

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

DEL PARSON,

Plaintiff,

v.

SCHEDULE A DEFENDANTS,

Defendants.

Case No. 26-cv-83

**FILED UNDER SEAL**

**DECLARATION OF DEL PARSON**

I, DEL PARSON, 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 Del Parson 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 "Del Parson." Growing up, my father was an art professor and would often take my family on painting excursion campouts. I found my father's love of art to be contagious. I went on to earn my Master of Fine Arts degree from Brigham Young University and became a gallery and portrait artist. After losing my wife and daughter in a car accident, I felt the Spirit of God helping me through the tough times. I began to paint religious subjects to give others the sense of hope that I found and to share my love of life.

4. I am the official source of products associated with the Del Parson Works (the "Del Parson Products"):



<https://ansadagroup.com/downloads/tag/del-parson/>



5. I am the owner of the copyright registrations for the Del Parson copyrighted works, which include United States Copyright Registration Nos. VA 1-638-968; VA 2-423-476; VA 1-704-416; VA 1-638-966; VA 2-296-298; and Vau 965-972 (the “Del Parson Works”). True and correct copies of the copyright registrations for the Del Parson Works are attached to the Complaint as **Exhibit 1**.










6. I control the quality of all materials and content that feature the distinctive Del Parson Works.

7. Substantial time, money, and other resources have been expended in developing, advertising, licensing, and otherwise promoting the Del Parson 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 Del Parson 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 Del Parson 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 Del Parson Works. The investigations show that Defendants are using the Defendant Internet Stores to sell infringing Del Parson 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 Del Parson 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 Del Parson Works and examples of Defendants’ products reviewed that embody the copyrighted Del Parson Works:

Reg. Number	Title of Work	Copyrighted Work	Defendants’ Image
VA 1-638-968	Lost Lamb		 Def #1-50, 70-73

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-423-476	Hope in the Second Coming		 Def #51-55, 74-77
VA 1-704-416	Perfect Love		 Def #56-61, 78-92
VA 1-638-966	Behold Your Little Ones		 Def #62-66, 93-107
VA 2-296-298	Heavenly Mother		 Def #67-68, 108-112
Vau 965-972	Facing Eternity		 Def #69, 113

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

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

13. The marketing and distribution of the Del Parson Works and derivative works are aimed at growing and sustaining sales. When infringers use the Del Parson Works without authorization, the exclusivity associated with the Del Parson 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 Del Parson Works create the impression that the copyright rights associated with the Del Parson Works may be infringed with impunity. The Del Parson 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 Del Parson Works cannot be compensated for financially since it erodes my ability to monetize the Del Parson 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 Aug 26, 2025

*Del Parson*  
Del Parson