

Counterfeiting and its Impact on Trademark in the Fashion Industry through the Lens of Indian Law

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In the fashion industry, counterfeiting has been present for a long time, be it due to consumer preference or lack of job opportunities, forcing people to commit illegal acts like these. The internet revolution has also acted as fuel for the ever-so-booming counterfeiting market. Fashion brands spend an enormous amount of money on promoting their items. However, when these items become popular, businesses with ill intentions try to imitate them to encash the goodwill and reputation established by the reputed brands. As society develops, fashion brand owners desire to protect their products in all possible ways. This paper shall discuss how Indian trademark law protects fashion brand owners, how the offence of counterfeiting in the fashion industry is expanding in physical and online markets, and the threat of its outspread in the future on emerging platforms like Metaverse. The author shall try to provide potential solutions to curb counterfeiting in the Indian fashion industry.

Keywords: Fashion Industry, Counterfeiting, Trademark, Infringement, Passing Off, Metaverse

Fashion is a way to express oneself through the medium of clothes, jewellery, shoes, etc. It depicts an individual's personality. The famous saying of Heraclitus: 'change is the only constant in life', can be observed in the fashion sector as it is constantly evolving with time and has grown into a massive 'fashion industry'. It is one of the fastest-growing industries globally and currently values approximately 3 trillion US dollars annually.¹ The apparel and textile sector is the fourth most significant sector in the world, according to industry statistics.¹

The fashion industry is responsible for enormous growth in the economy and the generation of revenue. The three essential components accountable for the global economic upswing are globalization, progressing trade facilitation, and the rising economic importance of intellectual assets.² Though globalization is transforming the world, it has also opened new gates for lawbreakers to perform illegal acts in the online world. While talking about the illegal acts related to the trading and manufacturing of fake products, one cannot overlook the role of counterfeiting as an offence. The magnitude of counterfeiting has increased multifold as these lawbreakers have found ways to free-ride on others' intellectual assets and pollute trade routes with

counterfeits. Consequently, the global economy has been affected immensely.²

This paper shall discuss how counterfeiting occurs in the fashion industry in the physical, online, and Metaverse markets. It will further discuss how the Indian trademark law is tackling the booming issue of counterfeiting in the fashion industry.

Counterfeiting and its Impact on the Economy

Counterfeiting amounts to copying or imitating genuine /branded products with the intention to deceive consumers. These counterfeit products are so closely similar to the original trademarked goods that it is difficult to distinguish between the two with the naked eye. Generally, the materials used to make these products are cheap and low-quality, degrading the branded product's reputation and original brand in the market. According to the Oxford Dictionary, 'counterfeit item' means when an item is made to look exactly like another item to trick people into thinking that they are getting the actual thing.³ The Trade-Related Aspects of Intellectual Property Rights (TRIPS) Agreement of 1994 defines 'Counterfeit trademark goods' as: "any goods, including packaging, bearing without authorization a trademark which is identical to the trademark validly registered in respect of such goods, or which cannot

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be distinguished in its essential aspects from such a trademark and which thereby infringes the rights of the owner of the trademark in question under the law of the country of importation".⁴ Hence, whenever a mark identical or similar to a registered mark is embedded on any other good without permission, such good becomes a counterfeited good. As per the Indian Penal Code, 1860, when a person causes one thing to resemble another, even if the imitation is not exact, with the intention or the knowledge that he is likely to practice deception, he is said to commit 'counterfeiting'.⁵

Recent studies in India have shown the adverse impact on the economy due to counterfeiting. For instance, the Federation of Indian Chambers of Commerce & Industry (FICCI) Committee Against Smuggling And Counterfeiting Activities Destroying the Economy (CASCADE) has estimated, in its annual report 'Smuggling & Counterfeiting Activities Destroying the Economy: Annual Report (August 2020- May 2021)', that the total economic and social costs globally due to counterfeiting and piracy worldwide stood between USD 737 to USD 898 billion in 2013 and this was expected to go up to USD 1.54 to USD 1.87 trillion by 2022, suggesting an increase of 108 percent.⁶ Authentication Solution Providers' Association (ASPA), a non-profit organisation working to build up the authentication eco-systems & environment in India against counterfeiting activity and illicit economy, has released the latest edition of its report 'The State of Counterfeiting in India – 2021', which highlights the trends of counterfeiting incidents reported in India for the period from January 2018 to December 2020.⁷ According to this report, counterfeiting costs the Indian economy INR 1 trillion annually and it also states that: "*In fact, one in three Indian adults have been victims of fake products from one or the other e-commerce websites, making online counterfeiting the fastest growing crime*".⁷ The ASPA has also claimed in its 2019 report that out of the many sectors and industries that the counterfeiters have targeted, the fast-moving consumer goods (FMCG), electronic gadgets such as cell phones, liquor, pharmaceuticals, apparel, footwear, etc., are few most adversely affected.⁸ Hence, it is quite evident that the apparel, textile, or fashion industry has been impacted heavily due to the surge in counterfeit incidents.

In the fashion industry, luxury fashion brands are often considered the epitome of the elite class and

extravagant living. Hence, consumers are frequently deceived into buying counterfeited products of these luxury brands at lower prices. According to *The Fashion Law*, with the emergence of fake luxury goods, the market for counterfeit clothing, handbags, and accessories has grown into a 450 billion-dollar industry and is still growing.⁹ Recently, the United States Trade Representative (USTR) released the '2021 Review of Notorious Markets for Counterfeiting and Piracy' in which it provided a Notorious Market List (NML), it mentions the following physical markets of India which carries the sale of counterfeit goods: Heera Panna in Mumbai, Kidderpore in Kolkata, Palika Bazaar and Tank Road in Delhi.¹⁰ Allegedly, wholesale counterfeit goods are supplied from Tank Road to other markets like Gaffar Market and Ajmal Khan Road.¹⁰

Counterfeiting in the Fashion Industry

Imitation of fashion garments takes place in several ways. One is by way of counterfeiting, where the counterfeiter copies the design and the brand logo to make the consumers believe that they are buying an original branded product. For instance, 'LV' of Louis Vuitton or 'Adidas' with three stripes. To avoid the liability of copying the item, counterfeiters often misspell the brand on their product, such as 'Guccy' or 'Reebok'; however, due to the immense popularity of such brands, consumers are deceived into buying these counterfeited products. Apart from logos or labels, trademarked colour combinations, patterns, and trade dress of fashion brands are also copied onto these counterfeited items. For instance, in 2018, a British luxury brand 'Burberry' filed a trademark infringement and counterfeiting lawsuit of 8 million dollars against one of America's largest big-box retailers 'Target' for selling products having 'blatant reproductions' and bearing unauthorized copies of Burberry's world famous 'checks' trademark.¹¹ According to a research published by the UK Office for National Statistics in 2020, three in ten (29%) participants reported having purchased a counterfeit item.¹² One of the categories in which respondents were most likely to have knowingly made counterfeit purchases was 'Clothing, Footwear and Accessories', with 13% having done so in the past year.¹² In an interview, Chanel, a renowned luxury brand, stated: "*Fighting against counterfeit means more than simply protecting our brand image. It also means protecting our creativity, our know-how, and*

the quality of our products, as well as helping to protect consumers from products that may pose health risks."¹³ The statement infers that the counterfeited designer products not only harm the fashion brand's reputation as the quality of such fake products is low, but also the rights of the creator, the health of the consumers, and the economy of the nation¹⁴ are kept at risk.

The term 'counterfeit' in the fashion industry is synonymous with knock-offs, fakes, duplicates, and dupes. The only difference between counterfeit items and knock-offs is that, in the former, the copied item is sold with the fake logo of the brand; however, in the latter, only the design is copied from the original brand but is sold under some other name. However, in both cases, there is economic harm and loss of recognition of the true artist. Hence, the ever-increasing networking of counterfeiting, both in the real world and the virtual world, attacks the core of what a trademark stands for and jeopardizes the realm of protection a trademark is meant to provide.

Recently, a designer, Vaishali S made an allegation on *Instagram* against Geisha Designs for copying her design at the Cannes Festival 2022.¹⁵ Also, in 2018, an international brand 'Dior' was accused of plagiarism by an Indian graphic artist and designer, Orijit Sen, co-founder of People Tree.¹⁶ The famous yoga motif created by People Tree was printed on a Dior's Resort 18 collection dress without permission or acknowledgment.¹⁶ Though the parties managed to reach an out-of-court settlement, such an act of the counterfeiters amounts to infringement of the Intellectual Property (IP) rights, like trademarks of the fashion brand owners.

The Ramifications of Counterfeiting on Trademark

IP rights are the legal rights bestowed upon a person who is either a creator or inventor of a work that is a product of the person's intellect. IP law protects the rights of the creators in the form of patents, copyright, trademarks, etc., which enable them to earn recognition or reap commercial benefits from their creative work and aims to foster an environment where creativity and innovation can flourish.¹⁷ The IP right that deals with the protection of logos, labels, and designs; and, also act as business/brand identifiers is trademark. For instance, the symbol of the luxury brand Gucci is the iconic double G, created by Aldo Gucci, in the sans-serif typeface combined with the unique link-like design, and the

logo of the fast fashion brand Hennes & Mauritz (commonly known as H&M), features the letters 'H' and 'M' with an ampersand between them, with an Amperserif and custom italic typeface in bright red colour. Both these marks/logos are protected as trademarks. Hence, in the fashion industry, the trademark law protects the brand owner when an exact or similar mark/logo/ symbol of their brand name is copied by counterfeiters onto their low-quality products to deceive the consumers. In *Nike Innovate C.V v Ashok Kumar*¹⁸, Nike alleged that the defendant was selling counterfeit goods using their trademark/ label, 'Nike' and the Swoosh design. The Saket District Court, Delhi found that the defendant infringed on Nike's trademark and awarded Nike a permanent injunction and damages.¹⁸

It is not always necessary that the trademark be inscribed on the apparel so that it is visible from afar to seek trademark protection. Trademark law also protects the mark on the buttons or a small label inside the apparel, and these marks can seek protection as trade dress, i.e., the complete image of the product including size, shape, color or color combinations, texture, graphics, or even particular sales techniques, under the Trademark Act, 1999.¹⁹ Hence, besides the brand logo/label, fashion brands can seek trademark protection over the unique attributes of their products. For instance, the well-known fashion house Burberry has trademark protection over its expression 'Burberry' & the unique check-based design.

In India, counterfeiting is considered a criminal offence under Section 28 of the Indian Penal Code. It can also be considered as cheating under Section 415 of the Indian Penal Code, which provides the offender an imprisonment of either description for a term which may extend to one year, or with fine, or with both.²⁰ As far as the Trademarks Act, 1999 is concerned, the legislation does not explicitly provide for the term 'counterfeiting'. However, when counterfeited apparel with a fake logo of the fashion brand is sold in the market, it amounts to trademark infringement as the mark of the right holder is copied and used without his permission for monetary profit, which extends to an economic loss to the trademark holder. Also, due to the similarity between the original and counterfeited product, the consumers get tricked into buying a low-quality product, which might also dilute the mark. Hence, when an original/authentic trademark is attached to a

counterfeit product, it becomes a 'spurious mark'.²¹ The Delhi High Court has also held that in regard to counterfeiting, the concept of deceptive similarity does not arise since the goods are copies of the original.²² Thus, only proof of the existence of such goods is enough to constitute a counterfeit.²² Counterfeiting also occurs when a fashion brand's trade dress is imitated. For example, in 2016, Gucci filed a suit against Forever 21 for copying their trademarked 'stripes' in their clothing. Forever 21 claimed that such color combinations were commonly sold by other parties as well, and finally, the case was settled in 2018.²³ As a brand is also recognized through its well-known trade dress, copying the same also amounts to trademark infringement.

Trademark Act, 1999

The Trademark Act, 1999 protects both registered and unregistered marks. According to Section 29, when any person uses a trademark that is identical or deceptively similar to a registered trademark, they shall be held liable for trademark infringement. Even if a brand has not registered its logo or trade dress, the Act prohibits any person from passing off the said mark as theirs.²⁴

Hence, Sections 27 and 29 of the Trademark Act lack clarity in defining counterfeiting and leave much to interpretations. However, one of the sub-sections of Section 29 talks about infringement of a registered trademark by using an identical mark on the identical goods as that of the trademark owner, in the course of trade, wherein such use can result in a likelihood of confusion.²⁵ This appears to be a case of counterfeiting where the identity is uncanny in terms of, both, the mark and the goods concerned. There is another reference to the use of identical marks but on similar goods as that of the trademark proprietor and not on identical goods.²⁶ The language of the Trademark Act, 1999 doesn't provide guidance in this aspect as to whether this, too, shall be a counterfeit or simply an infringement. In most of the judgments, the counterfeiting issues were dealt with like infringement, which seems evident since counterfeiting is a form of infringement only. Still, there has hardly been any conceptual understanding of the differences between these concepts. There is a reason why the terms 'infringement' and 'counterfeiting' exist; however, going by the language of the provisions and even the judgments, the difference between the two seems rather hazy and not

touched upon as such. Presently, Section 135 of the Trademarks Act, 1999, provides for compensatory damages based on losses incurred or the profits gained as a remedy in an infringement suit. However, this is not always the easiest procedure as counterfeiting is a clandestine activity where a perpetrator won't usually maintain an account of profits that he has made from the illegal business.

Section 102 of the Trademark Act, 1999, covers the offence of counterfeiting aptly. This provision explains the meaning of falsifying a mark as an act when any person without permission makes an identical or a deceptively similar trademark of a genuine trademark. It also includes any modification, effacement, or any other manner within its ambit.²⁷ It also states that false application of the mark shall mean that when any person without permission applies an identical or deceptively similar trademark to goods, or on incidental packaging as well as the use of package bearing such alleged mark for containing or covering goods which differ from proprietor's genuine goods. This act of the infringer falsifies the trademark holder's identity and association with the mark by indulging himself in respect of the mark by counterfeiting it. Hence, it is evident that 'counterfeiting' can be brought within the ambit of the term 'false trademark'. On the interpretation of Section 102 of the Trademark Act, 1999, it can be deduced that the language of the provision is rather broadly worded in the sense that it doesn't require the mark to be registered or doesn't require the counterfeit mark to be used on goods identical to those of the proprietor. The legislature's intention in incorporating such broad language appears to be that deterrence can be created amongst the potential counterfeiters as the rightful owner can bring a criminal action even when the mark is not registered or when the goods are not per se identical. However, the requirement of intention to defraud²⁸, failure to take reasonable precautions, disclosure of information from the prosecutor, and failure to prove innocence²⁹ set a certain standard for criminal suits to be filed. Therefore, the criminal mechanism, at least on the face of it, appears to be stringent and deterrent in its application. Under Section 103 of the Trademark Act, 1999, for applying a false trademark or manufacturing counterfeited fashion brand products, the infringer can be imprisoned for six months, extending up to three years, and a fine of up to 2 lakh rupees.³⁰

The differences between Section 102 and trademark infringement/passing off provided under Sections 29 and 27, respectively, are: (1) Section 102 does not require the counterfeited/falsified mark to be 'registered', hence, the Court has opened its doors for providing protection under this provision to both registered and unregistered marks. Section 29 discusses explicitly about protection of registered marks, and Section 27 deals with passing off unregistered marks. (2) Section 135 provides a civil remedy for infringement/ passing off under Sections 29 and 27, respectively. However, Section 103 provides a criminal penalty for the offence committed under Section 102 and mentions the term 'intent to defraud', which makes it clear that to make a person liable under Section 102, 'intent' should be present. Hence, this proves that Section 102 relates to the offence of counterfeiting, as for the commission of such offence 'intent' is required. The application of these provisions is not limited to counterfeiting acts in physical markets; its scope also extends to online markets.

Counterfeiting in the Online World

According to John Bliss, the president of the International Anti-Counterfeiting Coalition, 'Counterfeiting has moved from the back alleys to the information superhighway'³¹, and this has happened due to the advancement of technology and the emergence of e-commerce sites and social media platforms. Counterfeiters have found new ways to deceive consumers and make them believe that the apparel they buy online is of the brand they are looking for and is available at reasonable prices; however, many incidents have been reported where the consumers have received cheap and low-quality fake products. According to Ghost Data, about 20 percent of fashion products advertised on social media platforms are fake.³² Facebook and its subsidiaries, like Instagram and WhatsApp, are the major social media markets on which counterfeit goods are sold.³³ These platforms are incredibly famous among counterfeiters as they sell fake products via their accounts by posting images of the products, which they claim to be original and authentic but, in reality, are fake or counterfeit. Clothes appear to be the most counterfeited product, followed by cosmetics and personal care, watches and jewellery, handbags, and luggage.³⁴ In August 2022, the Delhi High Court directed the blockage of a website called www.myshoeshop.in that was selling first copies of

famous footwear brands like Nike, Adidas, Louis Vuitton, and New Balance at heavily discounted rates.³⁵ Recently, the judiciary has been inclining towards realizing the grave nature and extent of online counterfeiting, especially in the fashion industry, and has been giving judgments in favour of the aggrieved trademark owner.³⁶

Information Technology Act, 2000

There is no separate legislation or guidelines to deal with online counterfeiting. Currently, the Trademarks Act, 1999 deals with such cases along with the Information Technology Act, 2000 (IT Act). The IT Act includes online auction sites and online marketplaces under the term 'intermediary'.³⁷ Section 79 of the IT Act has incorporated certain exemptions concerning intermediary liability, which is frequently resorted to by the intermediaries for trademark infringement suits, where the infringing or counterfeiting goods have been sold through their platforms.

The recent Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, framed in addition to the provisions of the IT Act, provide that the intermediaries should regulate the content being hosted through their platforms as well as act in due diligence with respect to the users' content being posted on their platform by giving them knowledge of the restriction imposed under the guidelines. In furtherance of the duties imposed by the Guidelines, the intermediary must inform the users, through regulations, user agreement, or terms and conditions, to not indulge in any conduct that might infringe any kind of intellectual property of the legitimate owner.³⁸ Recently, the Delhi High Court, in its judgment *Christian Louboutin SAS v Nakul Bajaj*³⁹, discussed elaborately the role and liability of intermediaries in specific reference to the instances where counterfeiting occurs via the intermediaries. One of the significant observations of the Court has been reproduced hereafter '*...So long as they are mere conduits or passive transmitters of the records or of the information, they continue to be intermediaries, but merely calling themselves as intermediaries does not qualify all e-commerce platforms or online market places as one...*' In this respect, the Court stated that the exemption to intermediaries under Section 79(1) is not absolute. Instead, if Sections 79(2) & 79(3) are complied with, only then the protection in the form of exemption is accorded. The Court has also construed the overriding effect of the IT Act enshrined in

Section 81 of the said Act in respect of Sections 29, 102, and 103 of the Trademark Act, 1999. It is observed that the provisions of the Trademark Act, 1999 are in accordance with the IT Act; therefore, the latter Act does not have any overriding effect on the former Act. The Court even gave some specific illustrations about counterfeiting via e-commerce/online platforms wherein such platforms/intermediaries could not avail liability exemption under Section 79 of the IT Act. The illustrations discussed by the Court will go a long way in guiding future litigation concerning online counterfeiting and have been put forth as follows:

- (i) Any e-commerce website would be causing falsification of the mark if it allows counterfeit goods to be stored therein.
- (ii) If the service provider is using the mark in its invoice, thereby giving the counterfeit goods an impression of being authentic, then such conduct shall also be referred to as falsification of the mark.
- (iii) Exhibiting and showcasing the advertisements of the mark concerned, which facilitates the promotion of counterfeit goods, would also amount to falsifying the mark.
- (iv) Using its own packaging with respect to a counterfeit product and then exhibiting the same for sale would also be a falsification.³⁹

Metaverse: A New Arena for Counterfeiting

Besides e-commerce platforms, emerging technologies like virtual reality (VR), augmented reality (AR), and blockchain have seen the daylight and gained popularity in the last three years. These technologies are considered the future, and every sector, such as healthcare, tourism, real estate, education, entertainment, etc., is trying to make its mark on the said platforms so that they are not left behind from reaping the benefits and the fashion industry is no exception to this. Metaverse is a VR that allows consumers to perform all the activities on the virtual platform they perform in the physical world. It provides a platform for fashion brands to host fashion shows for the VR audience. Tommy Hilfiger and his collaboration with Zendaya were displayed through an immersive VR experience in 2019.⁴⁰ Papa Don't Preach is India's first fashion apparel brand to display their garments and accessories on the Metaverse platform.⁴¹ A surge in virtual trademark registrations by fashion brands,

such as Dolce & Gabbana, Ralph Lauren, Gucci, Prada, YSL, and Off-White⁴², has been observed in order to protect their IP in the virtual world. However, with the emergence of this immersive virtual world, a new space for counterfeiting has also opened. Now, the question arises whether the present trademark law which protects tangible goods also covers virtual goods. For luxury fashion brands, it is easier to seek trademark protection on such platforms due to their well-known status, however, for other fashion brands or independent designers it is not so easy. Hence, physical trademark registrations should also protect the virtual items of the brand, as not every brand can afford the registrations on two platforms, physical and virtual.

One of the first decisions to deal with a trademark dispute arising from non-fungible tokens (NFTs) is *Meta Birkin v. Hermes*⁴³. In this case, the French luxury design house Hermes sent a cease & desist letter to Mason Rothschild for infringement of their IP rights by selling the counterfeit version of their famous Birkin bag in the Metaverse. Hermès argued on the extensive commercial use the artist had made of the MetaBirkin label, including selling other products under that label and operating digital storefronts and marketing campaigns using the name. Hermès also provided evidence of actual confusion among consumers and industry observers about the origin and authorization of the MetaBirkin NFTs. Judge Rakoff denied the motion to dismiss and held that Hermès had adequately alleged that the MetaBirkin label was explicitly misleading.⁴³ This case will help the judges decide the upcoming cases on trademark infringement/ counterfeiting in Metaverse; however, there is an urgent need to amend the existing laws to resolve any legal issues that might emerge in the future.

Conclusion

The fashion industry is evolving in India day by day. As it contributes to the country's economy, it has become essential to protect the rights of the stakeholders. Offences like counterfeiting compel the right holders to compromise on their creativity, affecting the country's creative quotient. Therefore, the laws must be made stringent to combat the issue of counterfeiting, especially in the fashion industry.

Amendment in Trademark Law

Trademark Act, 1999 of India offers protection against counterfeiting, however, the legislation

doesn't specifically mention the term 'counterfeit'. Hence, the Trademark Act, 1999 lacks in providing better protection to the right holders. Therefore, an amendment to the existing trademark legal regime is the need of the hour to make it more conducive to the fashion industry. Also, the counterfeit market has seen a boost after the COVID-19 pandemic, hence, the penalties imposed should be increased to ensure the protection of the rights of the original creators.⁴⁴ Another alternative could be the expansive interpretation of the existing provisions by the courts, however, for that, we would have to wait for an infringement to take place so that the case could go to the Court and a broader interpretation could be provided to the provisions. Hence, as prevention is better than cure, the legislature should add a separate provision for counterfeiting in the existing law.

Awareness Initiatives by Government

Apart from amending the Trademark Law, it is also essential that awareness about the ills of counterfeiting is spread across the population. Training and awareness programs for government officials are also necessary to resolve this issue of counterfeiting rapidly. Cell for IP Promotion and Management (CIPAM) has already conducted more than 100 training and sensitization programs among Police, Customs, and Judiciary to provide improved and coordinated responses to industry concerns.⁴⁵ In addition, an advisory has been issued by the Ministry of Home Affairs to all State Police Academies to incorporate IPR in their training curriculum for both regular and in-service police officers. An IPR Enforcement Toolkit for police has been created for this purpose in association with FICCI to help police officials deal with IP crimes, particularly trademark counterfeiting and copyright piracy. To counter online piracy, CIPAM collaborated with the National Internet Exchange of India (NIXI) and Maharashtra Cyber and Digital Crime Unit (MCDCU) to suspend over 380 infringing websites based on incomplete KYC (or WHOIS norms).⁴⁵ However, considering the data discussed in this paper, it is quite clear that although CIPAM has taken these steps, the menace of counterfeiting is still on the rise; hence, it is necessary to make further changes.

Stringent Measures Adopted by Online Platforms

Now, with the emergence of the internet and the availability of knowledge, identifying dupes, knock-offs, and fakes between brands and their

counterfeiting producers is a growing concern. E-commerce platforms can adopt strong and effective IP enforcement policies, increasing transparency and collaboration with right holders to quickly address complaints and working more closely with law enforcement to identify IP infringement. With respect to the protection of the NFT or Metaverse market from counterfeiting, certain companies like MarqVision and DevianArt are taking steps to combat the issue in question.⁴⁶ Hence, both in the physical and virtual world, steps are being taken to combat the problem of counterfeiting in the fashion industry, however, without legislature making laws stringent it would be difficult to completely eradicate the menace of counterfeiting.

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