

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

Yoeu Inc,

Plaintiff,

Case No.: 1:26-cv-04323

v.

The Partnerships and Unincorporated
Associations Identified on Schedule A,

Defendants.

COMPLAINT

NOW COMES Yoeu Inc (“Plaintiff”), by and through Plaintiff’s undersigned counsel, hereby brings the present case against the Partnerships and Unincorporated Associations identified on Schedule A attached hereto (collectively, “Defendants”), and alleges as follows:

Introduction

1. This action has been filed by Plaintiff to combat online counterfeiters who trade upon Plaintiff’s commercial reputation and goodwill by offering for sale and/or selling unauthorized and unlicensed counterfeit liquid herbal dietary supplements using Plaintiff’s federally registered trademark (the “Plaintiff Mark”) (see Exhibit 1). Plaintiff sells genuine liquid herbal dietary supplements under the Plaintiff Mark, including the product depicted and offered for sale on Plaintiff’s authorized online storefront, as shown in Exhibit 2 (the “Genuine Product”). Defendants’ listings use the Plaintiff Mark in the listing title, description and/or product images to advertise, offer for sale, and sell non-genuine liquid herbal dietary supplements that are not manufactured by, affiliated with, or authorized by Plaintiff (the “Counterfeit Products”).