1 IN THE SUPERIOR COURT FOR THE STATE OF ALASKA THIRD JUDICIAL DISTRICT AT ANCHORAGE 2 THE STATE OF ALASKA, 3 4 Plaintiff, 5 v. 6 B. MERRY STUDIO, INC., ROBERT MERRY, JOSEPHINE MERRY, 7 MARY UY, MARK UY, and 8 JUDYLYN UY. 9 **Defendants** Case No. 3AN-22- CI 10 11 COMPLAINT FOR INJUNCTIVE RELIEF, 12 CIVIL PENALTIES, AND RESTITUTION (AS 45.50.501, AS 45.50.551) 13 14 The State of Alaska, by and through the Office of the Attorney General, alleges 15 and complains as follows: 16 INTRODUCTION 17 1. The Defendants run a family business, B. Merry Studio, Inc., in 18 Anchorage, Alaska. The Defendants sell knives, billikens, figurines, ornaments, and 19 similar products to retail stores and to individual customers. These items are advertised 20 as "Alaskan Made", as "Made in Alaska", or both. 21 22 2. In fact, the Defendants' primary business model is to acquire raw animal 23 materials such as bone, antler, and horn in Alaska, and then ship those materials to the 24 Philippines for manufacturing. The manufactured items are shipped back to Alaska in 25 finished or nearly finished form. The Defendants then remove the "Made in 26

Case No. 3AN-22- CI

Page 1 of 23

SOA v. B. Merry Studio, Inc. et al.

Complaint

Page 2 of 23

Philippines" stickers from the imported items, and replace them with labels claiming

ATTORNEY GENERAL, STATE OF ALASKA 1031 WEST 4TH AVENUE, SUITE 200 ANCHORAGE, ALASKA 99501-1994 PHONE (907) 269-5100

Complaint

11.	Mary Uy is the Secretary and a shareholder of B. Merry Studio, Inc.	c., and a
esident of A	Anchorage, Alaska.	

- 12. Mark Uy is an employee of B. Merry Studio Inc., and was a director and shareholder of B. Merry Studio, Inc. until February of 2021. Mark Uy is a resident of Anchorage, Alaska.
- 13. Judylyn Uy is an employee of B. Merry Studio, Inc., and a resident of Anchorage, Alaska.

JURISDICTION AND VENUE

- 14. The Attorney General has reason to believe that Defendants have engaged in acts or practices declared unlawful by AS 45.50.471, and brings this action in the public interest. This court has jurisdiction over all aspects of the complaint pursuant to AS 45.50.501(a) and AS 22.10.020.
- 15. Defendants conducted business in Anchorage, Alaska at all times relevant to this complaint. Venue in the Superior Court for the Third Judicial District at Anchorage is proper pursuant to Rule 3 of the Alaska Rules of Civil Procedure and AS 45.50.501(a).

FACTUAL ALLEGATIONS

I. B. Merry's Incorporation and History

16. On August 15, 2003, Robert Merry and Josephine Merry created a prior version of B. Merry Studio, Inc., called B. MERRY STUDIO, INC., an Alaska business corporation (entity number 81876D). This entity was involuntarily dissolved by the State on April 30, 2007.

SOA v. B. Merry Studio, Inc. et al. Complaint

Case No. 3AN-22-___CI Page 3 of 23

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17.	B. Merry operated without a business license from the date of the
dissolution of	f B. MERRY STUDIO, INC. (entity number 81876D) until August 9,
2012.	
18.	On August 9, 2012, Robert Merry obtained business license 977596, for
B. Merry Stu	dio, a sole proprietorship. The sole proprietorship's business license
expired on D	ecember 31, 2017.
19.	B. Merry Studio, Inc. incorporated on December 22, 2017, and obtained

- ined a business license on January 18, 2018. B. Merry Studio, Inc. remains in existence today. 20. B. Merry Studio, Inc. is a successor and mere continuation of the sole
- proprietorship (B. Merry Studio), the prior business corporation B. MERRY STUDIO, INC. (entity number 81876D), and the unlicensed and unincorporated version of B. Merry Studio. The current version of B. Merry Studio, Inc. is liable for the conduct of prior versions (licensed and unlicensed) of the company. The allegations in the following paragraphs pertain to a pattern of illegal conduct that began before the creation of the current iteration of the company and continue into the present.
- 21. The current and former versions of the company described in paragraphs 16 through 20 shall be collectively referred to as "B. Merry" in this Complaint.
- 22. B. Merry is a family business. Robert Merry and Josephine Merry are married. Mark Uy and Mary Uy are Josephine Merry's children, and Robert Merry's stepchildren. Judylyn Uy is married to Mark Uy.
- 23. B. Merry is in the business of selling knives, billikens, figurines, carvings, and similar products.

SOA v. B. Merry Studio, Inc. et al. Complaint

Case No. 3AN-22-Page 4 of 23

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24.	The majority of B. Merry's products are made, in part or in whole, from
nimal parts	s such as bone, horn, or antler.

- 25. B. Merry sells its products to retail stores across Alaska, including but not limited to stores in Anchorage, Girdwood, Juneau, Sitka, Ketchikan, and Petersburg.
- 26. B. Merry also sells its products directly to individual consumers over the internet and at live markets or shows.

II. B. Merry's Misuse of the "Made in Alaska" Emblem

- 27. The "Made in Alaska" emblem is a certification mark that is licensed to businesses by the Department of Commerce, Community, and Economic Development ("DCCED") for the purpose of promoting products that are manufactured in Alaska. The "Made in Alaska" emblem is registered with the State of Alaska, and with the U.S. Patent and Trademark Office.
- 28. The "Made in Alaska" emblem is well known in the State, and provides a competitive marketing advantage to businesses that use the emblem. Consumers trust that items with the "Made in Alaska" emblem were made in Alaska.
- 29. B. Merry possessed a permit to use the "Made in Alaska" emblem, but the permit was revoked on December 1, 2016 because B. Merry failed to file re-certification forms. B Merry obtained a new permit to use the "Made in Alaska" emblem on February 26, 2020.
- 30. B. Merry uses the "Made in Alaska" emblem in violation of its permitted use, by affixing the emblem to products that were not made in Alaska.

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B. Merry Falsely Markets Products as "Alaskan Made" and "Made in III. Alaska"

31. The majority of B. Merry's products offered for sale have a sticker attached to them that says "B. Merry" and "Alaskan Made." The image below is a typical example of a B. Merry product with the "Alaskan Made" sticker affixed to it.



In some instances, B. Merry's products are affixed with the State of 32. Alaska's trademarked "Made in Alaska" emblem instead of the "Alaskan Made" sticker. The image below is a typical example of a B. Merry Knife product with the "Made in Alaska" emblem affixed to it.



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33. In addition to the stickers, B. Merry knife blades are often etched with the words "B. Merry" and "Alaskan Made." The image below is a typical example of a B. Merry knife blade etching.



- The majority of B. Merry's products are not made in Alaska or by 34. Alaskans. B. Merry's products are typically made in the Philippines.
- 35. B. Merry acquires raw animal materials such as antlers, horns, and bone in Alaska, sometimes illegally purchasing the animal, or killing and illegally wasting the animal.
- 36. B. Merry then sends the animal products to the Philippines, typically to an entity called B&J's Pawnshop (B&J's) in Dumaguete City. Robert Merry and Josephine Merry have an ownership stake in B&J's.
- 37. B. Merry's exports of raw animal materials to the Philippines are documented by U.S. Fish and Wildlife Service declarations, denoting the raw materials being shipped.

SVWS Ferm 3-17 Bermed 4 V(0) 0 M B No. 1018-0 Expression Date: 94	012	11 44 / 11	U.S. FISH AND DECLARATION	FOR IMPO	RTATION	7 Name of 6	Camer story	
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	xport License Number:						331530	
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5 Purpose (10. Bonded ANCHOR	Location for Insp RAGE	pection
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						12. Marking Wildlife:	s on Cartons Co	ntaining
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				15c. Contact	Name;			
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ach	ALCES ALCES				нор	45 KG	l .	
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Ja.	MAMMUTHUS PREMIC	SENIUS			BOP	11 KG		_
'ou	MAMMOTH BONE				w	\$22	US	
15	HYDRODAMALIS GIGA	GIGAS			BOP	9 KG	US	
/2	STELLAR SEACOW				w	\$18		
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SOA v. B. Merry Studio, Inc. et al. Complaint

Userws Form 3-177 (Remed & 2010) (3 M. B. H. Bulls Vin) 12 (Application Desc. 40/11/2013) 1. Date of Import/Expert. (mem/dd/syyyy) Dio-11-2019 2. Import/Expert License Number: 1 E 0 4 1 5 DU 3. Indicate One:	9. Transportatio Diceus! 10. Bonded Loc Ar-20 11. Number of 0				Waybill or Bill of L se insportation Code insportation Code insportation for In Ar-Y-CytyRAC imber of Cartons Co arkings on Cartons Co	e or Province reprection, E ntaining Wilding;	
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15a. Customs Broker, Shipping Agent or Freigi (Complete business name/address/telephone an	nt Forwarder.	mail address)		Ger Number,		O Type:	
Species I for Scientific Name Graph Ching 195 Graph I I for Common Name		17a. Foreign CIT Numbe 17b. U.S. C Permit Nu	ITES	18a, Description Code 18b, Source Code	19a Quantity/Unit 19b. Total Monetary Valu	Origin Code (ISO Code)	21. Venomous Live Wildlife Indicator & (Check if you
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SOA v. B. Merry Studio, Inc. et al. Complaint

Case No. 3AN-22-___CI Page 9 of 23

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39.	Mark Uy ha	s signed a simila	r USFWS	declaration	for an	export of
ınmanufactu	ıred animal p	roducts to the Phi	lippines.			

- B&J's manufactures the raw materials into finished products and nearly 40. finished products, such as knives, billikens, figurines, and carvings.
- 41. As part of the manufacturing process, B&J's also uses products that are sourced from within the Philippines, such as dymond wood. On information and belief, B&J's also uses items sourced from China, such as knife blades with the words "B. Merry" and "Alaskan Made" already etched into them.
- 42. After manufacturing the raw materials into finished or nearly finished products, B&J's ships the products back to B. Merry in Alaska.
- 43. The images depicted below are typical invoices for items shipped from B&J's to B. Merry. The invoices are for "Labor Only", and include numerous products made from the types of raw materials B. Merry ships to B&J's.



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COMMERCIAL INVOICE: BJ0015-29 B & J'S PAWNSHOP AND FINE JEWELRY Ma. Cristina Street, Dumaguete City Tel. No. (6335) 422-5339

Email Add: bandjpawnshop@yahoo.com

Date: December 10, 2015

Attention:

SHIP TO B. Merry Studio 5603 Dorbrandt St. Anchorage, 907-243-8280

CARRIER: Teresa Gonzalgo PHONE NO .:

			PHONE NO.:		
QNTY	DESCRIPTION	UNIT	TOTAL	Raw Material	Total Materia
		PRICE		Cost	Cost
27	Caribou Antler PU Handles	10.00	270.00	15.00	405.00
134	Moose Antier PU Handles	10.00	1,340.00	15.00	2,010.00
30	Stellar Sea Cow PU Handles	10.00	300.00	15.00	450.00
10	Sheep Horn PU Handles	10.00	100.00	15.00	150.00
250	Plastic PU Handles	10.00	2,500.00	15.00	3,750.00
18	Caribou Antler BMK Handles	10.00	180.00	15.00	270.00
39	Caribou Antler BMK BH 5.0 Handles	10.00	390.00	15.00	585.00
3	Caribou Antier BMK EH 5.0 Handles	10.00	30.00	15.00	45.0
4	Plastic GH Handles	10.00	40.00	15.00	60.0
4	Stellar Sea Cow GH Handles	10.00	40.00	15.00	60.0
10	Caribou Antler GH Handles	10.00	100.00	15.00	150.0
3	Moose Antier GH Handles	10.00	30.00	15.00	45.0
14	Caribou Antler BH 3.5 Handles	10.00	140.00	15.00	210.0
2	Caribou Antier EH 3.5 Handles	10.00	20.00	15.00	30.0
7	Plastic Mule SK Handles	10.00	70.00	15.00	105.0
18	Moose Antler Mule SK Handles	10.00	180.00	15.00	270.0
15	Stellar Sea Cow Mule SK Handle	10.00	150.00	15.00	225.0
5	Sheep Horn Mule SK Handles	10.00	50.00	15.00	75.0
11_	Moose Antler Bear SK Handles	10.00	110.00	15.00	165.0
10	Caribou Antler Bear SK Handles	10.00	100.00	15.00	150.0
2	Plastic Bear SK Handles	10.00	20.00	15.00	30.0
14	Plastic FK Handles	10.00	140.00	15.00	210.0
					-
					-
OTAL SH	IPMENT BALANCE	Php	6.300.00	Php	

Box 2 of 2 box(es) Labor only

Note: All information is calculated in Philippine Peso Php Calculated exchange rate:

47.20 \$ \$200.21 133,47

RECEIVED PAYMENT BY: EVANGELINE MAQUILING

COMBINE TOTAL: 333.69

OFFICIAL RECEIPT NUMBER: 2579

Page 1 of 1 Box No. : 2

Weight: Approx. 83 kls.

ABOVE PRODUCTS ARE UNFINISHED

SOA v. B. Merry Studio, Inc. et al. Complaint

Case No. 3AN-22-___CI Page 11 of 23



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COMMERCIAL INVOICE: BJ0019-11

B & J'S PAWNSHOP AND FINE JEWELRY

Ma. Cristina Street, Dumaguete City Tel. No. (6335) 422-5339

Email Add: bandipawnshop@yanoo.com

Date: June 11, 2019

Attention:

SHIP TO B. Merry Studio 5603 Dorbrandt St. Anchorage, AK 9951H 907-243-8280

CARRIER: Teresa Gonzalgo

PHONE NO .:

QNTY	DESCRIPTION	UNIT	TOTAL	Raw Material Cost	Total Material
26	Plastic PU Handles	10.00	260.00	10.00	260.00
36	Caribou Antler PU Handles	10.00	360.00	10.00	360.00
125	Moose Antier PU Handles	10.00	1,250.00	10.00	1,250.00
152	Stellar Sea Cow PU Handles	10.00	1,520.00	10.00	1,520.00
10	Stellar Sea Cow MSK Handles	10.00	100.00	10.00	100.00
8	Moose Antier MSK Handles	10.00	80.00	10.00	80.00
9	Caribou Antier MSK Handles	10.00	90.00	10.00	90.00
16	Caribou Antler GM Handles	10.00	160.00	10.00	160.00
6	Moose Antier GH Handles	10.00	60.00	10.00	60.00
6	Stellar Sea Cow GH Handles	10.00	60.00	10.00	60.00
3	Dall Sheep GH Handles	10.00	30.00	10.00	30.00
9	Moose Antier CK Handles	10.00	90.00	10.00	90.00
-1	Moose Antier SK Handle	10.00	10.00	10.00	10.00
83	Moose Antier BMK 5.0 EH Natural Handles	10.00	830.00	10.00	830.00
2	Dall Sheep BMK 5.0 Handles	10.00	20.00	10.00	20 00
4	Moose Antier BMK 5.0 BH Natural Handles	10.00	40.00	10.00	40.00
6	Stellar Sea Cow BMK 5.0 Handles	10.00	60.00	10.00	60.00
53	Moose Antier BMK 3.5 EH Natural Handles	10.00	530.00	10.00	530.00
1	Moose Antier BMK 3.5 BH Natural Handle	10.00	10.00	10.00	10.00
9	Caribou Antler HT Handles	10.00	90.00	10.00	90.00
3	Moose Antier H1 Handles	10.00	30.00	10.00	30.00
3	Caribou Antier BSK Handles	10.00	30.00	10.00	30.00
1	Moose Antier BSK Handle	10.00	10.00	10.00	10.00
2	Stellar Sea Cow BSK Handles	10.00	20,00	10.00	20.00
OTAL SH	IPMENT BALANCE	Php	5,740,00	Pho	

Box 2 of 2 box(es)

Labor only

\$110.70

Note: All information is salculated in Philippine Peso Calculated exchange rate:

110.70

Manager

COMBINE TOTAL:

OFFICIAL RECEIPT NUMBER: 2720

Page 1 of 1 Box No.: 2

Weight: Approx. 71 kis.

ABOVE PRODUCTS ARE UNFINISHED

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> SOA v. B. Merry Studio, Inc. et al. Complaint

Case No. 3AN-22-____CI Page 12 of 23

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	44.	The invoices state that "Above Products are Unfinished", but multiple
federa	l inspec	ctions of B&J's imports have proven that the items B&J's ships to B.
Merry	are fin	ished or nearly finished.

- 45. Further, B&J's imported products have "Made in Philippines" stickers affixed to them, as required by federal law.
- 46. After receiving shipments from B&J's, B. Merry removes the "Made in Philippines" stickers.
- 47. B. Merry typically replaces the Made in Philippines stickers with stickers that say "Alaskan Made" or with stickers containing the "Made in Alaska" emblem.
- 48. The images shown below are examples of finished products shipped from B&J's to B. Merry, as photographed by federal agents who inspected B&J's imports.





49. The images shown below are front and back photographs of billikens that were available for sale at Grizzly Gifts in Anchorage on January 11, 2022 for \$69.99. These billikens appear identical to the imported billikens shown in Paragraph 48. The





50. The images below are photographs of a "pocket ulu" knife that is very similar to the pocket ulu shown in paragraph 48. The pocket ulu shown below was available for sale at the Alaska Mint on June 20, 2021, for \$64.99. The only notable

difference is that instead of a "Made in Philippines" sticker, this knife has a "Made in Alaska" sticker affixed to it.





The image below depicts two nearly finished knives shipped from B&J's 51. to B. Merry, as photographed by federal agents who inspected the package. One knife is still in its packaging, which includes stickers indicating that the handle was made in the Philippines and that the blade is made in China.



SOA v. B. Merry Studio, Inc. et al. Complaint

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52. The images below are front and back images of a knife, which was available for sale at Alaska Mint on January 10, 2022, for \$499.99. The knife appears identical to the knife depicted in paragraph 51, except that that eyes have been added to the handle, the "Made in Philippines" and "Made in China" stickers have been removed, and an "Alaskan Made" sticker has been added.





53. Robert Merry was interviewed by investigators. He denied placing "Made in Alaska" stickers on items imported from the Philippines. But he admitted that B. Merry removes "Made in Philippines" stickers from the imported products, and that "Alaskan Made" stickers are added to those products. He further stated that approximately half of his products are made in the Philippines.

54. By removing the "Made in Philippines" stickers from products and selling those products with the words "Alaskan Made" etched into them, or by placing "Alaskan Made" or "Made in Alaska" stickers on those products, B. Merry gives customers the false impression that its products are made in Alaska.

SOA v. B. Merry Studio, Inc. et al. Complaint

Case No. 3AN-22-Page 16 of 23

	55.	B. Merry further cultivates the false impression that its products are made
in Alas	ska thr	ough the use of print and online advertising, and through oral conversations
and oth	her dir	ect communications with customers.

56. The image below is of a photograph taken at Alaska Mint on March 29, 2021. The photograph depicts numerous B. Merry knives for sale, containing the "Made in Alaska" sticker or "Alaskan Made" sticker.



The paper placard at the back of the display reads:

BOB MERRY, AS A YOUNG BOY WAS PASSIONATE ABOUT THE OUTDOORS AND DEVELOPED A GREAT APPRECIATION OF ALL NORTH AMERICAN WILDLIFE. IN HIS EARLY ADULT LIFE HE WAS INVOLVED IN WILDLIFE MANAGEMENT.

BOB HAS HONED THE FINE ART OF CARVING WILDLIFE, FROM MANY NATURUAL MATERIALS FOUND IN NORTH AMERICA. OVER THE YEARS THE ENTIRE MERRY FAMILY HAS BECOME INVOLVED IN THE CARVING OF NATURAL RAW MATERIALS, RESIDING IN ALASKA THEY CONTINUE AS A FAMILY UNIT TODAY, BRINGING THEIR CARVING ART TO A HIGH PLATEAU.

THE BOB MERRY ART IS AVAILABLE IN SELECTED LOCATIONS IN NORTH AMERICA.

SOA v. B. Merry Studio, Inc. et al. Complaint

Case No. 3AN-22-___CI Page 17 of 23

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57. The image below is from a photograph taken at Grizzly Gifts on March 29, 2021. The image shows many B. Merry products for sale with "Made in Alaska" or "Alaskan Made" stickers affixed to them. The brochure in the middle of the display depicts the Merry family. This brochure is used to advertise B. Merry products at multiple stores in Alaska.



58. The brochure includes photographs of Robert Merry, Josephine Merry, Mary Uy, and Mark Uy in the process of carving B. Merry products, and contains a short blurb about each individual. The brochure also describes B. Merry as "Alaska's Premier Antler and Bone Sculpture Carvers."

- 59. In addition, B. Merry's Instagram page uses hashtags such as "#alaskamade", "#madeinalaska", "#alaskamadeproducts", "#alaskaknives", and "#alaskaartist" to promote B. Merry's products.
- 60. It is unfair and deceptive for B. Merry to promote its products as being made in Alaska or by Alaskans, when the products are made in the Philippines. It is also unfair and deceptive for B. Merry to fail to warn customers that some of its products are manufactured from animals that were illegally purchased, taken, or wasted.

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IV. B. Merry Falsely Advertises Products as Being Made from Steller's Sea Cow

- In addition to the "Alaskan Made" and "Made in Alaska" stickers, B. 61. Merry also uses stickers to label the particular animal that its products are purportedly made from.
- 62. A substantial portion of B. Merry's knives are purportedly made from Steller's sea cow.
- 63. Steller's sea cow was a large sea mammal species that inhabited the Russian Komandor Islands in the Bering Sea, until the species went extinct in the year 1768.
- 64. The image below is a photograph of a typical B. Merry knife, with a sticker claiming that the handle is made from Steller's sea cow.



65. Investigators purchased 23 B. Merry filet knives with Steller's sea cow stickers similar to the knife shown in the above paragraph. A forensic laboratory tested the knives, and determined that the majority of the knife handles were made from caribou or bowhead whale. None of the knife handles proved to be made from Steller's sea cow.

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	66.	B. Merry knows that the items it labels as Steller's sea cow are not made
from S	Steller's	s sea cow. B. Merry falsely labels items as Steller's sea cow because
Steller	's sea	cow items fetch a high price and because B. Merry seeks to evade federal
laws re	egardir	ng the export, import, and sale of bowhead whale products.

67. Selling knives that are inaccurately labeled as Steller's sea cow is unfair and deceptive. This conduct is particularly egregious when the knives are actually made from Bowhead whale—a species that is listed as endangered under the Endangered Species Act and protected under the Marine Mammal Protection Act.

V. The Individual Defendants Participated in B. Merry's Unfair and Deceptive **Trade Practices**

- 68. Robert Merry, Josephine Merry, Mary Uy, Mark Uy, and Judylyn Uy, all knowingly worked toward B. Merry's goal of selling products as "Alaskan Made" or "Made in Alaska", when those products were actually made in the Philippines. All of these individuals are aware of the overall scheme and of the conduct of each other.
- 69. Mark Uy and Robert Merry are typically involved in acquiring the raw materials that are later shipped to the Philippines.
- 70. Robert Merry and Josephine Merry are typically involved in shipping raw materials to the Philippines. However, Mark Uy has also been involved in this conduct.
- 71. Judylyn Uy and Mary Uy typically remove the "Made in Philippines" stickers from B. Merry products and replace them with the "Made in Alaska" emblem or "Alaskan Made" stickers.

78.

72.	Robert Merry, Josephine Merry, Mary Uy, and Mark Uy, are all involved
in the sale of	B. Merry products.
73.	Judylyn Uy is involved in bookkeeping and payroll.
74.	On information and belief, each of the named Defendants has additional
involvement	in B. Merry's operations beyond the involvement identified in Paragraphs
68 through 7	3.
75.	On information and belief, all of the individual Defendants are also aware
of, and active	ely contribute to, B. Merry's scheme to sell items as Steller's sea cow that
are not made	from Steller's sea cow.
COUNT I	
VIOLATION OF THE UNFAIR TRADE PRACTICES ACT, AS 45.50.471561	
76.	As described in this Complaint, Defendants engaged in unfair and
deceptive act	s and practices in violation of the provisions of the Unfair Trade Practices
Act, includin	g but not limited to: AS 45.50.471(a), (b)(2), (b)(4), (b)(6), (b)(11), and
(b)(12).	
COUNT II	
	TRADEMARK INFRINGEMENT, AS 45.50.170 and .180
77.	As described in this Complaint, Defendants infringed on the State's
trademarked	"Made in Alaska" Emblem in violation of AS 45.50.170.
	PERSONAL LIABILITY FOR COUNT'S I AND II

SOA v. B. Merry Studio, Inc. et al.

Case No. 3AN-22-___CI
Complaint

Page 21 of 23

practices, and for the acts of each other as part of a civil conspiracy.

Defendants are liable for their individual unfair or deceptive acts or

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- 79. Robert Merry, Josephine Merry, Mary Uy, and Mark Uy are additionally liable as officers, owners, and directors for all unfair or deceptive acts or practices of B. Merry because they had the authority to control the unfair or deceptive acts or practices and either had actual knowledge of the unfair or deceptive acts or practices, were recklessly indifferent as to whether the unfair or deceptive acts or practices were being committed, or knew it was highly probable that the unfair or deceptive acts or practices were being committed and intentionally avoided the truth.
- 80. Mark Uy and Judylyn Uy are additionally liable as employees for the unfair or deceptive acts or practices that they had some knowledge were unfair or deceptive and that they participated in or had the authority to control.
- 81. Robert Merry, Josephine Merry, Mary Uy, and Mark Uy are additionally liable for all unfair or deceptive acts or practices and all trademark infringement committed by B. Merry because they abused the corporate form to defeat public convenience, justify wrong, commit fraud, and defend crime.

DEMAND FOR JUDGMENT

WHEREFORE, the State of Alaska asks this court to enter judgment against the Defendants as follows:

- 82. Pursuant to AS 45.50.501, enjoining Defendants, and all who act under, by or through Defendants, from continuing to engage in the unlawful acts and practices alleged in this complaint;
- 83. Ordering Defendants, pursuant to AS 45.50.501(b), to restore to any person, any money or property which may have been acquired through the unlawful acts SOA v. B. Merry Studio, Inc. et al. Case No. 3AN-22-Page 22 of 23 Complaint

and practices alleged in this complaint, and which has not yet been restored to such	
person(s);	
84. Pursuant to AS 45.50.551(b), awarding separate civil penalties against	
each Defendant of \$25,000 per violation of AS 45.50.471, with the total number of	
violations to be proven at trial;	
85. Awarding full reasonable costs and attorney fees, including the cost of	
investigation, to the State of Alaska under AS 45.50.537(d);	
86. Pursuant to AS 45.50.180, ordering that B. Merry, Robert Merry,	
Josephine Merry, Mary Uy, and Mark Uy to cease the manufacture, use, display, or sale	
of the "Made in Alaska" emblem;	
87. Pursuant to AS 45.50.180, awarding punitive damages against B. Merry,	
Robert Merry, Josephine Merry, Mary Uy, and Mark Uy.	
88. Granting such additional relief as the court may deem proper.	
DATED February 3, 2022.	
TREG R. TAYLOR	
ATTORNEY GENERAL	
By: /s/ John H. Haley	
John H. Haley	
Assistant Attorney General	
Alaska Bar No. 1402010	