

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 Jasper Rietman'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. Jasper Rietman is the owner of the federal copyright registration that protects the creative content of Rietman's images and illustrations. Rietman is a professional artist from the Netherlands. Jasper Rietman's work features cosmic and natural themes to create compelling works of art.

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

6. Jasper Rietman is the owner of United States Copyright Registration No. VA 2-504-915 (the "Rietman Work") and the registration is attached hereto as Exhibit 1. Upon information and belief, the copyright has an effective date that predates the Defendant's acts of