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IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF GEORGIA, ATLANTA DIVISION

MOGULDOM MEDIA GROUP, LLC

Plaintiff

v.

CHINAZOR OKASI

Defendant.

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-RLV

Civil Action File No.

1:12-CV-0047

COMPLAINT

Plaintiff, Moguldom Media Group, LLC ("MMG"), by counsel, for its Complaint against Defendant, Chinazor Okasi ("Okasi"), complains and alleges as follows:

INTRODUCTION

1. This is an action for (a) false advertising and dilution, pursuant to the Lanham Act § 43(a), 15 U.S.C. § 1125(a) and (c); (b) deceptive trade practices pursuant to the Georgia Uniform Deceptive Trade Practices Act, Ga. Code Ann. § 10-1-370 *et seq.*; (c) unfair competition under the Georgia common law; and (d) willful violations of the Lanham Act and common law claims of unfair competition. MMG seeks permanent injunctive relief; damages sustained by

MMG as a result of Okasi's deceptive practices and treble damages and/or punitive damages resulting from Okasi's foregoing behavior; and all costs and fees, including reasonable attorneys' fees, incurred by MMG in this action.

THE PARTIES

2. Plaintiff, MMG, is a corporation organized and existing under the laws of the State of New York, having its principal place of business at 171 Madison Ave, Penthouse, New York, NY 10016.

3. Defendant, Okasi, is an individual having residence at 151 Sip Avenue, Jersey City, NJ 07306.

JURISDICTION AND VENUE

4. This action arises under the federal Lanham Act, 15 U.S.C. §1051 *et seq.*, and is between citizens of different states. Jurisdiction is proper under 28 U.S.C. §§ 1331 and 1338. This action further comprises claims arising under state law wherein jurisdiction is proper under 28 U.S.C. § 1367.

5. Okasi has purposefully directed false and misleading statements regarding MMG's brand Madame Noire to residents of the State of Georgia through the use of her personal website and through a twitter account. Through these actions, a substantial part of the events giving rise to this claim occurred in Georgia.

6. Venue properly resides in the United States District Court for the Northern District of Georgia pursuant to 28 U.S.C. §§ 1391.

FACTUAL BACKGROUND

7. MMG is a network of owned and operated digital brands focusing on African Americans.

8. The brands owned by MMG capture the pulse of diverse segments of African Americans and provide rich, compelling experiences across multiple medial channels including online video, mobile and social media platforms.

9. MMG owns such famous and distinctive brands as Bossip, The Atlanta Post, 24Wired.TV, HipHopWired, StyleBlazer and Madame Noire.

10. In early 2009, MMG had an idea for a women's lifestyle website to be primarily directed to African American women.

11. The idea was that the website was to provide, among other things, on-line reviews of African American celebrity gossip and entertainment news, current events, lifestyles and personal relationships.

12. The initial idea for the website was the creation of MMG owner and CEO Jamarlin Martin ("Martin") and the initial development was through a design team of MMG employees and managers.

13. The website was tentatively to be called "Clever Today," a suggestion by Martin. Immediately, MMG began investing resources in web design, research and hiring for the launch of the website.

14. The idea for the website was circulated to MMG's brand editors for input and contribution.

15. The editor of The Atlanta Post, a MMG brand, contacted Martin and recommended Okasi as a potential candidate for advancement within MMG.

16. At the time, Okasi was with MMG as an assistant editor of The Atlanta Post working in excess of 20 hours per week on her projects. Okasi had been under contract with MMG since December, 2009.

17. After the recommendation, Martin interviewed Okasi and offered her a promotion from contractor to fulltime employee with MMG. The position offered to Okasi was as the Assistant Director of Editorial Strategy to be based in the Company's office in New York, NY. Her duties were to include working across various MMG brands, including the development of the newest concept "Clever Today." Okasi's immediate supervisor was Martin.

18. Okasi was presented with an employment contract on March 15, 2010. Okasi signed the employment contract with MMG on April 12, 2010. In addition,

the employment agreement included an Employee Non-Disclosure and Intellectual Property Rights Agreement which was executed by Okasi on April 14, 2010.

19. During this time, Okasi began attending meetings related to the development and design of the new "Clever Today" website. These meetings were attended by numerous individuals, including Martin, Okasi, Marve Frazier, Elaine Flores and Rashaun Hall. During the development meetings, Okasi requested that the name of the website be reexamined and new alternatives be explored.

20. Martin directed Okasi to research alternative names for the concept and website and their potential availability via an eventual internet website. Among the alternative names suggested by Okasi were "Polish" and "Madame Noire." Okasi's preferred alternative was the name "Polish."

21. Martin rejected the "Polish" name and idea concepts proposed by Okasi related to the same. However, the development team liked "Madame Noire" and agreed to change the website and online magazine name of "Clever Today" to "Madame Noire."

22. In March, 2010, MMG applied for a trademark of the name "Madame Noire" with an intent to use in commerce.

23. The first use of the name "Madame Noire" in commerce was May 6, 2010.

24. The website was launched in early June, 2010.

25. The United States Patent and Trademark Office issued a registration number of 3,932,5656 to MMG as the owner of the mark "Madame Noire" on March 15, 2011.

26. Over several months, MMG hired additional assistant editors for the website Madame Noire. The editorial team included Elaine Flores, Danielle Kwateng and Kweli Wright.

27. All three of the assistant editors voluntarily quit their positions citing difficulties with their working relationships with Okasi and her inability to communicate and manage effectively.

28. An additional assistant editor, Demetria Irwin, was hired and worked closely with Okasi. Ms. Irwin also asked to be transferred to a different department of MMG. Ms. Irwin also cited difficulties working with Okasi as the reason for the request to transfer.

29. MMG became concerned with the management style of Okasi in her role as Assistant Director of Editorial Strategy and attempted interventional meetings to address the issues.

30. The difficulties surrounding Okasi's inability to effectively communicate and manage employees continued and MMG management made the

decision to reduce Okasi's role back to one of contractor as of January, 2010 in an attempt to keep continuity and harmony among the rest of MMG's employees. MMG was concerned that Okasi's increasingly toxic personality and continued unprofessional behavior was detrimental to the overall good of the company.

31. Unfortunately, Okasi's disruptions continued and, after additional problems were reported, Okasi's contract was terminated in March, 2010.

32. MMG has invested substantial time, resources and money in the development and branding of Madame Noire and the associated website since its conceptual beginning.

33. Since Okasi's termination, the website has increased its traffic over 400%.

34. Once terminated from her employment with MMG, Okasi filed for and obtained unemployment benefits against MMG.

35. When Okasi's unemployment benefits were exhausted, Okasi began making unfounded claims that she owned the name Madame Noire and she began threatening Martin that she was going to sue MMG unless she was compensated for the same. MMG declined to negotiate with Okasi over her baseless claims.

36. Okasi currently maintains a personal website at www.chinaokasi.com. The website is interactive and is commercial in nature as Okasi advertises and promotes her books and personal media appearances.

37. Okasi's website is accessible through the internet and is directed to residents of Georgia through the direct references to content written by her while an assistant editor of AtlantaPost.com, a publication that was directed to the residents of Atlanta, Georgia.

38. On her personal website, Okasi falsely claims that she is the creator and founder of "MadameNoire.com." See Exhibit "A," attached hereto.

39. Okasi also maintains a twitter account at [@chinaokasi](https://twitter.com/chinaokasi).

40. Okasi's twitter account is accessible through the internet and to those individuals who "follow" Okasi. The twitter messages are directed to "followers" which include the residents of Georgia as she maintains twitter followers from the state.

41. Okasi's bio section of her twitter account announces "Also, I own Madame Noire." See Exhibit "B," attached hereto.

42. On November 7, 2011, Okasi applied for trademark protection for the name "Madame Noire" under the same classification for goods and services as MMG's currently registered mark. See Exhibits "C" and "D," attached hereto.

43. Okasi is willfully and deliberately attempting to interfere with MMG's business and their ability to serve the public using MMG's registered trademark.

44. Okasi is willfully, intentionally, knowingly and in bad faith, attempting to deceive the public as to the nature, origin, characteristics, or quality of MMG's goods, services, or commercial activities.

COUNT I

False Advertising Under § 43(a) of the Lanham Act (15 U.S.C. § 1125(a))

46. MMG repeats and realleges the allegations contained in paragraphs 1 through 45 of the Complaint, and further states:

47. Okasi is a person who has used in connection with her services, advertised on her website and through her twitter account, MMG's registered trademark "Madame Noire."

48. Specifically, through her website and twitter account, Okasi has made false representations as to the designation of origin and ownership of the mark "Madame Noire."

49. Okasi's false representations are likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection or association of Okasi with MMG and/or Madame Noire as to the origin, sponsorship or approval of MMG's goods, services and commercial activities.

50. Okasi's false representations as to origin and ownership of "Madame Noire" misrepresents the nature, characteristics, and qualities of MMG's goods, services and commercial activities.

51. For all of Okasi's false representations and as to the designation of origin and ownership of the mark "Madame Noire," MMG is entitled to, and seeks, injunctive relief as set forth in 15 USC § 1116, and all remedies set forth in 15 USC §§ 1117(a) and 1118.

COUNT II

Dilution Under § 43(c) of the Lanham Act (15 U.S.C. § 1125(c))

52. MMG repeats and realleges the allegations contained in paragraphs 1 through 51 of the Complaint, and further states:

53. MMG owns the distinctive mark "Madame Noire."

54. Okasi has commenced to use MMG's mark in commerce in a manner that is likely to cause dilution by blurring or dilution by tarnishment.

55. Okasi's use of and reference to MMG's mark "Madame Noire" impairs the distinctiveness of MMG's mark as MMG is engaging in exclusive use of the mark in association with the goods and services associated with the same.

56. Okasi's use of and reference to MMG's mark "Madame Noire" impairs the distinctiveness of MMG's mark as "Madame Noire" is a well recognized and famous mark.

57. Okasi's use of and reference to MMG's mark "Madame Noire" impairs the distinctiveness of MMG's mark as Okasi's use and reference is intended to create an impermissible association with MMG's mark.

58. Further, Okasi's use of the mark "Madame Noire" on her personal website and twitter account harms the reputation of MMG's mark by association.

59. Due to the likelihood of dilution of the mark "Madame Noire," MMG is entitled to, and seeks, injunctive relief as set forth in 15 USC § 1116, and all remedies set forth in 15 USC §§ 1117(a) and 1118.

COUNT III
Deceptive Trade Practices Under the Georgia Deceptive Trade Practices Act
(Ga. Code Ann. § 10-1-370 *et seq.*)

60. MMG repeats and realleges the allegations contained in paragraphs 1 through 59 of the Complaint, and further states:

61. Okasi's representations as to the origin and ownership of the mark "Madame Noire" on her website and twitter account are false or misleading.

62. Okasi's representations as to the origin and ownership of the mark "Madame Noire" on her website and twitter account is likely to cause confusion or

a misunderstanding as to the source, sponsorship, approval or certification of the goods and services offered.

63. Okasi's representations as to the origin and ownership of the mark "Madame Noire" on her website and twitter account are likely to cause confusion or a misunderstanding as to her affiliation, connection, or association with MMG and it's mark "Madame Noire."

64. MMG has been, or is likely to be, injured because of Okasi's deceptive trade practices. MMG is entitled to injunctive relief from Okasi's deceptive practices. MMG is further entitled to recover the costs of this action, including MMG's reasonable attorneys' fees, pursuant to Ga. Code. Ann. § 10-1-373.

COUNT IV

Unfair Competition Under Georgia Common Law

65. MMG repeats and realleges the allegations contained in paragraphs 1 through 64 of the Complaint, and further states:

66. Okasi's false representations as to the origin and ownership of the mark "Madame Noire," as alleged herein above, constitutes unfair methods of competition and unfair and deceptive acts and practices, including but not limited to the use and employment of deception, fraud, false pretense, false promise, misrepresentation and the concealment, suppression and omission of material facts,

with intent that others, including but not limited to consumers, rely upon the concealment, suppression and omission of such material facts in violation of the Georgia common law of unfair competition.

67. Okasi's representations of fact are false and misleading representations of fact which were willful and intentional, and made with deceptive intent.

68. As a result of Okasi's unfair competition, as alleged herein, MMG has suffered and will continue to suffer damage and irreparable injury, including but not limited to the loss of goodwill, loss of competitive advantage, and pecuniary damages.

69. MMG has no adequate remedy at law.

70. MMG is entitled to compensatory damages, punitive damages, and injunctive relief based on Okasi's violations of the Georgia common law of unfair competition.

COUNT V
Willful Violations of the Lanham Act and Common Law Claims –
Punitive Damages

71. MMG repeats and realleges the allegations contained in paragraphs 1 through 70 of the Complaint, and further states:

72. Okasi's violations of the Lanham Act and common law unfair competition against MMG were committed willfully, intentionally, knowingly and

in bad faith, with intent to deceive the public as to the nature, characteristics, and/or origin of Okasi's goods, services, or commercial activities. As such, MMG is entitled to recover its damages, Okasi's profits, treble damages in amount up to three times any damages award, the costs of the action, including its attorney's fees, as provided for in 15 U.S.C. § 1117. MMG is further entitled to recover punitive damages under the Lanham Act and as provided for in Ga. Code Ann. § 51-12-5.1.

WHEREFORE, Plaintiff, MMG, respectfully demands:

A. That pursuant to 15 U.S.C. § 1116 and/or Ga. Code Ann. § 10-1-423, a permanent injunction be issued restraining and enjoining Okasi, and all those parties acting in concert with it, and its successors, agents, employees, officers and assigns, from directly or indirectly:

1. using MMG's registered mark "Madame Noire" in any form or fashion which would tend to confuse the public as to the origin or ownership of the mark; and

2. otherwise falsely advertising, or otherwise falsely claiming, that she is affiliated with MMG or its mark "Madame Noire."

B. That MMG be awarded a monetary judgment against Okasi under the Lanham Act, affording such monetary relief to which MMG is entitled pursuant to

15 U.S.C. § 1117, including actual damages, Defendant's profits, treble damages, and reasonable attorneys' fees and costs;

C. That Okasi be ordered to pay punitive damages, in an amount to be determined at trial, as a result of Okasi's willful and malicious false advertising and unfair competition under the Lanham Act and pursuant to Ga. Code Ann. § 51-12-5.1 and the Georgia common law;

E. That Okasi be ordered to publish corrective advertising to dispel the false, deceptive or impliedly false impressions created by her actions; or, in the alternative, awarding damages to MMG in an amount sufficient to compensate MMG for such corrective advertising as is appropriate to correct the deception caused by Defendants' acts of false advertising;

F. That Okasi be ordered to pay to MMG its reasonable attorneys' fees pursuant to the Lanham Act, 15 U.S.C. § 1117, and/or Ga. Code Ann. § 10-1-373, and/or Ga. Code Ann. § 9-15-4, and/or Ga. Code Ann. § 13-6-11;

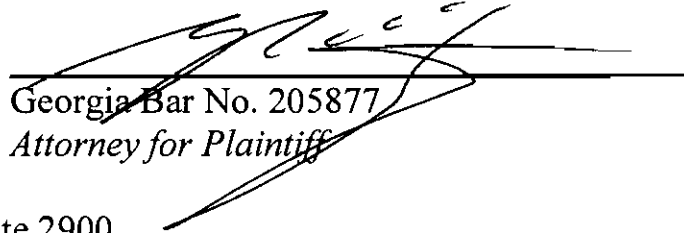
G. That MMG recover all other costs and disbursements that may be incurred by MMG in this action;

H. That MMG have trial by jury on all issues so triable; and

I. That the Court grant to MMG such other and further relief as it may deem just, proper and equitable.

Respectfully Submitted, this 5th day of January, 2012.

HALL BOOTH SMITH & SLOVER, P.C.



Georgia Bar No. 205877
Attorney for Plaintiff

191 Peachtree Street, Suite 2900
Atlanta, Georgia 30309
404-954-5000; (fax) 404-954-5020

| CHINA OKASI |

*"We are, each of us, unfinished people - living solely for the purpose of crafting and re-crafting ourselves."
- China Okasi*

Journalist | Education & Lifestyle Expert | Media Personality

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ABOUT ME

At 19, China Okasi became one of the youngest Ivy League alums to have graduated from Cornell University within just three years.

At 20, she was accepted to a Ph.D. program at Georgetown University, where she spent one year before leaving to unleash her creative talents in the non-academic world.

By 21, she worked full-time for Georgetown, and part-time as a magazine editorial assistant; she modeled, studied acting, and traveled to "cultivate her life," she says. She also began developing her new media expertise by launching various websites in the wee hours of the night -- one of which would rake in thousands per month a few years later (see P & P below).

Never one to undervalue education, she began her first master's degree the next year at age 22, at another Ivy League institution: the University of Pennsylvania's Graduate School of Education. There, she would school while working as an advisor (and as an instructor at the neighboring Temple University).

After finishing her Penn degree at 24, she scaled her teaching to part-time, in order to re-establish her full-time career as an associate editor. She also freelanced on the side for several publications, from Scholastic, to Philadelphia Inquirer, to MSNBC.com, to several magazines and new media companies. Her unique background & appetite for competition made her heavily sought after by corporate entities like KPMG & the City of New York, who used her expertise for high-stakes editorial and media projects.

With all her education and media work under her belt, she began serving as CEO of Penn & Paper.com (P & P) and, on a part-time basis, chairing its Board, and overseeing its various community projects that offer free services to underprivileged high school students in preparation for college. She also began writing and producing news content for NBC & MSNBC on a full-time basis, while completing yet another master's degree at her third Ivy League alma mater: the Columbia University Graduate School of Journalism.

Now a formally trained journalist and educator, her work focuses on gender/women's issues, lifestyle, pop culture, education, activism, politics and African/African-American issues. She has been featured in numerous publications including AOL Black Voices, BET, Loop 21, Huffington Post, Atlanta Post, MSNBC.com, Uptown Magazine, Philadelphia Inquirer & more. She has interviewed the likes of Cathy Hughes, Soledad O'Brien, Jimmy Fallon, Faith Evans & many, many, more personas, musicians, actors/actresses.

She is the original creator and founder of "MadameNoire.com" as a lifestyle magazine, and will be launching her new publication in October 2011. For most of the year, she serves as a local and cable news commentator and lives in New York City, where she completes several books, inch-by-inch.

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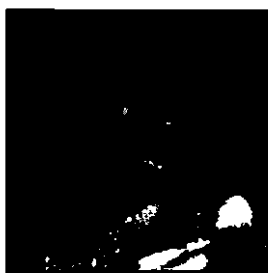
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China Okasi

@ChinaOkasi New York City

I do news commentary and break-dancing. Kidding about the break-dancing. Kind of. Also, I own Madame Noire.

<http://www.chinaokasi.com>

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If you're around your tube at 6:30pm tomorrow, catch China at 6:30pm on HLN - discussing something other than... <fb.me/XHNbhgQs>

12 hours ago

»



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China - riding back from Fox morning...back home to PJs! <fb.me/lqvwqoeJi>

19 Dec

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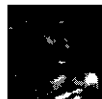


ChinaOkasi China Okasi

Hi, this is China! Just got off air with Angela McGlowan, former congressional candidate (R-MS) & Doug Schoen,... fb.me/1veDQjnH4

18 Dec

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New Time: China's on Fox & Friends tomorrow at 7:45am! Channel = Fox News.

17 Dec

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
Early birds! Catch China on Fox & Friends this Sun. w. former pollster for President Clinton, Doug Schoen + Angela... fb.me/PskB4xjh

15 Dec

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ChinaOkasi China Okasi


 **Jokoy** Will try 2 develop my Twitter - I've been yelled at. I suck. Cant even keep my msg to 1. This ish sux! Must link in LA! I have a thot

17 Nov

»



ChinaOkasi China Okasi

 **Jokoy** Hi! Btw-caught ur water bottle TWICE-put in my purse, took out, rubbed my eyes, NOW I HAVE PINK EYE! OK only 1st part of story's true

17 Nov

more

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Tweets

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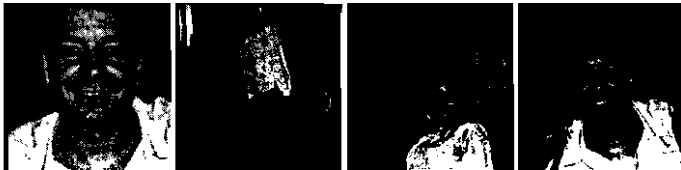
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MADAME NOIRE

Word Mark MADAME NOIRE

Goods and Services IC 041. US 100 101 107. G & S: Entertainment services, namely, providing a web magazine, web bulletin board postings, articles, internet blogs, and the like; providing online reviews of African American celebrity gossip and entertainment news; entertainment services, namely, providing a website featuring commentary, opinion and information on African American women pertaining to current event news; providing a website featuring commentary, opinion and information on African American woman, namely, lifestyles, celebrity gossip, entertainment news, current events news, and personal relationships; providing an internet website featuring a blog dealing with subjects of interest to African and American women website services; providing a website magazine; providing a web magazine with social, career, lifestyle and political commentary of interest primarily to women; providing a website with information of interest to women; commentary services, namely making information relating to social, relationship, style, political, fashion, lifestyle and other issues; providing online reviews and commentary; providing website featuring online reviews and commentary including allowing others to input content into the website

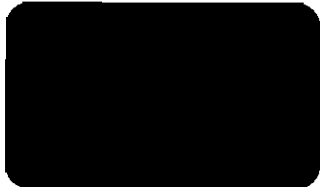
Standard Characters Claimed

Mark Drawing Code (4) STANDARD CHARACTER MARK

Serial Number 85466502

Filing Date November 7, 2011

Current Filing Basis 1B



Original Filing Basis 1B

Owner (APPLICANT) Chinazor Okasi INDIVIDUAL NIGERIA 151 Sip Avenue #14 Jersey City NEW JERSEY 07306

Attorney of Record Anthony H. Handal

Type of Mark SERVICE MARK

Register PRINCIPAL

Live/Dead Indicator LIVE

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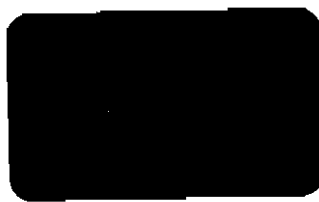
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MADAME NOIRE

Word Mark	MADAME NOIRE
Translations	The English translation of "NOIRE" in the mark is "BLACK".
Goods and Services	IC 041. US 100 101 107. G & S: Entertainment services, namely, providing on-line reviews of African American celebrity gossip and entertainment news; Entertainment services, namely, providing a website featuring information on African American women pertaining to current event news. FIRST USE: 20100506. FIRST USE IN COMMERCE: 20100506
	IC 045. US 100 101. G & S: Providing a website featuring information on African American women, namely, lifestyles and personal relationships. FIRST USE: 20100506. FIRST USE IN COMMERCE: 20100506
Standard Characters Claimed	
Mark Drawing Code	(4) STANDARD CHARACTER MARK
Serial Number	77959622
Filing Date	March 16, 2010
Current Filing Basis	1A
Original Filing Basis	1B
Published for Opposition	November 9, 2010



Registration Number 3932565
Registration Date March 15, 2011
Owner (REGISTRANT) Moguldom Media Group, LLC LIMITED LIABILITY COMPANY NEW YORK 260 Madison Avenue, 8th Floor New York NEW YORK 10016
Attorney of Record Justin M. Kerenyi
Type of Mark SERVICE MARK
Register PRINCIPAL
Other Data "MADAME NOIRE" does not identify a living individual.
Live/Dead Indicator LIVE

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