

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JEFF BARTELS,

Plaintiff,

v.

LIUDOUJIANGSHOP, *et al.*,

Defendants.

Case No. 25-cv-934

FILED UNDER SEAL

DECLARATION OF JEFF BARTELS

I, JEFF BARTELS, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am the artist that creates all the Jeff Bartels Works and the Plaintiff in this lawsuit. I make this declaration from matters within my knowledge save where otherwise stated.

3. I am an artist who produces work under the name “Jeff Bartels.” My art seamlessly combines elements of hyperrealism with aspects of surrealism to create strange and compelling works of art. My highly detailed oil paintings have evolved over the years into this unique combination of seemingly contradictory styles. My work is sometimes referred to as hyper-surrealism because of the extreme realism mixed with dream-like qualities. My work has been featured in galleries and museums all over the world including Canada, Europe, and South Korea.

4. I am the official source of products associated with the Jeff Bartels Works (the “Jeff Bartels Products”):

JEFF BARTELS
POST TRUTH REALISM

HOME

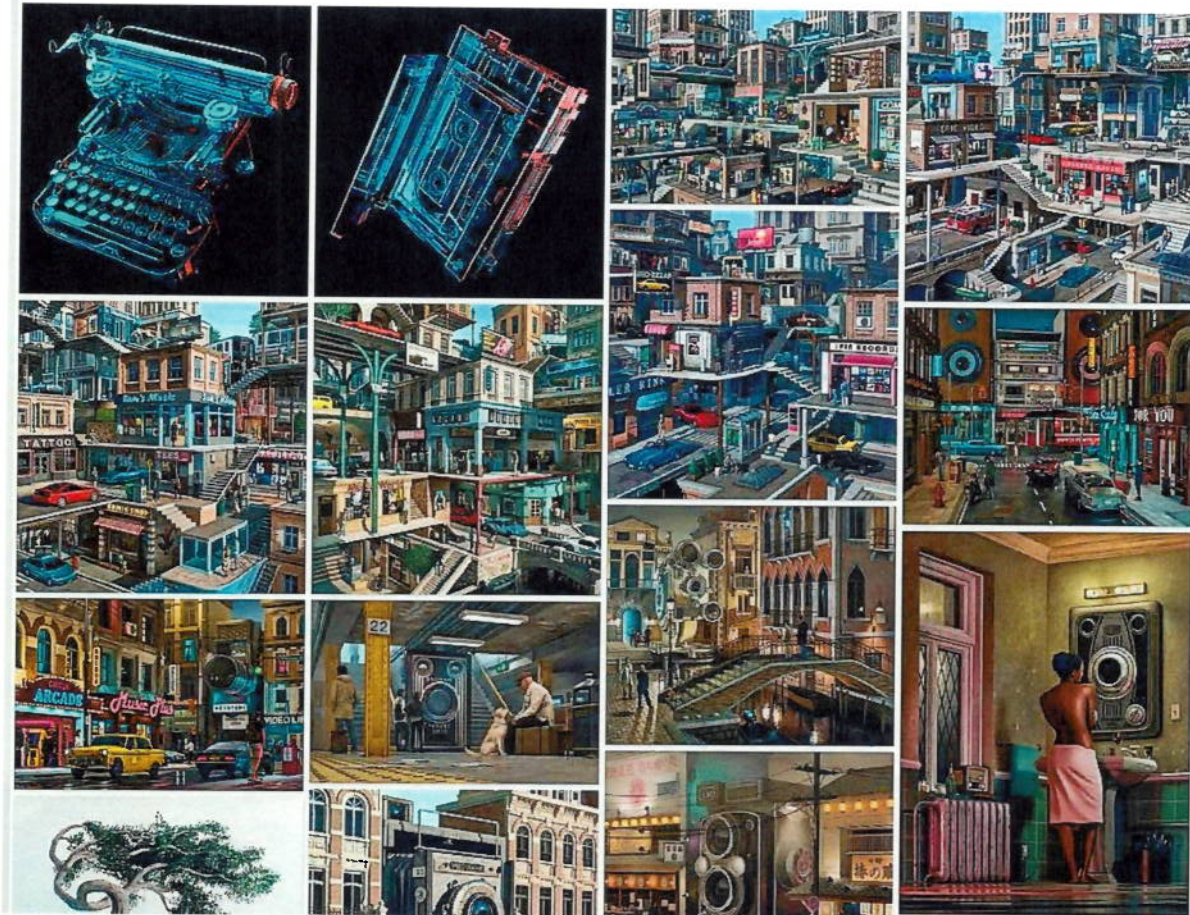
PAINTINGS

ALTERNATIVE ARTIFACTS

DIGITAL

MORE

PAINTINGS



<https://www.jeffbartels.com/paintings>





5. I am the owner of the copyright registrations for the Jeff Bartels copyrighted works, which include United States Copyright Registration Nos. VA 2-321-928; and VA 2-301-715 (the "Jeff Bartels Works"). True and correct copies of the copyright registrations for the Jeff Bartels Works are attached to the Complaint as **Exhibit 1**.

6. I control the quality of all materials and content that feature the distinctive Jeff Bartels Works.

7. Substantial time, money, and other resources have been expended in developing, advertising, licensing, and otherwise promoting the Jeff Bartels Works. As a result, the images are widely recognized and exclusively associated by consumers, the public, and the trade with my professional identity as an artist.

8. The success and acclaim of the Jeff Bartels Works has resulted in significant infringement of my copyright. Consequently, an anti-pirating program has been implemented to investigate suspicious websites and online marketplace listings identified in proactive internet sweeps. Various marketplace listings have been identified on multiple platforms, including the internet stores identified in Schedule A attached to the Complaint (“Defendant Internet Stores”), which were offering for sale, selling, and/or importing unauthorized copies of the Jeff Bartels Products to consumers in this judicial district and throughout the United States.

9. I am aware of investigations related to internet-based infringement of the Jeff Bartels Works. The investigations show that Defendants are using the Defendant Internet Stores to sell infringing Jeff Bartels Products from foreign countries such as China to consumers in the United States. I, or someone working under my direction, analyzed the Defendant Internet Stores and determined that infringing Jeff Bartels Products were being offered for sale to the United States, including Pennsylvania. The Defendants and their websites do not conduct business with me and do not have the right or authority to use the copyrights for any reason. Below is a side-by-side comparison of the Jeff Bartels Works and examples of Defendants’ products reviewed that embody the copyrighted Jeff Bartels Works:

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-321-928	Cute Baby Elephant DJ - Cute Baby Elephant DJ Glasses (Alternative Title)		 Def #1-369
VA 2-301-715	Cute Baby Elephant		 Def #370-375

10. Monetary damages alone cannot adequately compensate me for the ongoing infringement because monetary damages fail to address the loss of control of and damage to my reputation, goodwill, and control over the nature of the derivative works made using my copyrighted material. Furthermore, monetary damages are difficult, if not impossible, to completely ascertain due to the inability to fully quantify the monetary damage caused to my reputation and goodwill by acts of infringement.

11. My goodwill and reputation are irreparably damaged when the Jeff Bartels Works are used on unauthorized goods. I am further irreparably harmed by the unauthorized use of the Jeff Bartels copyrighted materials because infringers take away my ability to control the nature and quality of products bearing the Jeff Bartels Works and derivative works.

12. I am further irreparably damaged due to a loss of exclusivity. The copyright rights in the Jeff Bartels Works are meant to be exclusive rights.

13. The marketing and distribution of the Jeff Bartels Works and derivative works are aimed at growing and sustaining sales. When infringers use the Jeff Bartels Works without authorization, the exclusivity associated with the Jeff Bartels Works, as well as my reputation, is damaged and eroded, resulting in a loss of unquantifiable future sales.

14. Uncontrolled profiteering and pirating of the Jeff Bartels Works create the impression that the copyright rights associated with the Jeff Bartels Works may be infringed with impunity. The Jeff Bartels Works are distinctive and signify to consumers that products are authorized by me and are manufactured to my high-quality standards. The devaluing of the intellectual property associated with the Jeff Bartels Works cannot be compensated for financially since it erodes my ability to monetize the Jeff Bartels Works.

15. I will suffer immediate and irreparable injury, loss, or damage if an *ex parte* Temporary Restraining Order is not issued in accordance with Federal Rule of Civil Procedure 65(b)(1).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Jun 06, 2025



Jeff Bartels