

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

MICHAEL BARCOHANA,

Plaintiff,

v.

Changsha Leyoung and PuffBody,

Defendants.

Case No. 1:26-cv-01372

**COMPLAINT FOR TRADEMARK
INFRINGEMENT**

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff MICHAEL BARCOHANA, (“Plaintiff”), through its undersigned counsel, files this Complaint against Changsha Leyoung and PuffBody, (“Defendants”) and states the following allegations:

INTRODUCTION

Plaintiff brings this action against Defendants, who operate commercial storefronts on the Amazon.com online marketplace and who unlawfully exploits Plaintiff’s reputation and goodwill by manufacturing, marketing, offering for sale, and selling unauthorized and unlicensed products bearing infringing and counterfeit imitations of Plaintiff’s federally registered trademark (the “Counterfeit Products”).

Defendants establish their e-commerce stores on Amazon under their Seller Aliases through which Defendants advertise, offer for sale, and sell Counterfeit Products to unsuspecting consumers. Defendants further exploit the anonymity and expansive reach of the Internet, to unlawfully infringe on Plaintiff’s intellectual property rights.

Counterfeiters attempt to evade responsibility by operating under multiple Seller Aliases to hide their identities, locations, and the full extent of their counterfeiting scheme. Plaintiff is

forced to bring this action to stop the Defendants' counterfeiting of its registered trademark and to protect consumers from purchasing Counterfeit Products online. As a result of Defendants' actions, Plaintiff has suffered and continues to suffer irreparable harm through consumer confusion and dilution of its valuable trademarks, prompting a request for injunctive and monetary relief.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051, et seq., 28 USCS § 1338, and 28 USCS § 1331, as this action arises under the trademark laws of the United States.

2. This Court has personal jurisdiction over Defendants because Defendants directly target business activities toward consumers in the United States, including in the State of Illinois, through their interactive e-commerce stores on Amazon.com.

3. Venue is proper in this Court pursuant to 28 USCS § 1391, as a substantial part of the events giving rise to these claims occurred in this judicial district, including the offering for sale and sale of counterfeit products to consumers in this district.

THE PLAINTIFF

4. Plaintiff is the exclusive registered owner of the standard character mark, [REDACTED], United States Trademark Registration Number [REDACTED] and is therefore the appropriate Plaintiff to bring this case.

5. The [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

6. The [REDACTED] has been in use in U.S. commerce for Plaintiff's Goods since at least as early as August 3, 2024 ("Plaintiff's First Use Date").

7. The [REDACTED], in connection with Plaintiff's Goods have gained a strong following among health-conscious consumers by combining comfort, effective design, and a wellness-oriented aesthetic.

8. The [REDACTED] is widely promoted across wellness and beauty social media channels.

9. The [REDACTED] is inherently distinctive, and consumers associate the [REDACTED] with the exclusive source of Plaintiff's Goods.

10. The [REDACTED] is valid, subsisting, and in full force and effect. A copy of the United States registration certificate for Plaintiff's [REDACTED] is attached hereto as **Exhibit 1.**

11. Plaintiff's registration constitutes prima facie evidence of the validity of the marks and of Plaintiff's exclusive right to use the Trademarks in commerce pursuant to 15 U.S.C. § 1057(b).

12. The [REDACTED] is prominently displayed on Plaintiff's Goods, as well as in advertising, marketing, and promotional materials. Plaintiff has invested significant time, money, and resources to the creation, promotion, and protection of the [REDACTED]. Through these sustained efforts, Plaintiff has developed extensive brand awareness, consumer recognition and goodwill associated with the [REDACTED]. As a result, Plaintiff's Trademarks have become highly distinctive in the marketplace and symbolize the quality, reputation, and trust that consumers have come to expect from Plaintiff's Goods.

13. The [REDACTED] has become a valuable asset of Plaintiff's business, embodying the goodwill Plaintiff has established and distinguishing Plaintiff's products from those of competitors.

14. Plaintiff's Trademark has been used in US commerce continuously since at least as early as August 3, 2024, and has never been abandoned.

15. Genuine [REDACTED] are widely promoted and sold on Plaintiff's official website, [REDACTED], TikTok Marketplace, Amazon and are expanding to other sales and social media platforms, and likely will soon appear on retail shelves.

16. Sales of Genuine [REDACTED] Products through multiple channels are substantial and continue to grow, reflecting the strength of Plaintiff's brand and consumer trust.

17. Plaintiff's trademarks and products have also attracted unsolicited attention across social media, wellness blogs, and online communities focused on sleep optimization and breathwork. The growing presence of the [REDACTED] brand in the digital wellness industry has further increased the brand's recognition and positive reputation.

18. The [REDACTED] has been consistently promoted through social media campaigns, digital advertisements, email marketing, influencer partnerships, and branded packaging. Consumers widely recognize Plaintiff's Trademark as an indicator of origin, quality, and trustworthiness.

19. Plaintiff has invested substantial time, money, and resources in developing, promoting, and protecting the [REDACTED]. Plaintiff's exclusive sales channels and controlled distribution strategy serve legitimate business purposes, including safeguarding its intellectual property, maintaining consistent quality, minimizing consumer confusion, and reducing product liability risk.

20. The [REDACTED] has gained widespread recognition and significant brand value. The public, industry participants, and consumers associate [REDACTED]-branded products with Plaintiff and identify the Trademarks as symbols of high-quality, effective, and safe sleep support solutions. The significant goodwill and reputation associated with Plaintiff's Trademarks make them some of Plaintiff's most valuable assets.

THE DEFENDANTS

21. Defendants are unknown individual(s) and business entities who own and/or operate the e-commerce stores on Amazon.com and/or other seller aliases not yet known to Plaintiff. Defendants' residency, citizenship, and true addresses are unknown.

22. Defendant Changsha Leyoung is a business entity whose true address is unknown. Defendant's alleged business name is changsha leyang xiaofang shebei youxian gongsi and Defendant operates under the Brand name AEEFEU.

23. Defendant PuffBody is a business entity whose true address is unknown. Defendant's alleged business name is JIFENGQIANXINGKEJIYOUXIANGONGSI and Defendant operates under the Brand name PUFF BODY.

24. Upon information and belief, Defendants are foreign entities located in China and utilize Amazon's online marketplace, payment processing systems, and shipping infrastructure to sell infringing products to consumers throughout the United States, including Illinois.

25. Defendants' true identities and physical locations are intentionally concealed through the use of Seller Aliases and third-party marketplace infrastructure.

DEFENDANT'S UNLAWFUL CONDUCT

26. Plaintiff's overall success using the [REDACTED] has resulted in significant counterfeiting of the Brand Trademark.

27. Defendants concurrently employ and benefit from substantially similar advertising and marketing strategies.

28. E-commerce stores like Defendants, appear sophisticated and accepts payment in United States currency and/or funds from United States bank accounts via credit cards, Alipay, Shop Pay, Amazon Pay, Google Pay and/or PayPal.

29. Defendants advertise, market, offer for sale, and sell products bearing Plaintiff's [REDACTED] through Amazon storefront listings.

30. Defendants' Amazon product listings prominently display Plaintiff's trademark in product titles, descriptions, images, and promotional materials, thereby misleading consumers into believing the products are authorized by or affiliated with Plaintiff.

31. Defendants accept payment from U.S. consumers through Amazon's payment processing system and ship infringing products into Illinois.

32. Plaintiff has not authorized Defendants to use the [REDACTED], and Defendants are not authorized retailers or resellers of Plaintiff's genuine products.

33. Defendants' conduct is willful and intentional and designed to trade off Plaintiff's goodwill and reputation.

34. Defendants also deceive unknowing consumers by using Plaintiff's Trademark, within their advertising content, text, pictures, Search Engine Optimization ("SEO") terms, and/or meta tags for their Online Marketplace to attract various search engines crawling the Internet looking for websites relevant to consumer searches for Plaintiff's [REDACTED] products.

35. Counterfeiters like Defendants commonly engage in fraudulent conduct when registering the identities, such as the Seller Aliases, by providing false, misleading, and/or

incomplete information to prevent discovery of their true identities and the scope of their e-commerce operations.

36. Defendants unauthorized use of Plaintiff's Mark to sell counterfeit products in Illinois causes irreparable harm to Plaintiff by damaging its goodwill, reputation, brand, and trademark value. Attached as **Exhibit 2** are true and correct copies of examples of the uses of Plaintiff's Mark by Defendants.

COUNT I

TRADEMARK INFRINGEMENT AND COUNTERFEITING (15 U.S.C. § 1114)

37. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 36 as if fully set forth herein.

38. Plaintiff is the exclusive owner of the federally registered [REDACTED] [REDACTED] which is valid, subsisting, and in full force and effect.

39. Defendants uses the [REDACTED] in commerce without Plaintiff's consent.

40. Defendants have, without Plaintiff's authorization, manufactured, marketed, offered for sale, and sold products bearing counterfeit and infringing imitations of Plaintiff's [REDACTED] Mark.

41. Defendants use the [REDACTED] in connection with the sale, offering for sale, distribution, or advertising of goods.

42. Defendants use the [REDACTED] or substantially indistinguishable imitations thereof in connection with the advertising, promotion, offering for sale, and sale of counterfeit products through its Amazon storefronts listings.

43. The mark used by Defendants are a counterfeit mark.

44. Defendants' products bear marks that are identical to or substantially

indistinguishable from Plaintiff's registered [REDACTED], constituting counterfeit marks under the Lanham Act.

45. Defendants have sold counterfeit products to consumers, where products ordered on Amazon.com were delivered to consumers and shipped to Illinois.

46. Defendants have advertised its products on social media, such as Amazon, using [REDACTED] branded products in its videos.

47. Defendants' use of the [REDACTED] is likely to cause confusion, mistake, or deception.

48. Defendants' unauthorized use of the [REDACTED] is likely to cause confusion, mistake, and deception among consumers as to the origin, sponsorship, or approval of Defendants' products.

49. Consumers are likely to believe that Defendants' products originate from, are sponsored by, or are affiliated with Plaintiff when they are not.

COUNT II

FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

50. Plaintiff hereby re-alleges and incorporates by reference the allegations set forth in the Paragraphs 1 through 49, above.

51. Defendants' promotion, marketing, offering for sale, and sale of Counterfeit Products using the [REDACTED] without authorization, have and are creating a likelihood of confusion, mistake, and deception among the public as to the affiliation, connection, approval by, or association with Plaintiff, of the Defendants and their Counterfeit products.

52. By using Plaintiff's Trademark in connection with the sale of Counterfeit Products, Defendants create a false designation of origin.

53. By using Plaintiff's Trademarks, Defendants create a misleading representation of fact as to the origin and sponsorship of the Counterfeit Products.

54. Defendants false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the Counterfeit Products to the public is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

55. As a direct and proximate result of Defendants' actions, Plaintiff has suffered, and will continue to suffer, irreparable harm, including loss of goodwill, injury to reputation, and damage to the distinctiveness of its [REDACTED].

56. Monetary damages cannot adequately compensate such injuries. Plaintiff is entitled to injunctive relief under 15 U.S.C. § 1116, as well as damages, disgorgement of Defendants' profits, costs, and attorneys' fees pursuant to 15 U.S.C. § 1117.

57. If Defendants actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill of its [REDACTED].

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:

a. using Plaintiff's Trademark or any reproductions, counterfeit copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product, including within the content, text, SEO terms, and/or meta tags for their Online Marketplaces, that is not a genuine [REDACTED] product or is not authorized by Plaintiff to be sold in connection with Plaintiff's registered Trademarks;

b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Brand product or any other product produced by Plaintiff by using the [REDACTED] to sell and offer for sale such products that are not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff;

c. committing any acts calculated to cause consumers to believe that Defendants inferior products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff or its Brand;

d. further infringing Plaintiff's Trademarks and damaging Plaintiff's reputation and goodwill;

e. otherwise competing unfairly with Plaintiff through the unauthorized use of Plaintiff's Trademarks in any manner;

f. shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory sold or offered for sale through the unauthorized use of the Trademark;

g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendants store(s), or any other domain name or online marketplace account that is being used to sell or is the means by which Defendants could continue to sell counterfeit Brand products through the unauthorized use of the [REDACTED]; and

h. operating and/or hosting websites at the Defendants Online Marketplaces and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product through the unauthorized use of Plaintiff's [REDACTED].

2. Entry of an Order that, upon Plaintiff's request, those with notice of the injunction, including without limitation, any websites and/or online marketplace platforms, including Facebook, Instagram, TikTok, Amazon, Shopify, Alibaba, DHGate, eBay, and Walmart, shall disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using Plaintiff's [REDACTED];

3. That Defendants accounts for and pays to Plaintiff all profits realized by Defendants by reason of Defendants' unlawful acts herein alleged, and that the amount of damages for infringement of the [REDACTED] be increased by a sum not exceeding three times the amount thereof as provided by 15 U.S.C. § 1117;

4. In the alternative, that Plaintiff be awarded statutory damages for willful trademark counterfeiting pursuant to 15 U.S.C. § 1117(c)(2) of \$2,000,000 for each and every use of the [REDACTED] Trademark;

5. That Plaintiff be awarded its reasonable attorneys' fees and costs; and

6. Award any and all other relief that this court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury of all issues so triable pursuant to Federal Rule of Civil Procedure 38.

Dated: February 5, 2026

Respectfully Submitted,

By: /s/ Joseph W. Droter
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EXHIBIT 1
FILED
UNDER SEAL

EXHIBIT 2
FILED
UNDER SEAL