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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation;
AMAZON.COM SERVICES LLC, a Delaware
limited liability company; and CARTIER
INTERNATIONAL A.G., a Swiss corporation,

Plaintiffs,

v.

An individual or entity doing business as the
following Amazon Selling Account: YFXF; and
DOES 1-10,

Defendants.

No.

**COMPLAINT FOR DAMAGES
AND EQUITABLE RELIEF**

I. INTRODUCTION

1. This case involves Defendants’ unlawful and expressly prohibited advertisement, marketing, and sale of counterfeit luxury jewelry and accessories illegally bearing trademarks of Cartier International A.G. (“Cartier”) in the Amazon.com store (the “Amazon Store”). Amazon.com, Inc. and Amazon.com Services LLC (collectively, “Amazon”) and Cartier (collectively with Amazon, “Plaintiffs”) jointly bring this lawsuit to permanently prevent and enjoin Defendants from causing future harm to Amazon’s and Cartier’s customers, reputations, and intellectual property (“IP”), and to hold Defendants accountable for their illegal actions.

2. Amazon owns and operates the Amazon Store and equivalent counterpart international stores and websites. Amazon’s stores offer products and services to customers in more than 100 countries around the globe. Some of the products are sold directly by Amazon,

1 while others are sold by Amazon’s numerous third-party selling partners. The Amazon brand is
2 one of the most well-recognized, valuable, and trusted brands in the world. To protect its
3 customers and safeguard its reputation for trustworthiness, Amazon invests heavily in both time
4 and resources to prevent counterfeit goods from being sold in its stores. In 2021 alone, Amazon
5 invested over \$900 million and employed more than 12,000 people to protect its stores from fraud
6 and abuse. Amazon stopped over 2.5 million suspected bad actor selling accounts before they
7 published a single listing for sale.

8 3. Defendants engaged in a sophisticated campaign to market, advertise, and sell
9 counterfeit Cartier products in the Amazon Store, while disguising the products as non-branded
10 in an attempt to evade Amazon’s counterfeit detection tools. Specifically, Defendants opened a
11 selling account in the Amazon Store under the name “YFXF” (the “YFXF Defendant”) and listed
12 for sale seemingly non-infringing, non-branded bracelets. Yet, when customers ordered the
13 products, the YFXF Defendant shipped to the customer counterfeit bracelets bearing
14 unauthorized Cartier trademarks. Upon information and belief, Defendants and unknown co-
15 conspirators advertised their counterfeit products on third-party social media websites by using
16 “hidden links” to direct their followers to the counterfeit Cartier products, while disguising the
17 products as non-branded in the listings in the Amazon Store.

18 4. Since its inception in 1847, Cartier has become one of the preeminent symbols of
19 luxury in the world, producing and selling luxury items such as watches, handbags, fragrances,
20 and jewelry, including the famous LOVE bracelet.

21 5. Cartier’s LOVE collection was first introduced in 1969 with the LOVE bracelet,
22 and the design remains among Cartier’s most iconic styles. The LOVE collection is one of the
23 most famous bracelet designs and has been worn by celebrities such as Elizabeth Taylor, Kylie
24 Jenner, and Kanye West, as described by an article in Harper’s BAZAAR.¹

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26
27 ¹ See *10 Things You Didn’t Know About The Cartier Love Bracelet*, Harper’s Bazaar (Aug. 31, 2021),
<https://www.harpersbazaar.com.sg/watches-jewels/jewellery/10-things-didnt-know-cartier-love-bracelet/>.

1 6. The distinctive LOVE bracelet design is comprised of a binding closure and screw
2 motif, as shown in the photographs of the LOVE bracelet in *Figures 1 through 3* below.² Today,
3 Cartier's LOVE collection has grown to encompass bracelets, earrings, necklaces, and rings.

4 *Figures 1 through 3 below are images of Cartier's iconic LOVE bracelet.*

5 *Figure 1*



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² See *LOVE* on Cartier® Official Website | Cartier US, <https://www.cartier.com/en-us/jewelry/bracelets/love/>.

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Figure 2



Figure 3



7. Cartier owns, manages, enforces, licenses, and maintains intellectual property, including various trademarks. Relevant to this Complaint, Cartier owns the following registered trademarks (“Cartier Trademarks”).

<u>Mark</u>	<u>Registration No. (International Classes)</u>
<i>Cartier</i>	Registration No. 4,178,047 (IC 014)
CARTIER	Registration No. 759,202 (IC 014)
<i>Cartier</i>	Registration No. 411,240 (IC 014)
CARTIER	Registration No. 411,239 (IC 08, 014)

True and correct copies of the registration certificates for the Cartier Trademarks are attached as **Exhibit A.**

8. From February 2021 through August 2021, Defendants advertised, marketed, offered, and sold counterfeit Cartier products in the Amazon Store, using Cartier registered trademarks, without authorization, to deceive customers about the authenticity and origin of the products and the products' affiliation with Cartier.

9. As a result of their illegal actions, Defendants have infringed and misused Cartier's IP, willfully deceived and harmed Amazon, Cartier, and their customers, compromised the integrity of the Amazon Store, and undermined the trust that customers place in Amazon and Cartier. Defendants' illegal actions have caused Amazon and Cartier to expend significant resources to investigate and combat Defendants' wrongdoing and to bring this lawsuit to prevent Defendants from inflicting future harm to Amazon, Cartier, and their customers.

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