

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

LISA AUDIT,

Plaintiff,

Case No.

v.

**FILED UNDER SEAL**

CHNEP, et al.

Defendants.

**DECLARATION OF LISA AUDIT**

I, LISA AUDIT, 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 Lisa Audit Art Works. I make this declaration from matters within my knowledge save where otherwise stated.
3. I am an artist and graphic designer who produces works under the name "Lisa Audit." I create products and designs for various uses including tableware, stationery, kitchen textiles, bedding, bath, rugs, wall décor, and many more. I fell in love with art when I was a young girl and went on to study graphic arts in college. I find inspiration for my work in nature. I am proficient with oil paints, acrylics, and pen and ink.
4. I am the official source of products associated with the Lisa Audit Works (the "Lisa Audit Products"):



[Home](#) / [Artists](#)

## Lisa Audit

976 results

Filter & Sort  
Recommended



273 



Sea Life IV  
[Lisa Audit](#)

Canvas from  
**\$32.00** ~~\$79.99~~

[More like this](#)

441 



Marche de Fleurs on Black II  
[Lisa Audit](#)

Canvas from  
**\$38.00** ~~\$94.99~~

[More like this](#)

584 



Flamboyant III  
[Lisa Audit](#)

Canvas from  
**\$34.00** ~~\$84.99~~

[More like this](#)

<https://www.greatbigcanvas.com/category/audit-lisa/>

5. I am the owner of the copyright registrations for the Lisa Audit copyrighted works, which include United States Copyright Registration Nos. VA 2-420-419; VA 2-421-411; VA 2-420-610; VA 2-420-594; VA 2-420-615; VA 2-420-619; VA 2-420-731; VA 2-420-888; VA 2-420-729; VA 2-420-524; VA 2-420-631; VA 2-420-638; VA 2-422-057; VA 2-420-519; VA 2-420-635; VA 2-421-400; VA 2-422-058; VA 2-422-055; VA 2-420-527; VA 2-420-529; VA 2-420-516; and VA 2-420-521 (the “Lisa Audit Works”). True and correct copies of the copyright registrations for the Lisa Audit Works are attached to the Complaint as **Exhibit 1**.

6. I control the quality of all materials and content that feature the distinctive Lisa Audit Works.

7. Substantial time, money, and other resources have been expended in developing, advertising, licensing, and otherwise promoting the Lisa Audit Works. As a result, the images are widely recognized and exclusively associated by consumers, the public, and the trade with my name.

8. The success of the Lisa Audit Works has resulted in significant infringement of my copyrights. 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 importing unauthorized Lisa Audit 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 Lisa Audit Works. The investigations show that Defendants are using the Defendant Internet Stores to sell infringing Lisa Audit 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 Lisa Audit 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 Lisa Audit Works and examples of Defendants' products reviewed that embody the copyrighted Lisa Audit Works:

Reg. Number	Title of Work	Copyrighted Work	Defendants' Product
VA 2-420-419	Under the Sun I		 <p data-bbox="1084 474 1347 508">Def #1-113, 171-230</p>
VA 2-421-411	Under the Sun II		 <p data-bbox="1071 827 1364 856">Def #114-130, 231-233</p>
VA 2-420-610	Poppies Melody		 <p data-bbox="1101 1045 1331 1079">Def #131-140, 234</p>
VA 2-420-594	Poesie Florale III		 <p data-bbox="1156 1297 1273 1331">Def #141</p>
VA 2-420-615	Blossom I		 <p data-bbox="1075 1524 1364 1558">Def #142-146, 235-236</p>
VA 2-420-619	Blossom II		 <p data-bbox="1156 1789 1273 1822">Def #147</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Product
VA 2-420-731	Marche de Fleurs II		 <p data-bbox="1065 611 1357 642">Def #148-151, 237-239</p>
VA 2-420-888	Les Jardin II		 <p data-bbox="1127 974 1299 1005">Def #152-154</p>
VA 2-420-729	Les Jardin III		 <p data-bbox="1159 1299 1273 1331">Def #155</p>
VA 2-420-524	Garden View I		 <p data-bbox="1127 1549 1299 1581">Def #156-158</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Product
VA 2-420-631	Blue Feathered Peacock I		 <p data-bbox="1122 512 1295 543">Def #159-160</p>
VA 2-420-638	Cafe in Europe I		 <p data-bbox="1154 905 1268 936">Def #161</p>
VA 2-422-057	Sweet Cupcakes III		 <p data-bbox="1127 1171 1300 1203">Def #162-163</p>
VA 2-420-519	A Blue Note II		 <p data-bbox="1154 1520 1276 1551">Def #164</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Product
VA 2-420-635	Chef's Masterpiece II		 <p data-bbox="1153 583 1274 619">Def #165</p>
VA 2-421-400	Forest Study I		 <p data-bbox="1153 928 1274 961">Def #166</p>
VA 2-422-058	Spring Softies Bunnies II		 <p data-bbox="1068 1176 1364 1213">Def #167-168, 240-327</p>
VA 2-422-055	Tropical Blush VII		 <p data-bbox="1128 1459 1307 1495">Def #169, 328</p>
VA 2-420-527	Indigold X		 <p data-bbox="1161 1806 1274 1841">Def #170</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Product
VA 2-420-529	Indigold XXIII		 Def #329-345
VA 2-420-516	Indigold IX		 Def #346-350
VA 2-420-521	Indigold VI		 Def #351

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 Lisa Audit Works are used on unauthorized goods. I am further irreparably harmed by the unauthorized use of the Lisa Audit copyrighted materials because infringers take away my ability to control the nature and quality of products bearing the Lisa Audit Works and derivative works.

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

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

14. Uncontrolled profiteering and pirating of the Lisa Audit Works create the impression that the copyright rights associated with the Lisa Audit Works may be infringed with impunity. The Lisa Audit Works are distinctive and signify to consumers that the products are authorized by me and are manufactured to my high-quality standards. When infringers use the Lisa Audit Works on goods without authorization, the exclusivity of my products and reputation are damaged and eroded, resulting in a loss of unquantifiable future sales. The devaluing of the intellectual property associated with the Lisa Audit Works cannot be compensated for financially since it erodes my ability to monetize the Lisa Audit 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 10, 2025

*Lisa Audit rep. by Gary Levine*

---

Lisa Audit