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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

BENJAMIN JOSEPH LIGERI,)
)
Plaintiff,)
)
v.) Civil Action No. 2:25-cv-00796-TL
)
AMAZON.COM SERVICES, LLC,) JURY TRIAL DEMANDED
)
Defendants.)
_____)

**COMPLAINT FOR TRADEMARK INFRINGEMENT, TORTIOUS
INTERFERENCE, CONVERSION, AND DECLARATORY RELIEF**

I. INTRODUCTION

1. This case concerns a corporation that has grown fundamentally dismissive of the rule of law. Amazon.com Services LLC (“Amazon”) has taken it upon itself to override the authority of the United States Patent and Trademark Office (“USPTO”) by unilaterally engaging in Kafkaesque reclassification games — labeling federally registered trademarks as “abusive” and inventing other pretextual justifications — to block rightful brand owners from controlling their listings and to pave the way for Amazon and its preferred sellers to overwrite established brands with fabricated or self-serving names.

Through these tactics, Amazon systematically misappropriates brand goodwill, falsely designates the origin of products, and infringes on protected trademarks in violation of the Lanham Act and state law. Amazon exercised imperial control over Plaintiff’s brands, treating rightful ownership as irrelevant. Amazon does not simply mimic a trademark examiner, a judge, or a legislature — it has usurped all three roles, overriding USPTO mandates, intellectual property rights, blocking lawful brand ownership, and imposing private brand decrees that hijack trademark goodwill without judicial oversight.

- 1 2. These misappropriations of trademark goodwill and false designations of origin are not
2 incidental mistakes. They are the direct result of Amazon’s deliberate policy of stripping
3 rightful brand owners from Brand Registry, blocking access to their listings to update photos
4 and specs, and enabling fabricated or meaningless brand names to overwrite decades of
5 established goodwill.

6 Amazon’s weaponization of pseudo-judicial reclassifications — including but not limited to
7 labeling brands as “abusive” — serves as a pretext for these deeper and more fundamental
8 violations of trademark law and marketplace integrity.

- 9
10 3. Benjamin Joseph Ligeri ("Plaintiff") is the owner of multiple registered trademarks and the
11 original creator of highly successful ecommerce listings — products that became so
12 culturally ubiquitous that they were organically advertised by mega celebrities like Miley
13 Cyrus without payment.

14 Plaintiff launched and sold these products predominantly on Amazon.

15
16 After years working in the Amazon space, Plaintiff operated a seller account known as
17 “Health and Household,” which would now be approximately twelve years old if Amazon
18 had not baselessly deactivated it in 2023, confiscating the funds, inventory, and brands
19 managed within.

20 Amazon used an arbitrary false pretense to seize Plaintiff’s legacy account, withhold over
21 \$70,000 in pending disbursements (generated from hundreds of thousands of dollars in
22 discounted, platform-enriching sales from brands he owned personally), and revoke his
23 Brand Registry access — stripping him of control over his own trademarks and moving in to
24 absorb Plaintiff’s brand goodwill, undermine marketplace recognition, and misappropriate
25 the commercial equity Plaintiff painstakingly built over more than a decade.

- 26 4. Even without direct access to his original account, Plaintiff continues to license his
27 trademarks and supply products to authorized distributors who sell on Amazon. He has
28 fought, day and night and year after year, to keep his brands from complete obliteration.

1 5. Plaintiff has had to assist his licensed distributors through the chaos of Amazon hijacking
2 legitimate listings, Amazon blocking access to vital brand metadata, and Amazon preventing
3 products wholesalers lawfully purchased from being sold. Plaintiff has watched helplessly as
4 Amazon rebranded his listings under fabricated names like “AYOJOY,” “GEEGVV,” and
5 “EVRBLOCK,” while simultaneously blacklisting his trademarks from Brand Registry with
6 no meaningful explanation or recourse, and while ignoring any attempt to remediate
7 including letters to Amazon Legal and court action.

8 The cumulative effect of Amazon’s misconduct has been the systematic destruction of
9 Plaintiff’s brand equity, consumer goodwill, and marketplace recognition, inflicting ongoing
10 and irreparable harm to Plaintiff’s commercial interests.

11 6. This lawsuit seeks damages, injunctive relief, and a declaratory judgment affirming
12 Plaintiff’s rights under Federal and Washington law. Amazon’s conduct constitutes
13 trademark infringement, false designation of origin, unfair competition, conversion, tortious
14 interference with business expectancies, and the intentional misappropriation of Plaintiff’s
15 brand goodwill.

16 These violations were not isolated errors, but part of a systematic and willful pattern of
17 misconduct that breaches the most fundamental principles of intellectual property protection,
18 subverts the authority of the United States Patent and Trademark Office, and undermines
19 marketplace integrity.

20
21 7. The following facts, drawn from direct evidence, documentary records, and Amazon’s own
22 communications (some of which are attached as exhibits herein), establish the scope,
23 pattern, and deliberate nature of the misconduct alleged.

24 **II. PARTIES**

25
26 8. Plaintiff Benjamin Joseph Ligeri is an individual residing in Malabar, Florida. He is the
27 rightful owner of multiple registered trademarks including but not limited to “PrimeMed”,
28 Cool Chimpanzee,” “Point”, “Skin Deep”, and “Green Sky.”

- 1 9. Defendant Amazon.com Services LLC is a Delaware limited liability company
2 headquartered in Seattle, Washington. It conducts business throughout the United States and
3 operates the Amazon.com ecommerce platform.

4
5 **III. JURISDICTION AND VENUE**

- 6
7 10. This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. § 1331
8 (federal question jurisdiction) and 28 U.S.C. § 1338(a) (jurisdiction over trademark claims),
9 because this action arises under the Lanham Act, 15 U.S.C. § 1051 et seq., and involves
10 claims of trademark infringement, false designation of origin, unfair competition, and
11 related violations of federal law.

12 This Court also has supplemental jurisdiction over Plaintiff's related state law claims —
13 including tortious interference with business expectancy, conversion, and intentional
14 misappropriation of trademark goodwill — under 28 U.S.C. § 1367, because those claims
15 are so related to Plaintiff's federal claims that they form part of the same case or controversy
16 under Article III of the United States Constitution.

- 17 11. This Court has personal jurisdiction over Defendant Amazon.com Services LLC because it
18 resides in this district, maintains its principal place of business in King County, Washington,
19 regularly conducts substantial business in Washington and throughout the United States, and
20 the claims asserted herein arise directly from Defendant's business activities in this district.

- 21 12. Venue is proper in this district under 28 U.S.C. § 1391(b)(1) and (b)(2), because Defendant
22 Amazon.com Services LLC resides in this district and a substantial part of the events or
23 omissions giving rise to the claims occurred here.

24
25 Venue is also proper in King County, Washington under RCW 4.12.025 because Defendant
26 maintains its principal place of business there and consistently centers its contractual
27 agreements, venue provisions, and litigation transfer requests around King County.
28

IV. FACTUAL ALLEGATIONS

8. Plaintiff has owned and operated numerous brands, including Cool Chimpanzee, Ebion, Skin Deep, Biological Essentials, Green Sky, and many others. These brands have been properly registered with the USPTO and properly rely on GS1 for GTIN management.
9. Plaintiff previously sold these brands on Amazon and was the original creator of their listings. Even after exiting the marketplace, Plaintiff maintained ownership of the brands and continued to license the trademarks to wholesalers and resellers.
10. Beginning in 2024, Plaintiff discovered that Amazon was allowing (and/or itself executing) brand name changes on his listings. Without Plaintiff's consent, listings he created were modified to reflect fake brand names such as "AYOJOY," "JNAB," "FQQF," "GAGACISO," "GEEGVV," and others.
11. The original branded packaging remains visible in the product photos, but the listing shows a different brand—a clear case of brand hijacking that violates both consumer protection standards and intellectual property law, and even purportedly violates Amazon's own published policies.
12. When Plaintiff or his licensees attempted to correct hijacked brand names, Amazon refused, asserting that the original brand was now considered "abusive" and that the substitute brand would now takeover the listing. In one case, Amazon wrote: "After investigating, we discovered that the 'Cool Chimpanzee' brand has a status that is ABUSIVE."

When Plaintiff sought to correct recent hijackings, Amazon responded with form notices falsely claiming that Amazon does not allow brand changes—even though Plaintiff was seeking to reverse an unauthorized brand change, not initiate one. Through these tactics, Amazon systematically misrepresented rightful brand restorations as impermissible "changes," frustrating brand owners' efforts to reclaim their intellectual property and further entrenching fraudulent brand overwrites.

1 13. Amazon has created a self-reinforcing enforcement regime in which rightful brand owners
2 are banned from correcting hijackings, while bootleggers are freely allowed to overwrite
3 listing data.

4 14. Plaintiff provided Amazon with GS1 certificates, USPTO registrations, screenshots, emails,
5 and written cease-and-desist letters. In return, he received automated responses, further
6 denials, and threats to his business.

7
8 15. Amazon's refusal to restore Plaintiff's brands is not an accident or oversight. It is an
9 entrenched and deliberate practice. Amazon operates one of the most technologically
10 advanced platforms in the world, fully capable of verifying brand authenticity through GS1
11 records, USPTO registrations, attorney of record data (to whom it sends verification codes
12 when it chooses), and historical listing metadata.

13 Further, Amazon maintains strict written policies stating that only brand owners may control
14 listings, that brand names cannot be changed on active and established listings, and that
15 unregistered or fictitious brands are prohibited from listing products altogether. These
16 policies exist for good reason: allowing a product sold for years under the name "Point" to
17 suddenly appear under the fictitious brand "AYOJOY" would deceive customers and violate
18 basic principles of marketplace integrity.

19 Yet in practice, Amazon permits exactly these three things it prohibits by policy — and
20 worse — it enables fake brands to overwrite real ones, blocks rightful brand owners from
21 correcting the hijackings, and retaliates against them with account suspensions, listing
22 takedowns, or threats to seize inventory and funds. It does so in flagrant and intentional
23 violation of its own fraudulent stated, which serve as binding contractual commitments to
24 brand owners like Plaintiff who build (or permit the building of) their brands on Amazon's
25 platform.

26 Meanwhile, Amazon profits more from continued sales under the misrepresented listings,
27 benefiting directly from the consumer confusion and brand misappropriation it enables. In
28 effect, Amazon has created a private totalitarian enforcement regime, where reporting a
hijacker or bootlegger carries more risk than being one.

1 In many cases, Amazon is the perpetrator of the brand hijacking.

2
3 This pattern of misconduct has caused Plaintiff significant economic harm and irreparable
4 damage to his brands and business relationships.

5
6 **V. CAUSES OF ACTION**

7
8 **Count I: Trademark Infringement and False Designation of Origin (15 U.S.C. §§**
9 **1114, 1125(a)) and RCW 19.77 et seq**

10 16. Plaintiff re-alleges all prior paragraphs as though fully set forth herein.

11
12 17. Defendant has knowingly permitted, facilitated, and in many cases directly initiated the
13 rebranding of Plaintiff's trademarked products under different names.

14
15 18. This conduct creates customer confusion, dilutes brand recognition, and infringes on
16 Plaintiff's exclusive trademark rights.

17 19. Defendant has compounded the infringement by refusing to restore Plaintiff's brand names
18 even when presented with overwhelming and irrefutable evidence, including GS1
19 registrations, USPTO certificates, original listing metadata, product packaging photographs,
20 and sales history — not to mention the primary internal authentication records already
21 maintained by Defendant, which independently confirm brand ownership without the need
22 for Plaintiff's additional submissions.

23 20. Defendant's claim that it cannot determine the rightful brand owner — despite direct access
24 to the original listing data, GS1 registration records, USPTO trademark databases, and on-
25 product branding — constitutes a willful and bad-faith refusal to correct known trademark
26 hijackings. There's no ambiguity at all in these cases.

1 And, in other contexts, Defendant routinely and instantaneously uses these same tools of
2 theirs to punish sellers for even minor technical inconsistencies, such as slight discrepancies
3 between GS1 records and listing details. Defendant's feigned inability to resolve brand
4 hijackings — despite having all necessary information in its own possession — is not a
5 mistake; it is a calculated dilatory tactic, demanding redundant documentation to obscure
6 facts already known, suppress rightful brand owners, and facilitate consumer deception.

7 21. This pattern is not legitimate enforcement. It is a fraudulent abdication of Defendant's own
8 policies and marketplace duties. When enforcement serves Amazon's interests — punishing
9 sellers — it acts with speed and precision. When enforcement would favor rightful brand
10 owners, Amazon feigns ignorance, fabricates pseudo-"investigations," and defaults to
11 calculated delay and ultimate inaction.

12 **Count II: Tortious Interference with Business Expectancy**

13 22. Plaintiff re-alleges all prior paragraphs.

14
15 23. Plaintiff maintains ongoing business relationships with various wholesalers and resellers.
16 Amazon has intentionally interfered with these relationships by refusing to correct hijacked
17 listings, blocking new listings under Plaintiff's brands, sending misleading warnings to his
18 wholesalers, and in some cases, deactivating the wholesalers' accounts entirely.

19
20 In at least one recent case, Amazon shut down the account (and seized the assets of) a small,
21 hardworking wholesaler who was legitimately reselling Plaintiff's PrimeMed brand socks
22 and other products — falsely accusing the account owner of being a "related account" of
23 Plaintiff's without evidence or due process. Plaintiff had never even met this hardworking
24 wholesaler that he knew of, that's how removed he was from being related.

25 The term "related accounts" is yet another one of Amazon's fraudulent constructs: a vague
26 and undefined policy used as a veneer of legitimacy to justify control, retaliation, and
27 outright theft.
28

24. These actions by Defendant were intentional and done without legal or contractual justification.

Count III: Conversion

25. Plaintiff re-alleges all prior paragraphs.

26. By hijacking Plaintiff's listings and blocking his ability to control or license them, Amazon has wrongfully exercised control over Plaintiff's property. In doing so, Amazon intentionally misappropriated Plaintiff's brand goodwill, commercial reputation, and marketplace recognition, leveraging these assets to enrich its own platform presence and divert consumer loyalty.

Count IV: Declaratory Relief

27. Plaintiff seeks a declaration that Amazon has no lawful right to prevent Plaintiff or his licensees from listing products under brands registered to Plaintiff.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests judgment against Defendant as follows:

A. General and statutory damages in excess of ten million dollars (\$10,000,000.00), with the precise amount to be proven at trial, including damages authorized under 15 U.S.C. § 1117 for trademark infringement;

B. Preliminary and permanent injunctive relief:

(i) prohibiting Defendant from altering, overwriting, or blocking Plaintiff's brand listings without Plaintiff's consent or due process;

(ii) requiring Defendant to restore control over Plaintiff's brands and correct all improperly hijacked listings; and

(iii) enjoining Defendant from engaging in future hijackings or reclassifications of Plaintiff's trademarked products;

C. Declaratory relief affirming Plaintiff's lawful ownership and control rights over his trademarks and associated Amazon listings;

D. An award of Defendant's profits unjustly obtained through the misappropriation and false designation of Plaintiff's brands, pursuant to 15 U.S.C. § 1117(a), and as otherwise permitted by law.

E. An award of Plaintiff's costs, disbursements, and reasonable attorney's fees to the extent permitted by law;

F. Such other and further equitable, injunctive, and monetary relief as the Court deems just and proper.

G. An award of exemplary and/or punitive damages for Defendant's willful, malicious, and bad-faith conduct, in an amount to be determined at trial.

H. Plaintiff further reserves the right to seek statutory damages, enhanced damages, treble damages, and any other remedies permitted by 15 U.S.C. § 1117, including damages for willful infringement and false designation of origin, subject to proof at trial.

VII. EXHIBIT LIST

- **Exhibit A** – Unanswered cease-and-desist letter and correspondence with Amazon.
- **Exhibit B** – Chart of brand name changes (small representative sampling of 10 examples)
 - **Exhibit B-1** – Screenshot: Point brand listing hijacked as AYOJOY

- **Exhibit B-2** – Screenshot: Ebion brand listing hijacked as EVRBLOCK
- **Exhibit B-3** – Screenshot: Skin Deep listing hijacked as GEEGVV
- **Exhibit B-4** – Screenshot: Cool Chimpanzee listing hijacked as AOSBET
- **Exhibit C** – Amazon chat log admitting inability to track changes
- **Exhibit D** – Brand Registry rejection citing unrelated “abuse”
- **Exhibit E** – Email from Amazon denying listing correction due to brand being flagged as "abusive".

Respectfully submitted,



Benjamin Joseph Ligeri

Plaintiff, Pro Se
3120 Corey Rd
Malabar, FL 32950
321-831-2595
benligeri@gmail.com

Dated: ____4-28-25____

Exhibit A - Cease and Desist Letter

Benjamin Ligeri
3120 Corey Rd
Malabar, FL 32950
401-525-6340
benligeri@gmail.com

Feb 26, 2025

Amazon.com Legal Dept
P.O. Box 81226
Seattle, WA
98108-1226

All statements made under oath and under penalty of perjury.

Dear Amazon,

I have been trying to resolve matters of intellectual property hijacking of my brands for a very long time. My IP enforcement team's research shows that Amazon is the cause of the hijacked brands, not an actual seller or traditional hijacker. Amazon is sending notices to wholesalers who buy branded products from me that more or less state that my intellectual property has done something wrong and therefore has lost the ability to be a brand on Amazon (see enclosed document where **Amazon states that the brand "Cool Chimpanzee" is misusing another brand's intellectual property**). None of these accusations have any basis in reality. None of these brands have ever misused any other brand. To begin with, a brand is not a person, has no mens rea, and can't do anything wrong. I am also trying to sell my intellectual property and license my intellectual property to other Amazon sellers who can re-add it to brand registry to manage it, but those applications are being denied as well (see enclosed document entitled "**Brand Registry request for PrimeMed**"). If I sell a brand, it shouldn't carry any stigma (whether imagined or not) from my use of it as the new owner is now in control of it. Please also see letter (enclosed) sent to a myriad of Amazon emails as well as attorneys for Amazon on Feb 13th, 2025.

Recent brand changes that need to be corrected and we need to understand how this is happening:

B0B8185TY8 – "Cool Chimpanzee" brand Manual Card Shuffler changed to fake brand "Garifon"
B09FYVSL8L – "Green Sky" brand geriatric / yoga slip socks changed to fake brand "Gagaciso"
B09SNS9SWN – "Point" brand nosebleed plugs changed to presumably fake brand "Avojoy"

Sincerely,

Benjamin J Ligeri



Benjamin Joseph <benligeri@gmail.com>

re: URGENT MATTER OF INTELLECTUAL PROPERTY

8 messages

Ben Ligeri <benligeri@gmail.com>

Thu, Feb 13, 2025 at 10:57 AM

To: cs-reply@amazon.com, ANTITRUST <antitrust@ftc.gov>

Cc: Amazon <notice-dispute@amazon.com>, copyright@amazon.com, jeff@amazon.com, pq-product-review@amazon.com, primary@amazon.com, "Magliery, John" <johnmagliery@dwt.com>, "Sgro, Adam" <adamsgro@dwt.com>, Paulus H Chan <phc_ssg@yahoo.com>

Bcc: [REDACTED]

Dear Amazon and Attorneys of Amazon,

Wholesalers of my brands on Amazon are complaining that the brand names are changing to hijacked fake brands and they are in turn being blocked from selling product they purchased from me and my companies and being asked by Amazon for authorization/ownership of said "fake brands" in some kind of Alice in Wonderland level stunt.

I have no access to the Amazon platform. I don't sell on Amazon, I don't have access to a brand registry account or any other Amazon tools except the public:

<https://www.amazon.com/report/infringement> which is a service that no longer works.

I would like to resolve these brand new brand matters without having to file suit and injunction and I'm copying my attorneys at DWT who are handling other litigation I have with Amazon to see if they can offer any suggestions as well as Amazon department teams I've researched as possibly being the right avenue to correct these intellectual property ills.

Wholesalers are sending me cases they're filing with Amazon to show me the kinds of responses they're getting (see attached). Amazon is accusing my brands of being "malicious" somehow as if a brand could be personified to have deleterious human traits. A brand is but a name for a product that a consumer comes to know. Here's a couple examples from a brand that has done millions on the Amazon marketplace known as "Cool Chimpanzee", a brand that I acquired many years ago at the time of its launch on ecommerce sites such as Amazon.

These 300pk Cool Chimpanzee glow stars were created under the brand "Cool Chimpanzee", I remember I created the listing myself back when I was an Amazon seller. The brand is using a valid GS1 UPC registered to "Cool Chimpanzee". See attached "GS1 Statement.jpg" where GS1 claims Amazon can validate this with the GS1 database and Amazon has made the same claims before but are now asking generic sellers for GS1 documents that only I have to further complicate the matter. The entirety of documentation from Amazon that I've received from unaffiliated third parties proves Amazon is intentionally ripping these brands to retaliate against my lawsuits using tech muscle like Eric Smith. We would like to see if Amazon (now that they've been caught) would like to stop doing so and restore these brands to their natural state and thereby honor USPTO and federal laws.

If not, I will be commencing an action in my home state of Florida to address these new matters. I am not an Amazon seller, but merely an IP holder as of now, and as DWT and Amazon, and all parties are 100% aware, I am not subject to any BSA or arbitration or venue clauses

This was once super simple for Amazon to see that a listing was created under the brand "Cool Chimpanzee", and could therefore not be changed to another brand. Now Amazon's system has added multiple layers of subterfuge to make a once kindergarten-level maintenance and security process a now Space-X-level process.

Please see four screenshots of high selling products (and there are more)...

- 1) B0B1GFY6VB - Cool Chimpanzee Glow Stars changed to brand "JNAB"
- 2) B0B8185TY8 - Cool Chimpanzee Manual Card Shuffler changed to brand "Garifon"
- 3) B09FYVSL8L - Green Sky brand geriatric / yoga slip socks changed to brand "Gagaciso"
- 4) B09SNS9SWN - Point brand nosebleed plugs changed to brand "Avojoy"

What's strange is Amazon is so strict about brands. They *"don't"* let you change the brand of a product (and they shouldn't of course) as it is hard wired to the product and its UPC and customer expectation. None of which can be changed midstream. Amazon *"doesn't"* let you list under fake brands either as they require USPTO validation but these brands are all fake.

I would like to inquire about getting my brands bundled into a brand registry account where I can control and protect said brands. Short of that, I would like Amazon to see to it that these brands are restored to their proper name and gated from such changes. I can provide a list of all brands I own to Amazon if there is a special lock box they can put them in to prevent changes. In the past, ALL brands were in this lockbox across the entire Amazon marketplace, now it seems to be a "special" lockbox only earned by those who are in Amazon's special inner circle.

As you can see my attachments like JNAB CASE.jpg, Amazon is pretending to be Ms. Swan from In Living Color, claiming it would be WRONG to CHANGE the brand from JNAB to Cool Chimpanzee when the system knows quite well the brand is and has always been Cool Chimpanzee and the only change being sought is to undo the hijacking. It's SOOOO EASY to verify. The page itself shows the product and UPC, the GS1 database validates it. The Amazon historical validates it. The sales validate it. The description. Everything validates this is a brand hijacking. You have to try very hard to ignore the basic realities to put yourself in this position to begin with.

Please advise.

Yours,

Benjamin Joseph Ligeri
Global Specialty Products, CEO
[Linked In](#)

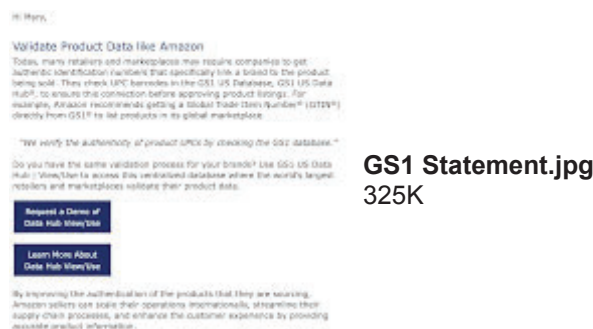
NOTICE OF THIRD-PARTY ACCESS TO BENLIGERI@GMAIL.COM

This email is used by other people acting on my behalf such as assistants or campaign managers. If you'd like to verify if an email (or portion thereof) was written by me or a third party handling my workflow, kindly ask. We have a full transparency policy.

EMAIL PRIVACY AND CONFIDENTIALITY AGREEMENT

Email Contains Sensitive Intellectual Property or Other Sensitive Information and Is Not To Be Distributed without express written permission from BenLigeri@gmail.com. This e-mail message, including any attachments, is intended only for the use of the individual or entity to which it is addressed and may likely contain information that is privileged and/or confidential. You are hereby notified that any use, dissemination, distribution and/or reproduction of this message and/or any attachments by unintended recipients is unauthorized and unlawful. Electronic Communication Privacy Act, 18 U.S.C. § 2510 - 2521.

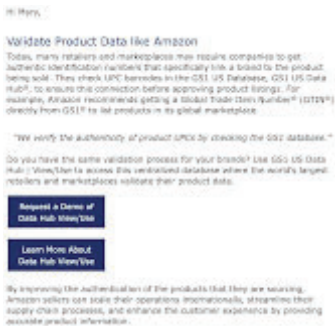
7 attachments



B0B8185TY8 - Screenshot 2024-12-27 at 9.04.10 AM.jpg
686K



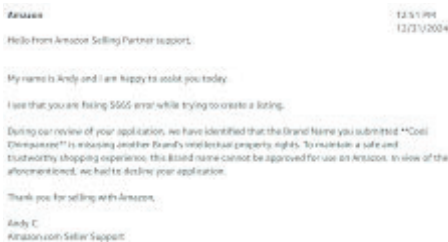
JNAB CASE.jpg
353K



GS1 Statement.jpg
325K



JNAB CASE.jpg
353K



Cool Chimpanzee.jpg
209K



Green Sky Doghouse.jpg
1165K

Amazon.com <nobody@bounces.amazon.com>
To: Ben Ligeri <benligeri@gmail.com>

Thu, Feb 13, 2025 at 10:58 AM

Hello,

This email address is no longer in use. Please follow the instructions below to submit your appeal via Account Health in Amazon Seller Central.

If you are appealing an action taken on your account, please submit your appeal by clicking the "Reactivate your account"

button in Account Health

(<https://sellercentral.amazon.com/performance/dashboard>). If you want to submit additional information, click on the "View appeal" button and submit additional information as requested.

If you are appealing an action taken on your listings for an intellectual property complaint:

1. Navigate to "Received Intellectual Property Complaints" in the "Product Policy Compliance" section in Account Health (<https://sellercentral.amazon.com/performance/dashboard>).
2. Locate the deactivation record for the product listings you want to appeal.
3. Click on the Appeal button next to the record to submit your appeal to reactivate your listings.

If you are appealing an action taken on your listings for an Amazon Listing Policy violation:

1. Navigate to "Listing Policy Violations" in the "Product Policy Compliance" section in Account Health (<https://sellercentral.amazon.com/performance/dashboard>).
2. Locate the deactivation record for the product listings you want to appeal.
3. Click on the Appeal button next to the record to submit your appeal to reactivate your listings.

If you want to submit additional information:

1. Click on the "View appeal" button next to the deactivation record.
2. Click the "Submit additional information" button to submit the information necessary to reactivate your listings.

If you would like to submit a retraction for a previously submitted notice of infringement complaint, please follow the guidelines from the notice-acceptance acknowledgement you received.

Submit the retraction to notice-retraction@amazon.com.

Sincerely,

P.S. You received this message because Amazon.com received the following message:

Date: Thu, 13 Feb 2025 10:57:05 -0500

From: Ben Ligeri <benligeri@gmail.com>

To: cs-reply@amazon.com, ANTITRUST <antitrust@ftc.gov>

Subject: re: URGENT MATTER OF INTELLECTUAL PROPERTY

Amazon.com <nobody@bounces.amazon.com>

Thu, Feb 13, 2025 at 10:58 AM

To: Ben Ligeri <benligeri@gmail.com>

Hello from Amazon,

You've written to an address that does not accept incoming e-mails, but we have provided links to help answer some common questions.

Where's My Stuff/Order: <http://www.amazon.com/help/wheres-my-stuff>

Cancel Items or Orders: <https://www.amazon.com/gp/help/customer/display.html?ie=UTF8&nodeId=201976060>

Problem with an Order: <https://www.amazon.com/gp/help/customer/display.html?nodeId=201945500>

Marketplace Order Problems: <https://www.amazon.com/gp/help/customer/display.html?ie=UTF8&nodeId=201889250>

Gift Certificates: <https://www.amazon.com/gp/help/customer/display.html?ie=UTF8&nodeId=201937160>

Returns & Refunds: <http://www.amazon.com/returns>

You can modify an order that has not shipped or update your address at any time by visiting Your Account:

<http://www.amazon.com/your-account>.

You can find answers to other questions by searching <http://www.amazon.com/help> or reach out to us by clicking contact us at the bottom of any Help page.

Thank you for shopping at Amazon.com. We hope to see you again soon.

Sincerely,

Amazon.com Customer Service

<http://www.amazon.com>

[Quoted text hidden]

Amazon.com <nobody@bounces.amazon.com>
To: Ben Ligeri <benligeri@gmail.com>

Thu, Feb 13, 2025 at 10:58 AM

Dear Seller,

Thank you for submitting your appeal. This email address does not accept incoming messages.

Please submit your appeal by following the instructions on the Account Health page in Seller Central (https://sellercentral.amazon.com/performance/dashboard?ref=ah_em_nr). The Account Health page shows how well your account is performing against the performance metrics and policies required to sell on Amazon, and helps us direct your appeal to the team that can best assist you.

To appeal a listing deactivation, please click on the 'Next Steps' link next to the listing on your Account Health page.

To appeal an account deactivation, please follow the instructions in the banner on the top of your Account Health page.

You should expect a reply within 1-2 days after your appeal is submitted.

Thank you,
Amazon

[Quoted text hidden]

Ben Ligeri <benligeri@gmail.com>

Thu, Feb 13, 2025 at 1:55 PM

To: cs-reply@amazon.com, ANTITRUST <antitrust@ftc.gov>

Cc: Amazon <notice-dispute@amazon.com>, copyright@amazon.com, jeff@amazon.com, pq-product-review@amazon.com, primary@amazon.com, "Magliery, John" <johnmagliery@dwt.com>, "Sgro, Adam" <adamsgro@dwt.com>, Paulus H Chan <phc_ssg@yahoo.com>

Let me add some trademark certificates as well to this correspondence to show my identity as owner.

[Quoted text hidden]

--

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[Quoted text hidden]

3 attachments



Cool Chimp Reg.pdf

334K



Reg. No. 6626154 - Point.pdf

60K



6927.006-06 20220503 REGISTRATION CERTIFICATE.pdf

68K

Amazon.com <nobody@bounces.amazon.com>

Thu, Feb 13, 2025 at 1:56 PM

To: Ben Ligeri <benligeri@gmail.com>

Hello,

This email address is no longer in use. Please follow the instructions below to submit your appeal via Account Health in Amazon Seller Central.

If you are appealing an action taken on your account, please submit your appeal by clicking the "Reactivate your account" button in Account Health

(<https://sellercentral.amazon.com/performance/dashboard>). If you want to submit additional information, click on the "View appeal" button and submit additional information as requested.

If you are appealing an action taken on your listings for an intellectual property complaint:

1. Navigate to "Received Intellectual Property Complaints" in the "Product Policy Compliance" section in Account Health (<https://sellercentral.amazon.com/performance/dashboard>).

2. Locate the deactivation record for the product listings you want to appeal.
3. Click on the Appeal button next to the record to submit your appeal to reactivate your listings.

If you are appealing an action taken on your listings for an Amazon Listing Policy violation:

1. Navigate to "Listing Policy Violations" in the "Product Policy Compliance" section in Account Health (<https://sellercentral.amazon.com/performance/dashboard>).
2. Locate the deactivation record for the product listings you want to appeal.
3. Click on the Appeal button next to the record to submit your appeal to reactivate your listings.

If you want to submit additional information:

1. Click on the "View appeal" button next to the deactivation record.
2. Click the "Submit additional information" button to submit the information necessary to reactivate your listings.

If you would like to submit a retraction for a previously submitted notice of infringement complaint, please follow the guidelines from the notice-acceptance acknowledgement you received.

Submit the retraction to notice-retraction@amazon.com.

Sincerely,

P.S. You received this message because Amazon.com received the following message:

Date: Thu, 13 Feb 2025 13:55:19 -0500
From: Ben Ligeri <benligeri@gmail.com>
To: cs-reply@amazon.com, ANTITRUST <antitrust@ftc.gov>
Subject: Re: URGENT MATTER OF INTELLECTUAL PROPERTY

Amazon.com <nobody@bounces.amazon.com>
To: Ben Ligeri <benligeri@gmail.com>

Thu, Feb 13, 2025 at 1:56 PM

Hello from Amazon,

You've written to an address that does not accept incoming e-mails, but we have provided links to help answer some common questions.

Where's My Stuff/Order: <http://www.amazon.com/help/wheres-my-stuff>

Cancel Items or Orders: <https://www.amazon.com/gp/help/customer/display.html?ie=UTF8&nodeId=201976060>

Problem with an Order: <https://www.amazon.com/gp/help/customer/display.html?nodeId=201945500>

Marketplace Order Problems: <https://www.amazon.com/gp/help/customer/display.html?ie=UTF8&nodeId=201889250>

Gift Certificates: <https://www.amazon.com/gp/help/customer/display.html?ie=UTF8&nodeId=201937160>

Returns & Refunds: <http://www.amazon.com/returns>

You can modify an order that has not shipped or update your address at any time by visiting Your Account:

<http://www.amazon.com/your-account>.

You can find answers to other questions by searching <http://www.amazon.com/help> or reach out to us by clicking contact us at the bottom of any Help page.

Thank you for shopping at Amazon.com. We hope to see you again soon.

Sincerely,

Amazon.com Customer Service
<http://www.amazon.com>

[Quoted text hidden]

Amazon.com <nobody@bounces.amazon.com>
To: Ben Ligeri <benligeri@gmail.com>

Thu, Feb 13, 2025 at 1:56 PM

Dear Seller,

Amazon

12:51 PM

12/31/2024

Hello from Amazon Selling Partner support,

My name is Andy and I am happy to assist you today.

I see that you are facing 5665 error while trying to create a listing.

During our review of your application, we have identified that the Brand Name you submitted **Cool Chimpanzee** is misusing another Brand's intellectual property rights. To maintain a safe and trustworthy shopping experience, this Brand name cannot be approved for use on Amazon. In view of the aforementioned, we had to decline your application.

Thank you for selling with Amazon,

Andy C.

Amazon.com Seller Support



Ben Joseph Sbovia <billing@jasminesgifts.com>

Fwd: [CASE 16930497391] Fix a product page from hacking

1 message

Jennifer Lexington <universalindustrieswyoming@gmail.com>
To: Global Specialists <ceo@gsp.llc>

Tue, Dec 31, 2024 at 1:03 PM

To Whom It May Concern at Global Specialty Products LLC

We don't know what to do about this. Amazon is changing your brands and saying they're abusive and we are working hard to change them back.

Forwarded Conversation**Subject: RE:[CASE 16930497391] Fix a product page from hacking**

From: **Amazon Seller Support** <merch.service05@amazon.com>
Date: Sun, Dec 29, 2024 at 11:35 PM
To: <universalindustrieswyoming@gmail.com>

Hello from Amazon Brand Registry Support,

We see that your query is regarding all of the brands have been changing and you thought Amazon required brands to stay the same and follow GS1 guidelines, the ASIN B0B1GFY6VB has Cool Chimpanzee brand since its origin and now it just changed to JNAB and the ASIN B0B8185TY8 has been changed Cool Chimpanzee to Garifon.

If you choose to rebrand a product you must create a new ASIN rather than update an existing ASIN.

This is true even if the product does not change materially after the brand update.

Rebranding and packaging differences on products can cause customer order returns and can potentially hurt your metrics. To prevent this unwanted outcome, we don't allow the brand name to be changed for an ASIN.

For more information, go to "Amazon Brand Name Policy":

<https://sellercentral.amazon.com/help/hub/reference/G2N3GKE5SGSHWYRZ>

If the intended brand is not part of Amazon Brand Registry, we recommend that you complete registration via "Enroll a new brand" link on the Brand Registry landing page:

<https://brandregistry.amazon.com/>

To help us continually improve, we ask that you take a moment to complete our survey below to tell us about your experience with this specific interaction.

Were you satisfied with the support provided?

Thank you for selling with Amazon,

Livitha P.

Amazon.com Seller Support

=====

MORE WAYS TO GET HELP:

Visit our Seller Forums for help from other sellers: <http://sellercentral.amazon.com/forums>

Browse all Seller Help topics: <http://sellercentral.amazon.com/gp/help>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

To contact us again about this issue, please use the Contact Us form using the following link:

<https://sellercentral.amazon.com/gp/contact-us/contact-amazon-form.html?ie=UTF8&caseID=16930497391>

From: **Amazon Seller Support** <merch.service05@amazon.com>
Date: Mon, Dec 30, 2024 at 11:11 AM
To: <universalindustrieswyoming@gmail.com>

Hello from Amazon Selling Partner Support,

My name is Nors. I am a Live Channel Specialist, and I'm contacting you to follow up on your concern about the brand update update that has been changed from Cool Chimpanzee to JNAB for ASIN B0B1GFY6VB and from Cool Chimpanzee to Garifon for ASIN B0B8185TY8 and you would like to report the possible hijacking.

The brand name have been changed due to the brand being flagged as "abusive" by Amazon.

If you stil believe that this listings was hijacked. We encouraged you to report this possible violation to our investigations team, select Report a violation of our rules on the Contact Us form (at the link below) and enter the details:

<https://sellercentral.amazon.com/cu/contact-us>

Please be sure to include the following information, as applicable:

- * The ASIN/ISBN of the item's detail page and the product title
 - * The store or business name of the seller you are reporting
 - * Your order ID [include this if appropriate]
 - * A concise explanation of the violation
- Alternatively, if you are the registered brand owner in Brand Registry, you can use Report a Violation from your brand registry account using the link below.

<https://brandregistry.amazon.com/brand/report-a-violation>

All reports are thoroughly investigated by our investigations team. For privacy reasons, the results of our investigations cannot be disclosed.

To help us continually improve, we ask that you take a moment to complete our survey below to tell us about your experience with this specific interaction.

Were you satisfied with the support provided?

Yes

No

Thank you for selling with Amazon,
Nors H.
Live Channel Specialist

For additional help, visit <http://sellercentral.amazon.ca/gp/help>

To contact us again about this issue, please use the Contact Us form in Seller Central using the following link:

<https://sellercentral.amazon.com/cu/case-dashboard/view-case?caseID=16930497391>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

From: **Amazon Seller Support** <merch.service05@amazon.com>
Date: Mon, Dec 30, 2024 at 12:43 PM
To: <universalindustrieswyoming@gmail.com>

Hello from Amazon Selling Partner Support,

Thank you for contacting us. This is Francisco and I'm glad to help.

We understand you are reporting that brand names have changed suddenly to an incorrect brand name.

To report this possible violation to our investigations team, select Report a violation of our rules on the Contact Us form (at the link below) and enter the details:

<https://sellercentral.amazon.com/cu/contact-us>

Please be sure to include the following information, as applicable:

- * The ASIN/ISBN of the item's detail page and the product title
- * The store or business name of the seller you are reporting
- * Your order ID [include this if appropriate]
- * A concise explanation of the violation

Alternatively, if you are the registered brand owner in Brand Registry, you can use Report a Violation from your brand registry account using the link below.

<https://brandregistry.amazon.com/brand/report-a-violation>

All reports are thoroughly investigated by our investigations team. For privacy reasons, the results of our investigations cannot be disclosed.

Thank you for contacting Amazon Selling Partner Support.

To help us continually improve, we ask that you take a moment to complete our survey below to tell us about your experience with this specific interaction.

Were you satisfied with the support provided?

Yes

No

Best regards,

Francisco Javier G.
Amazon Brand Registry Support

To contact us again about this issue, please access your case using the link shown below (Brand Registry account login required):

<https://brandregistry.amazon.com/gp/case-dashboard/view-case.html?caseID=16930497391>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

From: **Amazon Seller Support** <merch.service05@amazon.com>
Date: Mon, Dec 30, 2024 at 8:55 PM
To: <universalindustrieswyoming@gmail.com>

Hello from Amazon Brand Registry Support,

This is Jobvishal and I am here to assist you with your concern regarding updating the Brand name for the ASINs: B0B1GFY6VB and B0B8185TY8

Upon checking, I would like to let you know that we are unable to proceed with your request as changing brand name doesn't comply with our Amazon Brand Name Policy. We don't allow changes to the brand name on existing ASINs.

Changing the brand name on an existing ASIN can lead to customer confusion. If you want to rebrand your product, we recommend creating a new ASIN for rebranded products.

Minor corrections, such as typos, capitalization, or addressing legal abbreviations, are permitted. Any changes beyond such minor corrections are considered rebranding.

For more information, go to "Amazon Brand Name Policy":

<https://sellercentral.amazon.com/help/hub/reference/G2N3GKE5SGSHWYRZ>

Please note that we have checked everything that we should to verify the information regarding the change in Brand. I see the title with the suggested Brand name. However we are unable to go ahead as the Brand "Cool Chimpanzee" is not active and is in abusive state.

Also please be noted that Amazon does not encourage hijacking

If you believe that this listings was hijacked. I suggest you to report this violation to our investigations

team. Select Report a violation of our rules on the Contact Us form link below and enter the details:

<https://sellercentral.amazon.com/cu/contact-us>

Please be sure to include the following information, as applicable:

- > The ASIN/ISBN of the item's detail page and the product title
- > The store or business name of the seller you are reporting
- > Your order ID [include this if appropriate]
- > A concise explanation of the violation

You can use Report a Violation from your brand registry account using the link below if you are the registered brand owner in Brand Registry:

<https://brandregistry.amazon.com/brand/report-a-violation>

Please note that all reports are thoroughly investigated by our investigations team. For privacy reasons, the results of our investigations cannot be disclosed.

To help us continually improve, we ask that you take a moment to complete our survey below to tell us about your experience with this specific interaction.

Were you satisfied with the support provided?

Yes

No

Best regards,

Jobvishal M.
Amazon Brand Registry Support

To contact us again about this issue, please access your case using the link shown below (Brand Registry account login required):

<https://brandregistry.amazon.com/gp/case-dashboard/view-case.html?caseID=16930497391>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

Thank you for submitting your appeal. This email address does not accept incoming messages.

Please submit your appeal by following the instructions on the Account Health page in Seller Central (https://sellercentral.amazon.com/performance/dashboard?ref=ah_em_nr). The Account Health page shows how well your account is performing against the performance metrics and policies required to sell on Amazon, and helps us direct your appeal to the team that can best assist you.

To appeal a listing deactivation, please click on the 'Next Steps' link next to the listing on your Account Health page.

To appeal an account deactivation, please follow the instructions in the banner on the top of your Account Health page.

You should expect a reply within 1-2 days after your appeal is submitted.

Thank you,
Amazon

[Quoted text hidden]



Jennifer Lexington <universalindustrieswyoming@gmail.com>

RE:[CASE 17229508291] Brand Registry request for PrimeMed

4 messages

brandregistryapplication05@amazon.com <brandregistryapplication05@amazon.com>
To: universalindustrieswyoming@gmail.com

Mon, Feb 17, 2025 at 4:03 PM

Hello from Amazon Selling Partner Support,

Thank you for your interest in Amazon Brand Registry.

We'll update you about your brand application after the Brand Registry team completes the review. To review your submitted application(s), please visit <https://brandregistry.amazon.com/brand/enrollment/manage/applications>

We appreciate your patience.

To help us continually improve, we ask that you take a moment to complete our survey below to tell us about your experience with this specific interaction.

Were you satisfied with the support provided?

Best regards,

Rolando Augusto S.
Amazon Brand Registry Support

To contact us again about this issue, please access your case using the link shown below (Brand Registry account login required):
<https://brandregistry.amazon.com/gp/case-dashboard/view-case.html?caseID=17229508291>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

brandregistryapplication05@amazon.com <brandregistryapplication05@amazon.com>
To: universalindustrieswyoming@gmail.com

Tue, Feb 18, 2025 at 1:07 AM

Hello from Amazon Brand Registry Support,

My name is Sneha. I understand that you would like to register the brand PrimeMed.

We've provided a verification code to the public contact listed on the agency website where the trademark for PrimeMed is registered.

To receive the verification code, contact the trademark correspondent. Please do not, under any circumstance, contact the trademark office directly.

The verification code will confirm you are eligible to enroll PrimeMed in Brand Registry.

Trademark correspondent email address: contactus@thejacobsllaw.com

Reply to this case within 10 days with the verification code and case ID for this application.

The case ID for your application is 17229508291.

If the email for the trademark representative is a PEC, or certified email, they should unlock their email to receive non-PEC emails.

We're not able to provide you with instructions on how to unlock a PEC email. They should contact their email provider for instructions.

If you did not apply for Brand Registry, contact us immediately on the following page:

<https://brandregistry.amazon.com/cu/contact-us>

To help us continually improve, we ask that you take a moment to complete our survey below to tell us about your experience with this specific interaction.

Were you satisfied with the support provided?

Yes

No

Best regards,

Sneha G.
Amazon Brand Registry Support

To contact us again about this issue, please access your case using the link shown below (Brand Registry account login required):

<https://brandregistry.amazon.com/gp/case-dashboard/view-case.html?caseID=17229508291>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

brandregistryapplication05@amazon.com <brandregistryapplication05@amazon.com>

Tue, Feb 18, 2025 at 10:31 PM

Reply-To: "[CASE 17229508291] brand-registry-support@amazon.com" <brandregistryapplication05+e15bfa64-0f33-425e-a700-6b120e434d8b@amazon.com>

To: universalindustrieswyoming@gmail.com

Hello from Amazon Brand Registry Support,

My name is Sneha. I understand that you would like to register the brand PrimeMed.

I would like to inform you that I have reviewed the case and we have contacted the specialized department on your behalf; we await a response from them.

We will contact you as soon as we have an update or if any further information is required from your side.

[Quoted text hidden]

brandregistryapplication05@amazon.com <brandregistryapplication05@amazon.com>

Wed, Feb 19, 2025 at 6:13 AM

To: universalindustrieswyoming@gmail.com

Hello from Amazon Brand Registry Support,

My name is Sneha. I understand that you would like to register the brand PrimeMed.

We are unable to approve your request at this time for the following reason: the to-be-added trademark has been involved in abusive conduct on our websites or is related to an account that was used for such abusive conduct.

Please reach out to us via Brand Registry → Support → Help Center (Contact Brand Support) for support or queries related to the application.

To help us continually improve, we ask that you take a moment to complete our survey below to tell us about your experience with this specific interaction.

Were you satisfied with the support provided?

Best regards,

Sneha G.
Amazon Brand Registry Support

To contact us again about this issue, please access your case using the link shown below (Brand Registry account login required):

<https://brandregistry.amazon.com/gp/case-dashboard/view-case.html?caseID=17229508291>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

Exhibit B - Brand Changes

B09FYVSL8L - Changed from Green Sky to Gagaciso
B0B1GFY6VB - Changed from Cool Chimpanzee to Jnab
B0B8185TY8 - Changed from Cool Chimpanzee to Garifon
B09L6TZ8B2 - Changed from Biological Essentials to Whaline
B09SNS9SWN - Changed from Point to AYOJOY
B0B2L22K8Z - Changed from Ebion to Evrblock
B078RC2ZPC - Changed from Ebion to FQQF
B08GP5KB3W - Changed from Skin Deep to GEEGVV
B09L6S1SV3 - Changed from Biological Essentials to NOZA
B0B11BP4NYB - Changed from Green Sky to FAVOREAL



EXHIBIT B-1



Point Cotton Nosebleed Plugs - Extra Absorbent Blood Clotting Cotton Rolls for The Nose (50 Count)

Brand: AYOJOY
4.5 ★★★★★ 240 | Search this page

Amazon's Choice

200+ bought in past month

\$6⁵⁹ (\$0.13 / Count)

FREE Returns

Get \$60 off instantly: Pay \$0.00 upon approval for Amazon Visa.

Brand	AYOJOY
Color	White
Material	Cotton
Recommended Uses For Product	Nosebleed Management
Size	1 Count (Pack of 50)

About this item

- Exceptional Absorbency: Point Cotton Nosebleed Plugs are designed to provide superior absorbency for effective nosebleed management. The high-quality cotton material quickly soaks up blood, ensuring a clean and comfortable experience during nosebleeds. The extra absorbent properties allow for optimal blood clotting, helping to put an end to nosebleeds faster and more efficiently. These nosebleed plugs are an essential addition to any first aid kit or medicine cabinet.
- Convenient Blood Clotting Solution: Our cotton rolls are specifically crafted to promote blood clotting in the nose during nosebleeds. The soft and gentle cotton material encourages clot formation by providing a comfortable barrier in the nostril, ultimately leading to faster relief. Keep Point Cotton Nosebleed Plugs on hand for a quick and effective solution to unexpected nosebleeds, ensuring that you are always prepared in times of need.



Roll over image to zoom in

made from
genetic materials?



2 Pack Diner Retro Style Sugar Shakers

Brand: Evrblock
4.2 394
100+ bought in past month

\$10⁹⁸

FREE Returns

Material	Stainless Steel
Color	Silver, Clear
Brand	Evrblock
Item Weight	0.72 Kilograms
Shape	Oval

About this item

- SET OF TWO (2): Ebion Retro Style Diner Sugar Shaker Dispensers for Sugar/Spices/More. Perfect For Restaurants, Diners, Coffee Shops, Dining Room, Breakfast Tables and More!
- EXTENDED USE: 12 Ounce / 340 Gram Capacity, Dishwasher Safe, Clear Thick Glass, Stain Proof. Ideal for Commercial and Home usage. A Large 12oz Retro Diner Sugar Shaker Will Give Plenty Of Room For Sugar, Spices, Herbs, and Ebion Bee Pollen.
- CLASSIC RETRO DINER DESIGN: Our Cool Looking Classic Retro Diner Dispenser/Shaker/Pourer Is the Perfect Addition to Your Table.
- STAINLESS-STEEL LID: It Has a Brushed Metal Lid with Easy to Pour Flap Spout That Helps to Prevent Clogging. Ergonomically Shaped to Fit in the Hand, It Dispenses a Perfect Portion. The Glass and Stainless-Steel Combination Is a Beautiful Aesthetic for Any Need.
- DISHWASHER SAFE



Roll over image to zoom in



EXHIBIT B-3

300 Count Glow Stars; Glow in The Dark Stars for Ceiling, Ceiling Stars, Glowing Stars for Ceiling Include Bonus Moon, Earth & Big Dipper Constellation (300 Stars)

Visit the AosBet Store

4.4 1,897 ratings | Search this page

Amazon's Choice Overall Pick

200+ bought in past month

\$10⁹⁹

Get Fast, Free Shipping with Amazon Prime

FREE Returns

Get a \$80 Amazon Gift Card instantly upon approval for the Amazon Store Card. No annual fee.

- GLOW IN THE DARK STARS: Glow Stars, Ceiling Stars, Stars For Ceiling 300 Count
- 300 GLOW IN THE DARK STARS FOR CEILING Plus An Additional Bonus Extra Large Moon, Planet Earth, Big Dipper Constellation plus a Free Constellation Map and Putty Adhesive to Affix the Stars to Ceiling
- GLOW STARS, Also Known as Ceiling Stars Collection Includes 300 Total Ceiling Stars of Various Sizes; Also Includes an Extra Large Moon, Earth and Big Dipper Constellation as Bonuses
- CEILING STARS GLOW IN THE DARK All Night And Disappear in the Morning Sun As It's Darkness That Activates The Glowing Stars
- GLOW IN THE DARK STARS; Affix These To Your Child's Bedroom Wall & Ceiling and The Room Looks Like the Night Sky; Toddler

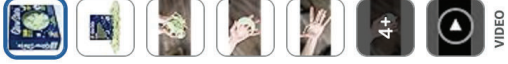


Exhibit C - Chat with Sarfaraz Hussain

okay great hopefully that solves the issue

Me

Sent at 8:13 PM

who can make a change like this if not me the brand owner

Me

Sent at 8:13 PM

any idea who made the category change

Sarfaraz Hussain

8:13 PM

That information is not available.

Me

Sent at 8:14 PM

can anyone change a category whenever, how can we better gate our brand?

Me

Sent at 8:15 PM

can you update the category change steps you took in the case so I can follow up if the problem persists

Sarfaraz Hussain

8:15 PM

Sometimes, it gets changed by some other sellers.

Sarfaraz Hussain

8:16 PM

You can just try to update the category from your inventory page or by performing full update.

Sarfaraz Hussain

8:19 PM

Is there anything else I can help you with, please let me know?

Sarfaraz Hussain

8:23 PM

I haven't heard from you in a while. Please confirm if we are still connected.

Sarfaraz Hussain

8:27 PM

As I am not getting any response from your end, so I am bound to disconnect this chat. Thank you for contacting Amazon Selling Partner Support.

Exhibit D - Trademark Rejection (Green Sky)

! Your Brand Registry enrollment application has been rejected.

Why did this happen?

This decision was made due to one or more of the following reasons: a) your account was engaging in conduct that violates Brand Registry's policies, such as, but not limited to, invalid notice submissions through our notice submission channels or tampering with the catalog; b) your application or account is related to other Amazon accounts or brands that have violated Amazon or Brand Registry's policies, c) you are associated with one or more selling accounts as a primary owner and all of them have failed seller verification, d) inability to provide sufficient evidence of branding on products/packaging; e) you have a selling account that is de-activated, or f) your trademark application appears to be filed by a filing firm that may be violating US federal regulations and USPTO rules (explained below).

If you are enrolling with a US trademark, please note that the USPTO requires foreign domiciled applicants or registrants to be represented by a [U.S. licensed attorney](#). This [rule](#) was designed to improve the quality of trademark submissions by U.S. attorneys who are bound by ethical rules to follow the [USPTO rules of professional conduct](#) and their state bar codes of conduct. The USPTO has guidance on evaluating filing firms and how to avoid potential USPTO rule violations [here](#). Additional scrutiny may be triggered by Amazon for use of a suspicious filing firm. Attorneys suspected of misconduct may be investigated by the USPTO. If you are working through an intermediary, rather than directly with a US licensed attorney, to seek a US trademark registration or enrollment into Brand Registry, your application may be subject to additional scrutiny by Amazon and the USPTO. Before hiring an attorney or a trademark service company, check whether they are subject to an [Order for Sanctions](#) from the USPTO or listed as an entity on the Potentially Misleading Solicitations [webpage](#). If you are concerned about the validity of your application or the conduct of any of the entities involved in your application, consult with a private U.S. attorney who is knowledgeable about trademark law (and not connected to any entity listed on the [Order for Sanctions](#) or Potentially Misleading Solicitations [webpage](#)) to evaluate your application. If you need help finding an attorney, you can find resources from the USPTO [here](#). You can also leverage the Amazon IP Accelerator program to connect with a curated network of vetted IP law firms. You can learn more about the program [here](#). Please note that the use of a firm vetted by the Amazon IP Accelerator program is not required for enrollment in Brand Registry.

Please note that enrollment in Brand Registry is at Amazon's sole discretion. Any misuse of Amazon's Brand Protection tools or suspected misconduct in the acquisition or maintenance of your intellectual property rights may lead to restrictions or removal from Brand Registry. If after having read the USPTO's rules and regulations, you have reason to believe that your trademark application may have been filed in violation of USPTO's rules and regulations, you may choose to file a new application that is in accordance with the USPTO's rules and regulations. Refer to [guidelines](#) for eligibility in Brand Registry. Once you have a new trademark application, you may submit a new enrollment request in Brand Registry. Please note that there are several things you can do to protect your trademark application or registration listed [here](#).

If at any point in the next 90 days, we find that your account is eligible for enrollment in Brand Registry, we will resume the enrollment application process automatically. In such an event, we will send you a communication proactively stating that the application process has been resumed along with a case ID.

FEEDBACK 

If your selling account is currently deactivated, you may appeal an action taken on your selling account by clicking the "Reactivate your account" button on the [Account Health page in Seller Central](#) .

Has your application been rejected in error?

You may submit an appeal by clicking on <https://brandregistry.amazon.com/appeal/actions/brv/211919a5-d8e0-4fdb-b102-7d672b5e9825> .

When submitting an appeal, please ensure that:

- Any selling accounts are active or, if they were previously de-activated, they should have been reactivated. If those selling accounts have not been reactivated, your Brand Registry appeal will be rejected.
- You reviewed the potential reasons for rejection of the application that have been listed above under the section 'Why did this happen?'. Then enter information accurately and to the best of your knowledge in the appeal form.
- Please do not leave any field blank in the appeal form.

Once you have submitted the appeal with all the required information, you will receive the first response within 3-5 days. Once an investigator has reviewed the case, we will reach out to you to request any additional information and documents needed pertaining to your brand. We may also request you to join a video verification with one of our investigators.

[Conditions of Use](#)

Exhibit E - Amazon Email: Refusal Due to 'Abusive' Brand



Benjamin Joseph <benligeri@gmail.com>

Fwd: [CASE 16944303531] Fix a product page

1 message

Dhaval Joshi <dhavaljoshi44441111@gmail.com>

Sun, Jan 5, 2025 at 9:55 PM

To: Ben Ligeri <benligeri@gmail.com>

----- Forwarded message -----

From: **Amazon Seller Support** <merch.service05@amazon.com>

Date: Sun, Jan 5, 2025 at 6:49 PM

Subject: RE:[CASE 16944303531] Fix a product page

To: <DhavalJoshi44441111@gmail.com>

Hello from Amazon Brand Registry Support,

We've reviewed your request to change the brand name from JNAB to Cool Chimpanzee. Let me guide you with the necessary information.

After investigating, we discovered that the "Cool Chimpanzee" brand has a statue that is ABUSIVE.

We reserve the right to decline any change where we have identified that the to-be-added account has been involved in abusive conduct on our websites, or is related to an account that was used for such abusive conduct.

Hence, We're declining this request as it doesn't comply with our Amazon Brand Name Policy. We don't allow changes to the brand value (also known as brand name) on existing ASINs. Let me guide you with the necessary information.

Changing the brand value on an existing ASIN from "generic" to a brand name or from a brand name to "generic" can lead to customer confusion.

If you believe that the product detail page represents a listing or policy violation, go to "Report a violation":

https://sellercentral.amazon.com/abuse-submission/index.html?mons_sel_mkid=amzn1.mp.o.ATVPDKIKX0DER&mons_sel_mcid=amzn1.merchant.o.APOBFWUY2LY04&mons_sel_persist=true&mons_sel_dc=AAAAmNTDRxY%3D

After the complaint has been submitted, our investigations team will contact you directly regarding the outcome.

To help us continually improve, we ask that you take a moment to complete our survey below to tell us about your experience with this specific interaction.

Were you satisfied with the support provided?

Best regards,

Patumrat P.
Amazon Brand Registry Support

To contact us again about this issue, please access your case using the link shown below (Brand Registry account login required):

<https://brandregistry.amazon.com/gp/case-dashboard/view-case.html?caseID=16944303531>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.