



COUNT I
COPYRIGHT INFRINGEMENT
(17 U.S.C. § 501)

22. PLAINTIFF repeats and re-alleges each of the above allegations as if set forth fully herein.

23. PLAINTIFF is the exclusive owner of the copyrights in and to the graphic illustrations used on the SMOLOTOV PRODUCT packaging.

24. PLAINTIFF'S copyrights are registered with the U.S. Copyright Office, under registration number VAu001569092 (effective July 7, 2025).

25. DEFENDANTS did not have a license, authorization, or permission from PLAINTIFF to copy, publish, display, sell, or distribute its original copyrighted works and/or any derivative thereof, that are incorporated in the SMOLOTOV PRODUCT packaging.

26. Despite having never obtained a license or permission to copy or display PLAINTIFF'S copyrighted works for any purpose, DEFENDANTS each copied, published, displayed, distributed, offered for sale/sold, and created unauthorized derivative copies of the works in connection with counterfeit versions of the SMOLOTOV PRODUCT.

27. Upon information and belief, DEFENDANTS' actions alleged herein were willful, knowing, intentional, and/or made in reckless disregard of PLAINTIFF'S copyrights, including because (i) DEFENDANTS are each aware that PLAINTIFF is the authorized seller/manufacture