

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

\_\_\_\_\_) )  
In the Matter of ) )  
 ) )  
AMAZON.COM, INC. ) )  
 ) ) CPSC DOCKET NO.: 21-2  
 ) )  
 ) )  
Respondent. ) )  
\_\_\_\_\_)

COMPLAINT COUNSEL’S SUBMISSION OF *IN CAMERA* MATERIALS  
FOR REVIEW BY THE PRESIDING OFFICER

Pursuant to the Presiding Officer’s authority under 15 C.F.R. § 1025.42(a) to regulate and decide discovery matters and his authority under 15 C.F.R. § 1025.45(b) to receive and preserve documents *in camera*, Complaint Counsel files this Submission of *In Camera* Materials for Review by the Presiding Officer. The materials, consisting of complete, unredacted copies of the Section 15 Defect Investigation Procedures Manual and the Regulatory Enforcement Division Standard Operating Procedure (SOP) for Assessing Compliance and Removing Violative Products referenced in Complaint Counsel’s Opposition to Amazon.com, Inc.’s Motion to Compel (“Opp.” Docket No. 48), are submitted *in camera* only to the Presiding Officer. *See* Exhibits A and B.

Complaint Counsel provides these documents for the Presiding Officer’s *in camera* review so that he may determine whether the law enforcement privilege and constraints on relevance, described in Complaint Counsel’s Opp., support Complaint Counsel’s assertion that these documents are protected from disclosure.

Respectfully submitted,

*John C. Eustice*

---

John C. Eustice, Senior Trial Attorney  
Liana G.T. Wolf, Trial Attorney  
Serena Anand, Trial Attorney

Division of Enforcement and Litigation  
Office of Compliance and Field Operations  
U.S. Consumer Product Safety Commission  
Bethesda, MD 20814  
Tel: (301) 504-7809

Complaint Counsel for  
U.S. Consumer Product Safety Commission

August 17, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on August 17, 2022, a copy of the foregoing was served upon all parties and participants of record in these proceedings as follows:

Alberta E. Mills  
Secretary  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814  
Email: [AMills@cpsc.gov](mailto:AMills@cpsc.gov)

Judge James E. Grimes  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549  
[alj@sec.gov](mailto:alj@sec.gov)

*By email to Counsel for Respondent:*

Sarah L. Wilson  
Stephen P. Anthony  
Thomas R. Brugato  
Nicholas Griepsma  
Rukesh A. Korde  
Covington & Burling LLP  
One CityCenter  
850 Tenth Street, N.W.  
Washington, DC 20001-4956  
[swilson@cov.com](mailto:swilson@cov.com)  
[santhony@cov.com](mailto:santhony@cov.com)  
[tbrugato@cov.com](mailto:tbrugato@cov.com)  
[bcavataro@cov.com](mailto:bcavataro@cov.com)

*John C. Justice*

---

Complaint Counsel for  
U.S. Consumer Product Safety Commission