

11. Venue is proper in this Court pursuant to 28 U.S.C. § 1391: Defendants do not reside in the United States and are subject to venue in any district. Further, Defendants solicit business from this Judicial District and, upon information and belief, conduct and transact significant business in this Judicial District.

INTRODUCTION

12. Plaintiff, Gary Hall, is the owner of several federal copyright registrations that protect the creative content of Plaintiff's images. The copyrights each protect one of many works of art by Gary Hall, a professional artist for over 25 years. After earning a bachelor's degree in Illustration & Animation, Hall began his career as a Graphic Designer and Illustrator for National Galleries & Museums Merseyside in 1999. He later transitioned into the video game industry, where he became the Art UI/UX Director at Activision before launching his own merchandise business in 2014. Gary Hall derives significant profits from the sale and distribution of art prints and licensed products.

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

14. Plaintiff is the owner of United States Copyright Registration Nos. VA 2-454-527, VA 2-458-781, VA 2-456-814, VA 2-456-822, VA 2-456-895, VA 2-456-893, VA 2-456-820, VA 2-456-818, VA 2-456-811, VA 2-456-827, VA 2-456-824, and VA 2-456-826 (the "Plaintiff's Works"). These registrations are valid, subsisting, and in full force and effect. True and correct copies of the registration certificates for the Plaintiff's Works are attached hereto as **Exhibit 1**.