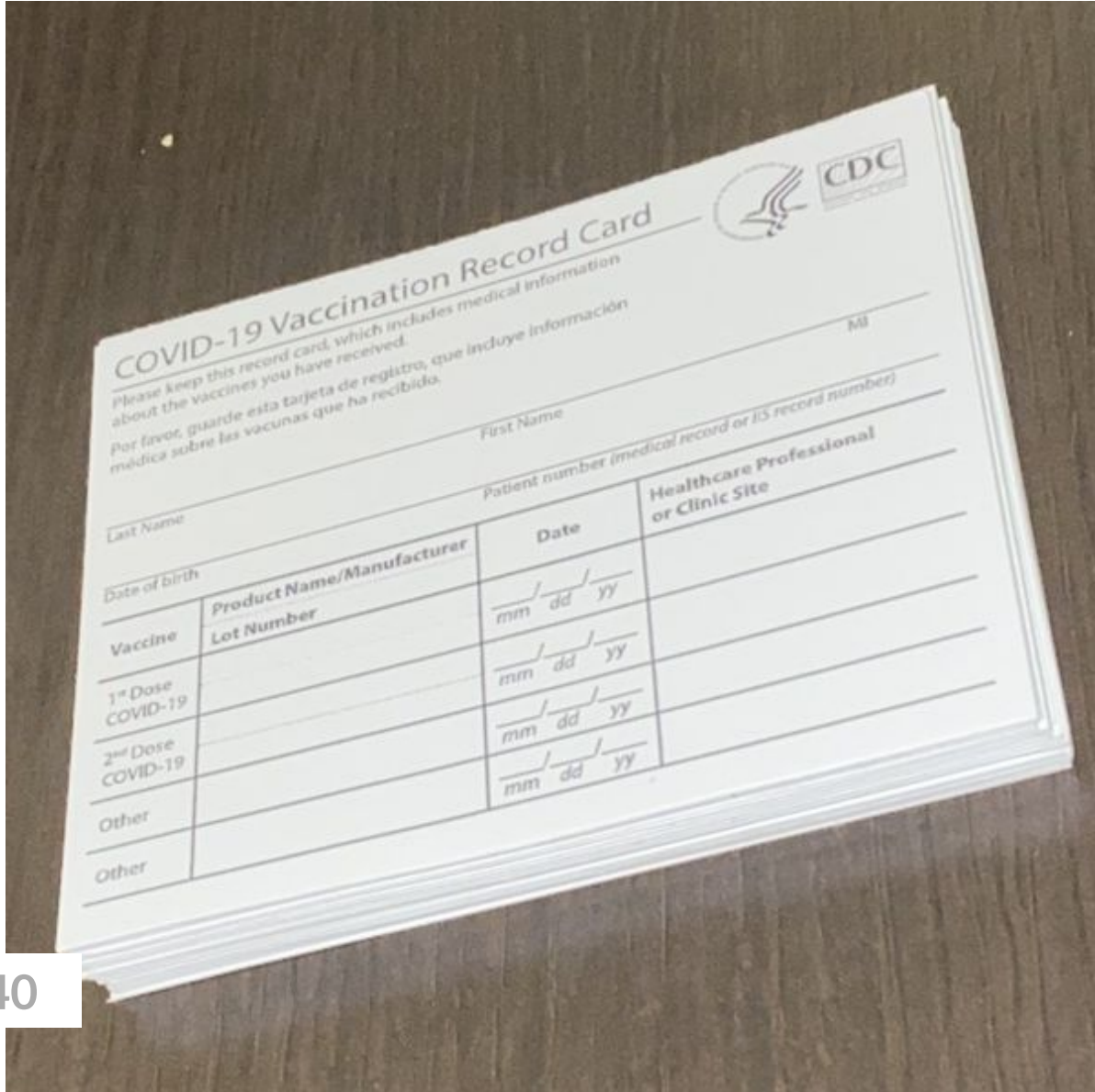


Bridget Hill
Wyoming Attorney General

Attachment: Example of blank vaccine card posting on OfferUp.com

OfferUp

OfferUp is the simplest way to buy and sell locally. Get the free app.



\$40



Vaccine Cards

Ships from Dallas, TX for \$3.49

Posted 1 hour ago in [Collectibles](#)

Make offer

OfferUp

Ask

Save

Share

Jason Mackintyre

Used (normal wear)

"vax cards" info in 2nd photo

Report

Get it shipped to your door

- 1 **Buy now or make an offer**
Make an offer at a price you like—or buy it right away at the seller’s price.
[Learn more about shipping](#)
- 2 **Enjoy!**
You have your item, and you have our buyer-protection guarantee.

Pokemon Disney Action figures Baseball cards Collectible statues Collectible glass >

Explore Terms Privacy Help Safe Trade Spots