

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

PRINCIPAL FINANCIAL SERVICES, INC.,)	
an Iowa Corporation,)	
)	
and)	
)	
PRINCIPAL GLOBAL INVESTORS, LLC)	
A Delaware Limited Liability Company,)	
)	
Plaintiffs,)	Civil Action No.: 1:14-CV-01283
)	
v.)	
)	Honorable Harry D. Leinenweber
MAURICIO IZQUIERDO)	
an individual,)	
)	
and)	
)	
John Doe,)	
)	
Defendants.)	

[PROPOSED] FINAL JUDGMENT

This action having been commenced by Plaintiffs PRINCIPAL FINANCIAL SERVICES, INC. and PRINCIPAL GLOBAL INVESTORS, LLC, (collectively “Plaintiffs”) against Defendant MAURICIO IZQUIERDO (“Defendant”), and default having been entered against Defendant MAURICIO IZQUIERDO, the Court being fully advised in the premises, finds as follows:




FINDINGS OF FACT AND CONCLUSIONS OF LAW





1. This Court has jurisdiction over the subject matter of the Complaint in this action based on 28 U.S.C. §§ 1332, 1367 and 1338 and 15 U.S.C. § 1121. This Court has personal jurisdiction over the Defendant. Venue is proper within this judicial district.

2. This Court has personal jurisdiction over Defendant pursuant to the Illinois long-arm statute, 735 Ill. Comp. Stat. 5/2-209 *et seq.* and such assertion is in accordance with the Due Process Clause of the Fourteenth Amendment of the United States Constitution.
3. This is an action for trademark infringement, unfair competition, deceptive trade practices, cybersquatting, and trademark dilution which arises under the Lanham Act, Title 15, United States Code 1051, *et seq.*, and the statutes and common laws of the State of Illinois.
4. Plaintiff PRINCIPAL GLOBAL INVESTORS, LLC is a limited liability company duly organized and existing under the laws of the State of Delaware and located at 711 High Street, Des Moines, Iowa 50392 (hereinafter “Plaintiff” and/or “PGI”). PRINCIPAL GLOBAL INVESTORS, LLC is an indirect wholly owned subsidiary of PRINCIPAL FINANCIAL SERVICES, INC (herein after “PFSI”). Plaintiff PFSI is the owner of the famous family of PRINCIPAL and PRINCIPAL formative trademarks (“PRINCIPAL Family of Marks”) in the United States and throughout the world. PFSI, through its various member companies and licensees, uses its famous family of PRINCIPAL and PRINCIPAL formative trademarks in interstate commerce and throughout the world in connection with a variety of services including, but not limited to, real estate, investment, investment management, investment advisory, lending, insurance, underwriting, employee benefits, estate planning, tax consultation, financial, banking, mutual funds, retirement, global asset management, and healthcare related services.
5. PFSI and/or its affiliates, licensees or predecessors-in-interest are, and have been for many years, engaged in marketing, advertising and providing a wide variety of real estate, investment, investment management, investment advisory, lending, insurance,





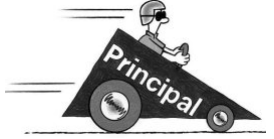
underwriting, employee benefits, estate planning, tax consultation, financial, banking, mutual funds, retirement, global asset management, and healthcare related services (hereinafter “Plaintiffs’ Services”).




6. PFSI is the owner of its famous family of PRINCIPAL and PRINCIPAL formative trademarks, including, but not limited to, the following current and subsisting U.S. registrations, pending applications, common law marks, and trade names (hereinafter collectively referred to as the “PRINCIPAL Family of Marks”):


Mark	Reg. No.	Reg. Date	Services
THE PRINCIPAL EDGE	1,469,375 Incontestable	12/15/87	Life, health, accident and casualty insurance underwriting services, investment management services, administering annuities, mutual funds, pensions and income programs for others and register investment advisory services
THE PRINCIPAL FINANCIAL GROUP	1,502,424 Incontestable	08/30/88	Consulting and contract management services to preferred provider organizations; arranging for prepaid medical care for others; health care services rendered through preferred provider organizations
	1,504,246 Incontestable	09/13/88	Consulting and contract management services to preferred provider organizations; arranging for prepaid medical care for others; health care services rendered through preferred provider organizations
	1,508,542 Incontestable	10/11/88	Life, health insurance and reinsurance underwriting and brokerage services; underwriting, administering and managing annuities and pension funds for others; variable life insurance and variable annuities funded through a variety of funding media
THE PRINCIPAL FINANCIAL GROUP (Stylized)	1,508,543 Incontestable	10/11/88	Life, health insurance and reinsurance underwriting and brokerage services; underwriting, administering and managing annuities and pension funds for others; variable life insurance and variable annuities funded through a variety of funding media
THE PRINCIPAL (Stylized)	1,508,544 Incontestable	10/11/88	Life, health insurance and reinsurance underwriting and brokerage services; underwriting, administering and managing annuities and pension funds for others; variable life insurance and variable annuities funded through a variety of funding media
	1,530,022 Incontestable	03/14/89	Life, health insurance underwriting services, investment management services, administering annuities, mutual funds, pensions and income programs for others, registered investment advisory services and broker-dealer securities services

Mark	Reg. No.	Reg. Date	Services
	1,530,023 Incontestable	03/14/89	Life, health insurance underwriting services, investment management services, administering annuities, mutual funds, pensions and income programs for others, registered investment advisory services and broker-dealer securities services
	1,531,199 Incontestable	03/21/89	Life, health insurance underwriting services, investment management services, administering annuities, mutual funds, pensions and income programs for others, registered investment advisory services and broker-dealer securities services
THE PRINCIPAL PLAN	1,561,335 Incontestable	10/17/89	Arranging for pre-paid medical care for others
PRINCIPAL	1,562,541 Incontestable	10/24/89	Financial analysis and consulting, management of securities and securities brokerage services
	1,698,013 Incontestable	06/30/92	Real estate leasing and management services
THE PRINCIPAL FINANCIAL GROUP	1,740,172 Incontestable	12/15/92	Commercial and residential real estate services; namely, brokerage, investment, management, mortgage loan, and valuation services
THE PRINCIPAL	1,740,181 Incontestable	12/15/92	Commercial and residential real estate services; namely, brokerage, investment, management, mortgage loan, and valuation services
PRINCIPAL BANK	2,843,297 Incontestable	05/18/04	Retail commercial banking services, namely, checking, savings, money market, credit cards, certificates of deposit, mortgage loans, commercial real estate lending, and corporate banking services
PRINCIPAL GLOBAL INVESTORS	3,053,544 Incontestable	01/31/06	Financial services, namely, portfolio management, financial market analysis, asset management, mortgage lending, real estate and securities investment management and investment management advisory services
	3,095,382 Incontestable	05/23/06	Retail commercial banking services, namely, checking, savings, money market, credit cards, certificates of deposit, mortgage loans, commercial real estate lending, and corporate banking services
PRINCIPAL FREEDOM	3,107,136 Incontestable	06/20/06	Financial services, namely, variable annuities
PRINCIPAL ADVANTAGE	3,174,382 Incontestable	11/21/06	Life, health, accident and casualty insurance underwriting and brokerage services, investment management services, underwriting, administering and managing annuities, mutual funds, pensions and income programs for others, registered investment advisory services and management of securities and securities brokerage services


Mark	Reg. No.	Reg. Date	Services
	<p>3,297,647 Incontestable</p>	<p>09/25/07</p>	<p>Annuities underwriting and investment, management of, distribution and administration services, namely, providing administrative services for fixed and variable annuities; funds investment; trust and custodial services for retirement plans, namely, investment of funds for others in the field of mutual funds and individual retirement accounts; administration of employee pension plans; financial services in the nature of an investment security; investment management services; mutual fund investment, distribution and brokerage; administration of employer provided and individual pension and fixed investment income programs; registered investment advisory services and broker-dealer securities services, namely, brokering and trading in securities and providing investment advisory services; banking services; consumer loan financing; pension plan consulting; estate planning; financial planning; administration services of insurance in the fields of life, disability, dental, prescription drug, vision and accidental death and dismemberment; administration of employee benefit plans, namely, deferred compensation benefit plans, profit sharing plans, cafeteria plans and other employee benefit plans; insurance underwriting and brokerage services for groups and individuals in the fields of life, disability and dental; real estate mortgage lending and mortgage asset procurement for others; maintaining real estate mortgage escrow accounts; real estate investment services; real estate management; leasing of commercial real estate; financial investment in the field of real estate development; providing administration services to employee welfare benefit plans and pre-paid dental plans and claims administration, namely, claims processing; and retail commercial banking services, namely, checking, savings, money market, credit cards, certificates of deposit, mortgage loans, commercial real estate lending, and corporate banking services</p>
<p>PRINCIPAL</p>	<p>3,324,583 Incontestable</p>	<p>10/30/07</p>	<p>Annuities underwriting and investment, management of, distribution and administration services, namely, providing administrative services for fixed and variable annuities; funds investment; trust and custodial services for retirement plans, namely, investment of funds for others in the field of mutual funds and individual retirement accounts; administration of employee pension plans; financial services in the nature of an investment security; investment management services; mutual fund investment, distribution and brokerage; administration of employer provided and individual pension and fixed investment income programs; registered investment advisory services and broker-dealer securities services, namely, brokering and trading in securities and providing investment advisory services; banking services; consumer loan financing; pension plan consulting; estate planning; financial planning; administration services of insurance in the fields of life, disability, dental, prescription drug, vision and accidental death and dismemberment; administration of employee benefit plans, namely, deferred compensation benefit</p>

Mark	Reg. No.	Reg. Date	Services
			plans, profit sharing plans, cafeteria plans and other employee benefit plans; insurance underwriting and brokerage services for groups and individuals in the fields of life, disability and dental; real estate mortgage lending and mortgage asset procurement for others; maintaining real estate mortgage escrow accounts; real estate investment services; real estate management; leasing of commercial real estate; financial investment in the field of real estate development; providing administration services to employee welfare benefit plans and pre-paid dental plans and claims administration, namely, claims processing; and retail commercial banking services, namely, checking, savings, money market, credit cards, certificates of deposit, mortgage loans, commercial real estate lending, and corporate banking services
	3,368,180 Incontestable	01/15/08	Financial services, namely, mutual fund investment services
PRINCIPAL FUNDS	3,368,181 Incontestable	01/15/08	Financial services, namely, mutual fund investment services
THE PRINCIPAL CHARITY CLASSIC	3,369,005 Incontestable	1/15/08	Golf umbrellas; plastic water bottles sold empty; jackets; hats; t-shirts; golf shirts; golf balls; entertainment in the nature of golf tournaments
	3,400,594 Incontestable	03/25/08	Financial services, namely, portfolio management, financial market analysis, asset management, mortgage lending, real estate and securities investment management and investment management advisory services
	3,456,731 Incontestable	07/01/08	Golf umbrellas; plastic water bottles sold empty; jackets; hats; t-shirts; golf shirts; golf balls; entertainment in the nature of golf tournaments
	3,461,024	07/08/08	Financial sponsorship of automobile racing teams; financial sponsorship of sporting and entertainment venues; entertainment in the nature of family-oriented festivals
	3,461,025	07/08/08	Shirts; annuities underwriting and investment, management of, distribution and administration services, namely, providing administrative services for fixed and variable annuities; funds investment; trust and custodial services for retirement plans, namely, investment of funds for others in the field of mutual funds and individual retirement accounts; administration of employee pension plans; financial

Mark	Reg. No.	Reg. Date	Services
			services in the nature of an investment security; investment management services; mutual fund investment, distribution and brokerage; administration of employer provided and individual pension and fixed investment income programs; registered investment advisory services and broker-dealer securities services, namely, brokering and trading in securities and providing investment advisory services; banking services; consumer loan financing; pension plan consulting; estate planning; financial planning; administration services of insurance in the fields of life, health, disability, dental, prescription drug, vision and accidental death and dismemberment; administration of employee benefit plans, namely, deferred compensation benefit plans, profit sharing plans and cafeteria plans; insurance underwriting and brokerage services for groups and individuals in the fields of life, health, disability and dental; mortgage banking services; mortgage brokerage services; real estate mortgage lending and mortgage asset procurement for others; maintaining real estate mortgage escrow accounts; real estate investment services; real estate management; leasing of commercial real estate; financial investment in the field of real estate development; providing administration services to employee welfare benefit plans and pre-paid dental plans and claims administration, namely, claims processing, and retail commercial banking services, namely, checking, savings, money market, credit cards, certificates of deposit, mortgage loans, commercial real estate lending, and corporate banking services
	3,961,137	5/17/11	Managed health care services, namely, preventive medical screenings, and wellness programs; providing health care information in the field of health and wellness
PRINCIPAL REAL ESTATE INVESTORS	4,111,149	3/13/2012	Real estate investment services; real estate management services
	4,130,738	4/24/2012	Real estate investment services; real estate management services
PRINCIPAL GLOBAL FIXED INCOME	4,396,203	09/03/2013	Financial services, namely portfolio management, financial market analysis, asset management, and investment management advisory services
	4,396,202	09/03/2013	Financial services, namely portfolio management, financial market analysis, asset management, and investment management advisory services
PRINCIPAL FINANCIAL GROUP	(pending app) 85/811,463	n/a	Annuities underwriting and investment, management of, distribution and administration services, namely, providing administrative services for fixed and variable

Mark	Reg. No.	Reg. Date	Services
			<p>annuities; funds investment; trust and custodial services for retirement plans, namely, investment of funds for others in the field of mutual funds and individual retirement accounts; administration of employee pension plans; financial services in the nature of an investment security; investment management services; mutual fund investment, distribution and brokerage; administration of employer provided and individual pension and fixed investment income programs; registered investment advisory services and broker-dealer securities services, namely, brokering and trading in securities and providing investment advisory services; banking services; consumer loan financing; pension plan consulting; estate planning; financial planning; administration services of insurance in the fields of life, disability, dental, prescription drug, vision and accidental death and dismemberment; administration of employee benefit plans, namely, deferred compensation benefit plans, profit sharing plans, cafeteria plans and other employee benefit plans; insurance underwriting and brokerage services for groups and individuals in the fields of life, disability and dental; real estate mortgage lending and mortgage asset procurement for others; maintaining real estate mortgage escrow accounts; real estate investment services; real estate management; leasing of commercial real estate; financial investment in the field of real estate development; providing administration services to employee welfare benefit plans and pre-paid dental plans and claims administration, namely, claims processing; and retail commercial banking services, namely, checking, savings, money market, credit cards, certificates of deposit, mortgage loans, commercial real estate lending, and corporate banking services</p>
	<p>(pending app) 85/811,461</p>	<p>n/a</p>	<p>Annuities underwriting and investment, management of, distribution and administration services, namely, providing administrative services for fixed and variable annuities; funds investment; trust and custodial services for retirement plans, namely, investment of funds for others in the field of mutual funds and individual retirement accounts; administration of employee pension plans; financial services in the nature of an investment security; investment management services; mutual fund investment, distribution and brokerage; administration of employer provided and individual pension and fixed investment income programs; registered investment advisory services and broker-dealer securities services, namely, brokering and trading in securities and providing investment advisory services; banking services; consumer loan financing; pension plan consulting; estate planning; financial planning; administration services of insurance in the fields of life, disability, dental, prescription drug, vision and accidental death and dismemberment; administration of employee benefit plans, namely, deferred compensation benefit plans, profit sharing plans, cafeteria plans and other employee benefit plans; insurance underwriting and</p>

Mark	Reg. No.	Reg. Date	Services
			<p>brokerage services for groups and individuals in the fields of life, disability and dental; real estate mortgage lending and mortgage asset procurement for others; maintaining real estate mortgage escrow accounts; real estate investment services; real estate management; leasing of commercial real estate; financial investment in the field of real estate development; providing administration services to employee welfare benefit plans and pre-paid dental plans and claims administration, namely, claims processing; and retail commercial banking services, namely, checking, savings, money market, credit cards, certificates of deposit, mortgage loans, commercial real estate lending, and corporate banking services</p>
<p>PRINCIPAL LIFE INSURANCE COMPANY</p>	<p>(pending app) 85/811,459</p>	<p>n/a</p>	<p>Annuities underwriting and investment, management of, distribution and administration services, namely, providing administrative services for fixed and variable annuities; funds investment; trust and custodial services for retirement plans, namely, investment of funds for others in the field of mutual funds and individual retirement accounts; administration of employee pension plans; financial services in the nature of an investment security; investment management services; mutual fund investment, distribution and brokerage; administration of employer provided and individual pension and fixed investment income programs; registered investment advisory services and broker-dealer securities services, namely, brokering and trading in securities and providing investment advisory services; banking services; consumer loan financing; pension plan consulting; estate planning; financial planning; administration services of insurance in the fields of life, disability, dental, prescription drug, vision and accidental death and dismemberment; administration of employee benefit plans, namely, deferred compensation benefit plans, profit sharing plans, cafeteria plans and other employee benefit plans; insurance underwriting and brokerage services for groups and individuals in the fields of life, disability and dental; real estate mortgage lending and mortgage asset procurement for others; maintaining real estate mortgage escrow accounts; real estate investment services; real estate management; leasing of commercial real estate; financial investment in the field of real estate development; providing administration services to employee welfare benefit plans and pre-paid dental plans and claims administration, namely, claims processing; and retail commercial banking services, namely, checking, savings, money market, credit cards, certificates of deposit, mortgage loans, commercial real estate lending, and corporate banking services</p>
<p>PRINCIPAL GLOBAL EQUITIES</p>	<p>(pending app) 85/849,830</p>	<p>n/a</p>	<p>Financial services, namely portfolio management, financial market analysis, asset management, and investment management advisory services</p>

Mark	Reg. No.	Reg. Date	Services
	(pending app) 85/849,834	n/a	Financial services, namely portfolio management, financial market analysis, asset management, and investment management advisory services

Business Names
PRINCIPAL ADMINISTRADORA GENERAL DE FONDOS S.A.
PRINCIPAL AFORE, S.A. DE C.V., PRINCIPAL GRUPO FINANCIERO
PRINCIPAL ASSET MANAGEMENT CHILE S.A.
PRINCIPAL ASSET MANAGEMENT COMPANY (ASIA) LIMITED
PRINCIPAL AUSTRALIA (HOLDINGS) PTY LIMITED
PRINCIPAL BANK
PRINCIPAL COMMERCIAL ACCEPTANCE, LLC
PRINCIPAL COMMERCIAL FUNDING, LLC
PRINCIPAL COMPANIA DE SEGUROS DE VIDA CHILE S.A.
PRINCIPAL CONSULTING (INDIA) PRIVATE LIMITED
PRINCIPAL DENTAL SERVICES, INC.
PRINCIPAL DEVELOPMENT INVESTORS, LLC
PRINCIPAL EDGE NETWORK – AUSTIN, LLC
PRINCIPAL EDGE NETWORK – DALLAS FT. WORTH, INC.
PRINCIPAL EDGE NETWORK – GEORGIA, LLC
PRINCIPAL EDGE NETWORK – SAN ANTONIO, LLC
PRINCIPAL EDGE NETWORK – TENNESSEE, LLC
PRINCIPAL EDGE NETWORK HOLDINGS, INC.
PRINCIPAL ENTERPRISE CAPITAL, LLC
PRINCIPAL FINANCIAL ADVISORS, INC.
PRINCIPAL FINANCIAL GROUP, INC.
PRINCIPAL FINANCIAL GROUP (MAURITIUS) LTD.
PRINCIPAL FINANCIAL GROUP, S.A. DE C.V., GRUPO FINANCIERO
PRINCIPAL FINANCIAL SERVICES, INC.
PRINCIPAL FINANCIAL SERVICES (AUSTRALIA), INC.
PRINCIPAL FINANCIAL SERVICES I (UK) LLP
PRINCIPAL FINANCIAL SERVICES I (US), LLC
PRINCIPAL FINANCIAL SERVICES II (UK) LTD.
PRINCIPAL FINANCIAL SERVICES II (US), LLC
PRINCIPAL FINANCIAL SERVICES III (UK) LTD.
PRINCIPAL FINANCIAL SERVICES LATIN AMERICA LTD.
PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V., OPERADORA DE FONDOS DE INVERSION, PRINCIPAL GRUPO FINANCIERO
PRINCIPAL FUNDS DISTRIBUTOR, INC.
PRINCIPAL GENERATION PLANT, LLC
PRINCIPAL GLOBAL COLUMBUS CIRCLE, LLC
PRINCIPAL GLOBAL INVESTORS (ASIA) LIMITED
PRINCIPAL GLOBAL INVESTORS (AUSTRALIA) LIMITED
PRINCIPAL GLOBAL INVESTORS (AUSTRALIA) SERVICE COMPANY PTY LIMITED
PRINCIPAL GLOBAL INVESTORS (EUROPE) LIMITED
PRINCIPAL GLOBAL INVESTORS (HONG KONG) LIMITED
PRINCIPAL GLOBAL INVESTORS (IRELAND) LIMITED
PRINCIPAL GLOBAL INVESTORS (JAPAN) LIMITED
PRINCIPAL GLOBAL INVESTORS (SINGAPORE) LIMITED
PRINCIPAL GLOBAL INVESTORS HOLDING COMPANY, INC.
PRINCIPAL GLOBAL INVESTORS PARTICIPACOES, LTDA
PRINCIPAL GLOBAL INVESTORS TRUST
PRINCIPAL GLOBAL INVESTORS, LLC
PRINCIPAL GLOBAL SERVICES PRIVATE LIMITED

<i>Business Names</i>
PRINCIPAL HOLDING CHILE SPA (CHILE)
PRINCIPAL HOLDING COMPANY CHILE S.A.
PRINCIPAL HOLDING COMPANY, LLC
PRINCIPAL INSTITUTIONAL CHILE S.A.
PRINCIPAL INSURANCE COMPANY (HONG KONG) LIMITED
PRINCIPAL INTERNATIONAL (ASIA) LIMITED
PRINCIPAL INTERNATIONAL DE CHILE S.A.
PRINCIPAL INTERNATIONAL HOLDING COMPANY, LLC
PRINCIPAL INTERNATIONAL LATIN AMERICA LTD.
PRINCIPAL INTERANTIONAL SOUTH AMERICA I LTD.
PRINCIPAL INTERANTIONAL SOUTH AMERICA II LTD.
PRINCIPAL INTERANTIONAL SOUTH AMERICA II LTD., AGENCIA EN CHILE
PRINCIPAL INTERNATIONAL, INC.
PRINCIPAL INVESTORS CORPORATION
PRINCIPAL LIFE INSURANCE COMPANY
PRINCIPAL LIFE INSURANCE COMPANY OF IOWA
PRINCIPAL MANAGEMENT CORPORATION
PRINCIPAL MEXICO COMPANIA DE SEGUROS S.A. DE C.V., PRINCIPAL GRUPO FINANCIERO
PRINCIPAL MEXICO SERVICIOS, S.A. DE C.V.
PRINCIPAL NATIONAL LIFE INSURANCE COMPANY
PRINCIPAL NOMINEE COMPANY (HONG KONG) LIMITED
PRINCIPAL PENSIONES, S.A. DE C.V., PRINCIPAL GRUPO FINANCIERO
PRINCIPAL PNB ASSET MANAGEMENT COMPANY PRIVATE LIMITED
PRINCIPAL REAL ESTATE FUND INVESTORS, LLC.
PRINCIPAL REAL ESTATE HOLDING COMPANY, LLC
PRINCIPAL REAL ESTATE INVESTORS, LLC
PRINCIPAL REAL ESTATE PORTFOLIO, INC.
PRINCIPAL REINSURANCE COMPANY OF DELAWARE
PRINCIPAL REINSURANCE COMPANY OF VERMONT
PRINCIPAL RETIREMENT ADVISORS PRIVATE LIMITED
PRINCIPAL SHAREHOLDER SERVICES, INC.
PRINCIPAL TRUST COMPANY (ASIA) LIMITED
PRINCIPAL TRUSTEE COMPANY PRIVATE (INDIA) LIMITED
PRINCIPAL WELLNESS COMPANY
CCB PRINCIPAL ASSET MANAGEMENT COMPANY, LTD
CIMB PRINCIPAL ISLAMIC ASSET MANAGEMENT SDN. BHD.
CIMB WEALTH ADVISORS BERHAD
CIMB-PRINCIPAL ASSET MANAGEMENT (SINGAPORE) PTE LTD
CIMB-PRINCIPAL ASSET MANAGEMENT BETHAD
CIMB-PRINCIPAL ASSET MANAGEMENT COMPANY LIMITED (THAILAND)
DISTRIBUIDORA PRINCIPAL MEXICO, S.A. DE C.V.
HIPOTECARIA CRUZ DEL SUR PRINCIPAL, S.A. (CHILE)
PFG DO BRASIL LTDA
PGI FINISTERRE HOLDING COMPANY LTD
PGI ORIGIN HOLDING COMPANY LTD
PRINCOR FINANCIAL SERVICES CORPORATION
PRINCORP WEALTH ADVISORS (ASIA) LIMITED
PT CIMB PRINCIPAL ASSET MANAGEMENT

<i>Common Law Names</i>
PRINCIPAL ADMINISTRATIVE EASE PROGRAM
PRINCIPAL ADVOCATE EDGE
PRINCIPAL ADVANTAGE FOR EMERGING BUSINESS
PRINCIPAL ADVISORY SELECT PORTFOLIOS
PRINCIPAL ANNUITY EDGE
PRINCIPAL ANNUITY LEGACY

<i>Common Law Names</i>
PRINCIPAL ANNUITY NEWSWIRE
PRINCIPAL ANNUITY PLUS
PRINCIPAL ASSET RETENTION PROGRAM
PRINCIPAL ASSET REWARD PROGRAM
PRINCIPAL ASO ESSENTIALS
PRINCIPAL AUTOMATIC STANDARD APPROVAL PROGRAM
PRINCIPAL BANK AUTOMATIC LOAN PAYMENT
PRINCIPAL BANK CASH ACCOUNT
PRINCIPAL BANK CHANGE A RATE CD
PRINCIPAL BANK CHOICE CHECKING
PRINCIPAL BANK EASY LADDER CD
PRINCIPAL BANK \$50,000 HOME MAKEOVER SWEEPSTAKES
PRINCIPAL BANK HIGH YIELD IRA
PRINCIPAL BANK MONEY MARKET CASH SWEEP
PRINCIPAL BANK MONEY MARKET IRA
PRINCIPAL BANK MONEY MOVEMENT
PRINCIPAL BANK SAFE HARBOR IRA
PRINCIPAL BANK SECURE
PRINCIPAL BENCHMARK REPORT: EMPLOYER SPONSORED RETIREMENT SOLUTIONS FOR KEY EMPLOYEES
PRINCIPAL FUNDING DESIGN TOOL
PRINCIPAL FUNDING EXCHANGE
PRINCIPAL BUSINESS SUCCESSION REVIEW
PRINCIPAL CAPITAL INCOME INVESTORS
PRINCIPAL CANCER CARE PROGRAM
PRINCIPAL CLASSIC COMPREHENSIVE MEDICAL
PRINCIPAL CLASSIC PPO
PRINCIPAL CLASSIC PPO PLUS
PRINCIPAL CLASSIC VALUE PPO
PRINCIPAL COACHES CHALLENGE
PRINCIPAL COLLEGE BOUND FUND
PRINCIPAL COLLEGE SAVINGS PROGRAM
PRINCIPAL.COM
PRINCIPAL COMMERCIAL MORTGAGE EDGE
PRINCIPAL COMPREHENSIVE RETIREMENT PROGRAM
PRINCIPAL DENTAL ACCESS NETWORK
PRINCIPAL DENTAL HEALTH EDGE
PRINCIPAL DENTAL MEMBER ADVANTAGE PROGRAM
PRINCIPAL DENTAL SERIES
PRINCIPAL DIRECT CONNECT
PRINCIPAL DUE DILIGENCE PROGRAM
PRINCIPAL DYNAMIC PORTFOLIOS BY IBBOTSON
PRINCIPAL EARLY EDGE
PRINCIPAL EASE
PRINCIPAL EASE PROGRAM
PRINCIPAL EASY ENROLLMENT
PRINCIPAL ECONOMIC EDGE
PRINCIPAL EDGE NETWORK
PRINCIPAL EDGE NETWORK PREMIER
PRINCIPAL EDGE NETWORK - SELECT
PRINCIPAL EDGE VARIABLE ANNUITY
PRINCIPAL EDUCATION NETWORK
PRINCIPAL E-DISTRIBUTION SERVICES
PRINCIPAL E-DIVERSIFICATION SERVICES
PRINCIPAL E-ENROLL
PRINCIPAL E-FINANCIAL PROFESSIONAL
PRINCIPAL ELITE FIXED ANNUITY
PRINCIPAL EMPLOYEE FINANCIAL CENTER

Common Law Names
PRINCIPAL EMPLOYEE TERM LIFE
PRINCIPAL EMPLOYER DRIVEN WELLNESS SOLUTION
PRINCIPAL ENROLLMENT SUITE
PRINCIPAL eRETIREMENT SOLUTIONS
PRINCIPAL ESOP EDGE
PRINCIPAL EXECUTIVE BONUS PLUS
PRINCIPAL EXECUTIVE EXCHANGE
PRINCIPAL EXECUTIVE RETIREMENT AND COMPENSATION SERVICE
PRINCIPAL EZ DEFINED BENEFIT/ PRINCIPAL EZ DB
PRINCIPAL FINANCIAL MILESTONES PROGRAM
PRINCIPAL FINANCIAL SECURITY REVIEW
PRINCIPAL FINANCIAL SECURITY SERIES
PRINCIPAL FINANCIAL SOLUTIONS EXPLORER
PRINCIPAL FINANCIAL WELL BEING
PRINCIPAL FIXED ANNUITY
PRINCIPAL FIXED ANNUITY PLUS
PRINCIPAL FIXED ANNUITY SELECT
PRINCIPAL FLOATING RATE SEPARATE ACCOUNT
PRINCIPAL 403(b) CONSOLIDATOR
PRINCIPAL FUNDS
PRINCIPAL GLOBAL CREDIT OPPORTUNITIES FUND
PRINCIPAL GLOBAL FINANCIAL WELL BEING STUDY
PRINCIPAL GLOBAL INVESTORS COLLECTIVE INVESTMENT TRUST
PRINCIPAL GLOBAL NET
PRINCIPAL GLOBAL PROPERTY SECURITIES FUND
PRINCIPAL GREEN FUND I
PRINCIPAL GROWTH FIXED ANNUITY
PRINCIPAL GUARANTEED FIXED ANNUITY
PRINCIPAL GUARANTEED INCOME
PRINCIPAL HEALTH ASSESSMENT
PRINCIPAL HEALTH CARE
PRINCIPAL HEALTH COACHING
PRINCIPAL HEALTH INFO LINE
PRINCIPAL HEALTH SAVINGS ACCOUNT
PRINCIPAL HEALTH + WEALTH
PRINCIPAL HEALTHY CONNECTIONS
PRINCIPAL HEALTHY EDGE
PRINCIPAL HEALTHY ESSENTIALS
PRINCIPAL HEALTHY RESOURCES
PRINCIPAL HIGH QUALITY CANADIAN FIXED INCOME PLUS FUND
PRINCIPAL HOME ACCESS LINE
PRINCIPAL HOME EQUITY ACCESS LOAN
PRINCIPAL ILLUSTRATION EDGE
PRINCIPAL IMPACTPLUS
PRINCIPAL INCOME IRA
PRINCIPAL INCOME MANAGER
PRINCIPAL INCOME PROTECTOR
PRINCIPAL INCOME PROVIDER
PRINCIPAL INDUSTRIAL INVESTORS
PRINCIPAL INVESTMENT PLUS VARIABLE ANNUITY
PRINCIPAL IRA EXCHANGE
PRINCIPAL LIFE CORE NOTES
PRINCIPAL LIFE INCOME FUNDING
PRINCIPAL LIFE INSURANCE COMPANY
PRINCIPAL LIFERIGHT INSURANCE PROGRAM
PRINCIPAL LIFETIME
PRINCIPAL LIFETIME HORIZON FUND
PRINCIPAL LIFETIME INCOME SOLUTIONS

<i>Common Law Names</i>
PRINCIPAL, LLC
PRINCIPAL LOAN CONNECTION
PRINCIPAL MANAGED ACCOUNT PROGRAM
PRINCIPAL MAXIMUM FUNDED VARIABLE UNIVERSAL LIFE
PRINCIPAL MEDICAL WELLNESS SERIES
PRINCIPAL MESSAGE CENTER
PRINCIPAL MESSENGER
PRINCIPAL MORTGAGE FUNDING
PRINCIPAL® MULTI-ASSET ADVISORS & DESIGN
PRINCIPAL NATIONAL LIFE INSURANCE COMPANY
PRINCIPAL NONQUALIFIED BENEFIT EXCHANGE
PRINCIPAL NONQUALIFIED EDGE PROGRAM
PRINCIPAL OPEN DOOR CLOSED END SECONDS
PRINCIPAL PARK
PRINCIPAL PARTNERS
PRINCIPAL PASSAGE DIRECT INVESTMENT PROGRAM
PRINCIPAL PASSAGE FEE BASED BROKERAGE ACCOUNT
PRINCIPAL PASSAGE MANAGED PORTFOLIO
PRINCIPAL PASSAGE PREMIER ASSET ALLOCATION SERVICE
PRINCIPAL PAYROLL PROGRAMS
PRINCIPAL PERFORMANCE ANNUITY
PRINCIPAL PERFORMANCE ANNUITY 7
PRINCIPAL PHYSICIAN REWARD PLAN
PRINCIPAL PLAN MANAGER EXCHANGE
PRINCIPAL PORTFOLIO CONSTRUCTION STRATEGIES
PRINCIPAL PREFERRED JUMBO MORTGAGE
PRINCIPAL PREVENTIVE SCREENING
PRINCIPAL PRIVILEGED PARTNERS PROGRAM
PRINCIPAL PRIVILEGES PARTNER PROGRAM
PRINCIPAL PRIORITY PASSPORT CLUB
PRINCIPAL PRIORITY ROLLOVER
PRINCIPAL PRODUCER WORKSPACE
PRINCIPAL REAL ESTATE SERVICES
PRINCIPAL REIMBURSEMENT ARRANGEMENT
PRINCIPAL RESIDENTIAL MORTGAGE DIRECT
PRINCIPAL RESIDENTIAL MORTGAGE HOMEGEN JUMBO LINE
PRINCIPAL RESOURCE CENTER
PRINCIPAL RETIRE SECURE
PRINCIPAL RETIREGUIDE
PRINCIPAL RETIREMENT ACCOUNT
PRINCIPAL RETIREMENT EDGE PROGRAM
PRINCIPAL RETIREMENT INCOME EDGE
PRINCIPAL RETIREMENT MILESTONES PROGRAM
PRINCIPAL RETIREMENT NAVIGATOR
PRINCIPAL RETIREMENT NETWORK FOR UNION MEMBERS
PRINCIPAL RETIREMENT OUTSOURCING
PRINCIPAL RETIREMENT PLANNING CENTER
PRINCIAPL RETIREMENT +
PRINCIPAL RETIREMENT RESOURCE CONSULTANT
PRINCIPAL RETURN-TO-WORK RESOURCES
PRINCIPAL RIVERWALK
PRINCIPAL ROLLOVER CHOICE
PRINCIPAL ROLLOVER OPTIONS
PRINCIPAL RX EDGE
PRINCIPAL SAVINGS BUILDER ANNUITY
PRINCIPAL S-CORPS BONUS PLUS
PRINCIPAL S OWNER PLUS
PRINCIPAL SECURE DECISIONS

Common Law Names
PRINCIPAL SECURE FIXED ANNUITY
PRINCIPAL SECURE INCOME ANNUITY
PRINCIPAL SECUREDLOAN
PRINCIPAL SECURITY BUILDER RETIREMENT PROGRAM
PRINCIPAL SECURITY BUILDER RETIREMENT PROGRAM INDIVIDUAL 401(K)
PRINCIPAL SELECT DENTIST PROGRAM
PRINCIPAL SELECT REWARD PLAN
PRINCIPAL SELECT SERIES ANNUITY
PRINCIPAL SERVICES TRUST COMPANY
PRINCIPAL SINGLE PREMIUM DEFERRED ANNUITY
PRINCIPAL SPLIT DOLLAR PLUS
PRINCIPAL SPONSOR SERVICE CENTER
PRINCIPAL STEP AHEAD RETIREMENT OPTION
PRINCIPAL STRATEGIC ASSET MANAGEMENT
PRINCIPAL SURVIVOR LIFE INSURANCE WITH THE IBIS OPTION
PRINCIPAL SURVIVORSHIP UNIVERSAL LIFE PROTECTOR
PRINCIPAL SWITCH KIT
PRINCIPAL TOTAL RETIREMENT SUITE
PRINCIPAL TPA EDGE
PRINCIPAL TRAILBLAZER
PRINCIPAL TRUST COMPANY
PRINCIPAL TRUST INCOME FUND
PRINCIPAL TRUST TARGET DATE FUNDS
PRINCIPAL UNDERRIGHT
PRINCIPAL UNIVERSAL LIFE FLEX
PRINCIPAL UNIVERSAL LIFE PREFERRED
PRINCIPAL UNIVERSAL LIFE PROTECTOR
PRINCIPAL UNIVERSAL LIFE PROTECTOR II
PRINCIPAL VALUE BASED HEALTH BENEFIT
PRINCIPAL VALUE UNIVERSAL LIFE
PRINCIPAL VARIABLE UNIVERSAL LIFE ACCUMULATOR
PRINCIPAL VARIABLE UNIVERSAL LIFE INCOME
PRINCIPAL VOLUNTARY BENEFITS EDGE
PRINCIPAL VOLUNTARY ROLLOVER INCOME
PRINCIPAL WELLNESS CLASSIC HRA
PRINCIPAL WELLNESS CLASSIC PPO
PRINCIPAL WELLNESS FSA
PRINCIPAL WELLNESS COMPANY
PRINCIPAL WHOLESALE MORTGAGE
PRINCIPAL WORK SECURE – 2004
PRINCIPAL YEAR ROUND WELLNESS PROGRAM
MIDLANDS CHOICE - PRINCIPAL
MY PRINCIPAL@EDGE
MY PRINCIPAL@EDGE IN RETIREMENT
MY PRINCIPAL@EDGE STRATEGY
SOLUTIONS FOR ADVISORS FROM THE PRINCIPAL FINANCIAL GROUP
THE PRINCIPAL CHILD DEVELOPMENT CENTER
THE PRINCIPAL FINANCIAL GROUP@ SECURE MAIL CENTER
THE PRINCIPAL MY VISIT
THE PRINCIPAL FINANCIAL DREAMS TOUR
THE PRINCIPAL RETIREMENT NEWSLETTER
THE PRINCIPAL@ RIVER'S EDGE
THE PRINCIPAL@ SECURE MAIL CENTER
THE PRINCIPAL@ 10 BEST COMPANIES
THE PRINCIPAL WARRANTY
THE PRINCIPAL WELLNESS SOLUTION
YOUR MONEY UPDATE BY THE PRINCIPAL

7. Since at least as early as 1960, Principal, via its affiliates, licensees and/or predecessors-in-interest, has used one or more of the marks making up its famous PRINCIPAL Family of Marks in interstate commerce in connection with Plaintiffs' Services, specifically, financial analysis and consulting, management of securities and securities brokerage services.
8. Since at least as early as 1985, Principal and/or its affiliates, licensees or predecessors-in-interest have used one or more of the marks making up the PRINCIPAL Family of Marks in interstate commerce in the United States and throughout the world in connection with real estate, investment, investment management, investment advisory, lending, insurance, underwriting, employee benefits, estate planning, tax consultation, financial, banking, mutual funds, retirement, global asset management, and healthcare related services.
9. Plaintiffs have made an enormous investment, exceeding one billion dollars, in advertising and promoting its products and services under the PRINCIPAL Family of Marks. As a result, Plaintiffs have acquired extremely valuable goodwill in association with the PRINCIPAL Family of Marks, which has become famous and distinctive in connection with Plaintiffs' Services. Plaintiffs' customers have come to rely on the PRINCIPAL Family of Marks as a symbol of quality and reliability.
10. PFSI's U.S. trademark registrations are valid and subsisting, and constitute *prima facie* and/or conclusive evidence of PFSI's exclusive right to use its registered marks in connection with the goods and/or services covered by the registrations, *e.g.*, real estate, investment, investment management, investment advisory, lending, insurance, underwriting, employee benefits, estate planning, tax consultation, financial, banking,

mutual funds, retirement, global asset management, and healthcare related services.

See 15 U.S.C. §§ 1115(a) and (b).

11. Based on the inherent and/or acquired distinctiveness of the PRINCIPAL Family of Marks; the duration and extent of Plaintiffs' use of the PRINCIPAL Family of Marks; the duration and extent of advertising featuring the PRINCIPAL Family of Marks; the geographic area in which Plaintiffs have sold and advertised goods and/or services featuring the PRINCIPAL Family of Marks; the nature of the trade channels Plaintiffs use to market goods and/or services featuring the PRINCIPAL Family of Marks compared to the channels through which Defendants sell their services; the degree of public recognition of the PRINCIPAL Family of Marks; and the various federal registrations for the PRINCIPAL Family of Marks, the PRINCIPAL Family of Marks has become famous as contemplated by Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c).
12. Since long before the acts of Defendants complained of herein, PFSI and/or its affiliates, licensees or predecessors-in-interest have continuously used one or more of the marks which comprise its PRINCIPAL Family of Marks in the State of Illinois and elsewhere in interstate commerce.
13. Defendant MAURICIO IZQUIERDO is an individual located at Pino 506 Col Arboledas, Puerto Vallarta, JA, Mexico, 48315, and is the sole proprietor of a business which operates under the name BIT MEDIA STUDIO, from the same address.
14. Defendant MAURICIO IZQUIERDO offers residential, commercial and industrial real estate management services as well as resale and rental of time share

- memberships throughout the State of Illinois and in interstate commerce under the trade name and service mark PRINCIPAL GLOBAL INVESTORS LLC and at the website located at the URL's <http://www.principalglobalinvestorsllc.com> and <http://www.pglobalinvestors.com> (hereinafter "Defendant's Services").
15. Despite actual and/or constructive notice of PFSI's rights in and to its PRINCIPAL Family of Marks, on or about January 25, 2014, Defendant MAURICIO IZQUIERDO obtained a domain name registration for the domain name [principalglobalinvestorsllc.com](http://www.principalglobalinvestorsllc.com) which fully incorporates and is confusingly similar to PFSI's famous PRINCIPAL Family of Marks including, but not limited to, its PRINCIPAL GLOBAL INVESTORS trade name and service mark.
16. Despite actual and/or constructive notice of PFSI's rights in and to its PRINCIPAL Family of Marks, at some time after January 25, 2014, Defendant MAURICIO IZQUIERDO commenced operation of and continues to operate an Internet web site at the URL <http://www.principalglobalinvestorsllc.com> where it offers residential, commercial and industrial real estate management services as well as resale and rental of time share memberships throughout the State of Illinois and in interstate commerce under the trade name and service mark PRINCIPAL GLOBAL INVESTORS LLC (hereinafter "Defendants' Services").
17. Defendant MAURICIO IZQUIERDO's use of the PRINCIPAL GLOBAL INVESTORS LLC Mark has caused actual confusion and is likely to continue to cause actual confusion in the marketplace as to source, origin, sponsorship and/or affiliation with Plaintiffs' PRINCIPAL Family of Marks.
18. Defendants MAURICIO IZQUIERDO's PRINCIPAL GLOBAL INVESTORS LLC

Mark is identical or virtually identical and/or confusingly similar to Plaintiffs' PRINCIPAL Family of Marks.

19. Plaintiffs' Services and Defendants MAURICIO IZQUIERDO's Services as well as the classes of consumers who purchase such services are identical and/or virtually identical.
20. Defendant MAURICIO IZQUIERDO adopted the PRINCIPAL GLOBAL INVESTORS LLC Mark with the intent to trade on and/or capitalize on the goodwill symbolized by the PRINCIPAL Family of Marks.
21. Any unauthorized advertising, promotion, distribution or sale of tax consultation, financial, banking, insurance, investment, investment management, investment advisory, estate planning, underwriting, lending, mutual funds, real estate, retirement, employee benefits, global asset management, and/or healthcare related services by Defendant MAURICIO IZQUIERDO utilizing a trademark or trade name incorporating PRINCIPAL and/or PRINCIPLE is likely to confuse, mislead or deceive the public into believing that such goods or services originate from or are sponsored or authorized by Plaintiff and constitutes trademark infringement, unfair competition, deceptive trade practices, cybersquatting and trademark dilution in violation of Federal and common law and the laws of the State of Illinois
22. Plaintiffs effectuated service of the duly and properly translated Complaint and court sealed Summons on Defendant MAURICIO IZQUIERDO, through the Central Authority of Mexico on Defendant MAURICIO IZQUIERDO, at the following address: Pino numero 506, Colonia Arboledas, Puerto Vallarta, Jalisco C.P., 48315,

which to the best of Plaintiffs' knowledge is the address where Defendant, MAURICIO IZQUIERDO, resides.

23. Without any order permanently enjoining Defendant MAURICIO IZQUIERDO from using the PRINCIPAL GLOBAL INVESTORS LLC Mark or any other colorable imitation of any PRINCIPAL or PRINCIPLE formative trade name and trademark in any advertisement, promotion, offer for sale, or sale of any goods or services that are sufficiently similar to those offered by Plaintiffs, there is a substantial likelihood that Defendant MAURICIO IZQUIERDO will continue to infringe upon Plaintiff's marks and violate the Lanham Act, Title 15, United States Code 1051, *et seq.*, and the statutes and common laws of the State of Illinois.

I.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED that:

- A. Defendant MAURICIO IZQUIERDO's use of the PRINCIPAL GLOBAL INVESTORS LLC Mark is likely to cause public confusion, mistake or deception as to the origin or source of Defendant MAURICIO IZQUIERDO's Services, in violation of the Lanham Act, 15 U.S.C. § 1114(1).
- B. Defendant MAURICIO IZQUIERDO's acts, as alleged herein, constitute willful trademark infringement as contemplated by the Lanham Act, 15 U.S.C. § 1117.
- C. Defendant MAURICIO IZQUIERDO's use of the PRINCIPAL GLOBAL INVESTORS LLC Mark constitutes a false designation of origin, a false or misleading description of fact or a false or misleading representation of fact which is likely to cause confusion, mistake or deception in violation of the Lanham Act, Section 43(a), 15 U.S.C. § 1125(a).

- D. The aforesaid willful and deliberate acts of Defendant MAURICIO IZQUIERDO, all occurring after the PRINCIPAL Family of Marks became famous, have caused and continue to cause dilution and/or are likely to cause dilution of the famous PRINCIPAL Family of Marks and thus constitute trademark dilution in violation of Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c).
- E. Defendant MAURICIO IZQUIERDO acts as complained of herein created a likelihood of confusion or of misunderstanding as to the source, sponsorship or approval of Plaintiffs' and Defendant MAURICIO IZQUIERDO's services, as well as a likelihood of confusion or of misunderstanding as to affiliation, connection or association of Plaintiffs and Defendants.
- F. By engaging in these deceptive trade practices, Defendant MAURICIO IZQUIERDO's has directed these deceptive trade practices to the market generally, thereby directly implicating the consumer protection concerns invoked by the Illinois Deceptive Trade Practices Act.
- G. Such conduct by Defendant MAURICIO IZQUIERDO has violated and continues to violate the Illinois Deceptive Trade Practices Act, 815 ILCS 510/1 *et seq.*
- H. Defendant MAURICIO IZQUIERDO's acts were conducted in bad faith, in conscious and deliberate disregard of Plaintiffs' rights, and were performed with the intention of depriving Plaintiffs of their rights.
- I. Defendant MAURICIO IZQUIERDO registered, owns and continues to use the infringing domain name principalglobalinvestorsllc.com with a bad faith intent to profit from and/or trade off of the goodwill associated with Plaintiffs' famous PRINCIPAL Family of Marks.

- J. The infringing domain name is identical and/or confusingly similar to one or more of the famous PRINCIPAL Family of Marks including, but not limited to, Plaintiffs' PRINCIPAL GLOBAL INVESTORS marks as referenced herein.

II.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that:

- K. Defendant MAURICIO IZQUIERDO willfully violated Sections 32(1), 43(a), 43(c) and 43(d) of the Lanham Act, 15 U.S.C. § 1051 *et seq.*;
- L. Defendant MAURICIO IZQUIERDO committed acts of unfair competition and deceptive trade practices in violation of Illinois common law and 815 ILCS 510/1 *et seq.*;
- M. Defendant MAURICIO IZQUIERDO, as well as any officers, agents, servants, employees and attorneys, and all persons in active concert or participation with Defendant MAURICIO IZQUIERDO, are immediately and permanently enjoined and restrained from:
- a. using any PRINCIPAL and/or PRINCIPLE formative trademark, trade name and/or domain name in connection with any tax consultation, financial, banking, insurance, investment, investment management, investment advisory, estate planning, underwriting, lending, mutual funds, real estate, retirement, employee benefits, global asset management, and/or healthcare related services, including but not limited to any use on any signage, electronic materials, branding materials, domain names, web sites, social media and other printed or promotional materials relating to such services;

- b. making any false and/or misleading statements in the advertising, promotion and offering for sale of tax consultation, financial, banking, insurance, investment, investment management, investment advisory, estate planning, underwriting, lending, mutual funds, real estate, retirement, employee benefits, global asset management, and/or healthcare related services that would be likely to confuse, mislead and/or deceive customers and/or potential customers into believing that such services originate from Plaintiff; and
- c. assisting, aiding and/or abetting any other person and/or business entity in engaging in and/or performing any of the activities enjoined herein.

N. Pursuant to 15 U.S.C. § 1118, Defendant MAURICIO IZQUIERDO, as well as any officers, agents, servants, employees and attorneys, and all persons in active concert or participation with Defendant MAURICIO IZQUIERDO, are ordered to deliver up and destroy all products, labels, signs, packages, wrappers, advertisements, promotions and all other matter in custody or under the control of Defendant MAURICIO IZQUIERDO, as well as any officers, agents, servants, employees and attorneys, and all persons in active concert or participation with Defendant MAURICIO IZQUIERDO, that bear any of the PRINCIPAL Family of Marks or any other mark that is likely to be confused with one or more of the PRINCIPAL Family of Marks;

O. If there are any violations of this Judgment, Plaintiff may or seek full damages and profits, trebled as prescribed by Section 35(a) of the Lanham Act, 15 U.S.C. § 1117(a), as well as its costs and attorneys' fees and any such other and further

relief to which it may be entitled. The jurisdiction of this Court is retained for the purpose of making any other orders necessary or proper to construe, enforce or implement the terms of this Judgment and to punish or award damages or violations thereof.

IT IS SO ORDERED.

DATED: _____

The Honorable Harry D. Leinenweber
United States District Court Judge