



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](http://www.naag.org)

April 19, 2021

Nathan Garnett  
General Counsel  
OfferUp.com  
1745 114<sup>th</sup> 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.

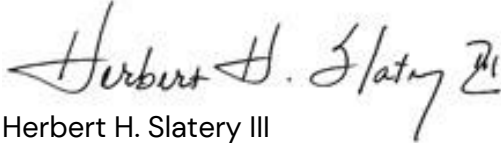
Sincerely,



Kwame Raoul  
Illinois Attorney General



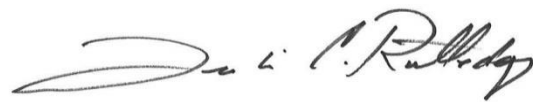
Josh Stein  
North Carolina Attorney General



Herbert H. Slatery III  
Tennessee Attorney General



Treg R. Taylor  
Alaska Attorney General



Leslie Rutledge  
Arkansas Attorney General



Matthew Rodriquez  
Acting California Attorney General



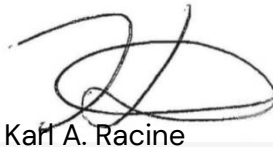
Phil Weiser  
Colorado Attorney General



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



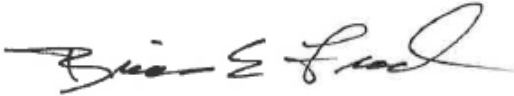
Daniel Cameron  
Kentucky Attorney General



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



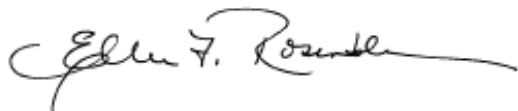
Letitia James  
New York Attorney General



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



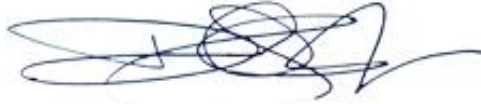
Jason R. Ravensborg  
South Dakota Attorney General



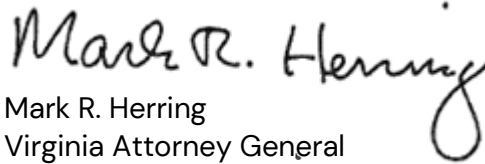
Sean Reyes  
Utah Attorney General



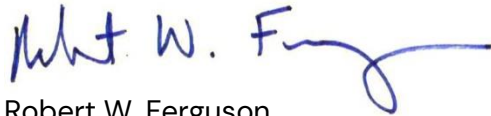
T.J. Donovan  
Vermont Attorney General



Denise N. George  
Virgin Islands Attorney General



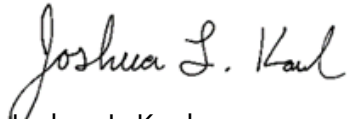
Mark R. Herring  
Virginia Attorney General



Robert W. Ferguson  
Washington Attorney General



Patrick Morrissey  
West Virginia Attorney General



Joshua L. Kaul  
Wisconsin Attorney General

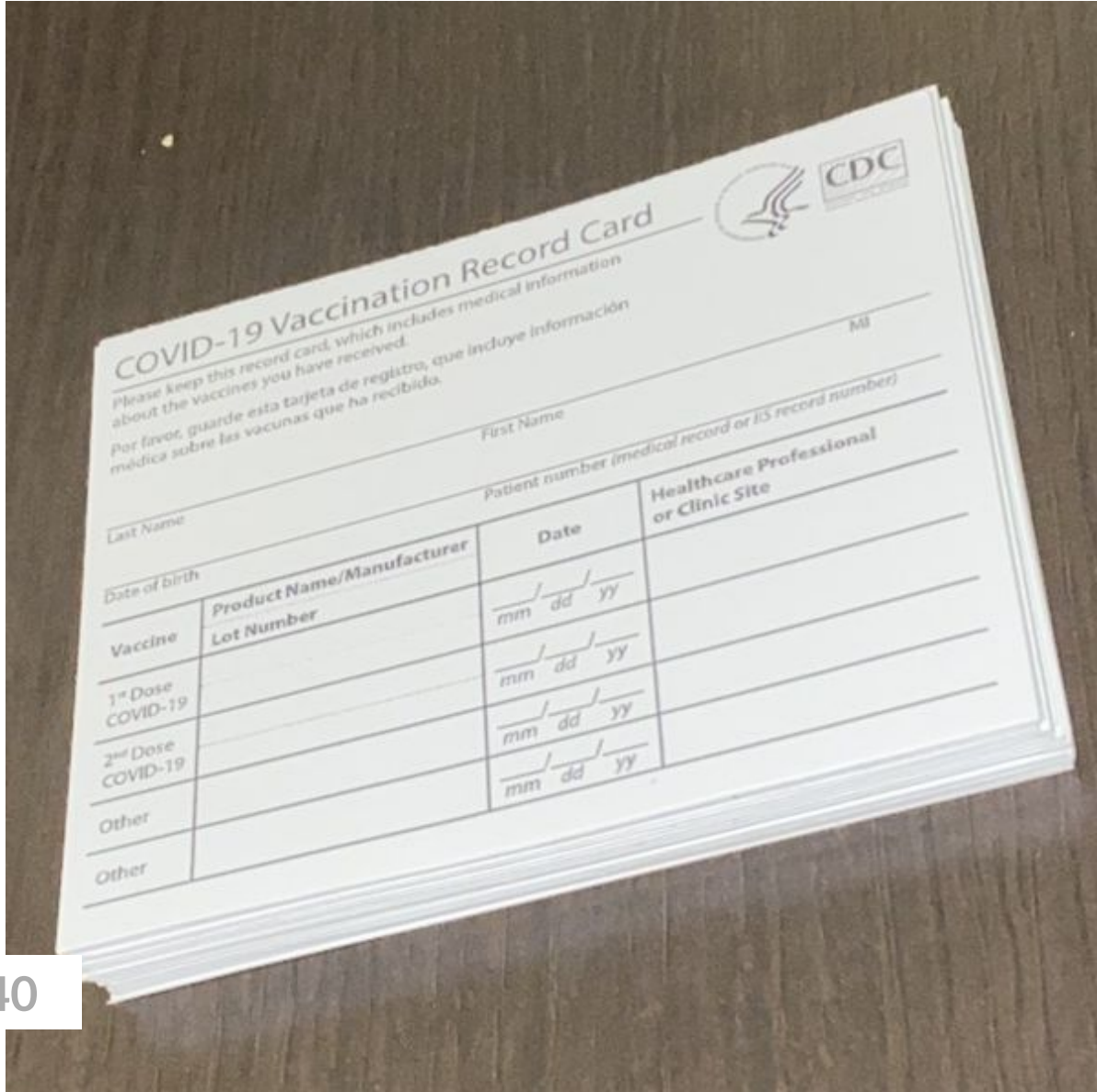


Bridget Hill  
Wyoming Attorney General

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