

information and belief, the copyright has an effective date that predates the Defendants' acts of copyright infringement.

6. In an effort to illegally profit from the creative content of the Kate Louise Powell Work, Defendants have created numerous Defendant Internet Stores and designed them to appear to be selling authorized Kate Louise Powell Products.

7. 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' activities, occurring at the same time and in the same retail space and manner as one another, blend together to create a single negative impression on consumers such that they constitute the same occurrence or series of 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. Plaintiff is forced to file this action to combat Defendants' piracy of the Kate Louise Powell Work. Plaintiff has been and continues to be irreparably damaged through loss of control over the creative content of the valuable copyright, reputation, goodwill, the quality, and ability to license as a result of Defendants' actions and seeks injunctive and monetary relief.

THE PLAINTIFF

8. Plaintiff, Kate Louise Powell, is the owner of the Copyright Registration that protects the creative content of the Kate Louise Powell Work. Powell is an illustrator and animal rights activist. After drawing recreationally her whole life, she started to take her artistic career more seriously in 2012 and produced a number of popular illustrations with reoccurring motifs of flowers and butterflies. Since then, she has experimented with photography, mixed media, and