

2. The LEADER IP is valid, subsisting, and in full force and effect. True and correct copies of the federal copyright registration certificates for the LEADER Copyrights are attached hereto as **Exhibit 1**. True and correct copies of the federal trademark registration certificates for the LEADER Trademarks are attached hereto as **Exhibit 2**.

3. Defendants are improperly advertising, marketing, and/or selling unauthorized and illegal products infringing upon the LEADER IP (the “Counterfeit Products”). By selling Counterfeit Products that purport to be genuine and authorized products using the LEADER IP (the “Plaintiff’s Products”), Defendants cause confusion and deception in the marketplace.

4. Defendants create numerous fully interactive commercial internet stores operating under the online marketplace accounts identified in Schedule A (collectively, the “Defendant Internet Stores”), including on the platforms eBay, Etsy, Shein, Temu, TikTok, and Walmart (collectively, the “Marketplace Platforms”).

5. Defendants design their online marketplace accounts to appear to be selling genuine Plaintiff’s Products, while selling inferior imitations of such products.

6. The Defendant Internet Stores share unique identifiers, such as design elements and similarities of the Counterfeit Products offered for sale, establishing a logical relationship between them and suggesting that Defendants’ illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences.

7. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal counterfeiting operation. Plaintiff is forced to file this action to combat Defendants’ counterfeiting of the LEADER IP, as well as to protect consumers from unknowingly purchasing Counterfeit Products.

8. As a result of Defendants' actions, Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, and tarnishing of their valuable trademarks and goodwill. Plaintiff also has been and continues to be irreparably damaged through the copying and misappropriation of their valuable copyrights and goodwill. Therefore, Plaintiff seeks injunctive and monetary relief.

9. This Court has personal jurisdiction over each Defendant, in that each Defendant conducts significant business in New York and in this Judicial District, and the acts and events giving rise to this lawsuit of which each Defendant stands accused were undertaken in New York and in this Judicial District.

10. In addition, each Defendant has offered to sell and ship infringing products into this Judicial District.

SUBJECT MATTER JURISDICTION

11. This Court has original subject matter jurisdiction over the copyright claim pursuant to the Copyright Laws of the United States, 17 U.S.C. § 101 *et seq.*, and 28 U.S.C. §§ 1331, 1338(a)–(b).

12. This Court has original subject matter jurisdiction over the trademark infringement and false designation of origin claims in this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051 *et seq.*, and 28 U.S.C. §§ 1331, 1338(a)–(b).

13. This Court has jurisdiction over the unfair deceptive trade practices claims in this action that arise under the laws of the State of New York pursuant to 28 U.S.C. § 1367(a), because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

PERSONAL JURISDICTION AND VENUE

14. Personal jurisdiction exists over Defendants in this Judicial District pursuant to C.P.L.R. § 302(a)(1) and (3), or, in the alternative, Fed. R. Civ. P. 4(k) because, upon information and belief, Defendants regularly conduct, transact, and/or solicit business in New York and in this Judicial District; derive substantial revenue from business transactions in New York and in this Judicial District; and/or otherwise avail themselves of the privileges and protections of the laws of the State of New York such that this Court's assertion of jurisdiction over Defendants does not offend traditional notions of fair play and due process.

15. In addition, because Plaintiff sells genuine merchandise and apparel bearing the LEADER Copyrights and the LEADER Trademarks in this Judicial District, Defendants' illegal counterfeiting and infringing actions have injured Plaintiff in this Judicial District through lost sales and customers. Defendants' actions have also harmed Plaintiff by confusing and deceiving consumers in this Judicial District who can view Defendant Internet Stores such that Defendants should reasonably expect such actions to have consequences in New York and this Judicial District.

16. For example, Defendant Internet Stores accept orders for Counterfeit Products from and offer shipping to New York addresses located in this Judicial District. Exemplar screenshots of the shopping cart from Defendant Internet Stores allowing Counterfeit Products to be shipped to this Judicial District are attached as **Exhibit 3** to the Declaration of Juan Pablo Christensen, filed in conjunction with the filing of this Complaint.

17. Upon information and belief, Defendants also were and/or are systematically directing and/or targeting their business activities at consumers in the United States, including those in New York and in this Judicial District, through accounts (the "User Account(s)") on e-

commerce sites including the Marketplace Platforms, as well as any and all as yet undiscovered User Accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants, and all persons in active concert or participation with any of them. Through these User Accounts, consumers in the United States, including New York and in this Judicial District, can view the marketplace accounts that each Defendant operates, uses to communicate with Defendants regarding their listings for Counterfeit Products, and to place orders for, receive invoices for, and purchase Counterfeit Products for delivery in the United States, including New York and in this Judicial District, as a means for establishing regular business with the United States, including New York and in this Judicial District.

18. Defendants have transacted business with consumers located in the United States, including New York and in this Judicial District, for the sale and shipment of Counterfeit Products.

19. Venue is proper in this Court pursuant to at least 28 U.S.C. §§ 1391(b)(2) and 1400(a) because Defendants have committed acts of copyright and trademark infringement in this Judicial District and do substantial business in the Judicial District.

THE PLAINTIFF

20. LEADER is a limited company organized under the laws of Argentina with its principal place of business in Buenos Aires, Argentina.

21. LEADER is the creator of the LEADER Copyrights, as follows:

Copyright Reg. No.	Copyright	Registration Date
VA 2-409-101	LORITO PEPE	Aug. 22, 2024
VA 2-409-102	LA VACA LOLA	Aug. 22, 2024
VA 2-409-104	BARTOLITO	Aug. 22, 2024
VA 2-411-390	ZENON	Sep. 5, 2024

22. LEADER is the owner and/or assignee of the LEADER Trademarks, as follows:

U.S. TM Reg. No.	Trademark	Registration Date
6,624,657	(Classes 9, 16, 18, 25, 28, 35, 38, 41) 	Jan. 25, 2022
6,823,426	(Classes 9, 16, 18, 25, 28, 35, 38, 41) 	Aug. 23, 2022
7,082,813	(Classes 9, 16, 18, 21, 25, 28, 29, 35, 38, 41) LA VACA LOLA	Jun. 20, 2023
7,185,436	(Classes 9, 16, 18, 25, 28, 35, 38, 41) BARTOLITO	Oct. 10, 2023

THE DEFENDANTS

23. Defendants are individuals and business entities who, upon information and belief, reside mainly in the People's Republic of China or other foreign jurisdictions.

24. Defendants are merchants on online e-commerce platforms, including the Marketplace Platforms.

THE PLAINTIFF'S PRODUCTS

25. Plaintiff is a recognized leader in the Spanish-language children's entertainment and consumer products industry, distinguished by its digital-first content strategy, brand credibility, and scale. Plaintiff's products were developed to offer a music-driven preschool franchise built around original characters and songs. Plaintiff's brand and content have generated a massive following across YouTube and YouTube Kids, at their own YouTube Channels "El Reino Infantil" (translated as "The Children's Kingdom"), giving Plaintiff's Products an established, pre-existing audience connection to consumers as opposed to relying on a newly introduced brand. Plaintiff's products are extensively tested and produced under controlled sourcing and rigorous quality standards across a broad portfolio of licensed series, characters, and products.

26. From its origins as a YouTube channel dedicated to children's songs and original characters, LEADER has grown into a widely adopted brand with billions of views across its online content, exclusive licensing partnership across numerous product categories and territories worldwide, and a substantial subscriber base. Plaintiff has also received numerous awards and industry recognitions for its products, including YouTube Diamond, Gold, and Silver Play Button awards across its channel network; the Honorary Prize for Best Musical Content at KidFestival 2025 in Spain; the Eikon Award for Sustainability in Education; the Dircoms Award for Online

Communication; the “Pilar de la Industria” honorary recognition at the PRODU Awards during MIP Cancun; and a finalist selection in the Digital-First Program category at the Rose d’Or Latinos Awards in 2026.

27. From the launch of its first audiovisual content under its flagship IP, “La Granja de Zenón,” in 2016, Plaintiff and its authorized licensees have been the official source of genuine products incorporating the LEADER IP in the United States and around the world, which include an expanding portfolio of related entertainment and consumer products, such as more than 60 different merchandise items (including backpacks, toys, and plush toys), live theater productions such as, but not limited to, La Granja de Zenón live show at James L. Knight Center in Miami in August 2025, and additional series and character-based media. Since Plaintiff launched the LEADER Products, it has followed a defined strategy for positioning its brand, marketing and promoting the product line in the industry and to consumers, and establishing distribution channels. Plaintiff distributes, promotes, and/or sells its genuine LEADER Products directly to consumers through its own network of YouTube channels and related digital platforms, including Instagram, TikTok, and Facebook (Meta), and through exclusive licensees worldwide, with Arbrex Commercial Group SRL serving as one of Plaintiff’s first retail partners. Through these promotional efforts and others Plaintiff leverages ongoing partnerships to drive brand awareness and consumer engagement.

28. Since at least 2014, the LEADER IP is and has been the subject of substantial and continuous marketing and promotion by Plaintiff. Plaintiff has and continues to widely market and promote the LEADER IP in the industry and to consumers. Plaintiff’s promotional efforts include, by way of example but not limitation, experiential and retail-driven marketing initiatives, such as live theater productions touring across Spain, Argentina, and numerous Latin American countries