

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

Zhiyong Chen,

Plaintiff,

Case No.: 1:26-cv-08681

v.

The Partnerships and Unincorporated
Associations Identified on Schedule A,

Defendants.

COMPLAINT

Plaintiff Zhiyong Chen ("Plaintiff"), by and through undersigned counsel, brings this action against the Partnerships and Unincorporated Associations identified on Schedule A (collectively, "Defendants") and alleges as follows:

NATURE OF THE ACTION

1. Plaintiff owns U.S. Trademark Registration No. 7,824,054 for the mark Yoeu Naturals (the "Plaintiff Mark") for use in connection with after-sun milks. A copy of the registration record is attached as Exhibit 1.

2. Defendants operate fully interactive online stores identified on Schedule A (the "Defendant Online Stores"). Through those stores, Defendants use the Plaintiff Mark to advertise, offer for sale, and sell non-genuine after-sun milks (the "Counterfeit Products") without Plaintiff's authorization.

3. Plaintiff, through its representative, completed a test purchase from each Defendant Online Store for delivery to an address in this Judicial District. Each Defendant accepted payment and processed the order for shipment to Illinois.