UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of Amazon.com, Inc., Respondent	CPSC Docket No. 21-2 Hon. Carol Fox Foelak Presiding Officer

DECLARATION OF JOSHUA GONZÁLEZ
IN SUPPORT OF AMAZON'S MOTION FOR SUMMARY DECISION

I, Joshua González, hereby declare that:

1. I am an attorney for Respondent Amazon.com, Inc. ("Amazon") in the above-captioned matter.

2. I am over the age of 18 and I am competent to make this declaration.

3. As used in this Declaration, "CPSC" refers to the Consumer Product Safety Commission.

4. As used in this Declaration, "Subject Products" refers to certain children's sleepwear garments, carbon monoxide detectors, and hair dryers identified in greater detail in ¶ 2 of Amazon's Statement of Undisputed Material Facts.

5. As used in this Declaration, "Third-Party Sellers" refers to the sellers of the Subject Products.

6. Attached as Exhibit 1 is a true and correct copy of Complaint Counsel's Objections and Responses to Respondent's Requests for Admission, dated March 21, 2022.

7. Attached as Exhibit 2 is a true and correct copy of the transcript of the deposition of Sagi Goldberg, taken on August 12, 2022.

8. Attached as Exhibit 3 is a true and correct copy of an email from CPSC Internet Investigative Analyst Renee Morelli-Linen to Amazon with the subject line "Firm contact information request - TAIYCYXGAN," Amazon-CPSC-FBA-00003695, sent on December 26, 2019.

9. Attached as Exhibit 4 is a true and correct copy of an email from CPSC Compliance Officer Carolyn Carlin to Amazon with the subject line "FW: U.S. Consumer Product Safety Commission (CPSC) - NOTICE OF VIOLATION," Amazon-CPSC-FBA-00003696, sent on January 24, 2020.

10. Attached as Exhibit 5 is a true and correct copy of the document summarizing communications between Amazon and the Third-Party Sellers of the children's sleepwear Subject Products, Amazon-CPSC-FBA-00002388.

11. Attached as Exhibit 6 are true and correct copies of emails between CPSC Compliance Officer Carolyn Carlin and Amazon with the subject line "RE: FW: U.S. Consumer Product Safety Commission (CPSC) - NOTICE OF VIOLATION," Amazon-CPSC-FBA-00001674, sent between January 24, 2020 and September 8, 2020.

12. Attached as Exhibit 7 is a true and correct copy of the Notice of Violation from CPSC Compliance Officer Carolyn Carlin to Third-Party Seller Taiycyxgan, Amazon-CPSC-FBA-00000229, sent via email on January 24, 2020.

13. Attached as Exhibit 8 are true and correct copies of email communications between CPSC Compliance Officer Carolyn Carlin and Amazon with the subject line "RE: FW: U.S.

Consumer Product Safety Commission (CPSC)- NOTICE OF VIOLATION," Amazon-CPSC-FBA-00001627, sent between January 24, 2020 and February 5, 2020.

14. Attached as Exhibit 9 is a true and correct copy of an Amazon spreadsheet listing information related to certain children's sleepwear products, Amazon-CPSC-FBA-00001840.

15. Attached as Exhibit 10 is a true and correct copy of an email from CPSC Compliance Officer Carolyn Carlin to Amazon with the subject line "Notice of Violation - CPSC Sample Number 19-800-1505, Amazon-CPSC-FBA-00001682, sent on November 3, 2020.

16. Attached as Exhibit 11 is a true and correct copy of a Notice of Violation from CPSC Compliance Officer Carolyn Carlin to Amazon counsel Genus Heidary, Amazon-CPSC-FBA-00001683, sent via email on November 3, 2020.

17. Attached as Exhibit 12 is a true and correct copy of a letter from Amazon counsel Genus Heidary to CPSC Compliance Officer Carolyn Carlin, Amazon-CPSC-FBA-00000255, sent via email on December 8, 2020.

18. Attached as Exhibit 13 is a true and correct copy of a spreadsheet listing dates that Amazon contacted purchasers of the Subject Products, Amazon-CPSC-FBA-00001841.

19. Attached as Exhibit 14 is a true and correct copy of a spreadsheet listing consumer messaging data related to Amazon's communications with purchasers of the Subject Products, Amazon-CPSC-FBA-00002397.

20. Attached as Exhibit 15 is a true and correct copy of an email from Senior Federal Investigator Michelle Mach to CPSC Compliance Officer Carolyn Carlin with the subject line "FW: Attention: Important safety notice about your past Amazon order," CPSC_AM0000497, sent on June 12, 2021.

21. Attached as Exhibit 16 is a true and correct copy of the transcript of the deposition of Patricia Davis Mitchell, taken on August 17, 2022.

22. Attached as Exhibit 17 is a true and correct copy of a spreadsheet listing data related to refunds Amazon issued for the children's sleepwear Subject Products, Amazon-CPSC-FBA-00001616.

23. Attached as Exhibit 18 is a true and correct copy of an email from CPSC Senior Federal Investigator Michelle Mach to Amazon with the subject line "Request for company/firm contact information - Home Swee," Amazon-CPSC-FBA-00003694, sent on February 10, 2020.

24. Attached as Exhibit 19 is a true and correct copy of an email from CPSC Compliance Officer Carolyn Carlin to Amazon with the subject line "US CPSC -- Immediate Stop-Sale an Destruction (HOME SWEE)," Amazon-CPSC-FBA-00003707, sent on March 31, 2020.

25. Attached as Exhibit 20 is a true and correct copy of a Notice of Violation from CPSC Compliance Officer Carolyn Carlin to Dolcevida and Home Swee, Amazon-CPSC-FBA-00003709, sent via email on March 17, 2020.

26. Attached as Exhibit 21 is a true and correct copy of a compilation of email communications between CPSC Compliance Officer Carolyn Carlin and Amazon with the subject line "RE: FW: U.S. Consumer Product Safety Commission (CPSC) - NOTICE OF VIOLATION," Amazon-CPSC-FBA-00002017, sent between February 18, 2020 and May 12, 2020.

27. Attached as Exhibit 22 are true and correct copies of email communications between CPSC Compliance Officer Carolyn Carlin and Amazon with the subject line "RE: US CPSC -- Immediate Stop-Sale an Destruction (HOME SWEE)," Amazon-CPSC-FBA-00001654, sent between March 31, 2020 and July 1, 2020.

28. Attached as Exhibit 23 is a true and correct copy of a Notice of Violation from CPSC Compliance Officer Carolyn Carlin to Amazon counsel Genus Heidary, Amazon-CPSC-FBA-00000302, sent via email on November 3, 2020.

29. Attached as Exhibit 24 are true and correct copies of email communications between CPSC Internet Investigative Analyst Renee Morelli-Linen and Amazon with the subject line "Company Contact Information request," Amazon-CPSC-FBA-00003699, sent on February 20, 2020.

30. Attached as Exhibit 25 is a true and correct copy of a Notice of Violation from CPSC Compliance Officer Carolyn Carlin to Third-Party Seller IDGIRLS International, Amazon-CPSC-FBA-00000225, sent via email on February 21, 2020.

31. Attached as Exhibit 26 are true and correct copies of email communications between CPSC Compliance Officer Carolyn Carlin and Amazon with the subject line "RE: IDGIRLS International -- United States Consumer Product Safety Commission (CPSC) - Notice of Violation," Amazon-CPSC-FBA-00001647, sent between March 9, 2020 and July 1, 2020.

32. Attached as Exhibit 27 is a true and correct copy of a Notice of Violation from CPSC Compliance Officer Carolyn Carlin to Amazon counsel Genus Heidary, Amazon-CPSC-FBA-00000328, sent via email on November 3, 2020.

33. Attached as Exhibit 28 is a true and correct copy of a letter from Amazon counsel Genus Heidary to CPSC Compliance Officer Carolyn Carlin with the subject line "Amazon's supplemental response to CPSC NOV dated November 3, 2020 for Sample No. 20-800-1726," Amazon-CPSC-FBA-00000307, sent via email on December 8, 2020.

34. Attached as Exhibit 29 are true and correct representative samples of the direct consumer safety notifications sent to purchasers of the Subject Products, Amazon-CPSC-FBA-00000212, sent on January 21, 2021 and June 11, 2021.

35. Attached as Exhibit 30 is a true and correct copy of the transcript of the deposition of Blake Rose, taken on August 26, 2022.

36. Attached as Exhibit 31 are true and correct copies of email communications between CPSC Senior Federal Investigator Michelle Mach and Amazon with the subject line "Request for company/firm contact information - HOYMN," Amazon-CPSC-FBA-00001633, sent between March 11, 2020 and March 12, 2020.

37. Attached as Exhibit 32 is a true and correct copy of the Notice of Violation from CPSC Compliance Officer Carolyn Carlin to Third-Party Seller HOYMN, Amazon-CPSC-FBA-00000323, sent via email on March 17, 2020.

38. Attached as Exhibit 33 is a true and correct copy of an email from CPSC Compliance Officer Carolyn Carlin to Amazon with the subject line "US CPSC -- Immediate Stop-Sale and Destruction (HOYMN)," Amazon-CPSC-FBA-00002583, sent on March 31, 2020.

39. Attached as Exhibit 34 are true and correct copies of email communications between CPSC Compliance Officer Carolyn Carlin and Amazon with the subject line "US CPSC -- Immediate Stop-Sale and Destruction (HOYMN)," Amazon-CPSC-FBA-00001651, sent between March 31, 2020 and July 1, 2020.

40. Attached as Exhibit 35 is a true and correct copy of a Notice of Violation from CPSC Compliance Officer Carolyn Carlin to Amazon counsel Genus Heidary, Amazon-CPSC-FBA-00000250, sent via email on November 3, 2020.

41. Attached as Exhibit 36 is a true and correct copy of a letter from Amazon counsel Genus Heidary to CPSC Compliance Officer Carolyn Carlin with the subject line "Request for Corrective Action - CPSC Sample Number: 20-800-1345," Amazon-CPSC-FBA-00002383, sent via email on December 23, 2020.

42. Attached as Exhibit 37 is a true and correct representative sample of the direct notice email from Amazon to purchasers of HOYMN children's sleepwear Subject Products, Amazon-CPSC-FBA-00002419, sent on May 17, 2022.

43. Attached as Exhibit 38 is a true and correct copy of an email from CPSC Senior Compliance Officer Joseph Williams to Amazon with the subject line "CA210014 Amazon," CPSC_AM001813, sent on March 2, 2021.

44. Attached as Exhibit 39 is a true and correct copy of a Notice of Non-Compliance from CPSC Senior Compliance Officer Joseph Williams to Amazon counsel Genus Heidary, Amazon-CPSC-FBA-00000233, sent via email on March 2, 2021.

45. Attached as Exhibit 40 is a true and correct copy of the transcript of the deposition of Joseph Williams, taken on August 16, 2022.

46. Attached as Exhibit 41 is a true and correct copy of a spreadsheet listing information related to Amazon's destruction of certain hair dryer, carbon monoxide detector, and children's sleepwear products, Amazon-CPSC-FBA-00001617.

47. Attached as Exhibit 42 is a true and correct copy of a spreadsheet listing information related refunds issued by Amazon to purchasers of certain carbon monoxide detector and hair dryer products, Amazon-CPSC-FBA-00002377.

48. Attached as Exhibit 43 is true and correct copy of an email from the CPSC to Amazon with the subject line "CPSC Notice - Carbon Monoxide Detectors," Amazon-CPSC-FBA-00002712, sent on August 10, 2020.

49. Attached as Exhibit 44 is a true and correct copy of a spreadsheet listing information related to refunds issued by Amazon to purchasers of certain carbon monoxide detectors, hair dryers, and children's sleepwear, Amazon-CPSC-FBA-00003803.

50. Attached as Exhibit 45 is a true and correct copy of Complaint Counsel's Objections and Responses to Respondent's First Set of Interrogatories to Consumer Product Safety Commission, dated March 21, 2022.

51. Attached as Exhibit 46 is a true and correct compilation of copies of emails between Amazon and Third-Party Seller Dolcevida regarding certain children's sleepwear Subject Products, Amazon-CPSC-FBA-00000337, sent between November 20, 2020 and December 18, 2020.

52. Attached as Exhibit 47 is a true and correct compilation of copies of emails between Amazon and Third-Party Seller IDGIRLS International regarding certain children's sleepwear subject products, Amazon-CPSC-FBA-00000347, sent between November 20, 2020 and December 19, 2020.

53. Attached as Exhibit 48 is a true and correct compilation of copies of emails between Amazon and Third-Party Seller HOYMN regarding certain children's sleepwear products, Amazon-CPSC-FBA-00000342, sent between March 12, 2020 and December 30, 2020.

54. Attached as Exhibit 49 is a true and correct compilation of copies of emails between Amazon and Third-Party Seller Taiycyxgan regarding certain children's sleepwear products, Amazon-CPSC-FBA-00000353, sent between November 20, 2020 and December 16, 2020.

55. Attached as Exhibit 50 is a true and correct compilation of communications between Amazon and with Third-Party Sellers of the children's sleepwear Subject Products, Amazon-CPSC-FBA-00001615.

56. Attached as Exhibit 51 is a true and correct copy of an email from Amazon to Third-Party Seller Jackshop regarding certain carbon monoxide detectors, Amazon-CPSC-FBA-00001774, sent on December 7, 2020.

57. Attached as Exhibit 52 is a true and correct copy of an email from Amazon to Third-Party Seller WangLuoYMX regarding certain carbon monoxide detectors, Amazon-CPSC-FBA-00001776, sent on or about December 7, 2020.

58. Attached as Exhibit 53 is a true and correct compilation of copies of emails between Amazon and Third-Party Seller WJZXTEK Direct, Amazon-CPSC-FBA-00001778, sent between December 7, 2020 and December 8, 2020.

59. Attached as Exhibit 54 is a true and correct copy of an email from Amazon to Third-Party Seller Bistee US regarding certain carbon monoxide detectors, Amazon-CPSC-FBA-00001780, sent on December 7, 2020.

60. Attached as Exhibit 55 is a true and correct compilation of copies of emails between Amazon and Third-Party Seller lecoolife regarding certain carbon monoxide detectors, Amazon-CPSC-FBA-00001782, sent on December 7, 2020.

61. Attached as Exhibit 56 is a true and correct copy of an email from Amazon to Third-Party Seller Beauty-America SHOP regarding certain carbon monoxide detectors, Amazon-CPSC-FBA-00001784, sent on December 7, 2020.

62. Attached as Exhibit 57 is a true and correct compilation of copies of emails between Amazon and Third-Party Seller SiDell-US regarding certain carbon monoxide detectors, Amazon-CPSC-FBA-00001786, sent between December 7, 2020 and December 9, 2020.

63. Attached as Exhibit 58 are true and correct copies of email communications between Amazon and Third-Party Seller Liu Chongxiao with the subject line "Notice of Violation - Hair Dryers," Amazon-CPSC-FBA-00002346, sent on June 15, 2021.

64. Attached as Exhibit 59 is a true and correct copy of email communications between Amazon and Third-Party Seller Romancelink regarding certain hair dryers, Amazon-CPSC-FBA-00001813, sent between March 10, 2021 and June 5, 2021.

65. Attached as Exhibit 60 is a true and correct copy of the CPSC's "Recall Handbook" (the "2012 Recall Handbook") dated March 2012.

66. Attached as Exhibit 61 is a true and correct copy of the United States Government Accountability Office's report to Congress titled "Consumer Product Safety Commission: Actions Needed to Improve Processes for Addressing Product Defect Cases," Amazon-CPSC-FBA-00001566, dated November 2020.

67. Attached as Exhibit 62 is a true and correct copy of the Expert Report of Joseph P. Mohorovic, dated May 9, 2022.

68. Attached as Exhibit 63 is a true and correct copy of the article authored by Michael S. Wogalter, Sandra S. Godfrey, Gail A. Fontenelle, David R. Desaulniers, Pamela R. Rothstein, and Kenneth R. Laughery titled "Effectiveness of Warnings" that was published in Volume 29, Issue 5 of Human Factors in or about October 1987.

69. Attached as Exhibit 64 is a true and correct copy of the CPSC Office of Compliance and Field Operations' Division of Defect Investigation's Section 15 Defect Investigation Procedures Manual, CPSC_AM0013521 dated April 2014.

70. Attached as Exhibit 65 is a true and correct copy of a CPSC directive, CPSC_AM0014049, dated July 15, 1992.

71. Attached as Exhibit 66 is a true and correct copy of a presentation slide deck titled "CPSC Defect Recall Data" prepared by Carol Cave, CPSC_AM0009637, and presented as part of the CPSC's Recall Effectiveness Workshop program on July 25, 2017.

72. Attached as Exhibit 67 is a true and correct copy of the transcript from the deposition of Carolyn Carlin, taken on August 18, 2022.

73. Attached as Exhibit 68 is a true and correct copy of a presentation slide deck titled "Goals for CPSC Recall Press Releases" prepared by Patty Davis, CPSC_AM0009649, and presented as part of the CPSC's Recall Effectiveness Workshop program on July 25, 2017.

74. Attached as Exhibit 69 is a true and correct copy of the transcript from the CPSC's Recall Effectiveness Workshop's "early session," Amazon-CPSC-FBA-00001348, dated July 25, 2017.

75. Attached as Exhibit 70 is a true and correct copy of portions of a CPSC standard operating procedure, CPSC_AM0015392.

76. Attached as Exhibit 71 is a true and correct copy of the press statement titled "CPSC Staff Statement on Qualtrics, 'Consumer Attitudes and Behaviors Regarding Product Safety,'" dated July 2022.

77. Attached as Exhibit 72 is a true and correct copy of the CPSC recall alert titled "LUS Recalls Hair Dryers Due to Electrocution or Shock Hazard (Recall Alert)," published on the CPSC website as part of CPSC Recall No. 20-738 on April 23, 2020.

78. Attached as Exhibit 73 is a true and correct copy of the CPSC recall notice titled "Universal Security Instruments Recalls Combination Photoelectric Smoke & Carbon Monoxide Alarms Due to Risk of Failure to Alert Consumers to Hazardous Levels of Carbon Monoxide", published on the CPSC website as part of CPSC Recall No. 22-111 on March 31, 2022.

79. Attached as Exhibit 74 is a true and correct copy of the article authored by Jennifer A. Cowley and Michael S. Wogalter titled "Analysis of Terms Comprising Potential Names for a Recall Notification Campaign", published in Volume 52, Issue 21 of the Proceedings of the Human Factors and Ergonomics Society Annual Meeting Journal in September 2008.

80. Attached as Exhibit 75 is a true and correct copy of the CPSC recall notice titled "Cordless Electric Lawn Mowers Recalled Due to Fire Hazard; Made by Hongkong Sun Rise Trading", published on the CPSC website as part of CPSC Recall No. 17-168 on May 26, 2017.

81. Attached as Exhibit 76 is a true and correct copy of the CPSC recall notice titled "Cordless Electric Chainsaws Recalled Due to Injury Hazard; Distributed by Hongkong Sun Rise Trading", published on the CPSC website as part of CPSC Recall No. 18-090 on February 1, 2018.

82. Attached as Exhibit 77 is a true and correct copy of the CPSC recall notice titled "Essential Medical Supply Recalls Adult Portable Bed Rails Due to Entrapment and Asphyxia Hazard; One Death Reported", published on the CPSC website as part of CPSC Recall No. 22-039 on December 22, 2021.

83. Attached as Exhibit 78 is a true and correct copy of the CPSC recall alert titled "Trimmers/Brushcutters Recalled by STIHL Incorporated Due to Injury Hazard (Recall Alert)", published on the CPSC website as part of CPSC Recall No. 11-711 on December 16, 2010.

84. Attached as Exhibit 79 is a true and correct copy of the CPSC recall notice titled "Polaris Recalls RZR and GENERAL Recreational Off-Highway Vehicles Due to Burn and Fire Hazards", published on the CPSC website as part of CPSC Recall No. 17-102 on March 2, 2017.

85. Attached as Exhibit 80 is a true and correct copy of the CPSC recall notice titled "General Electric Recalls Gas Rangetop with Grill Due to an Explosion Hazard", published on the CPSC website as part of CPSC Recall No. 12-021 on October 25, 2011.

86. Attached as Exhibit 81 is a true and correct copy of the CPSC recall notice titled "Cree Recalls LED Lamps", published on the CPSC website as part of CPSC Recall No. 15-159 on June 4, 2015.

87. Attached as Exhibit 82 is a true and correct copy of the CPSC recall notice titled "CPSC and Crown Darts UK Warn Consumers to Stop Using and Dispose of Banned Lawn Dart Sets; Recalling Firm is Unable to Conduct Recall", published on the CPSC website as part of CPSC Recall No. 20-163 on August 12, 2020.

88. Attached as Exhibit 83 is a true and correct copy of the CPSC recall notice titled "Juratoys Recalls Bead Maze Toys Due to Choking Hazard", published on the CPSC website as part of CPSC Recall No. 20-066 on February 6, 2020.

89. Attached as Exhibit 84 is a true and correct copy of the CPSC recall notice titled "Impex Fitness Recalls Dumbbell Handles Due to Impact Injury Hazard", published on the CPSC website as part of CPSC Recall No. 22-022 on November 23, 2021.

90. Attached as Exhibit 85 is a true and correct copy of the CPSC recall notice titled "BRAV USA Recalls Youth Jackets with Drawstrings Due to Strangulation and Entrapment Hazards", published on the CPSC website as part of CPSC Recall No. 21-114 on April 21, 2021.

91. Attached as Exhibit 86 is a true and correct copy of the CPSC recall notice titled "Hooey Recalls Children's Sweatshirts with Drawstrings Due to Strangulation Hazard", published on the CPSC website as part of CPSC Recall No. 20-018 on November 12, 2019.

92. Attached as Exhibit 87 is a true and correct copy of the CPSC recall alert titled "Gorilla Commerce Recalls Oven Liners Due to Risk of Carbon Monoxide Poisoning (Recall Alert)", published on the CPSC website as part of CPSC Recall No. 21-705 on October 29, 2020.

93. Attached as Exhibit 88 is a true and correct copy of the CPSC recall notice titled "JW Crawford Recalls Children's Rain Ponchos Due to Strangulation Hazard", published on the CPSC website as part of CPSC Recall No. 18-023 on November 3, 2017.

94. Attached as Exhibit 89 is a true and correct copy of the CPSC's "Product Safety Planning, Reporting, and Recall Handbook" (the "2021 Recall Handbook"), CPSC_AM0011464, dated September 2021.

95. Attached as Exhibit 90 is a true and correct copy of a CPSC document titled "Recall Effectiveness Workshop Report," CPSC_AM0011459 CPSC Recall Effectiveness Workshop Report 2018, dated February 22, 2018.

96. Attached as Exhibit 91 is a true and correct copy of the presentation slide deck titled "Review of Recall Process and Standard Notifications" prepared by Blake Rose, CPSC_AM0009669, and presented as part of the CPSC's Recall Effectiveness Workshop program on July 25, 2017.

97. Attached as Exhibit 92 is a true and correct copy of the research paper titled "Insights into Product Recall Effectiveness", prepared by the U.K. Department for Business, Energy & Industrial Strategy's Office for Product Safety & Standards dated September 2020.

98. Attached as Exhibit 93 is a true and correct copy of an email from CPSC Senior Federal Investigator Michelle Mach to CPSC Senior Compliance Officer Joseph Williams with the subject line "FW: Attention: Important safety notice about your past Amazon order," CPSC_AM001814, sent on June 15, 2021.

99. Attached as Exhibit 94 is a true and correct copy of a study prepared for the CPSC by Heiden Associates and XL Associates titled "Recall Effectiveness Research: A Review and Summary of the Literature on Consumer Motivation and Behavior," CPSC_AM0010101, prepared in July 2003.

100. Attached as Exhibit 95 is a true and correct copy of the article authored by Lyndsey Layton titled "Officials Worry About Consumers Lost Among the Recalls", published in The Washington Post on July 2, 2010.

101. Attached as Exhibit 96 is a true and correct copy of an article authored by Michael S. Wogalter and William J. Vigilante, Jr. titled "Attention Switch and Maintenance", published in the first edition of the Handbook of Warnings in October 2006.

102. Attached as Exhibit 97 is a true and correct copy of an article authored by Anita Bernstein titled "Voluntary Recalls", published in Volume 2013 of the University of Chicago Legal Forum in 2013.

103. Attached as Exhibit 98 is a true and correct copy of an article titled "Product Recalls: Big Brother or Caring for One Another?", published by Stericycle Expert Solutions on June 12, 2018.

104. Attached as Exhibit 99 is a true and correct copy of the transcript of the hearing before the 114th Congress' Subcommittee on Consumer Protection, Product Safety, Insurance, and Data Security of the Senate, including a transcript of the statement by CPSC Commissioner Ann Marie Buerkle, dated October 8, 2015.

105. Attached as Exhibit 100 is a true and correct copy of the transcript of the hearing before the U.S. Senate Committee on Commerce, Science, and Transportation regarding an "Update on the Recalls of Defective Takata Air Bags and NHTSA's Vehicle Safety Efforts," dated June 23, 2015.

106. Attached as Exhibit 101 is a true and correct copy of a CPSC laboratory report analyzing a children's sleepwear product, CPSC_AM0014331, prepared by Emily Maling and approved by Allyson Tenney on June 22, 2022.

107. Attached as Exhibit 102 is a true and correct copy of a CPSC document titled "Draft Strategic Plan 2023–2026: Protecting the Public from Unsafe Consumer Products", as it appeared on the CPSC website on or about August 30, 2022.

108. Attached as Exhibit 103 is a true and correct copy of a study prepared by the Government Accountability Office titled "Consumer Product Safety Commission: Awareness, Use, and Usefulness of SaferProducts.gov", published March 11, 2013.

109. Attached as Exhibit 104 is a true and correct copy of the transcript of the deposition of Joseph P. Mohorovic, taken on July 20, 2022.

110. Attached as Exhibit 105 is a true and correct copy of the Merriam Webster Dictionary's entry for the word "recall", as it appeared on the Merriam Webster Dictionary website on or about September 20, 2022.

111. Attached as Exhibit 106 is a true and correct copy of Complaint Counsel's Notice of Deposition of Corporate Representative(s) for Respondent Amazon.com, Inc., dated June 15, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 23, 2022.

Joshua A. González

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2022, a true and correct copy of the foregoing document was, pursuant to the Order Following Prehearing Conference entered by the Presiding Officer on October 19, 2021:

- filed by email to the Secretary of the U.S. Consumer Product Safety Commission, Alberta Mills, at amills@cpsc.gov, with a copy to the Presiding Officer at alj@sec.gov and to all counsel of record; and
- served to Complaint Counsel by email at jeustice@cpsc.gov, lwolf@cpsc.gov, and sanand@cpsc.gov.

Nicholas Griepsma

Nicholas J. Griepsma