

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

JANTZ & JANTZ GbR d/b/a ANITA'S &
BELLA'S ART/ARTWORK,

Plaintiff,

v.

DUSHUAME, et al.,

Defendants.

Case No. 25-cv-1431

FILED UNDER SEAL

DECLARATION OF ANITA JANTZ

I, ANITA JANTZ, 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. Jantz & Jantz GbR d/b/a Anita's and Bella's Art/Artwork ("Jantz & Jantz"), is a civil law partnership between my sister, Isabella Jantz, and myself. Together we created the Jantz Work. I make this declaration from matters within my knowledge save where otherwise stated.

3. My sister and I formed Jantz & Jantz GbR in 2018. Together we create art that focuses on minimalism, purity, and the beauty of nature. Our pieces use a combination of photography, scanning, painting, and digital effects like liquifying in Photoshop as well as editing the images to cut out specific parts and make color changes. Our pieces often start as photographs or scans of real materials which are then edited in Photoshop to manipulate color, add texture, or overlay hand-drawn designs, paintings, or photographs of other materials. Our success is based on our combined skills as well as our ability to work with our clients, adjusting and redesigning as necessary, to create something original and new. We have been featured artists on Society6 as well as Redbubble and sell prints of our work on a variety of products across multiple websites.

4. Jantz & Jantz is the official source of products associated with the Jantz Works (the “Jantz Products”):



<https://society6.com/a/artists/anitabellajantz/shop>

5. Jantz & Jantz is the owner of the United States Copyright Registration Nos. VA 2-405-926; VA 2-405-928; VA 2-405-934; VA 2-405-850; VA 2-405-851; VA 2-405-841; VA 2-405-854; VA 2-404-316; VA 2-404-319; VA 2-404-317; VA 2-404-307; VA 2-405-938; VA 2-404-368; VA 2-404-323 (the “Jantz Works”). True and correct copies of the copyright registrations for the Jantz Works are attached to the Complaint as **Exhibit 1**.

6. Jantz and Jantz controls the quality of all materials and content that feature the distinctive Jantz Works.

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

8. The success and acclaim of the Jantz Works have resulted in significant infringement of our 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/or importing unauthorized copies of the Jantz Works 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 Jantz Works. The investigations show that Defendants are using the Defendant Internet Stores to sell infringing Jantz Works 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 Jantz Works Products were being offered for sale to the United States, including Pennsylvania. The Defendants and their websites do not conduct business with Jantz & Jantz and do not have the right or authority to use the copyrights for any reason. Below is a side-by-side comparison of the Jantz Works and examples of Defendants’ products reviewed that embody the copyrighted Jantz Works:

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-405-926	Dark Night Purple Black Silver Glitter #1		 Def #1-35, 123-125, 141
VA 2-405-928	Sparkling Gold Brown Glitter Glam #1		 Def #36-58, 126-133, 142-148
VA 2-405-934	Tropical Watermelon Glitter #5		 Def #59-73, 134, 149-153
VA 2-405-850	Olive Green Marble Agate Gold Glitter Glam #1		 Def #74-88, 135-138, 164-191

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-405-851	Dark Green Black Marble Agate Silver Glitter Glam #1		 <p data-bbox="1084 674 1360 701">Def #89-104, 192-199</p>
VA 2-405-841	Liquid Marble Agate Glitter Glam #1		 <p data-bbox="1078 1073 1369 1100">Def #105-110, 200-206</p>
VA 2-405-854	Liquid Marble Agate Glitter Glam #9		 <p data-bbox="1078 1444 1369 1472">Def #111-116, 139, 207</p>
VA 2-404-316	Dark Teal Ink Copper Gold Geometric Glam #1		 <p data-bbox="1078 1797 1369 1824">Def #117-118, 208-227</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-404-319	Mermaid Glitter Scales #9		 <p data-bbox="1105 619 1341 646">Def #119, 228-230</p>
VA 2-404-317	Eucalyptus Fan Palm Finesse #1		 <p data-bbox="1105 903 1341 930">Def #120, 231-237</p>
VA 2-404-307	Classic Lavender Gold Geo #1		 <p data-bbox="1166 1228 1281 1255">Def #121</p>
VA 2-405-938	Mermaid Scales on Unicorn Girls Glitter #1		 <p data-bbox="1166 1591 1281 1619">Def #122</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-404-368	Tropical Jungle Leaves Pattern #13 (Fall Colors)		 <p data-bbox="1133 632 1312 659">Def #140, 238</p>
VA 2-404-323	Sparkling UNICORN Girls Glitter Heart #1		 <p data-bbox="1133 905 1312 932">Def #239-240</p>

10. Monetary damages alone cannot adequately compensate Jantz & Jantz for the ongoing infringement because monetary damages fail to address the loss of control of and damage to Jantz & Jantz's reputation, goodwill, and control over the nature of the derivative works made using the 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 Jantz & Jantz's reputation and goodwill by acts of infringement.

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

12. Jantz & Jantz is further irreparably damaged due to a loss of exclusivity. The copyright rights in the Jantz Works are meant to be exclusive rights.

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

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

15. Jantz & Jantz 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 Aug 13, 2025

Anita Jantz

Anita Jantz