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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



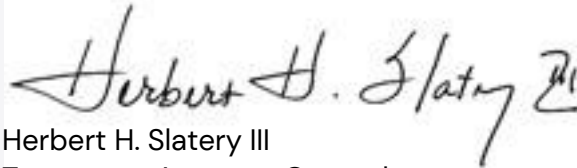
Matthew Rodriguez  
Acting California Attorney General



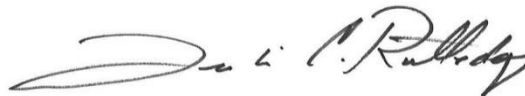
William Tong  
Connecticut Attorney General



Karl A. Racine  
District of Columbia Attorney General



Herbert H. Slatery III  
Tennessee Attorney General



Leslie Rutledge  
Arkansas Attorney General



Phil Weiser  
Colorado Attorney General



Kathleen Jennings  
Delaware Attorney General



Ashley Moody  
Florida Attorney General



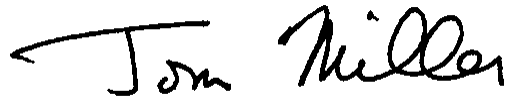
Christopher M. Carr  
Georgia Attorney General



Leevin Taitano Camacho  
Guam Attorney General



Kwame Raoul  
Illinois Attorney General



Tom Miller  
Iowa Attorney General



Derek Schmidt  
Kansas Attorney General



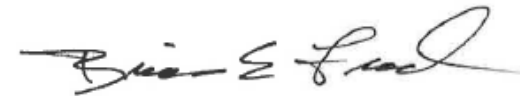
Daniel Cameron  
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Maura Healey  
Massachusetts Attorney General



Dana Nessel  
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Keith Ellison  
Minnesota Attorney General



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Hector Balderas  
New Mexico Attorney General



Letitia James  
New York Attorney General



Wayne Stenehjem  
North Dakota Attorney General



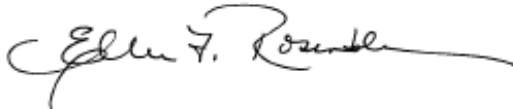
Edward Manibusan  
Northern Mariana Islands Attorney General



Dave Yost  
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Mike Hunter  
Oklahoma Attorney General



Ellen F. Rosenblum  
Oregon Attorney General



Josh Shapiro  
Pennsylvania Attorney General



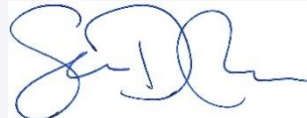
Peter F. Neronha  
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Alan Wilson  
South Carolina Attorney General



Jason R. Ravensborg  
South Dakota Attorney General



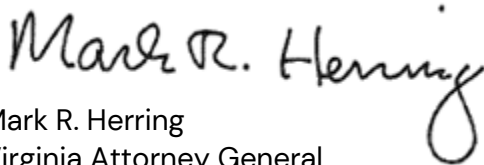
Sean Reyes  
Utah Attorney General



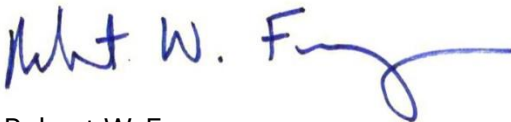
Denise N. George  
U.S. Virgin Islands Attorney General



T.J. Donovan  
Vermont Attorney General



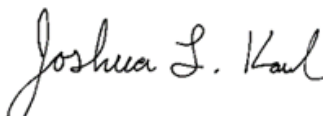
Mark R. Herring  
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*Bridget Hill*

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