

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

7. Gabby Leithsceal is the owner of United States Copyright Registration No(s). VA 2-421-553 (the "Leithsceal 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 Leithsceal, Defendants have created numerous Defendant Internet Stores and designed them to appear to be selling authorized Leithsceal 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. Gabby Leithsceal is forced to file this action to combat Defendants' infringement of the Leithsceal 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 Gabby Leithsceal'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.