

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL SALCEDO,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A,

Defendants.

Case No. 26-cv-4567

COMPLAINT

Plaintiff, Michael Salcedo (“Plaintiff”), by and through its attorneys, Aronberg Goldgehn Davis & Garmisa, for its Complaint against the Partnership and Unincorporated Associations identified on Schedule A (collectively referred to as “Defendants”) states as follows:

ALLEGATIONS COMMON TO ALL COUNTS

Nature of the Case

1. Plaintiff uses and is the owner of the federally registered trademarks: U.S. Registration Nos. 7,982,908 and 7,961,295 and common law trademarks corresponding to the same. True and correct copies of the registration certificates for the above trademarks are attached as **Exhibit A** (the “Alphabet Lore Marks”).

2. Plaintiff uses and is the owner of the federally registered copyrights: U.S. Registration Nos. PA0002382244 and VAu001541833. True and correct copies of the registration certificates for the above copyrights are attached as **Exhibit B** (the “Alphabet Lore Copyrights”).

3. This action has been filed to combat the online trademark and copyright infringement and counterfeiting of Defendants, who trade upon Plaintiff’s valuable intellectual

property including the Alphabet Lore Marks, and Alphabet Lore Copyrights (collectively the “Alphabet Lore IP”) by selling, and/or offering for sale, unauthorized, unauthentic, and counterfeit products in connection with the Alphabet Lore Marks, as well as to stop and prevent Defendants’ selling of unauthorized products that use, are based on, and/or are derived from, the Alphabet Lore Copyrights through the use, manufacture, offer to sell, and sale of unauthorized and infringing products (the “Unauthorized/Infringing Goods”).

4. Defendants use and operate fully interactive e-commerce stores¹ operating under the seller aliases identified in Schedule A attached hereto (the “Seller Aliases”).

5. Defendants create e-commerce stores operating under one or more Seller Aliases that are advertising, offering for sale, and selling Unauthorized/Infringing Goods to unknowing consumers.

6. E-commerce stores operating under the Seller Aliases share unique identifiers, establishing a logical relationship between them and that Defendants’ counterfeiting operation such that Defendants infringement arise out of the same transaction, occurrence, or series of transactions or occurrences.

7. Defendants attempt to avoid and mitigate liability by operating under one or more Seller Aliases to conceal both their identities and the full scope and interworking of their counterfeiting operations.

8. Defendants further utilize images from Plaintiff’s website in conjunction with the sale of products with the same or similar appearance as those sold by Plaintiffs, further causing confusion among customers.

¹ The e-commerce store URLs are listed on Schedule A under the Online Marketplaces.