

11. In an effort to deceptively profit from the Santana Trademarks, Defendants utilize the Defendant Internet Stores, designed to give the impression that they are legitimate licensees or resellers of authentic products manufactured or authorized by Tesoro, with Defendants' ultimate intention being to deceive unknowing consumers into purchasing Counterfeit Products.

12. Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, tarnishment, loss of control over its creative work, among others, as a result of Defendants' actions and is thus seeking injunctive and monetary relief.

THE PLAINTIFF

13. Plaintiff is incorporated in Nevada and located at 11035 Lavender Hill Dr., Suite 160, #426, Las Vegas, Nevada 89135.

14. Plaintiff owns, manages, and licenses intellectual property related to the internationally renowned rock band, Santana ("Santana").

15. Santana was formed in 1966 in San Francisco, California, by guitarist, Carlos Santana. The band has sold over forty- seven (47) million albums in the US, and an estimated one hundred (100) million worldwide. In 1998, Santana was inducted into the Rock and Roll Hall of Fame, and in 2000, the band won eight Grammy Awards for hit singles "Smooth" and "Maria, Maria." Spanning six decades, Santana has been a pioneer for inclusion of Latin music into the mainstream and remains beloved by fans of every generation around the world.

16. Santana is currently preparing for the latest leg of its Oneness Tour, beginning on March 28, 2026, where they will perform throughout the United States.

17. Santana merchandise includes clothing, musical instruments, accessories like candles, scarves, tote bags, stickers, tote patches, bandanas, accessories for musical instruments,