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15 TCL NORTH AMERICA

16 **UNITED STATES DISTRICT COURT**

17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

18 TTE TECHNOLOGY, INC. DBA
19 TCL NORTH AMERICA,

20 Plaintiff,

21 v.

22 SAMSUNG ELECTRONICS
23 AMERICA, INC.,

24 Defendant.

Case No. 8:26-cv-02494

COMPLAINT FOR:

1) **VIOLATION OF SECTION
43(A) OF THE LANHAM ACT;**

2) **VIOLATION OF
CALIFORNIA'S FALSE
ADVERTISING LAW; AND**

3) **VIOLATION OF
CALIFORNIA'S UNFAIR
COMPETITION LAW**

DEMAND FOR JURY TRIAL

1 Plaintiff TTE Technology, Inc. dba TCL North America (“Plaintiff” or
2 “TCL”), alleges the following against Samsung Electronics America, Inc.
3 (“Defendant” or “Samsung”).

4 I. INTRODUCTION

5 1. In recent years, Samsung encountered an uncomfortable reality: it could
6 not lawfully compete with TCL’s QM Line of Mini LED televisions, which contain
7 key technological advancements that are integral to Mini LEDs. Samsung’s inferior
8 product offerings led to a rapidly vanishing market share of Mini LEDs. Desperate
9 to resurrect its lagging sales and reduced market share, Samsung resorted to a fraud
10 on the market. It took a cheap, non-Mini LED model from a recycled product line
11 and peddled it to the public as a “supreme” Mini LED model at an attractive price
12 point. This age-old tale of corporate greed proved successful, as Samsung’s sham
13 products stole back TCL’s hard-won market share. Samsung’s deceptive conduct,
14 however, brazenly violates the Lanham Act and California’s Unfair Competition
15 Law. This lawsuit seeks to stop Samsung’s unlawful conduct and obtain relief for
16 the immense harm it has caused.

17 2. Mini LEDs are a technological advancement in the television market
18 that allow for a substantially better picture with greater dynamic range and higher
19 contrast ratios. The reason Mini LEDs achieve such improved results is because
20 anywhere from dozens to thousands of Mini LEDs arrayed across the entire back of
21 a television can be independently controlled, either individually or in zones, to
22 brighten or dim depending on the picture being projected. This is referred to as Full
23 Array Local Dimming (“FALD”) and is a substantial step forward from previous
24 technology.

25 3. Before Mini LEDs, a television with the capability to dim its light
26 source was limited to dimming or brightening the light source as a single unit
27 regardless of how many LEDs or other light sources were placed on the back panel
28 of the television. To achieve contrast between light and dark, individual pixels in

1 the LCD screen placed in front of the back panel were used to control the amount of
2 light emitted from the television across the screen. This was an imperfect system
3 because pixels could not fully stop all light from emitting, resulting in dull blacks
4 and “haloing” or “blooming” effects where white light bled into dark areas of the
5 screen.

6 4. With the advent of Mini LEDs, dozens, if not thousands, of Mini LEDs
7 that are only 100 to 300 microns in size could be arrayed across the entire back panel
8 of a flat screen television. Those Mini LEDs could be independently brightened or
9 dimmed individually or in zones, allowing for much deeper blacks and much
10 brighter whites with little to no “haloing” or “blooming” effect. It is understood
11 within the industry, as well as within the market by consumers and independent
12 reviewers, that when a product is labeled as a Mini LED television, it contains FALD
13 technology. Indeed, FALD is the singular most important technical advancement
14 provided by Mini LEDs.

15 5. TCL is a pioneer in the Mini LED market, having released its first
16 generation of 8K Mini LED products at CES 2019. TCL later released these
17 products to the Chinese market in 2020 with a starting price of approximately
18 \$7,250. At CES 2021, TCL officially launched its high-end 4K Mini LED products
19 globally. The North American model, the Q825, and other regions’ model, the C825,
20 were available in 75”, 65”, and 55” sizes. The starting price in North America was
21 ~\$1,799 USD, and in Europe, ~€1,299. TCL has since continued to advance the
22 technology, offering multiple lines of Mini LED televisions, and substantially
23 decreasing the price of the technology.

24 6. All of TCL’s Mini LED televisions contain FALD, as do all other
25 competitor Mini LED-marketed televisions. This allows for consumers to obtain a
26 television offering a picture quality that rivals—if not surpasses—much higher-
27 priced OLED models for a fraction of the price.

1 7. Beginning in 2021, TCL began selling an affordable range of genuine
2 Mini LED television models with FALD and quickly found success in the U.S.
3 market. Then, in 2023, TCL released its QM Line of affordable Mini LED
4 televisions, selling at retail for half the price of the most-similar Samsung TV, while
5 including advanced features such as QLED and higher refresh rates (e.g., 144 Hz).
6 Leveraging its technological leadership and highly efficient supply chain, TCL’s
7 research, development, and sales of Mini LED TVs have transformed this segment
8 of the television market into a rapidly growing category. Between 2023 and 2025,
9 thanks to their exceptional picture quality and accessible pricing, TCL’s Mini LED
10 TVs won the favor of U.S. consumers, driving a rapid surge in sales volume and
11 market share within the U.S. market. TCL’s development and successful sales of
12 Mini LED televisions were a threat to Samsung’s status as the world’s largest
13 provider of televisions, and began to eat away at Samsung’s sales and market share
14 in competing product categories. Between 2023 and 2025, TCL overtook Samsung
15 in both sales and market share of Mini LED televisions in the United States.

16 8. TCL’s edge over Samsung can be attributed to the fact that Samsung
17 did not have—and has failed to develop—a Mini LED television that contained
18 FALD at a viable price point. Accordingly, in March of 2026, in response to TCL’s
19 significant market share growth in the Mini LED market, Samsung countered by
20 quickly launching another line of televisions—the M70H/M80H/M90H models (“M
21 Models”)—that it branded “Mini LED” and priced substantially below TCL’s
22 lowest-priced Mini LED televisions. But M Models were not competing Mini LED
23 televisions. Instead, Samsung merely recycled its pre-existing low-end standard
24 LED televisions, the Crystal UHD line, and re-labelled them as “Mini LED.” As
25 described in detail below, Samsung’s M Models contain none of the technological
26 advancements associated with Mini LED technology, including FALD.

27 9. Samsung did not only intentionally mislabel its M Model televisions as
28 Mini LED to confuse consumers and divert sales from TCL. Samsung also creates

1 marketing and promotional materials specifically designed to mislead consumers
2 into believing that its M Models contain Mini LED and FALD technology.

3 10. Samsung's website specifically guides consumers through the
4 differences in television technologies, informing them of the differences between
5 certain models and the technological advantages Samsung's televisions purportedly
6 offer. For example, Samsung's website provides a comparison of Mini LED and
7 QLED, and under a section entitled "What is Mini LED", Samsung unequivocally
8 states:

9 "Mini LED is an advanced backlighting display technology
10 that uses tiny LEDs, smaller than standard ones, **for more**
11 **precise backlight control through local dimming**
12 **zones—a technique where backlight zones are**
13 **controlled independently.** This helps achieve better image
14 quality, high contrast and enhanced picture quality,
15 especially noticeable with HDR content."¹

16 11. Under "Mini LED vs. QLED: FAQs," in response to "Which TV offers
17 better contrast, Mini LED or QLED?", Samsung states:

18 "Mini LED technology in Samsung Neo QLED TVs
19 provides better contrast ratios due to its ability to
20 control local dimming zones more precisely. This
21 results in deeper blacks compared to QLED, which uses a
22 standard LED backlight."²

23 12. These statements clearly show that Samsung understands the correct
24 meaning of "Mini LED." Samsung nevertheless deceptively labels its M Models
25 with the "Mini LED" moniker even though the M Models do not include Mini LEDs
26 with local dimming.

27 13. Samsung's deception does not stop there. Samsung goes further by
28 creating purposefully misleading and confusing descriptions of the "dimming
technology" contained in these models. For example, Samsung's specification

¹ <https://www.samsung.com/us/tvs/tv-buying-guide/mini-led-vs-qled/>.

² *Id.*

1 sheets identify the dimming feature available on its Mini LED televisions as
2 “Supreme Mini LED Dimming,” which, when coupled with its descriptions of Mini
3 LED local dimming on its website, is purposefully designed to suggest dimming that
4 is a *better* version of typical Mini LED FALD than that of its competitors such as
5 TCL. This is reinforced by the fact that Samsung uses the same terminology—
6 “Supreme Mini LED Dimming”—to describe its high-end Neo QLED televisions,
7 which actually contain Mini LED technology, including FALD, and are marketed at
8 a much higher price, further confusing and deceiving customers about the
9 technology actually employed by Samsung in its M Model televisions.

10 14. Rather than honestly admit to consumers that these M Models do not
11 contain FALD, Samsung strings together a series of incomprehensible adjectives for
12 its televisions’ dimming capabilities that are purposefully designed to deceive
13 consumers into believing that the M Model televisions they are purchasing contain
14 Mini LED technology and the resultant better picture qualities associated with Mini
15 LED and FALD.

16 15. Samsung’s false advertising and deceptive marketing techniques
17 regarding its M Model “Mini LED” televisions are a straight-forward violation of
18 the Lanham Act and California’s Unfair Competition Law. Samsung’s conduct
19 purposefully deceives and confuses consumers, and illegally diverts sales from TCL.

20 II. PARTIES

21 16. TTE Technology, Inc. dba TCL North America is a Delaware
22 corporation with a principal place of business in Irvine, California.

23 17. On information and belief, Defendant Samsung Electronics America,
24 Inc. is a New York corporation with a principal place of business in Plano, Texas.
25 Samsung markets, sells, and distributes its products throughout the United States,
26 including California.

27 III. JURISDICTION AND VENUE

28 18. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331

1 because the case includes a claim of false and deceptive advertising under the
2 Lanham Act (15 U.S.C. §§ 1051, et seq.), including 15 U.S.C. § 1125, which
3 expressly provides that claims arising thereunder are subject to federal subject matter
4 jurisdiction.

5 19. The Court has supplemental jurisdiction over TCL’s state claims
6 pursuant to 28 U.S.C. § 1367(a) because TCL’s claims are joined with substantial
7 and related claims under the Lanham Act and arise out of a common nucleus of
8 operative facts.

9 20. The Court has personal jurisdiction over Samsung because Samsung
10 transacts and does business in California, has sufficient minimum contacts with
11 California, and advertises, markets, sells, and distributes its Mini LED televisions in
12 California.

13 21. Venue is proper pursuant to 28 U.S.C. § 1391(a) because a substantial
14 part of the events or omissions giving rise to TCL’s claims occurred in this district
15 and Samsung conducts substantial business within California, including the
16 marketing, distribution, and sale of its products in this district.

17 **IV. FACTUAL ALLEGATIONS**

18 22. Television technology has advanced dramatically in just a few decades.
19 One of the most significant areas of advancement has been the light source, the
20 central requirement of all television products. In the first televisions—cathode ray
21 tubes (“CRT TVs”)—the light was derived from the luminescence of the screen
22 itself, and in particular the interaction of the electron beam with the phosphor layer
23 on the screen. CRT TVs were “pieces of furniture” having substantial physical
24 footprints to account for the depth of the television, which was required to be
25 proportionate to the size of the screen. The larger the screen, the greater the physical
26 depth.

27 23. The introduction of the Liquid Crystal Display (“LCD”) television
28 substantially reduced this depth requirement by eliminating the cathode ray tube and

1 positioning the fluorescent light source near the back panel of the television. LCD
2 televisions work by projecting light from a “backlight” in the rear of the television
3 through a panel of liquid crystals (“LCD Panel”). The liquid crystals are arranged
4 in a matrix of columns and rows in the LCD Panel, with each liquid crystal
5 representing a “pixel.” Selectively applying a voltage to each pixel causes the liquid
6 crystal at each pixel to open or close, thereby varying the amount of the projected
7 backlight that projects through each pixel to, for example, a color filter and
8 eventually to the viewer.

9 24. Backlights in early LCD televisions were cold-cathode fluorescent
10 lamps (“CCFLs”), which were bulky and emitted substantial heat. In addition,
11 because the CCFLs worked by consuming a fuel source (inert gas in the tube), they
12 eventually needed replacement.

13 25. In the early 2000s, LCD televisions began using LEDs as backlights,
14 which by then were small and durable. Unlike the CCFLs, LEDs would never
15 require replacement unless they were damaged. In addition, The LED backlights
16 required significantly less power and emitted less heat. The LEDs were also much
17 smaller – generally .5mm to 1.8mm – allowing for more LEDs to be included in the
18 television. The LEDs were generally arranged behind the LCD Panel, with this
19 configuration referred to as “Back Lit” or “Direct Lit.” The LEDs on some models,
20 referred to as “Edge Lit,” were instead arranged at one or more edges of the back
21 panel with their light directed to reflective and/or diffusive material behind the LCD
22 Panel.

23 26. In some televisions, the backlights could be dimmed or brightened to
24 adjust the picture. Any such dimming, however, was uniform across the screen,
25 meaning that dimming dark pixels would also dim brighter pixels, and vice versa.
26 The result of this was a low dynamic range (the difference between the deepest
27 blacks and brightest whites) and a low contrast ratio (the ratio of the deepest black
28 to the brightest white).

1 27. Subsequently, as a further advancement in lighting, some
2 manufacturers attempted to increase dynamic range and improve contrast ratios,
3 through the inclusion of “local dimming.” Local dimming involves grouping the
4 LEDs on the back panel into independently-controlled zones of LEDs and dimming
5 each zone independently. Based on the size of LEDs at the time, this generally
6 allowed for no more than a few dozen dimming zones. Since the number of zones,
7 due to the low number of LEDs, was relatively few, this early local dimming did not
8 significantly increase the dynamic range or improve the contrast ratio, and often
9 experienced a problem referred to as “blooming” or “haloing,” where light from
10 LEDs in a brighter zone spreads into darker zones resulting in the viewer observing
11 light spreading into darker areas of the picture.

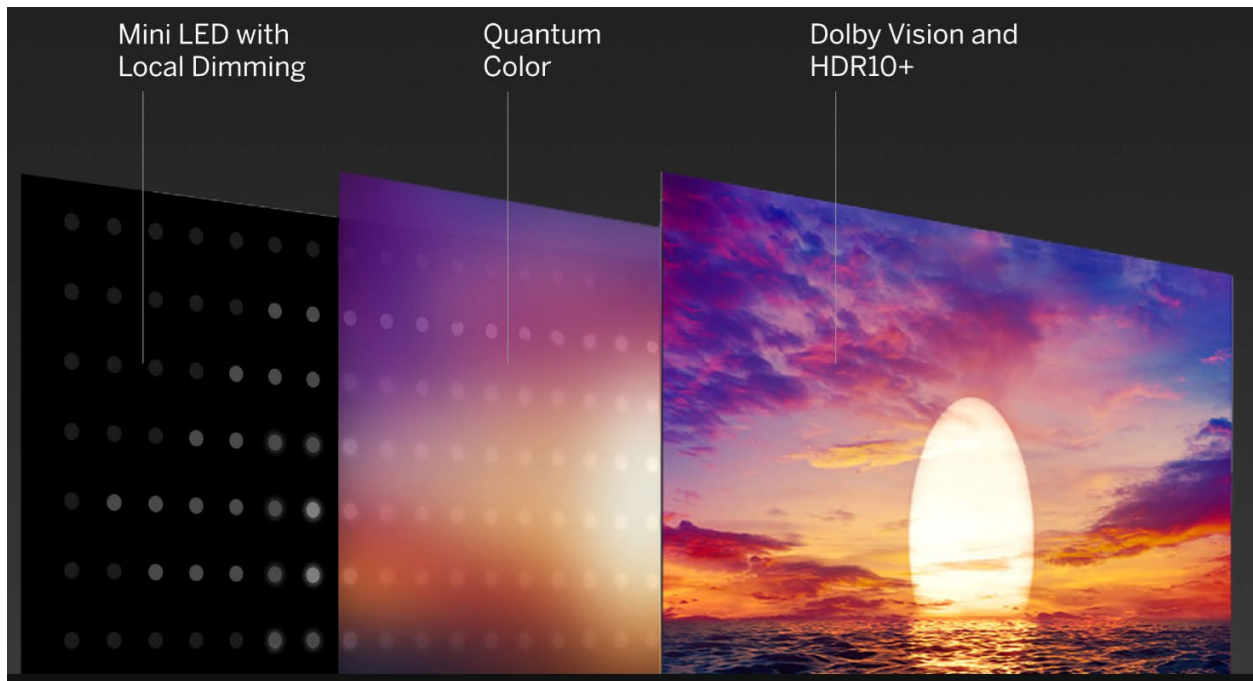
12 28. A major step forward occurred with the introduction of smaller LEDs
13 known as “mini” LEDs. Mini LEDs are generally .1mm to .3mm, the size of a grain
14 of sand, enabling the inclusion of dozens to thousands of Mini LEDs in a single
15 television, as compared to tens of standard LEDs. More LEDs permitted more local
16 dimming zones, and Mini LED televisions could have dozens or even thousands of
17 independently controllable zones allowing for considerably more granular local
18 dimming. The capacity to have dozens to thousands of Mini LEDs across the entire
19 back of a television, that can be controlled either individually or in zones to brighten
20 or dim based on the picture, is referred to as Full Array Local Dimming (“FALD”).
21 Mini LEDs, and the FALD technology they enabled, significantly increased the
22 dynamic range and contrast ratio of LCD televisions and resolved the blooming or
23 haloing problem.

24 29. Before Mini LEDs, local dimming was generally ineffective. The only
25 purpose for the inclusion of Mini LEDs into modern televisions was to provide for
26 more effective local dimming. In fact, there is no other reason to use Mini LEDs for
27 television backlighting. Accordingly, the term Mini LED is understood both within
28 the industry and within the marketplace to necessarily include FALD technology, as

1 that is the only significant benefit that Mini LEDs provide to the product and the
2 consumer.

3 30. Competitors confirm that Mini LED televisions necessarily include
4 FALD by, for example, consistently defining, promoting and identifying Mini LED
5 televisions as having FALD, which accomplishes the sought-after qualities of
6 increased dynamic range and significantly improved contrast ratios.

7 31. Vizio, for example, which offers its own collection of Mini LED
8 televisions, provides on its website a visual representation of “A look behind Mini
9 LED” that explicitly highlights the FALD feature in conjunction with the Mini LED
10 panel inside its television.³



23 32. Sony is another industry participant that equates Mini LED televisions
24 with FALD. For example, Sony’s website characterizes the backlight control
25 technology of its Mini LED 4K HDR Google television to include “a unique local
26 dimming algorithm [that] controls thousands of LEDs accurately for stunning
27

28 ³ <https://www.vizio.com/en/tv/mini-led#mini-led>

1 contrast.”⁴

2 33. Similarly, Hisense offers multiple series of Mini LED televisions and
3 all of the product descriptions for these televisions include the number of local
4 dimming zones offered. The Hisense U6 series includes “up to 600 local dimming
5 zones,” the QD7 series includes “Full Array Local Dimming,” the U7 series includes
6 “up to 3000 local dimming zones,” and the UX series includes “up to 5000 local
7 dimming zones.”⁵

8 34. LG advertises its QNED Mini LED television as featuring
9 “approximately 30,000 Mini LEDs” with “close to 2,500 unique dimming zones.”⁶

10 35. Other Mini LED industry participants that define, promote and identify
11 their televisions as having FALD include Roku, Insignia, and Element.⁷

12 36. Industry publications and reviewers agree that Mini LED televisions
13 necessarily utilize FALD. For example, Consumer Reports stated “[s]ome newer
14 sets have Mini LED backlights, which use a large number of even smaller LEDs that
15 can be divided into more zones and locally dimmed,”⁸ and that “Mini LEDs take
16 full-array backlights with local dimming a step further by shrinking the size of the
17
18

19 ⁴ <https://electronics.sony.com/tv-video/televisions/all-tvs/p/k65xr50>

20 ⁵ <https://www.hisense-usa.com/product-page/televisions-65-class-u6-series-miniled-uled-4k-fire-tv-65u65qf>; <https://www.hisense-usa.com/product-page/televisions-65-class-qd7-series-miniled-uled-4k-fire-tv-65qd7qf>;
21 <https://www.hisense-usa.com/product-page/televisions-65-class-u7-series-miniled-uled-4k-google-tv-65u75qg>; <https://www.hisense-usa.com/product-page/televisions-116-class-ux-rgb-miniled-uled-4k-google-tv-116ux>.
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24 ⁶ https://www.lg.com/levant_en/qned-tvs/2021/large-screen.

25 ⁷ <https://support.roku.com/article/improve-contrast-with-local-dimming>;
26 https://www.bestbuy.com/product/insignia-55-class-f70-series-4k-uhd-qlcd-mini-led-smart-tv-with-fire-tv/J2FPJK9F77/sku/6677122?utm_source=feed&extStoreId=1092;
27 <https://elementelectronics.com/product/element-100-mini-led-qlcd-4k-uhd-hdr-144hz-smart-google-tv-emq600ae100g/>.
28

⁸ <https://www.consumerreports.org/electronics-computers/tvs/best-tvs-of-the-year-a3862868628/>.

1 LEDs.”⁹ Similarly, CNET has stated that “[t]here’s a new variation on local
2 dimming, a sort of full-array on steroids. It’s called mini-LED, and the first
3 [television] to ship with the technology is the TCL 8 series.”¹⁰ In addition, ZDNet
4 states that Mini LED televisions have “zone-based dimming.”¹¹

5 **A. The Competitive LED Television Market**

6 37. The LED television market is highly competitive at both the wholesale
7 and retail levels. Competition is based upon a number of key factors including price,
8 picture quality, size, configuration and physical footprint, brand identification,
9 longevity/durability, and technological innovations.

10 38. The vast majority of LED televisions are sold through walk-in sales at
11 “big box” stores such as Walmart, Costco, and Sam’s Club, and through internet
12 retail sales on the websites of these same stores, Amazon.com and others. As such,
13 consumer sales are dependent upon distinctions in product offerings that are
14 provided by the manufacturers in advertising, promotional materials, store displays,
15 website descriptions, statements printed on packaging materials, and product
16 specifications – all in writing (“Product Representations”). For example, for
17 televisions sold on the internet via purchasing websites (approximately 40% of all
18 retail sales), the purchaser has no ability to actually see the television screens in
19 operation and must rely solely upon the Product Representations made by the
20 manufacturer in its written promotional materials.

21 39. In addition, since consumers cannot “look under the hood,” because
22 these products are closed systems in which the technology described cannot be
23 observed by the buyer, customers are nearly completely reliant upon the
24 manufacturer’s Product Representations concerning the technology they are

25 ⁹ [https://www.consumerreports.org/electronics-computers/tvs/buying-](https://www.consumerreports.org/electronics-computers/tvs/buying-guide/#which-type-of-tv-should-i-buy)
26 [guide/#which-type-of-tv-should-i-buy.](https://www.consumerreports.org/electronics-computers/tvs/buying-guide/#which-type-of-tv-should-i-buy)

27 ¹⁰ [https://www.cnet.com/tech/home-entertainment/led-local-dimming-explained/.](https://www.cnet.com/tech/home-entertainment/led-local-dimming-explained/)

28 ¹¹ [https://www.zdnet.com/home-and-office/home-entertainment/mini-led-vs-oled-](https://www.zdnet.com/home-and-office/home-entertainment/mini-led-vs-oled-tv/)
[tv/.](https://www.zdnet.com/home-and-office/home-entertainment/mini-led-vs-oled-tv/)

1 purchasing and its impact on the television screen image. For this reason, honesty
2 and truthfulness are critical to the purchasing decisions by a vast number of
3 consumers. Purchasers who seek advances in technology as an element of their
4 price/quality/durability considerations are necessarily relying on the veracity of
5 written manufacturer materials in making competitive purchasing decisions. And
6 manufacturers link their specific technology advancements to the quality of their
7 television offerings in their Product Representations.

8 40. In short, competition today is based upon providing increased picture
9 quality through advancements in technology, in a variety of sizes and models, at the
10 lowest possible competitive prices.

11 41. Due to competitors continuously developing technologies to
12 incorporate into their products, brand leveraging through brand recognition is also
13 an important competitive factor. Brand leveraging is the practice of using an
14 established brand's reputation and recognition to smoothly enter new markets or
15 introduce new or modified products. In this regard, a company is able to rely on
16 existing customer trust to reduce the risks of new products and markets. The benefits
17 of brand leveraging include instant recognition of new products and the ability to
18 command higher prices.

19 **B. TCL's Mini LED Television Products**

20 42. TCL has been a pioneer in advancing the technology related to the use
21 of LEDs for backlighting as a component of picture quality. In 2019, TCL developed
22 what it described as the "MINI LED TV with Local Dimming"—a substantial
23 innovation in backlighting. Rather than the standard 30 to 50 large LEDs arranged
24 on a back panel, TCL created new models by placing small LEDs in arrays across
25 the entire back panel of the product, deploying (depending upon size) from 300 to
26 over 10,000 LEDs, each LED individually controlled as its own local dimming zone.
27 This innovation permitted each zone of these smaller "mini" LEDs to be dimmed
28 individually to significantly improve picture quality.

43. This Mini LED innovation has been recognized by standards published in 2021 by the China Video Industry Association, which equate Mini LED with “local dimming.” For example, the standard T/CVIA-83-2021, “Test Methods for Mini LED Backlight LCD TV,” defines local dimming as “[a] Mini LED backlight in a Mini LED backlit LCD TV that allows independent brightness control of individual zones.” These standards were developed and written by representatives from numerous television manufacturers and related entities, including Samsung (China) Investment Co., Ltd.

44. Based on the historical development of Mini LEDs and their primary purpose of allowing for more detailed and effective local dimming zones, as well as the accepted industry standard published in China by manufacturers, publications by industry analysts and product testing entities, and industry literature, the terminology “Mini LED” television has been broadly recognized as synonymous with the concepts of back panel arrays of Mini LEDs for the purpose of providing precise local dimming zones. It is also widely understood and accepted that because of the implementation of significantly more local dimming zones, Mini LED televisions have a substantially better picture in terms of contrast, brightness, and the reduction or elimination of haloing and blooming. Mini LED televisions are recognized as far superior to both types of previous LED televisions using Edge and Direct Lighting.

45. To achieve this superior picture quality, TCL’s Mini LED televisions include components and technologies (“Advanced Mini LED Components”) not found in LED televisions without Mini LED technology. These components include:

- **Mini LEDs.** Smaller LEDs, typically under 300 microns (0.3 mm) each.

These small components allow manufacturers to pack dozens to thousands more individual light sources into the same screen size.

- **Dimming Zones.** The Mini LEDs are controlled to create dozens to thousands of tiny, independent dimming zones. These small zones provide

precise light control, resulting in deeper blacks, and reduced “blooming” (light bleeding into dark areas) and “haloing” (light glow around objects).

- **Advanced Substrate and Circuitry.** This advanced circuitry—a highly dense and complex substrate matrix—is required to power and individually address the dozens to thousands of LED light sources.
- **Diffusion Layers.** TCL includes ultra-thin diffuser layers and a reduced diffuser “gap” because the Mini LED light sources are dense and uniform. These ultra-thin diffuser layers also reduce “blooming.” This is compared to the non-Mini LEDs that use thick plastic diffuser sheets needed to spread out the light from the much larger and more spaced-out LEDs found in non-Mini LED televisions.
- **Advanced Controllers.** TCL uses advanced controllers that allow a highly granular level of control of each LED.

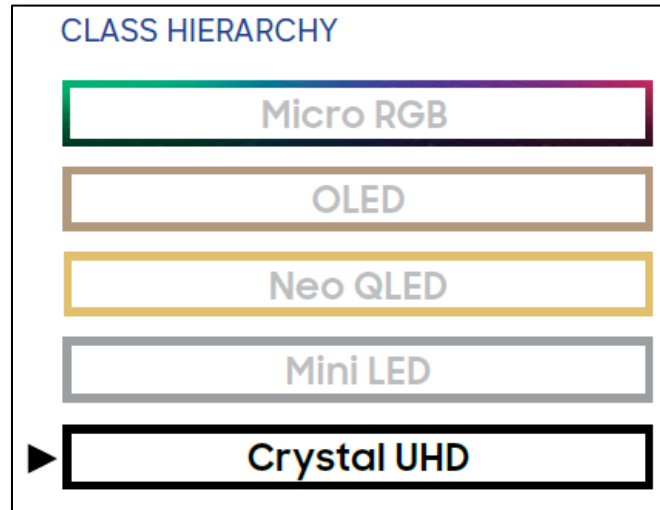
C. Samsung’s False Representations of Its Mini LED Products

46. Samsung introduced its first purported Mini LED televisions in 2021, with its “Neo QLED” models. These television models were relatively expensive, starting at \$1,100 at the time, significantly higher than TCL’s lowest-priced Mini LED televisions, which started at approximately \$700.

47. In an effort to compete with TCL’s Mini LED televisions, in March 2026, Samsung introduced a line of televisions that were simply labeled “Mini LED,” referred to herein as Samsung’s M Model line of televisions. Samsung has three such M Models, the M70H, M80H and the M90H, which range from \$330 to \$2,499.99.

48. While Samsung identifies the M Models as “Mini LED” to compete with TCL’s popular and lower-priced Mini LED models, the M Models are not “Mini LED” in any sense of the word. In fact, upon inspection, it is clear that Samsung did not even attempt to develop its own affordable Mini LED television, but instead simply rebranded its Crystal UHD TV, a lower-end standard LED TV,

as “Mini LED.” Indeed, as shown below, Samsung’s television specification sheets identify the Crystal UHD line as Samsung’s most-basic, entry-level television in Samsung’s television “class hierarchy.”

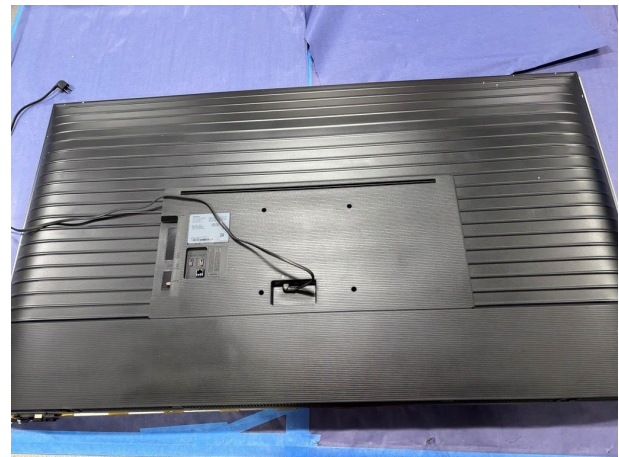


49. That Samsung simply repackaged the Crystal UHD models as the M Models is clear – the two models are identical in nearly every way. For example, as shown below, the backs of the Crystal UHD and the M Model televisions are identical.

Samsung Crystal UHD

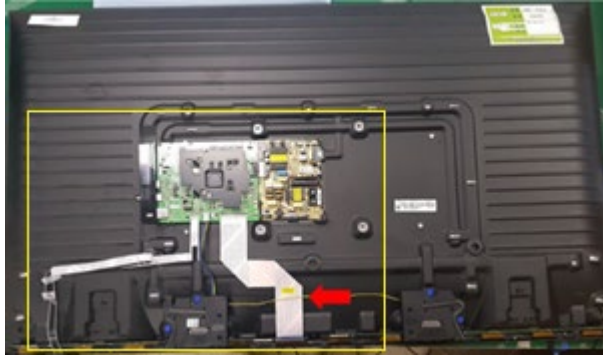


Samsung M70H Mini LED



50. Moreover, the power board and control board, the wires extending therefrom, and the surrounding structures are also identical on both televisions.

Samsung U800F Crystal UHD¹²

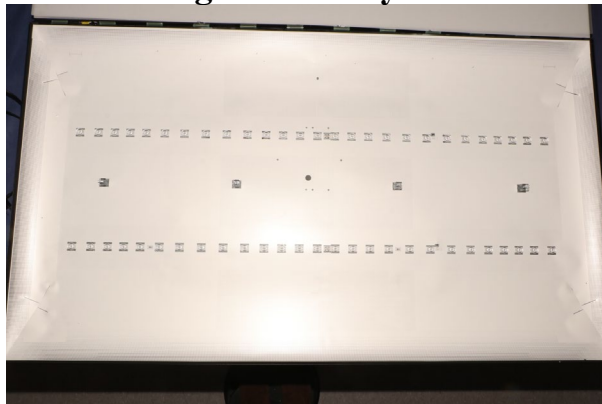


Samsung M70H "Mini LED"¹³

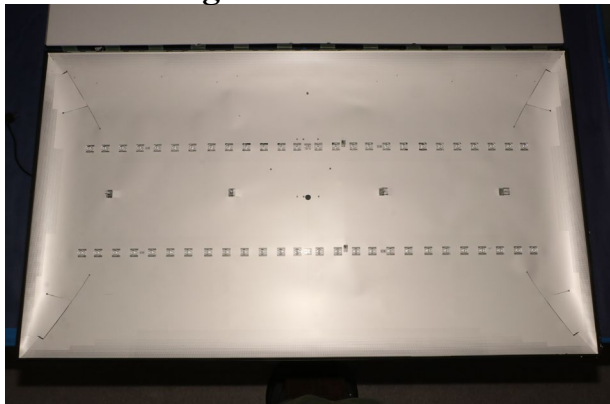


51. In addition, as shown below, when the television is opened up to reveal the back panel, both televisions have identical reflector films.

Samsung U800F Crystal UHD



Samsung M70H "Mini LED"



¹² https://org.downloadcenter.samsung.com/downloadfile/ContentsFile.aspx?CDSite=UNI_CA&OriginYN=N&ModelType=N&ModelName=HG75U800FNF&CttFileID=I0824207&CDCttType=EU&VPath=EU%2F202508%2F20250828091216430%2FRepair_Guide_HU8000F_HGxxU800Fxxxxx_Ver1.0.pdf

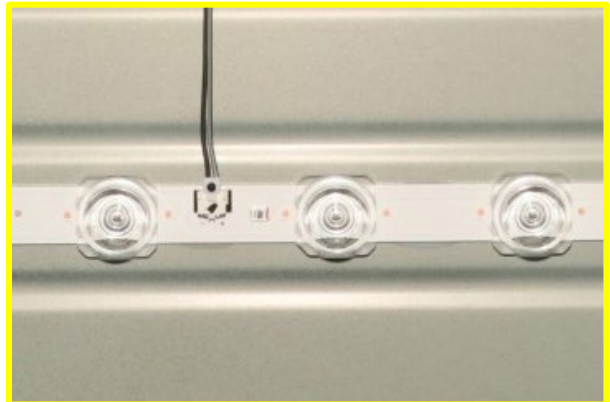
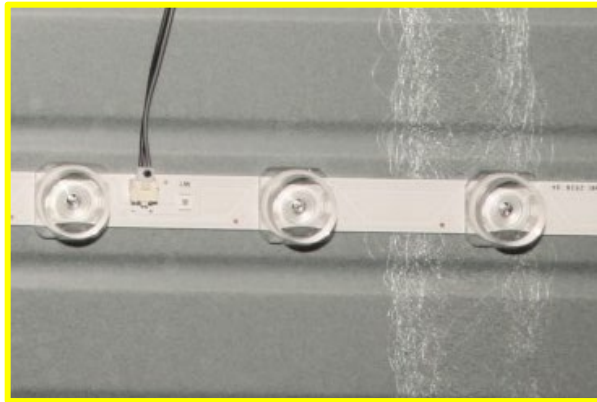
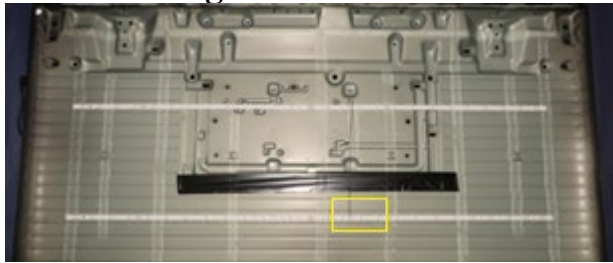
¹³ https://org.downloadcenter.samsung.com/downloadfile/ContentsFile.aspx?CDSite=UNI_CA&OriginYN=N&ModelType=N&ModelName=HG75U800FNF&CttFileID=I0824207&CDCttType=EU&VPath=EU%2F202508%2F20250828091216430%2FRepair_Guide_HU8000F_HGxxU800Fxxxxx_Ver1.0.pdf

52. As shown below, under the reflector films both televisions have two parallel rows of LEDs extending almost the width of the television. The Crystal UHD has 54 LEDs each enclosed in a circular lens or housing. The M Model has only 52 such circular LED housings, identical to the housings in the Crystal UHD models. As shown in the second set of pictures below, the clear coverings over the LEDs are also nearly identical.

Samsung U800F Crystal UHD



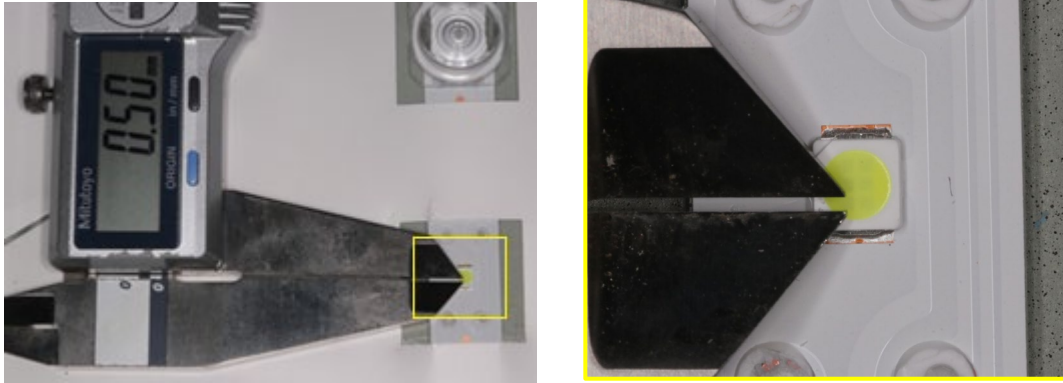
Samsung M70H "Mini LED"



53. Testing reveals that the LEDs in both the Crystal UHD and the M Models have roughly the same level of brightness, with the Crystal UHD television measured as having slightly brighter LEDs. As a result, Samsung's M Model "Mini LED" TVs have two *fewer* LEDs and its LEDs are less bright than the low-end Crystal UHD model they are based on.

54. While the Samsung M Models—which are nothing more than rebranded Crystal UHD models—are promoted and marketed as Mini LED televisions, they are not Mini LEDs for several reasons—the exact same reasons why Samsung does not market its Crystal UHD models as "Mini LED."

55. First, their LEDs are not “Mini” as understood by the industry. The LEDs in Samsung’s M Models, as pictured below, are 0.5 mm, significantly larger than the .1 to .3 mm understood and accepted by the industry.



56. Second, these Samsung “Mini LED” televisions have only a few dozen LEDs, not the many dozens or thousands of LEDs typically found in Mini LED televisions. Also, the few dozen LEDs are not arranged in an array on a panel, and instead are arranged on two aluminum strips. The LED layout of these Mini LED televisions is identical to the LED layout of Samsung’s Crystal UHD televisions.

57. Third, and most importantly, these televisions do not have the ability to provide any local dimming. They do not contain an LED control chip or control circuitry necessary to control individual or zones of LEDs independently. In fact, the processor found in the M Models is exactly the same as that in the Crystal UHD Models:

Samsung U800F Crystal UHD

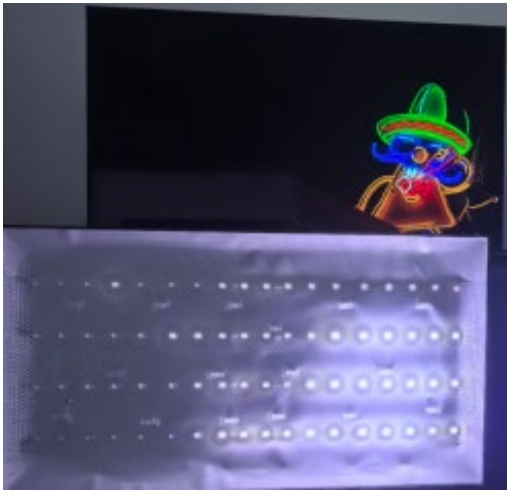


Samsung M70H “Mini LED”



58. Additionally, each LED is wired in series in an electrical circuit that prevents them from being controlled individually or in zones. Instead, as pictured below, all the LEDs on the back panel for Samsung's M models are controlled as a single group and dimmed and brightened together in unison.

FALD Mini LED Zones



Samsung M70H/M80H Uniform LEDs



59. The Samsung M Models do not include the Advanced Mini LED Components, which are found in Mini LED televisions and are necessary to provide the local dimming feature. Samsung's M Models do not have (1) actual mini LEDs, (2) local dimming zones, (3) the advanced circuitry required for local dimming zones, nor (4) any LED control board to achieve local dimming.

60. On information and belief, Samsung knew it could not produce a Mini LED television with the Advanced Mini LED Components and FALD at a price that could compete with the least expensive TCL Mini LED televisions. Instead, Samsung decided to recycle its Crystal UHD standard LED television—which has never been marketed or otherwise represented as Mini LED—and falsely and deceptively represent that these televisions were “Mini LED” televisions.

61. Samsung knew then and knows now that its M Models are not Mini LED televisions. For example, Samsung agrees that a Mini LED television's

1 principal feature is FALD. On its own website providing consumers with a
2 comparison of Mini LED technology to QLED technology, under a section entitled
3 “What is Mini LED,” Samsung unequivocally states:

4 **“Mini LED is an advanced backlighting display**
5 **technology that uses tiny LEDs, smaller than standard**
6 **ones, for more precise backlight control through local**
7 **dimming zones—a technique where backlight zones are**
8 **controlled independently.** This helps achieve better image
9 quality, high contrast and enhanced picture quality,
10 especially noticeable with HDR content.”¹⁴

11 62. Under “Mini LED vs. QLED: FAQs,” in response to “Which TV offers
12 better contrast, Mini LED or QLED?,” Samsung states:

13 **“Mini LED technology in Samsung Neo QLED TVs**
14 **provides better contrast ratios due to its ability to**
15 **control local dimming zones more precisely.** This results
16 in deeper blacks compared to QLED, which uses a standard
17 LED backlight.”¹⁵

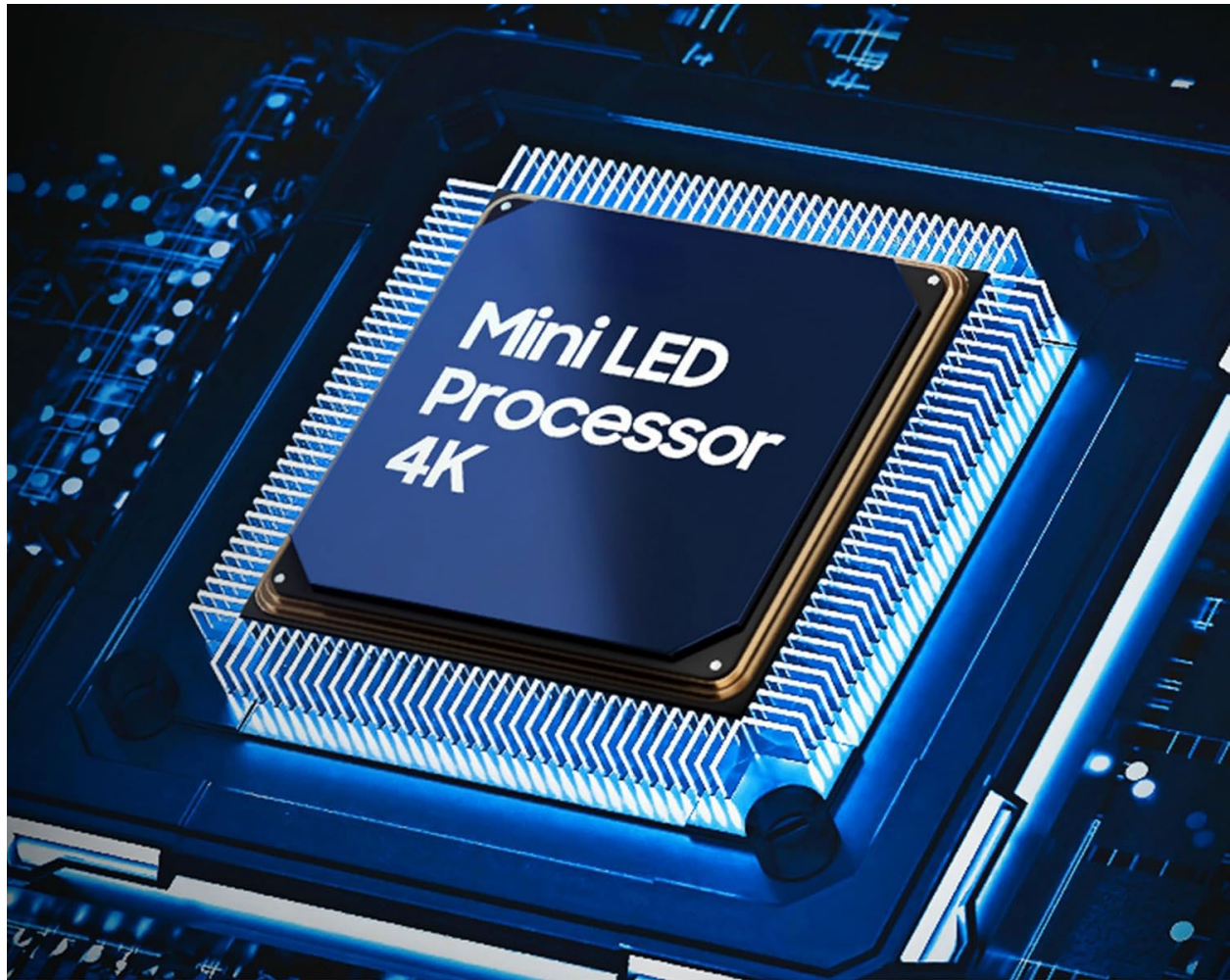
18 63. As explained above, Samsung offers two lines of televisions marketed,
19 promoted, and identified as “Mini LED TVs”: its M Model line and its Neo QLED
20 line, which Samsung markets as “combin[ing] Mini LED with Quantum Dot display
21 technology.”

22 64. Samsung’s specification sheets for M Models and some of its Neo
23 QLED models identify the same “Supreme Mini LED Dimming” feature. This
24 “Supreme Mini LED Dimming” terminology, when coupled with Samsung’s
25 descriptions of Mini LED local dimming on its website, is purposefully designed to
26 suggest dimming that is a *better* version of FALD than its competitors like TCL.

27 ¹⁴ <https://www.samsung.com/us/tvs/tv-buying-guide/mini-led-vs-qled/>.

28 ¹⁵ *Id.*

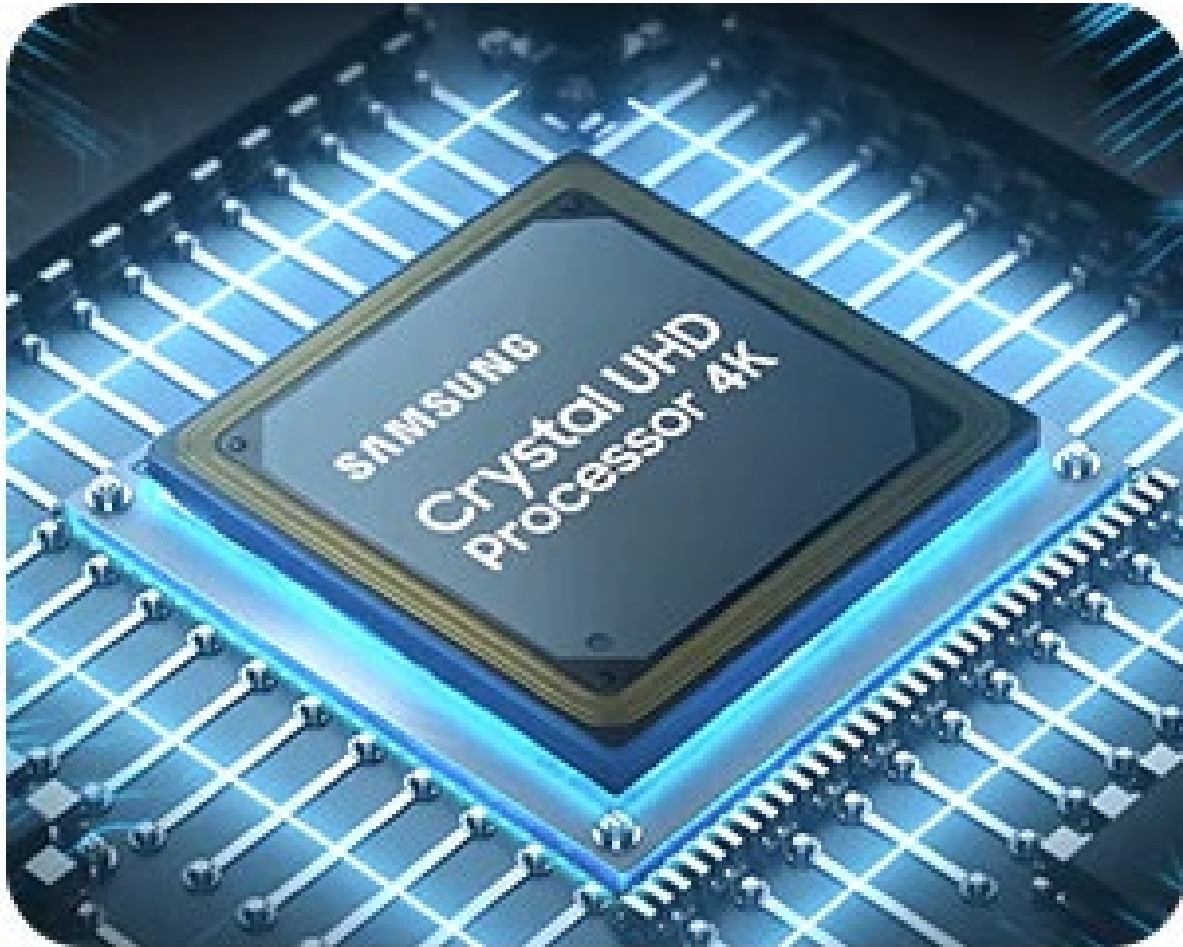
65. In fact, Samsung goes so far as to advertise that its M Models contain a “Mini LED Processor”:



Mini LED Processor 4K

Powers a sharp, bright and vibrant 4K picture

1 However, as noted above, Samsung's M Models contain the exact same processor
2 as its non-Mini LED Crystal UHD model televisions, which Samsung describes in
3 its marketing as a "Crystal UHD Processor," not a "Mini LED Processor":

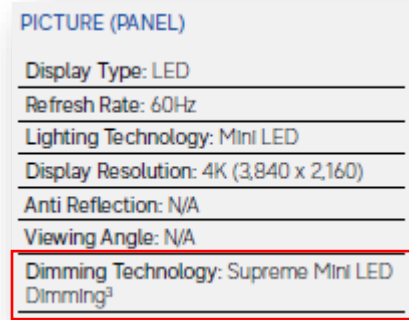


Crystal Processor 4K

24 Despite their different descriptions, Samsung is using the exact same processor in
25 both its M and Crystal UHD Models.

26 66. Despite containing the exact same processor and circuitry as the non-
27 Mini LED Crystal UHD Models, Samsung's specification sheets for its M Models
28 include a small footnote that states (in print so small that it cannot be read without

magnification, and in language incomprehensible to the consumer): “Supreme Mini LED Dimming is Software-based (not full-array hardware-based) technology” (shown below in actual size):



³Supreme Mini LED Dimming is Software-based (not full-array hardware-based) technology.
⁴Available only on 55" class and larger screen sizes. DLG 120Hz increases refresh rate up to 120Hz, but will reduce image sharpness. Optimal for fast-paced action. Requires a compatible 2020-2023 Samsung TV. Please refer to samsung.com for more details.
⁵HDMI-CEC (Consumer Electronics Control) facilitates convenient control functions with compatible devices.
⁶Subscriptions may be required for some services. Smart Trainer support devices may vary by country.
⁷Requires SmartThings app to be installed on the mobile device and connected via the same Wi-Fi network.
⁸Required for this service after 6 months of free use. (Users can access 5 songs per day for free with

67. On information and belief, the processing chips in Samsung’s M Models provide the same level of technology as those contained in Samsung’s Crystal UHD Models, neither of which are able to control Mini LEDs individually or in zones.

68. Confirming the extent of this deception, the specification sheets for some of Samsung’s more expensive Neo QLED televisions, which incorporate true Mini LED technology including local dimming, also identify their type of “Dimming Technology” as “Supreme Mini LED Dimming,” but without a footnote disclaimer.

69. Taken together, Samsung has purposely chosen deceptive terminology to refer to two different types of dimming: one that employs the full-array local dimming expected by consumers in Mini LED televisions at a substantially higher price—as made clear by Samsung’s own website explanations— and a second, lower

1 priced product that does not have local dimming at all, and is merely a rebranded
2 and renamed older, recycled product—containing no Mini LED technology.

3 70. The specification sheets for Samsung’s other Neo QLED televisions,
4 identify the “Dimming Technology” as Supreme UHD Dimming, Ultimate UHD
5 Dimming, or Ultimate 8K Dimming Pro. These meaningless terms are purposefully
6 deceptive as they make it even more difficult for customers to determine which
7 televisions have FALD and which do not.

8 71. Samsung has repeatedly made, and continues to make, false and
9 deceptive statements in the marketing and advertisement of its Neo QLED and Mini
10 LED televisions by characterizing them *all* as genuine Mini LED televisions.
11 Samsung’s website specifically states that “Mini LED is an advanced backlighting
12 display technology that uses tiny LEDs, smaller than standard ones, for more precise
13 backlight control through local dimming zones,” leading customers to believe that
14 any Samsung television identified as “Mini LED” employs FALD. However, the
15 representations contained in the M Models’ specification sheets confuse the issue of
16 whether these televisions are in fact Mini LED televisions. Samsung’s inconsistent
17 characterizations of its M and Neo QLED model televisions as variously having
18 “Supreme Mini LED Dimming,” “Software-based” dimming technology, “Quantum
19 Mini LED Full Array,” and “Mini LED” contrast are purposeful and designed to
20 mislead consumers into believing all purported Samsung Mini LED televisions
21 contain FALD technology, when in fact they do not. Samsung’s representations are
22 false, deceptive, and confusing to consumers.

23 72. Samsung clearly intended—and intends—to promote its non-Mini LED
24 M Model products to consumers and the rest of the industry as genuine Mini LED
25 televisions, when Samsung knows they are not.

26 **D. Samsung’s False Advertising Misleads and Confuses Consumers**

27 73. LED television models employing Mini LED technology play a
28 significant competitive role in the marketplace. This is evidenced by actual

1 consumer purchasing decisions. TCL, as a major supplier of Mini LED television
2 models, has experienced significantly increased unit sales, market share, and brand
3 recognition as a direct result. TCL's QM8K, QM7K and QM6K television models
4 are the principal market entries with true Mini LED technology, including FALD.
5 Samsung's M Model televisions, by comparison, do not have Mini LED technology,
6 including FALD, putting Samsung at a competitive disadvantage at the relevant
7 price points.

8 74. Given the advancement of local dimming technology, the Mini LED
9 market is a competitive battleground. Consumers and the market expect that Mini
10 LED televisions—which are understood by consumers to necessarily contain
11 FALD—provide greater dynamic range, higher contrast ratios, and better pictures.
12 Given this understanding, TCL strives to advance Mini LED technology and invests
13 significant time and resources into improving its Mini LED televisions' backlights,
14 which contain dozens to thousands of tiny, individually controlled LEDs that enable
15 the local dimming feature.

16 75. Moreover, because of the advancement in picture quality obtained by
17 genuine Mini LED technology, Mini LED televisions now compete with traditional
18 higher-priced technologies like OLED televisions. While Samsung's OLED
19 televisions are significantly more expensive than TCL's Mini LED televisions,
20 TCL's Mini LED televisions provide similar picture quality at a substantially lower
21 price. On information and belief, Samsung, as the leading producer of OLED
22 televisions, noticed this difference and grew concerned that the market and
23 consumers would recognize Mini LED televisions as equal to or better than OLED
24 televisions.

25 76. Given OLED televisions' pricing disadvantage and the increase in
26 TCL's sales, Samsung sought to maintain the market for its higher-priced OLED
27 televisions while at the same time both devaluing Mini LED technology in the
28 marketplace and diverting TCL's Mini LED sales to it, increasing its share of the

1 Mini LED market. In order to achieve this goal, Samsung recycled its old entry-
2 level televisions—the Crystal UHD line—and then deceptively advertised them as
3 Samsung’s “Mini LED” televisions even though the M Models do not have any of
4 the technical features of Mini LED televisions, including actual mini LEDs and local
5 dimming. To deceive consumers into purchasing these imposter Mini LED
6 televisions, maintain the market for its higher-priced OLED televisions, and divert
7 sales away from TCL’s Mini LED televisions, Samsung sold and continues to sell
8 its falsely-labeled M Model televisions at substantially discounted prices.
9 Samsung’s purposes are clear: to maintain its market of high priced OLEDs and
10 deceive consumers into believing they are purchasing a Samsung-branded Mini LED
11 television employing the same or superior Mini LED technology as its competitors,
12 at a cheaper price point. In reality, consumers are purchasing a carbon copy of
13 Samsung’s entry-level Crystal UHD Models that employ basic technology and do
14 not contain “Mini LED” technology.

15 77. Samsung’s consumers are confused by Samsung’s Product
16 Representations. For example, a Samsung community online discussion board
17 evidences the confusion in response to a community member posing the question,
18 “How is the Mini LED M80H lit?”¹⁶

19
20 SashaOz: “Hey all, for a while I've been trying to find
21 out, how are the new Mini LEDs are lit? **As far as I know, it's not FALD.** [...]”

22 celan_: “It's a bottom of the barrel edge-lit tv”

23 arianwen27: “Edge lit and micro led are separate
24 technologies. Micro led is a high end tech
25 where edge lit is a budget way of making a
26 panel”

27 [. . . .]

28 ¹⁶ <https://eu.community.samsung.com/t5/tv/how-is-the-mini-led-m80h-lit/td-p/14682399>

1 SashaOz: “Thank you, as far as I got it, M80H dimmes
2 not the LEDs but the liquid crystals to
3 imitate the FALD functioning in more
4 expensive models, right?”

5 celan_: “MINI LED is VERY different than MICRO
6 LED, MINI LED is just a type of backlight
7 for LCD, MICRO LED is a completely
8 different (and extremely expensive)
9 technology

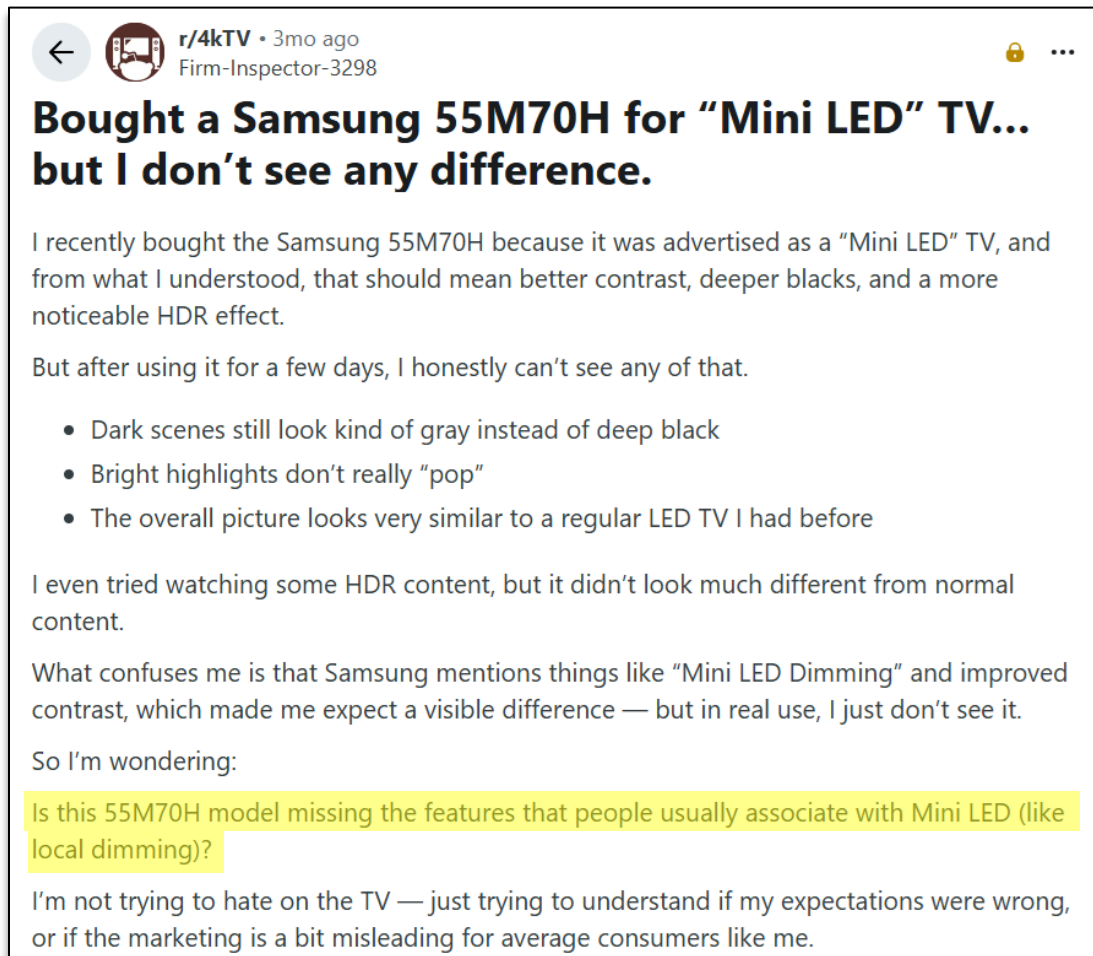
10 anyway **QN70F, QN70H, M70H and
11 M80H are all edge lit TVs being
12 deceptively marketed as mini LED”**

13 arianwen27: “Thanks for the correction. I completely
14 missed the wording difference. **Yeah I can
15 see how that's a problem now with how
16 it's described...”**

17 78. The community members in this online discussion demonstrate an
18 understanding of the expected relationship between Mini LED televisions and
19 FALD, the difference between Mini LED backlight technology and edge lit
20 technology, and the deceptive nature of Samsung’s advertising of its M Models as
21 Mini LED televisions.

22 79. Consumer statements on several other message boards further
23 demonstrate customer confusion caused by Samsung’s marketing of the M Model
24 televisions as “Mini LED.” For example, in a recent Reddit post titled “Bought a
25 Samsung 55M70H [M Model] for ‘Mini LED’ TV...but I don’t see any difference,”
26 a customer wonders if one of Samsung’s M Model Mini LED televisions (55M70H)
27
28

1 is “missing the features that people usually associate with Mini LED (like local
2 dimming).”¹⁷



19
20 80. In another Reddit post titled “Is my Samsung TV faulty?”, a Samsung
21 customer criticizes Samsung’s decision to “trick consumers” by falsely marketing
22 the M Models as “Mini LED” while characterizing the dimming as “software
23 dimming”:

24 “Samsung this year released the M80H which is a Direct
25 LED with no local dimming, but “software dimming” to
26 mimic MiniLED dimming. It doesn’t work at all, it’s still
27 the same as any other Direct LED but now is marketed to

28 ¹⁷ https://www.reddit.com/r/4kTV/comments/1sj32oi/bought_a_samsung_55m70h_for_mini_led_tv_but_i/.

1 trick consumers that don't know any better.”¹⁸

2 81. Other examples of consumer confusion discussed in message boards
3 include:

4 Thread Title: **Did Samsung just make a fake MiniLED TV with the M80H?**¹⁹

5 Isn't the whole point of MiniLED supposed to be better
6 backlight control, more precise dimming zones, and
7 stronger HDR? But RTINGS shows the M80H has no Local
8 Dimming.

9 So what exactly is MiniLED doing here?

10 ...

11 At that point, is this really a MiniLED TV in any meaningful
12 way, or is Samsung just using the MiniLED label because it
13 sounds better on the box?

14 From a buyer's perspective this feels misleading. I was
15 considering it before, but now I'm definitely looking at
16 other brands. Feel free to rec me some better options.

17 Thread Title: **Is the Samsung M80H still MiniLED if it has no local dimming?**²⁰

18 I was looking into the Samsung M80H because I thought it
19 was supposed to be a MiniLED TV, but the RTINGS review
20 has me confused.

21 In their lighting zone transition test, it shows:

22 Local Dimming: No

23 Backlight: Direct

24 Dimming Zone Count: N/A

25 So what exactly is the “MiniLED” part doing here? I always
26 thought the whole point of MiniLED was having a lot of
27 small backlight zones with local dimming, so you get better
28 control over dark scenes, highlights, and blooming.

¹⁸ https://www.reddit.com/r/4kTV/comments/1ty8xsc/is_my_samsung_tv_faulty/

¹⁹ https://www.reddit.com/r/AskTechnology/comments/1tyawaa/did_samsung_just_make_a_fake_miniled_tv_with_the/

²⁰ https://www.reddit.com/r/hometheater/comments/1txipja/is_the_samsung_m80h_still_miniled_if_it_has_no/

1 But if there is no local dimming at all, doesn't that make it
2 way closer to a basic direct-lit TV? The review also says the
3 black levels are disappointing because of the complete lack
4 of local dimming, and the brightness score is only 5.3, so it
5 doesn't even seem to get the usual MiniLED benefits.

6 Maybe I'm misunderstanding how Samsung is using the
7 term here, but this feels really misleading. Is this just
8 marketing, or is there some technical explanation I'm
9 missing?

10 **E. Samsung's False Advertising Harmed TCL**

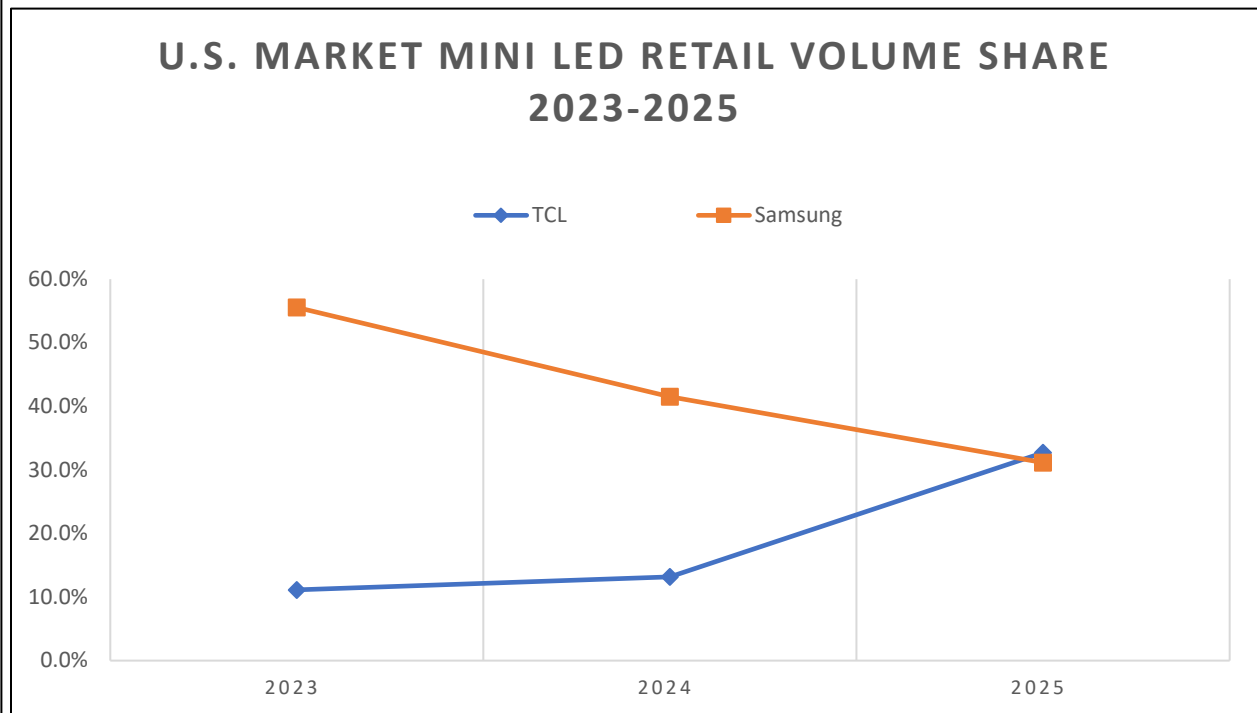
11 82. As a result of Samsung's false and deceptive advertisement of its
12 televisions as genuine Mini LED televisions with FALD, many consumers who
13 sought the higher quality picture associated with Mini LED televisions were misled
14 into purchasing Samsung's mock Mini LED televisions without local dimming and
15 FALD. These consumers were dissatisfied with a lower picture quality than
16 expected.

17 83. Samsung's false and misleading advertising of its mock "Mini LED"
18 televisions diverts sales away from TCL, which substantially harms the sales of
19 TCL's genuine Mini LED televisions, negatively impacting TCL's revenues and
20 profits.

21 84. In 2023, when TCL introduced its QM line of Mini LED televisions,
22 Samsung dominated Mini LED television sales in the United States. Samsung's
23 market share was over 55% of all Mini LED televisions sold that year. In 2024,
24 Samsung's Mini LED sales decreased year-over-year, while TCL and other
25 manufacturers increased their Mini LED sales with more competitively priced
26 products. Samsung's market share in the United States decreased approximately
27 14%, to just over 41%. Beginning in 2025, for the first time, TCL sold more Mini
28 LED television units than Samsung, and also for the first time, surpassed Samsung
in U.S. market share. Samsung's market share decreased by another 10%, while
TCL's market share more than doubled, increasing from 13.2% in 2024 to 32.7% in
2025. TCL's product lineup expanded and its technology improved throughout this
period, from the QM850 series in 2023, to the QM851 and QM751 series in 2024,

and the QM8K, QM7K, and QM6K series in 2025. These evolutions significantly enhanced TCL's competitiveness in the marketplace.

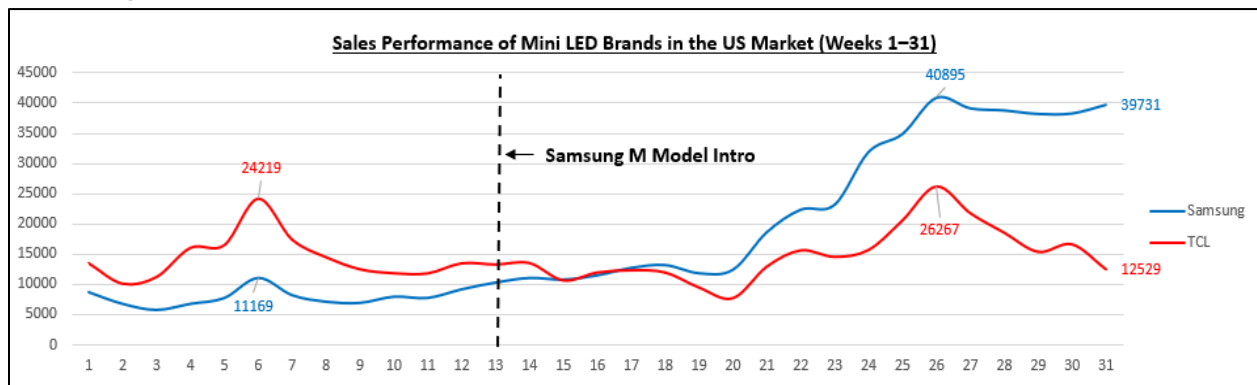
85. Samsung's plummeting market share resulted from its lack of a competitive product line. From 2023 to 2025, Samsung saw its U.S. market share of Mini LED television sales plunge from 55.6% to 31.1%; at the same time, TCL's market share nearly tripled from 11.1% to 32.7%.



In 2026, Samsung attempted to counter and reverse these devastating market losses. But Samsung could not compete with TCL's technology and prices. It therefore resorted to the short-cut of deception. Rather than developing a genuine Mini LED line that could compete in the marketplace, Samsung simply repurposed its existing non-Mini LED television and falsely dubbed it the M Model "Mini LED." Through this duplicity, Samsung was able to price the sham M Model "Mini LED" at 25% below TCL's lowest-priced Mini LED model. Samsung furthered this ruse through false labeling, false advertising, and deceptive product descriptions to undercut TCL's genuine products. The result has been a substantial increase in the sales of Samsung's sham Mini LEDs, at the direct expense of TCL's genuine Mini LED

products.

86. The sales data available for 2026 shows that Samsung’s illegal conduct has, in fact, misled purchasers, and improperly diverted sales from TCL’s genuine Mini LED televisions. In the first 12 weeks of 2026, Samsung’s sales of Mini LED televisions ranged from approximately 5,895 to 11,169 units per week, for an average of 8,138 unit sales per week. During the same period, TCL’s sales ranged from approximately 10,160 to 24,219 units per week, for an average of 14,383 unit sales per week—consistently outperforming Samsung on a weekly basis. The data metrics dramatically shifted after Samsung introduced its falsely-labeled M Model televisions in late March. Samsung’s sales swiftly skyrocketed to an average of approximately 25,034 units per week from April to July—an astonishing three-fold increase nearly overnight. Meanwhile, TCL’s average weekly sales remained largely level at around 14,942 units during that same period. By this point, Samsung’s sales of its sham M Model quickly grew to approximately 60% of its total Mini LED sales after only a few months on the market. At the same time, Samsung has lowered the average sales price of its “Mini LED” televisions by a shocking 49%.



87. Samsung’s knowingly false advertising of its M Model televisions as Mini LED televisions was done with the conscious objective of injuring competition in the Mini LED market and competitors like TCL. These anticompetitive actions, which seek to harm and displace TCL as a competitor in the market, violate the

1 California's Unfair Competition Law. Samsung's unlawful conduct includes falsely
2 advertising the quality and technology contained in its products and falsely
3 representing that Samsung's product is of the same character, capability and
4 technology as TCL's products.

5 88. Samsung intentionally and irreparably harms competition by branding
6 its non-Mini LED televisions as "Mini LED" televisions, which deceptively
7 circumvents the complexity and costs of developing and manufacturing genuine
8 Mini LED technology. This diverts customers and sales from competitors' honestly-
9 promoted products to Samsung's falsely advertised products. Samsung's
10 exploitation of its brand name leverage to sell sham Mini LED televisions denigrates
11 Mini LED technology in the marketplace and irreparably damages the goodwill
12 associated with TCL's genuine products.

13 **CLAIMS FOR RELIEF**

14 **COUNT I**

15 **VIOLATION OF SECTION 43(A) OF THE LANHAM ACT**

16 **15 U.S.C. § 1125(A)**

17 89. TCL repeats and reasserts each of the preceding allegations as if fully
18 set forth herein.

19 90. Throughout the relevant period, Samsung, in the course of promoting,
20 marketing, advertising, labeling, packaging, distributing, offering for sale, and
21 selling its television products in the United States, has made and continues to make
22 false and misleading statements of fact regarding the nature, characteristics,
23 qualities, capabilities, and technological features of its M Model televisions.

24 91. Samsung's false and misleading statements lead consumers, retailers,
25 distributors, industry participants, and reviewers to believe that all Samsung
26 televisions advertised as "Mini LED" televisions include Mini LED technology,
27 including FALD and other related technology, when they do not.

28 92. Those representations are false and misleading because the M Model

1 televisions advertised and sold as “Mini LED” technology do not, in fact, possess
2 the technological characteristics, performance capabilities, or functionality
3 reasonably understood by consumers and industry participants to be associated with
4 true “Mini LED” televisions. Rather, Samsung’s M Model televisions are identical
5 to its existing lower level non FALD Crystal UHD televisions it had previously
6 marketed and sold, and which have never been promoted as containing Mini LED
7 technology. Samsung simply recycled its previous models, and intentionally
8 decided to falsely re-label them as “Mini LED.”

9 93. Samsung’s imposter Mini LED televisions, including at least the
10 M70H, M80H and M90H, do not incorporate Mini LED functionality that
11 consumers and industry participants associate with and expect from televisions
12 marketed as “Mini LED”, including FALD technology.

13 94. Samsung’s own statements confirm the reasonableness of the belief of
14 consumers, industry participants and others that the Samsung Mini LED televisions
15 employ FALD technology. For example, on its own website providing consumers
16 with a comparison of Mini LED to QLED, under a section entitled “What is Mini
17 LED,” Samsung unequivocally states:

18 **Mini LED is an advanced backlighting display**
19 **technology that uses tiny LEDs, smaller than standard**
20 **ones, for more precise backlight control through local**
21 **dimming zones—a technique where backlight zones are**
22 **controlled independently.** This helps achieve better image
23 quality, high contrast and enhanced picture quality,
24 especially noticeable with HDR content.²¹

25 95. In a separate section on Samsung’s website, Samsung answers the
26 question “Which TV offers better contrast, Mini LED or QLED?” by stating:

27 **“Mini LED technology in Samsung Neo QLED TVs**
28 **provides better contrast ratios due to its ability to**
29 **control local dimming zones more precisely.** This results
30 in deeper blacks compared to QLED, which uses a standard

²¹ <https://www.samsung.com/us/tvs/tv-buying-guide/mini-led-vs-qled/>.

LED backlight.”²²

96. Samsung’s statements such as these are deceptive. On information and belief, consumers, industry participants and others understood these statements to confirm that they and Samsung have the same understanding of the meaning of “Mini LED” televisions, and that if Samsung represents that a television is Mini LED, it must mean that television includes FALD technology.

97. Samsung’s deliberate intention to mislead the public is further demonstrated by its decision to classify and advertise its imposter Mini LED televisions as having “Supreme Mini LED Dimming.” Other Samsung televisions that actually include FALD technology are also identified as having “Supreme Mini LED Dimming,” further deceiving consumers and others into thinking that the false Mini LED televisions also include FALD technology.

98. Samsung makes, publishes, approves, authorizes, and disseminates these false and misleading representations through numerous channels of commercial advertising and promotion, including, without limitation, product packaging, product labels, point-of-sale materials, retailer displays, product specification sheets, online marketing materials, product webpages, social media content, video advertisements, print advertisements, promotional literature, press materials, and other forms of commercial communication directed toward consumers and the marketplace.

99. Upon information and belief, Samsung further directs, encourages, authorizes, permits, or otherwise causes its distributors and retailers to display its M Model televisions with marketing materials describing its televisions as including “Mini LED” technology.

100. Samsung’s repeated false and misleading statements describing its M Model televisions as including “Mini LED” display technology deceive and/or has

²² *Id.*

1 the capacity to deceive a substantial segment of potential consumers because they
2 lead consumers to reasonably believe that Samsung televisions labeled “Mini LED”
3 in fact feature FALD display technology that make darks and lights appear more
4 vivid and have a picture quality that is superior to televisions without “Mini LED”
5 technology.

6 101. Samsung’s misleading statements regarding its imposter M Model
7 “Mini LED” televisions are material to consumers purchasing decision because
8 contrast ratio, dynamic range and picture quality influence consumers’ television
9 purchasing decisions. In making their purchasing decision, Consumers reasonably
10 interpret Samsung’s false and misleading statements to mean that Samsung’s M
11 Model “Mini LED” televisions containing “Supreme Mini LED Dimming” have
12 local dimming technology that makes darks and lights appear more vivid resulting
13 in picture quality that is superior than televisions without “Mini LED” technology.

14 102. Samsung’s M Model advertisements containing the false and
15 misleading phrases “Mini LED” and “Supreme Mini LED Dimming” were
16 distributed in interstate commerce.

17 103. Samsung’s false and misleading statements that its M Model televisions
18 contain “Mini LED” and “Supreme Mini LED Dimming” technology has harmed
19 TCL and continues to present a likelihood of future injury to TCL.

20 104. As a direct result of Samsung’s false and misleading statements
21 describing its M Model televisions as having “Mini LED” and “Supreme Mini LED
22 Dimming” technology, TCL has suffered and continues to suffer a direct diversion
23 of customers and sales and damage to TCL’s goodwill. Samsung’s diversion of sales
24 from TCL is of the kind that falls within the zone of interest protected by the Lanham
25 Act because it constitutes an injury to TCL’s commercial interest in maintaining its
26 reputation as one of the leading producers in the “Mini LED” television market.
27 Moreover, Samsung’s false and misleading statements cause consumers seeking to
28 purchase a television with “Mini LED” and local dimming technology to purchase

1 Samsung's televisions instead of TCL's Mini LED televisions and denigrate the
2 FALD technology employed in TCL's MINI LED televisions.

3 105. TCL's sales diversion injury is traceable to and flows directly from
4 Samsung's dissemination of false and misleading statements describing its
5 televisions as "Mini LEDs" and is irreparable at least because customer reviews,
6 blogs, and technology comparison websites show that consumer understanding of
7 "Mini LED" technology directly influences consumers to purchase the television
8 which boasts "Mini LED" technology in comparison to all other competitors that do
9 not include that term in its marketing materials.

10 106. TCL's injury of diversion of sales is likely to be redressed by a
11 favorable decision granting injunctive and monetary relief. Injunctive relief
12 stopping Samsung from marketing and selling its M Model televisions as containing
13 "Mini LED" and "Supreme Mini LED Dimming" technology will allow TCL to
14 attempt to limit the loss of additional future customers and sales that may be illegally
15 diverted to Samsung. Monetary damages are necessary to the extent that an
16 injunction is insufficient to immediately cease the illegal diversion, and to
17 compensate for the past illegal diversion of sales.

18 **COUNT II**

19 **VIOLATION OF CALIFORNIA'S FALSE ADVERTISING LAW**

20 **Cal. Bus. & Prof. Code, § 17500**

21 **(False Advertising)**

22 107. TCL repeats and reasserts each of the preceding allegations as if fully
23 set forth herein.

24 108. Samsung's deceptive conduct detailed above constitutes its attempt to
25 harm TCL as a competitor in the Mini LED television market in the State of
26 California.

27 109. Samsung's false and misleading advertising of its M Model televisions
28 as "Mini LED" televisions constitutes unlawful, unfair, and fraudulent business acts.

1 110. Samsung falsely represents to its consumers and the public that
2 Samsung's M Model televisions incorporate or feature "Mini LED" display
3 technology.

4 111. Samsung's website misleads consumers into believing that Samsung
5 understands that televisions described as "Mini LED" necessarily include FALD and
6 local dimming. Under a section entitled "What is Mini LED," Samsung
7 unequivocally states:

8 **Mini LED is an advanced backlighting display**
9 **technology that uses tiny LEDs, smaller than standard**
10 **ones, for more precise backlight control through local**
11 **dimming zones—a technique where backlight zones are**
12 **controlled independently.** This helps achieve better image
13 quality, high contrast and enhanced picture quality,
14 especially noticeable with HDR content.²³

15 112. In answering "Which TV offers better contrast, Mini LED or QLED?"
16 on its website, Samsung further states:

17 **Mini LED technology in Samsung Neo QLED TVs**
18 **provides better contrast ratios due to its ability to**
19 **control local dimming zones more precisely.** This results
20 in deeper blacks compared to QLED, which uses a standard
21 LED backlight.²⁴

22 113. These statements are deceptive. On information and belief, consumers,
23 industry participants and others understood these statements to collectively confirm
24 that they and Samsung have the same understanding of the meaning of "Mini LED"
25 televisions, and that if Samsung represents that a television is Mini LED, it must
26 mean that television includes FALD technology.

27 114. Samsung's statements are false and misleading because the M Model
28 televisions advertised and sold as "Mini LED" technology did not, in fact, possess
the technological characteristics, performance capabilities, or functionality

²³ <https://www.samsung.com/us/tvs/tv-buying-guide/mini-led-vs-qled/>.

²⁴ *Id.*

1 reasonably understood by consumers and industry participants to be associated with
2 genuine “Mini LED” televisions. Contrary to Samsung’s false and misleading
3 statements, Samsung’s M Model “Mini LED” televisions do not contain FALD
4 technology and do not provide consumers with supreme display quality. Rather,
5 Samsung has simply falsely relabeled its existing entry-level non-Mini LED
6 television model, the Crystal UHD series, as containing “Mini LED” and “Supreme
7 Mini LED Dimming” technologies despite those televisions having never been
8 promoted or sold as containing those technologies previously.

9 115. As an industry participant, and as evidenced by Samsung’s own
10 statements on its website, Samsung is aware of the advancements in television
11 technology and that Mini LED televisions obtain high quality picture displays
12 through FALD, which requires the grouping of LEDs that are arrayed across the
13 back panel into independently-controlled zones and dimming each zone
14 independently.

15 116. In addition, Samsung falsely markets and advertises its M Model “Mini
16 LED” televisions as having “Supreme Mini LED Dimming” that is comparable or
17 superior to genuine Mini LED televisions with FALD. Samsung, however, knew, or
18 should have known, that advertising its M Model televisions as having “Mini LED”
19 capabilities that are “Supreme” compared to genuine Mini LED FALD technology,
20 is false or misleading.

21 117. Consumers and members of the public are both likely and actually
22 deceived by Samsung’s false and misleading advertising. Samsung’s advertising
23 falsely misleads consumers and members of the public that Samsung’s M Model
24 televisions are “Mini LED” even though the televisions do not contain Mini LED
25 technology. Online posts regarding Samsung’s M Model televisions show that
26 consumers believe that “Mini LED” is associated with FALD and the expected
27 improved picture quality. Thus, by stating that its televisions are “Mini LED,”
28 Samsung effectively deceives consumers into purchasing an imposter “Mini LED”

1 television with no Mini LED picture qualities.

2 118. As a result of Samsung's false and misleading statements, TCL's sales
3 were diverted to Samsung. Samsung's false and misleading statements deceived
4 consumers into purchasing Samsung's imposter "Mini LED" televisions, directly
5 harming TCL and other competitors in the marketplace.

6 **COUNT III**

7 **VIOLATION OF CALIFORNIA'S UNFAIR COMPETITION LAW (UCL)**

8 **Cal. Bus. & Prof. Code, § 17200 et seq.**

9 **(Unlawful, Unfair, or Fraudulent Business Acts)**

10 119. TCL repeats and reasserts each of the preceding allegations as if fully
11 set forth herein.

12 120. Samsung's false and misleading advertising is an unlawful practice or
13 business act under Section 43(A) of the Lanham Act, 15 U.S.C. § 1125(A) and
14 California's False Advertising Law. "Mini LED" technology is known by both the
15 industry and consumers to include FALD capabilities that provide enhanced contrast
16 and picture quality. Samsung falsely advertises that it understands Mini LED
17 televisions to mean televisions with FALD technology and that its Mini LED
18 televisions have FALD or are superior to FALD. Instead, all of the LEDs on the back
19 panel of Samsung's M Model televisions are controlled as a single group and
20 dimmed and brightened together in unison. Samsung's M Model televisions are
21 simply recycled versions of its Crystal UHD model televisions that do not have Mini
22 LED technology. Thus, Samsung's M Model "Mini LED" televisions are no more
23 than a rebranding of Samsung's older, non-Mini LED technology, and statements
24 that Samsung's M70H, M80H, and M90H are "Mini LED" are false. Samsung's
25 statements mislead consumers into believing that Samsung's M Model televisions
26 have Mini LED technology, and consumers purchase Samsung's M Model
27 televisions, causing a loss of sales to competitors like TCL.

28 121. Samsung's false and misleading advertising is also an unfair business

1 act or practice. California has a strong public policy to protect consumers from unfair
2 and deceptive practices. Samsung violates this public policy by deceptively
3 indicating on its website that Samsung understands Mini LED to include or have
4 technology that includes or is superior to FALD technology and then falsely
5 advertises its M Model televisions as “Mini LED,” which deceives consumers into
6 believing that Samsung’s M Model televisions have FALD capabilities and,
7 therefore, higher contrast and improved picture qualities. As demonstrated by online
8 comments, consumers are genuinely confused by Samsung’s false statements and
9 consider Mini LED technology when making purchasing decisions. By falsely
10 advertising its M Model televisions as “Mini LED,” Samsung deceives consumers
11 into making purchases based on false information.

12 122. The effect of Samsung’s unfair business practices causes competitors
13 to lose business and inhibits entry into the Mini LED market. Since the introduction
14 of Samsung’s falsely-labeled M Model televisions in May 2026, Samsung’s sales of
15 Mini LED televisions have more than doubled and Samsung has overtaken all
16 competitors in the Mini LED market in California and the United States. Between
17 January 2026 and April 2026, Samsung averaged approximately 5,800 unit sales per
18 week of Mini LED televisions, while TCL averaged approximately 6,900 unit sales
19 per week during the same time period. Between May 2026 and July 2026, after the
20 introduction of its falsely-labeled M series televisions, Samsung’s sales of Mini LED
21 televisions increased dramatically, averaging 11,650 unit sales per week, with a peak
22 of over 23,000 unit sales in the second week of July. Meanwhile, TCL’s Mini LED
23 sales have averaged during the same time period approximately 7,400 weekly unit
24 sales, with a peak of over 13,000 unit sales in the second week of July. During this
25 period of dramatically increased sales by Samsung since May 2026, its falsely-
26 labeled M series of televisions have overtaken all other Mini LED Samsung
27 television models, and have grown to approximately 60% of Samsung’s total sales
28 of Mini LED televisions in California and the United States. During that same time

1 period, Samsung has decreased the price of its falsely-labeled M series televisions
2 by a shocking 32%. Samsung's introduction of falsely-labeled Mini LED televisions
3 have resulted in Samsung dramatically outselling TCL since May 2026—despite
4 never outselling TCL on a weekly basis between January 2026 and April 2026,
5 before the introduction of the M Model series.

6 123. Samsung's diversion of sales from TCL's products to Samsung's
7 products constitutes an injurious effect on competition in the market and constitutes
8 proof that Samsung utilizes false advertising with the unlawful purpose or desire to
9 destroy competition.

11 PRAYER FOR RELIEF

12 WHEREFORE, Plaintiff seeks the following relief:

- 13 a. Preliminary and permanent injunction barring Samsung and its
14 officers, agents, employees, and all persons acting in concert or
15 participation with from engaging in the unlawful conduct described
16 above, including barring Samsung from:
- 17 i. Falsely advertising its M Model televisions as “Mini LED”
18 or having the same character, capability, and technology as
19 TCL's Mini LED products;
 - 20 ii. Falsely advertising its M Model televisions as having
21 “Supreme Mini LED Dimming”;
 - 22 iii. Directing, encouraging, authorizing, permitting, or
23 otherwise causing its distributors and retailers to display
24 Samsung's televisions with marketing materials describing
25 its M Model televisions as including “Mini LED”
26 technology.
- 27 b. That Samsung file, within ten (10) days from entry of an injunction, a
28 declaration with this Court, signed under penalty of perjury, certifying

1 the manner in which Samsung has complied with the terms of the
2 injunction;

- 3 c. Judgment in favor of TCL and against Samsung on all claims;
- 4 d. An order finding that, by the acts complained of herein, Samsung has
5 engaged in false advertising and unfair competition in violation of 15
6 U.S.C. §§ 1125(a)(1)(B);
- 7 e. An order finding that, by the acts complained of herein, Samsung
8 engaged in false and misleading advertising in violation of California
9 Business & Professions Code § 17500;
- 10 f. An order finding that, by the acts complained of herein, Samsung has
11 engaged in unfair competition and acts of unfair and deceptive
12 business practices in violation of California Business & Professions
13 Code § 17200;
- 14 g. An order that Samsung must pay and provide for appropriate
15 corrective advertisements regarding Samsung's Model M televisions;
- 16 h. An order requiring Samsung to account for and pay to TCL any and
17 all profits arising from the foregoing acts of deceptive advertising and
18 business practices pursuant to 15 U.S.C. § 1117, and other applicable
19 laws;
- 20 i. An order requiring Samsung to pay to TCL any and all lost profits that
21 TCL sustained as a result of Samsung's foregoing acts of deceptive
22 advertising and business practices pursuant to 15 U.S.C. § 1117 and
23 other applicable laws;
- 24 j. An order requiring Samsung to pay TCL compensatory damages in an
25 amount as yet undetermined caused by the false or misleading
26 advertising and business practices and trebling such compensatory
27 damages for payment to TCL in accordance with 15 U.S.C. § 1117,
28 and other applicable laws;

- 1 k. An order requiring Samsung to pay TCL restitution in the amount
2 taken or obtained by means of Samsung's unfair business practices;
3 l. Reasonable costs and expenses incurred in this action, including
4 attorneys' fees and costs of the suit;
5 m. Pre-judgment interest on all such damages, monetary, or otherwise;
6 and
7 n. All other relief, legal or injunctive, as this Court finds appropriate.
8
9

10 **DEMAND FOR JURY TRIAL**

11 Plaintiff demands a trial by jury on all triable issues.
12
13

14 Dated: August 31, 2026

LARSON LLP

16 By: /s/ R.C. Harlan

17 Stephen G. Larson

18 R.C. Harlan

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