

infringers who trade upon Daniel Lachman's reputation, goodwill, and valuable copyrights by selling and/or offering for sale products in connection with Daniel Lachman's works. In addition, the Defendants are selling unauthorized products that are based on and derived from the copyrighted subject matter of Daniel Lachman's images and illustrations.

7. Daniel Lachman is the owner of United States Copyright Registration No(s). VA 2-375-574 (the "Lachman Works") and the registrations are attached hereto as **Exhibit 1**. Upon information and belief, the copyrights have effective dates that predate the Defendants' acts of copyright infringement.

8. In an effort to illegally profit from the creative content of Lachman, Defendants have created numerous Defendant Internet Stores and designed them to appear to be selling authorized Lachman products.

9. The Defendant Internet Stores share unique identifiers, such as design elements and similarities of the unauthorized products offered for sale, establishing a logical relationship between them and suggesting that Defendants' illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal operation. Daniel Lachman is forced to file this action to combat Defendants' infringement of the Lachman Works. Plaintiff has been and continues to be irreparably damaged through loss of ability to license, loss of future sales, and loss of control over the creative content of the valuable copyrights, the quality of products sold in connection with Daniel Lachman's copyrighted material, ability to license these products, and damage to Plaintiff's reputation and good will as a result of Defendants' actions and seeks injunctive and monetary relief.