

residents can purchase products bearing infringing versions of Kiki Xue'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 Kiki Xue'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. Kiki Xue is the owner of the federal copyright registration that protects the creative content of Xue's images and illustrations. Xue is a professional artist from Paris, France. Kiki Xue's work blends fashion and photography to create compelling works of art.

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

6. Kiki Xue is the owner of United States Copyright Registration No. VA 2-504-774 (the "Xue Work") and the registration is attached hereto as Exhibit 1. Upon information