

by operating one or more commercial, interactive Internet Stores through which Illinois residents can purchase products bearing infringing versions of Kenneth Cappello's copyrighted works. Each of 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 Kenneth Cappello's federally registered copyrighted works within the Northern District of Illinois. Each of 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. Kenneth Cappello is the owner of the federal copyright registrations that protect the creative content of Cappello's images and illustrations. Cappello is a professional artist from California. Kenneth Cappello's work features celebrity and fashion photography to create compelling works of art.

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