

by operating one or more commercial, interactive Internet Stores through which Illinois residents can purchase products bearing infringing versions of Rose Stitch Art's copyrighted works. The Defendant has targeted Illinois residents by operating online stores that offer shipping to the United States, including Illinois, accept payment in U.S. dollars via credit cards and/or PayPal and has sold and shipped products bearing infringing versions of Rose Stitch Art's federally registered copyrighted works within the Northern District of Illinois. The Defendant is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois.

3. This Court has personal jurisdiction over each Defendant, in that each Defendant conducts business in Illinois and in this judicial district, and the acts and events giving rise to this lawsuit of which each Defendant stands accused were undertaken in Illinois and in this judicial district.

INTRODUCTION

4. Rose Stitch Art is the owner of the federal copyright registration that protects the creative content of Rose Stitch's images and illustrations. Rose Stitch is a professional artist from United Kingdom. Rose Stitch Art's work features embroidery and stitchwork to create compelling works of art.

5. This action has been filed by Rose Stitch Art to combat online copyright infringers who trade upon Rose Stitch Art's reputation, goodwill, and valuable copyrights by selling and/or offering for sale products in connection with Rose Stitch Art's works. In addition, the Defendant is selling unauthorized products that are based on and derived from the copyrighted subject matter of Rose Stitch Art's images and illustrations.