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BY \_\_\_\_\_  
DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 SAN JOAQUIN COUNTY

11 PEOPLE OF THE STATE OF  
12 CALIFORNIA ,

13 Plaintiff,

14 v.

15 CHEN ZHANG, (DOB 7/16/1980)

16 Defendant.

Case No. SF119093A

COMPLAINT [Felony]

20 COUNT 1

21 On or about and between January 1, 2010 and November 3, 2011, at and in the County San  
22 Joaquin in the State of California, Defendant **Chen Zhang** did commit a felony, a violation of  
23 PENAL CODE SECTION 350(a)(2), in that Defendant did willfully and unlawfully,  
24 manufacture, intentionally sell and knowingly posses for sale a counterfeit of a mark registered  
25 with the Secretary of State and registered on the Principal Register of the United States Patent and  
26 Trademark Office, to wit: Lia Sophia.

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COUNT 2

On or about and between January 1, 2010 and November 3, 2011, at and in the County San Joaquin in the State of California, Defendant **Chen Zhang** did commit a felony, a violation of PENAL CODE SECTION 350(a)(2), in that Defendant did willfully and unlawfully, manufacture, intentionally sell and knowingly possess for sale a counterfeit of a mark registered with the Secretary of State and registered on the Principal Register of the United States Patent and Trademark Office, to wit: Premier Designs.

COUNT 3

On or about and between January 1, 2010 and November 3, 2011, at and in the County San Joaquin in the State of California, Defendant **Chen Zhang** did commit a felony, a violation of PENAL CODE SECTION 350(a)(2), in that Defendant did willfully and unlawfully, manufacture, intentionally sell and knowingly possess for sale a counterfeit of a mark registered with the Secretary of State and registered on the Principal Register of the United States Patent and Trademark Office, to wit: Park Lane.

COUNT 4

On or about and between January 1, 2010 and November 3, 2011, at and in the County San Joaquin in the State of California, Defendant **Chen Zhang** did commit a felony, a violation of PENAL CODE SECTION 350(a)(2), in that Defendant did willfully and unlawfully, manufacture, intentionally sell and knowingly possess for sale a counterfeit of a mark registered with the Secretary of State and registered on the Principal Register of the United States Patent and Trademark Office, to wit: Thirty One Gifts.

COUNT 5

On or about and between January 1, 2010 and November 3, 2011, at and in the County San Joaquin in the State of California, Defendant **Chen Zhang** did commit a felony, a violation of PENAL CODE SECTION 350(a)(2), in that Defendant did willfully and unlawfully, manufacture, intentionally sell and knowingly possess for sale a counterfeit of a mark registered with the Secretary of State and registered on the Principal Register of the United States Patent and Trademark Office, to wit: Stella and Dot.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: December 6, 2011

Respectfully Submitted,

KAMALA D. HARRIS  
Attorney General of California



KEITH LYON  
Deputy Attorney General  
*Attorneys for People the State of California*