

US Law Group APC
Jiang Jing (Sean) (CA Bar No. 339158)
1968 South Coast Highway, #2854;
Laguna Beach, California, U.S. 92651;
Tel: 917-985-7989;
Email: CEO@USLaw.Group
Attorney for the Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT CALIFORNIA**

Shenzhen Yiranxin Technology Co., Ltd.

Case No. ['25CV1991 GPC MSB].

Plaintiff,

COMPLAINT

(1) Trademark Infringement and Counterfeiting (2) False Designation of Origin

The Partnerships and Unincorporated Associations Identified on Schedule "A," Defendants.

Action Seeking Statewide and Nationwide Relief

A. COMPLAINT

Plaintiff Shenzhen Yiranxin Technology Co., Ltd (hereinafter, “**YRX**” or “**Plaintiff**”) hereby brings the present action against the Partnerships and Unincorporated Associations identified on Schedule A attached hereto (collectively, the “**Defendants**”) and alleges as follows:

B. JURISDICTION AND VENUE

1. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051, *et seq.*, 28 U.S.C. § 1338(a)-(b), and 28 U.S.C. § 1331.
2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants since each of the Defendants directly targets business activities toward consumers in the United States, including California, through at

least the fully interactive e-commerce stores operating under the seller aliases identified in Schedule A attached hereto (the “**Seller Aliases**”). Specifically, Defendants have targeted sales to California residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases, offer shipping to the United States, including California, accept payment in U.S. dollars and/or funds from U.S. bank accounts and, on information and belief, have sold products using infringing and counterfeit versions of YRX’s federally registered trademark-“**IKMEN**” to residents of the U.S. (including California). Each of the Defendants is committing tortious acts in California, is engaging in interstate commerce, and has wrongfully caused YRX substantial injury in the State of California.

C. Introductions

3. This action has been filed by YRX to combat e-commerce store operators who trade upon YRX's IPs, reputation and goodwill by offering for sale and/or selling unauthorized and unlicensed products, including automotive maintenance and replacement parts, automotive accessories, key chains, apparel, and home decor products using infringing and counterfeit versions of YRX's federally registered trademark (the "**Counterfeit YRX Products**"). Defendants create e-commerce stores operating under one or more Seller Aliases that are advertising, offering for sale, and selling Counterfeit YRX Products to unknowing consumers. E-commerce stores operating under the Seller Aliases share unique identifiers establishing a logical relationship between them and that Defendants' counterfeiting operation arises out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid and mitigate liability by operating under one or more Seller Aliases to conceal both their identities and the full scope and interworking of their counterfeiting operation. YRX is forced to file this action to combat Defendants' counterfeiting of its registered trademarks, as well as to protect unknowing

1 consumers from purchasing Counterfeit YRX Products over the Internet. YRX has been and
 2 continues to be irreparably damaged through consumer confusion, dilution, and tarnishment
 3 of its valuable trademarks as a result of Defendants' actions and seeks injunctive and
 4 monetary relief.

5

6 **D. PARTIES**

7

8 **Plaintiff**

9

10 4. Shenzhenshi Yiranxin Technology Co., Ltd. is a limited liability company of People's
 11 Republic of China ("**PRC**"), having its principal place in PRC, from its founding to present
 12 day, has remained at the forefront of the automotive industry. It specializes in its own field
 13 in the automotive modification industry and has many partners around the world. It is
 14 associated with some of the most famous and storied brands in the automotive industry,
 including without limitation, Chevrolet, Toyota, Volkswagen, Porsche and BYD, etc.

15 5. Propelled by its reputation and recognizable trademarks, which are carefully curated and
 16 monitored, consumers recognize YRX and its YRX brand as a source of reliable and
 17 quality vehicles, vehicle parts and accessories, miniature vehicles and toys, and various
 18 other lifestyle products (collectively, the "**YRX Products**"). YRX has registered many
 19 of its trademarks with the United States Patent and Trademark Office. YRX Products
 20 typically include at least one of YRX's registered trademarks. YRX uses its trademarks
 21 in connection with the marketing of its YRX Products, including the following mark
 22 which is referred to as the "**YRX Trademark**."

Registration No.	Trademark
6340976	IKMEN

23

24 6. The above U.S. registration for the YRX Trademark is valid, subsisting, in full force and
 25 effect, and is incontestable pursuant to 15 U.S.C. § 1065. The registration for the YRX
 26 Trademark constitute *prima facie* evidence of their validity and of YRX's exclusive right to
 27

1 use the YRX Trademark pursuant to 15 U.S.C. § 1057(b). True and correct copy of the
2 United States Registration Certificate for the above-listed YRX Trademark is attached hereto
3 as Schedule B.

4 7. The YRX Trademark is distinctive when applied to the YRX Products, signifying to the
5 purchaser that the products come from YRX and are manufactured to YRX's quality
6 standards. Whether YRX manufactures the products itself or contracts with others to do so,
7 YRX has ensured that products bearing the YRX Trademark are manufactured to the good
8 quality standards.

9 10. YRX has expended substantial time, money, and other resources in developing, advertising
11 and otherwise promoting the YRX Trademark. Products have also been the subject of
12 extensive unsolicited publicity resulting from their high quality, performance, and
13 innovative design. As a result, products bearing the YRX Trademark are widely recognized
14 and exclusively associated by consumers, the public, and the trade as being high-quality
15 products sourced from YRX. The YRX Trademark has achieved fame and recognition
16 which has added to the distinctiveness of the marks. As such, the goodwill associated
17 with the Trademark is of incalculable and inestimable value to YRX.

18 9. The YRX Trademark has been used by YRX for many years. The innovative marketing
19 and product designs of the YRX Products have enabled the YRX brand to achieve
20 widespread recognition and fame and have made the YRX Trademark some of the most
21 well-known marks in the industry. The widespread fame, outstanding reputation, and
22 significant goodwill associated with the YRX brand have made the YRX Trademark
23 valuable assets of YRX.

24
25 **The Defendants**

26 10. Defendants are business entities of unknown makeup who own and/or operate one or
27 more of the e-commerce stores under at least the Seller Aliases identified on Schedule A

1 and/or other seller aliases not yet known to Plaintiff. On information and belief,
2 Defendants reside and/or operate in the People's Republic of China or other foreign
3 jurisdictions, or redistribute products from the same or similar sources in those locations.
4 Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b).

5 11. On information and belief, Defendants, either individually or jointly, operate one or more
6 e-commerce stores under the Seller Aliases listed in Schedule A attached hereto. Tactics
7 used by Defendants to conceal their identities and the full scope of their operations make it
8 virtually impossible for Plaintiff to learn Defendants' true identities and the exact
9 interworking of their counterfeit network. If Defendants provide additional credible
10 information regarding their identities, Plaintiff will take appropriate steps to amend the
11 Complaint.
12

13

14 **DEFENDANTS' UNLAWFUL CONDUCT**

15

16 12. The success of the YRX brand has resulted in significant counterfeiting of the YRX
17 Trademark. Consequently, YRX has an anti-counterfeiting program and regularly
18 investigates suspicious e-commerce stores identified in proactive Internet sweeps and
19 reported by consumers. Recently, YRX has identified a few interactive e-commerce stores
20 offering Counterfeit YRX Products on online marketplace platforms Amazon, including
21 the e-commerce stores operating under the Seller Aliases. The Seller Aliases target
22 consumers in this Judicial District and throughout the United States. According to a U.S.
23 Customs and Border Protection (CBP) report, in 2021, CBP made over 27,000 seizures of
24 goods with intellectual property rights (IPR) violations totaling over \$3.3 billion, an
25 increase of \$2.0 billion from 2020. Of the 27,000 in total IPR seizures, over 24,000 came
26 through international mail and express courier services (as opposed to containers), most of
27 which originated from China mainland and Hong Kong.
28

1 13. Defendants have targeted sales to California residents by setting up and operating e-
2 commerce stores that target United States consumers using one or more Seller Aliases,
3 offer shipping to the United States, including California, accept payment in U.S. dollars
4 and/or funds from U.S. bank accounts and, on information and belief, have sold Counterfeit
5 YRX Products to residents of California.

6
7 14. Defendants concurrently employ and benefit from substantially similar advertising and
8 marketing strategies. For example, Defendants facilitate sales of Counterfeit YRX Products
9 by designing the e-commerce stores operating under the Seller Aliases so that they appear to
10 unknowing consumers to be authorized online retailers, outlet stores, or wholesalers. E-
11 commerce stores operating under the Seller Aliases appear sophisticated and accept
12 payment in U.S. dollars and/or funds from U.S. bank accounts via credit cards, Alipay,
13 Amazon Pay, and/or PayPal. E-commerce stores operating under the Seller Aliases often
14 include content and images that make it very difficult for consumers to distinguish such
15 stores from an authorized retailer. On information and belief, Plaintiff has not licensed or
16 authorized Defendants to use any of the YRX Trademark, and none of the Defendants are
17 authorized retailers of genuine YRX Products.

18
19 15. Defendants also deceive unknowing consumers by using YRX Trademark without
20 authorization within the content, text, and/or meta-tags of their e-commerce stores to attract
21 various search engines crawling the Internet looking for websites relevant to consumer
22 searches for YRX Products. Other e-commerce stores operating under Seller Aliases omit
23 using YRX Trademark in the item title to evade enforcement efforts while using
24 strategic item titles and descriptions that will trigger their listings when consumers are
25 searching for YRX Products.

26
27 16. E-commerce store operators like Defendants commonly engage in fraudulent conduct
28 when registering the Seller Aliases by providing false, misleading and/or incomplete

1 information to e-commerce platforms to prevent discovery of their true identities and the
2 scope of their e-commerce operation.

3
4 17. E-commerce store operators like Defendants regularly register or acquire new seller aliases
5 for the purpose of offering for sale and selling Counterfeit YRX Products. Such seller alias
6 registration patterns are one of many common tactics used by e-commerce store
7 operators like Defendants to conceal their identities, the full scope and interworking of
8 their counterfeiting operation, and to avoid being shut down.

9
10 18. Even though Defendants operate under multiple fictitious aliases, the e-commerce stores
11 operating under the Seller Aliases often share unique identifiers, such as templates with
12 common design elements that intentionally omit any contact information or other
13 information for identifying Defendants or other Seller Aliases they operate or use. E-
14 commerce stores operating under the Seller Aliases include other notable common features
15 such as use of the same registration patterns, accepted payment methods, check-out methods,
16 keywords, advertising tactics, similarities in price and quantities, the same incorrect grammar
17 and misspellings, and/or the use of the same text and images. Additionally, Counterfeit
18 YRX Products for sale by the Seller Aliases bear similar irregularities and indicia of
19 being counterfeit to one another, suggesting that the Counterfeit YRX Products were
20 manufactured by and come from a common source and that Defendants are interrelated.

21
22 19. Counterfeitors such as Defendants typically operate under multiple seller aliases and
23 payment accounts so that they can continue operation in spite of YRX's enforcement.
24 E-commerce store operators like Defendants maintain off-shore bank accounts and
25 regularly move funds from their financial accounts to off-shore accounts outside the
jurisdiction of this Court to avoid payment of any monetary judgement awarded to YRX.
Indeed, analysis of financial account transaction logs from previous similar cases indicates

1 that off-shore counterfeiters regularly move funds from U.S.-based financial accounts to
2 off-shore accounts outside the jurisdiction of this court.

3
4 20. Defendants are working to knowingly and willfully import, distribute, offer for sale, and
5 sell Counterfeit YRX Products in the same transaction, occurrence, or series of transactions
6 or occurrences. Defendants, without any authorization or license from YRX, have
7 knowingly and willfully used and continue to use the YRX Trademark in connection
8 with the advertisement, distribution, offering for sale, and sale of the Counterfeit YRX
9 Products into the United States and California over the Internet.

10
11 21. Defendants' unauthorized use of the YRX Trademark in connection with the advertising,
12 distribution, offering for sale, and sale of Counterfeit YRX Products, including the sale of
13 Counterfeit YRX Products into the United States, including California, is likely to cause
14 and has caused confusion, mistake, and deception by and among consumers and is
15 irreparably harming YRX.

16
17 **E. COUNT 1**

18 **TRADEMARK INFRINGEMENT AND COUNTERFEITING (15 U.S.C. §**

19 **1114)**

20
21 22. YRX hereby re-alleges and incorporates by reference the allegations set forth in the
22 preceding paragraphs.

23
24 23. This is a trademark infringement action against Defendants based on their unauthorized use
25 in commerce of counterfeit imitations of the federally registered YRX Trademark in
26 connection with the sale, offering for sale, distribution, and/or advertising of infringing
27 goods. The YRX Trademark is a highly distinctive mark. Consumers have come to expect
28 the good quality from YRX Products sold or marketed under the YRX Trademark.

1 24. Defendants have sold, offered to sell, marketed, distributed, and advertised, and are still
2 selling, offering to sell, marketing, distributing, and advertising products using
3 counterfeit reproductions of the YRX Trademark without YRX's permission.

4 25. YRX is the exclusive owner of the YRX Trademark. YRX's United States Registration for
5 the YRX Trademark (Schedule B) is in full force and effect. On information and belief,
6 Defendants have knowledge of YRX's rights in the YRX Trademark and are willfully
7 infringing and intentionally using counterfeits of the YRX's Trademark. Defendants'
8 willful, intentional, and unauthorized use of the YRX Trademark is likely to cause and is
9 causing confusion, mistake, and deception as to the origin and quality of the Counterfeit
10 YRX Products among the general public.

11 26. Defendants' activities constitute willful trademark infringement and counterfeiting under
12 Section 32 of the Lanham Act, 15 U.S.C. § 1114.

13 27. YRX has no adequate remedy at law and, if Defendants' actions are not enjoined, YRX
14 will continue to suffer irreparable harm to its reputation and the goodwill of its well-
15 known YRX Trademark.

16 28. The injuries and damages sustained by YRX have been directly and proximately caused
17 by Defendants' wrongful reproduction, use, advertisement, promotion, offering to sell, and
18 sale of Counterfeit YRX Products.

21
22
23 **F. COUNT II**

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

25 29. YRX hereby re-alleges and incorporates by reference the allegations set forth in the
26 preceding paragraphs.

1 30. Defendants' promotion, marketing, offering for sale, and sale of Counterfeit YRX
2 Products has created and is creating a likelihood of confusion, mistake, and deception
3 among the general public as to the affiliation, connection, or association with YRX or the
4 origin, sponsorship, or approval of Defendants' Counterfeit YRX Products by YRX.

5 31. By using the YRX Trademark in connection with the sale of Counterfeit YRX Products,
6 Defendants create a false designation of origin and a misleading representation of fact as
7 to the origin and sponsorship of the Counterfeit YRX Products.

8 32. Defendants' false designation of origin and misrepresentation of fact as to the origin and/or
9 sponsorship of the Counterfeit YRX Products to the general public involves the use of
10 counterfeit marks and is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. §
11 1125.

12 33. YRX has no adequate remedy at law and, if Defendants' actions are not enjoined, YRX
13 will continue to suffer irreparable harm to its reputation and the goodwill of its YRX
14 Trademarks and brand.

15

16

17

18 **G. PRAYER FOR RELIEF**

19

20 WHEREFORE, YRX prays for judgement against Defendants as follows:

21 1) That Defendants, their affiliates, officers, agents, servants, employees, attorneys,
22 confederates, and all persons acting for, with, by, through, under or in active concert
23 with them be temporarily, preliminarily and permanently enjoined and restrained from:
24 a. using the YRX Trademark or any reproductions, counterfeit copies, or colorable
25 imitations thereof in any manner in connection with the distribution, promotion,
26 marketing, advertising, offering for sale, or sale of any product that is not a genuine

1 YRX Product or is not authorized by YRX to be sold in connection with the YRX
2 Trademark;

3 b. passing off, inducing, or enabling others to sell or pass off any products as genuine
4 YRX Products or any other products produced by YRX that are not YRX's, or not
5 produced under the authorization, control, or supervision of YRX and approved by
6 YRX for sale under the YRX Trademark;

7 c. committing any acts calculated to cause consumers to believe that Defendants'
8 Counterfeit YRX Products are those sold under the authorization, control, or supervision
9 of YRX or are sponsored by, approved by, or otherwise connected with YRX;

10 d. further infringing the YRX Trademark and damaging YRX's goodwill; and

11 e. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving,
12 storing, distributing, returning, or otherwise disposing of, in any manner, products or
13 inventory not manufactured by or for YRX, nor authorized by YRX to be sold or
14 offered for sale, and which bear any of YRX's trademarks, including the YRX
15 Trademark, or any reproductions, counterfeit copies, or colorable imitations thereof;

16 2) Entry of an Order that, upon YRX's request, those with notice of the injunction,
17 including, without limitation, any online marketplace platforms such as Amazon,
18 Walmart, and Temu (collectively, the "Third Party Providers") shall disable and cease
19 displaying any advertisements used by or associated with Defendants in connection
20 with the sale of counterfeit and infringing goods using the YRX Trademark;

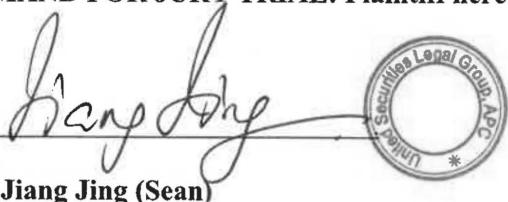
21 3) That Defendants account for and pay to YRX all profits realized by Defendants by
22 reason of Defendants' unlawful acts herein alleged, and that the amount of damages
23 for infringement of the YRX Trademark be increased by a sum not exceeding three
24 times the amount thereof as provided by 15 U.S.C. § 1117;

25 4) In the alternative, that YRX be awarded statutory damages for willful trademark
26 counterfeiting pursuant to 15 U.S.C. § 1117(c)(2) of \$100,000 for use of the YRX
27 trademark;

28 5) That YRX be awarded its reasonable attorneys' fees and costs; and

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

1
2 **DEMAND FOR JURY TRIAL:** Plaintiff hereby demands a jury trial on all issues so triable.
3
4

5 
6 By: Jiang Jing (Sean)



7 **US Law Group APC**

8 **Attorney for Plaintiff**

9 **Dated: July 31, 2025**

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 **Schedule A**

2 **Defendant Online Marketplaces**

No.	URL	Name / Seller Alias
1	https://www.amazon.com/sp?ie=UTF8&seller=A1QTFF7D7EC49I	Anthony Parts
2	https://www.amazon.com/sp?ie=UTF8&seller=A3P4LI8ATCIHIT	Mariah Auto LLC

1 **Schedule B**

2 **Registration Certificate of the YRX Trademark**

