

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

Yoeu Inc

Plaintiff,

Case No.: 1:26-cv-00007

v.

Honorable Mary M. Rowland

The Partnerships and Unincorporated
Associations Identified on Schedule A,

Defendants.

DECLARATION OF QIN ZHUANG

I, Qin Zhuang, declare as follows:

1. I am an attorney at law and counsel of record for Plaintiff Shenzhen Tongxing International Electronic Commerce Co., Ltd. (“Plaintiff”) in the above-captioned action. Unless otherwise stated, I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.
2. According to a U.S. Customs and Border Protection (CBP) report, in 2024, CBP made over 32.3 million seizures of goods with intellectual property rights (IPR) violations totaling over \$5.4 billion, an increase of \$2.6 billion from 2023.¹ Over 97% of the IPR seizures came through de minimis shipments, most of which originated from China and Hong Kong.²
3. At last count, global trade in counterfeit and pirated goods was worth an estimated \$467 billion per year — accounting for a staggering 2.3% of all imports, according to the

¹ See INTELLECTUAL PROPERTY RIGHTS SEIZURE STATISTICS, FISCAL YEAR 2024, CBP PUB. 3964-0125, U.S. CUSTOMS BORDER PROT., <https://www.cbp.gov/sites/default/files/2025-01/IntellectualPropertyRightsSeizureStatisticsFiscalYear2024%20FINAL.pdf> (last modified Jan. 16, 2025).

² Id.

Organization for Economic Cooperation and Development (the “OECD”).³ The primary source of all those counterfeits, the OECD and others say, is China.⁴

4. A February 2017 report commissioned by Business Action to Stop Counterfeiting and Piracy (BASCAP) and the International Trademark Association (INTA) entitled *The Economic Impacts of Counterfeiting and Piracy* included findings that counterfeit and pirated products account for billions in economic losses, resulting in tens of thousands of lost jobs for legitimate businesses and broader economic losses, including lost tax revenue.⁵
5. Based on my experience in online marketplace enforcement matters, defendants engaged in the unauthorized sale of trademark-infringing or counterfeit goods frequently respond to notice of lawsuits or enforcement activity by removing or altering listings, disabling storefronts, changing store names, and/or opening replacement stores under new seller aliases in order to evade detection and continue sales.
6. Based on my experience, once defendants receive notice of a lawsuit or impending restraint, they can and often will quickly move proceeds derived from online sales from accounts subject to U.S. jurisdiction (including payment-processor accounts) to external accounts and/or offshore accounts, and they can rapidly alter or delete online evidence. The speed of electronic transfers and the ease of modifying online storefronts increases the risk that advance notice would frustrate effective relief.

³ See Press Release, Organization for Economic Cooperation and Development, Global trade in fake goods reached USD 467 billion, posing risks to consumer safety and compromising intellectual property (May 7, 2025), <https://www.oecd.org/en/about/news/press-releases/2025/05/global-trade-in-fake-goods-reached-USD-467-billion-posing-risks-to-consumer-safety-and-compromising-intellectual-property.html>.

⁴ Id.; See also, Intellectual Property Rights Seizure Statistics, Fiscal Year 2024, U.S. Customs and Border Protection.

⁵ FRONTIER ECON., INT’L CHAMBER COM. BUS. ACTION TO STOP COUNTERFEITING & PIRACY & INT’L TRADEMARK ASS’N, *THE ECONOMIC IMPACTS OF COUNTERFEITING AND PIRACY* (2017), https://www.inta.org/wp-content/uploads/public-files/perspectives/industry-research/2017_Frontier_Report.pdf.

7. These risks are heightened where, as reflected in the materials submitted by Plaintiff, Defendants appear to operate from foreign jurisdictions (e.g. China), as shown in the Seller Information for Defendants, while directing sales into the United States. Absent prompt interim relief, there is a substantial risk that assets will be moved beyond the reach of this Court and that relevant evidence will be altered or destroyed.
8. For these reasons, the requested TRO and temporary asset restraint are necessary to preserve the status quo and to prevent dissipation of proceeds associated with the challenged sales before Defendants can be heard.
9. Based on my research, there is no treaty between the United States and the People's Republic of China establishing routine recognition and enforcement of judgments from United States courts in China. This practical reality supports the need for effective interim relief to preserve assets and maintain the Court's ability to award meaningful final relief.
10. Plaintiff also seeks narrowly tailored expedited discovery directed to third parties such as relevant online marketplaces, payment processors, and financial institutions. This discovery is necessary to identify Defendants, confirm contact information, and locate accounts and funds associated with the challenged online sales. Such information is uniquely within the possession of third parties and cannot reasonably be obtained from Defendants at this stage.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 14, 2026, in Beijing, China

Declarant: */s/ Qin Zhuang*

Print Name: Qin Zhuang