

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

LISA AUDIT,

Plaintiff,

v.

TAOAIXUEMAIWAZI, et al.,

Defendants.

Case No. 25-cv-1707

FILED UNDER SEAL

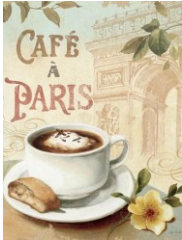







COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff hereby sues Defendants, the Individuals, Partnerships, and Unincorporated Associations identified in the Caption, which are set forth in **Schedule “A”** hereto (collectively “Defendants”). All Defendants are knowingly and intentionally promoting, advertising, distributing, offering for sale, and selling infringing versions of Plaintiff’s copyrighted works (the “Infringing Products”) on the Amazon.com, Temu.com, and Walmart.com online marketplaces, operating under the seller identities and/or the online marketplace accounts as set forth on **Schedule “A”** hereto (the “Seller IDs” and collectively, the “Defendant Merchant Storefronts”). In support of its claims, Plaintiff alleges as follows:

NATURE OF ACTION









1. Plaintiff is the owner of several United States Registered Copyrights which are infringed by Defendants. Each Defendant has infringed at least one of Plaintiff’s Registered Copyrights. Below is a side-by-side comparison of Plaintiff’s copyrighted works and an example of Defendants’ products that embody Plaintiff’s copyrighted works:

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-420-524	Garden View I		 <p data-bbox="1117 562 1341 596">Def #1-11, 47-48</p>
VA 2-420-498	Garden View Tossed		 <p data-bbox="1154 919 1300 953">Def #12-13</p>
VA 2-420-615	Blossom I		 <p data-bbox="1105 1234 1349 1268">Def #14-19, 49-51</p>
VA 2-420-619	Blossom II		 <p data-bbox="1175 1535 1279 1568">Def #20</p>
VA 2-420-631	Blue Feathered Peacock I		 <p data-bbox="1175 1797 1279 1831">Def #21</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-420-638	Cafe in Europe I		 Def #22-24 130-143
VA 2-420-635	Chef's Masterpiece II		 Def #22-24, 144-145,
VA 2-420-507	Harmonious Hydrangeas		 Def #28
VA 2-420-516	Indigold IX		 Def #29, 52-55

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-420-521	Indigold VI		 Def #30-32, 56, 146-154
VA 2-420-529	Indigold XXIII		 Def #33-35, 57-60
VA 2-420-730	Marche de Fleurs III		 Def #36-37, 155-164
VA 2-420-594	Poesie Florale III		 Def #38-39, 165-171
VA 2-422-058	Spring Softies Bunnies II		 Def #40-44, 61-124, 172-200

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-421-426	Spring Softies III		 <p data-bbox="1143 548 1312 583">Def #45, 125</p>
VA 2-422-057	Sweet Cupcakes III		 <p data-bbox="1175 867 1284 898">Def #46</p>
VA 2-420-731	Marche de Fleurs II		 <p data-bbox="1101 1182 1357 1245">Def #126-127, 201-203</p>
VA 2-420-888	Les Jardin II		 <p data-bbox="1105 1493 1357 1528">Def #128, 204-216</p>
VA 2-420-721	My Greenhouse Flowers I		 <p data-bbox="1166 1812 1292 1848">Def #129</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-421-422	Spiced Nature		 <p data-bbox="1133 579 1320 611">Def #217-225</p>
VA 2-420-652	Tulip and Insects		 <p data-bbox="1133 890 1320 921">Def #226-227</p>
VA 2-420-736	Rainbow Garden Spice II		 <p data-bbox="1133 1155 1320 1186">Def #228-229</p>
VA 2-421-402	French Vases I		 <p data-bbox="1166 1499 1287 1530">Def #230</p>

JURISDICTION AND VENUE

2. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Copyright Act, 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)–(b), and 28 U.S.C. § 1331.

3. This Court has personal jurisdiction over each Defendant because they have purposefully directed and expressly aimed their tortious activities at the Commonwealth of Pennsylvania and established sufficient minimum contacts with Pennsylvania by, among other things, upon information and belief, advertising and selling infringing products bearing Plaintiff's copyrighted designs to consumers within Pennsylvania through a highly interactive commercial website, through the regular course of business, with the knowledge that Plaintiff is harmed in Pennsylvania as a result of Defendants' sales of infringing products to Pennsylvania residents. Plaintiff's claims arise out of and relate to Defendants' sales of infringing products bearing Plaintiff's copyrighted designs to Pennsylvania residents through the regular course of business. Alternatively, based on their overall contacts with the United States, Defendants are subject to personal jurisdiction in this district pursuant to Federal Rule of Civil Procedure 4(k)(2) because (i) Defendants are not subject to jurisdiction in any state's court of general jurisdiction; and (ii) exercising jurisdiction is consistent with the United States Constitution and laws.

4. Personal jurisdiction over a non-resident of the state in which the Court sits is proper to the extent authorized by the state's laws. Fed. R. Civ. P. 4(e). Pennsylvania authorizes personal jurisdiction over each Defendant pursuant to § 5322 of the Pennsylvania Consolidated Statutes, Title 42, (the "Pennsylvania Long Arm Statute") which provides in pertinent part:

(a) **General Rule.** A tribunal of this Commonwealth may exercise personal jurisdiction over a person ... who acts directly or by an agent, as to a cause of action or other matter arising from such person:

(1) Transacting any business in this Commonwealth [including, but not limited to:]...

(i) The doing by any person in this Commonwealth of a series of similar acts for the purpose of thereby realizing pecuniary benefit or otherwise accomplishing an object.

(ii) The doing of a single act in this Commonwealth for the purpose of thereby realizing pecuniary benefit or otherwise accomplishing an object with the intention of initiating a series of such acts.

(iii) The shipping of merchandise directly or indirectly into or through this Commonwealth.

(iv) The engaging in any business or profession within this Commonwealth.

* * *

(3) Causing harm or tortious injury by an act or omission in this Commonwealth.

(4) Causing harm or tortious injury in this Commonwealth by an act or omission outside this Commonwealth.

* * *

(10) Committing any violation within the jurisdiction of this Commonwealth of any statute ... or rule or regulation promulgated thereunder by any government unit.

(b) Exercise of full constitutional power over nonresidents. In addition to the provisions of subsection (a) the jurisdiction of the tribunals of this Commonwealth shall extend to all persons who are not within the scope of section 5301 (relating to persons) to the fullest extent allowed under the Constitution of the United States and may be based on the most minimum contact with this Commonwealth allowed under the Constitution of the United States.

42 Pa. Cons. Stat. § 5322.

5. The Pennsylvania Long Arm Statute confers personal jurisdiction over the Defendants because Defendants regularly conduct, transact, and/or solicit business in Pennsylvania and in this Judicial District and, upon information and belief, derive substantial revenue from their business transactions in Pennsylvania and in this Judicial District. Defendants have availed themselves of the privileges and protections of the laws of Pennsylvania, such that this Court's assertion of jurisdiction over Defendants does not offend traditional notions of fair play and substantial justice. Defendants should reasonably expect that their actions in and outside of Pennsylvania would subject them to legal action in Pennsylvania and this Judicial District. For example:

a. Defendants have directed their business activities at consumers in Pennsylvania via Amazon, Temu, and Walmart through which consumers in Pennsylvania can view Defendants' online storefronts, communicate with Defendants regarding Defendants' Infringing Products, and place orders for, purchase, and receive delivery of Defendants' Infringing Products in Pennsylvania.

b. Defendants are sophisticated sellers on Amazon, Temu, and Walmart each operating one or more commercial businesses through which Defendants operate online storefronts to promote, advertise, distribute, offer for sale, and sell the Infringing Products imported into the United States.

c. Defendants (although foreign entities) accept payment in U.S. Dollars and offer shipping to Pennsylvania and this Judicial District (and calculate, charge, and remit tax based on sales into Pennsylvania and this Judicial District).

d. Upon information and belief, Defendants have cooperated, communicated, shared information, and coordinated their efforts in order to create an infringing marketplace operating in parallel to the legitimate marketplace of Plaintiff and third parties authorized to sell products embodying Plaintiff's copyrighted works, including: employing and benefitting from substantially similar paid advertising, marketing, and advertising strategies (*e.g.*, search engine optimization or "SEO"), in order to make their online storefronts appear more relevant and target a consumer searching for products embodying Plaintiff's copyrighted works. By their actions, in addition to the damages associated with unauthorized use of Plaintiff's copyrighted works, Defendants are causing concurrent and irreparable harm to Plaintiff and the consuming public by: (1) reducing the online visibility of Plaintiff's copyrighted works; (2) diluting and eroding

the retail market price for Plaintiff's copyrighted works; (3) causing overall degradation of the value of goodwill associated with Plaintiff's copyrighted works; (4) devaluing the exclusivity that enhances the worth of Plaintiff's art and reputation; and (5) increasing Plaintiff's overall cost to market its goods and educate consumers about Plaintiff's copyrighted works.

e. Defendants are concurrently targeting their infringing activities toward consumers in, and causing harm in, Pennsylvania.

f. Defendants reside and/or operate in foreign jurisdictions with intellectual property enforcement systems and are cooperating by creating an illegal stream of infringing goods. (See, *e.g.*, <https://sellerdefense.cn/>). Defendants regularly remove and add products from their online storefronts, making it extremely difficult to enforce Plaintiff's intellectual property under the laws of the United States.

g. Upon information and belief, Defendants are aware of Plaintiff and Plaintiff's copyrighted works and are aware that their infringement is likely to cause harm to Plaintiff in the United States, Pennsylvania, and this Judicial District.

h. Plaintiff is suffering irreparable and indivisible injury and has suffered substantial damages as a result of Defendants' unauthorized sale of the Infringing Products in direct competition with Plaintiff.

6. Alternatively, if Defendants contend that their use of Amazon, Temu, and Walmart should not be construed as contacts with the individual states and the Court accepts that contention, Federal Rule of Civil Procedure 4(k)(2) confers personal jurisdiction over Defendants because (1) the claims asserted herein arise under federal copyright law; (2) Defendants would not be subject to jurisdiction in any state's courts of general jurisdiction; and (3) exercising jurisdiction is

consistent with the United States Constitution and laws. For example, exercising jurisdiction is constitutionally permissible because:

a. Defendants have purposefully directed their activities at the United States.

The Defendants have voluntarily chosen to open accounts on Amazon, Temu, and Walmart to access the United States' market. Upon information and belief, Amazon, Temu, and Walmart target the entire United States, and do not provide sellers like Defendants with the ability to opt into or out of any particular jurisdiction (*e.g.*, state) within the United States. Amazon, Temu, and Walmart the online marketplaces chosen by Defendants: (1) provide prices in U.S. dollars; (2) advertise free shipping to U.S. buyers, including buyers in Pennsylvania, and (3) provide testimonials of and reviews by U.S. buyers.

b. Upon information and belief, Defendants have each had sales of the Infringing Products in the United States.

c. Plaintiff's injuries arise from Defendants' forum-related activities. Defendants' offer to sell, sale, and distribution of the Infringing Products to U.S. residents is a but for cause of all of the infringement alleged in this action. Defendants know or should know that infringement of works copyrighted by U.S. entities or persons is likely to injure U.S. residents.

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391: Defendants do not reside in the United States and are subject to venue in any district. Further, Defendants solicit business from this Judicial District and, upon information and belief, conduct and transact significant business in this Judicial District.

INTRODUCTION

8. Plaintiff, Lisa Audit, is the owner of several federal copyright registrations that protect the creative content of Plaintiff's images. The copyrights protect works of art by Lisa Audit, an artist and graphic designer who creates products and designs for various such as tableware, stationery, kitchen textiles, bedding, bath, rugs, and wall décor. She studied graphic arts in college and finds her inspiration in nature. She is proficient with oil paints, acrylics, and pen and ink. Lisa Audit derives significant profits from the sale and distribution of art prints and licensed products.

9. This action has been filed by Plaintiff to combat online copyright infringers who trade upon Plaintiff's reputation, goodwill, and valuable copyrights by selling and/or offering for sale products in connection with Plaintiff's image. In addition, the Defendants are selling unauthorized products that are based on and derived from the copyrighted subject matter of Plaintiff's images.

10. Plaintiff is the owner of United States Copyright Registration Nos. VA 2-420-524; VA 2-420-498; VA 2-420-615; VA 2-420-619; VA 2-420-631; VA 2-420-638; VA 2-420-635; VA 2-420-507; VA 2-420-516; VA 2-420-521; VA 2-420-529; VA 2-420-730; VA 2-420-594; VA 2-422-058; VA 2-421-426; VA 2-422-057; VA 2-420-731; VA 2-420-888; VA 2-420-721; VA 2-421-422; VA 2-420-652; VA 2-420-736; and VA 2-421-402 (the "Lisa Audit Works"). These registrations are valid, subsisting, and in full force and effect. True and correct copies of the registration certificates for the Lisa Audit Works are attached hereto as **Exhibit 1**. Upon information and belief, the copyrights have effective dates that predate the Defendants' acts of copyright infringement.

11. In an effort to illegally profit from the creative content of the Lisa Audit Works, Defendants have created numerous Defendant Merchant Storefronts and designed them to appear to be selling authorized Lisa Audit Works.

12. The Defendant Merchant Storefronts 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 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 Lisa Audit Works. Plaintiff has suffered, and continues to suffer, irreparable harm due to the loss of control over the quality and creative content of her valuable copyrighted works, as well as damage to her reputation, goodwill, and ability to license as a result of Defendants' actions. Accordingly, Plaintiff seeks injunctive and monetary relief.

13. The rise of online retailing, coupled with the ability of e-commerce sites to hide their identities, has made it nearly impossible for policing actions to be undertaken by Plaintiff because taking advantage of takedown procedures to remove infringing products would be an ineffective and endless game of whack-a-mole against the mass piracy that is occurring over the internet. Sadly, a swarm of infringers have decided to trade upon Plaintiff's reputation, goodwill, and valuable copyrights by selling and/or offering for sale products in connection with Plaintiff's images. The aggregated effect of the mass piracy that is taking place has overwhelmed Plaintiff and Plaintiff's ability to police Plaintiff's rights against the dozens of anonymous defendants who are selling illegal infringing products at prices well below an original.

14. To be able to offer the infringing products at a price substantially below the cost of original, while still being able to turn a profit after absorbing the cost of manufacturing, advertising, and shipping requires an economy of scale only achievable through a cooperative effort throughout the supply chain. As Homeland Security's recent report confirms, infringers act in concert through coordinated supply chains and distribution networks to unfairly compete with legitimate brand owners while generating huge profits for the illegal pirating network:

Historically, many counterfeits were distributed through swap meets and individual sellers located on street corners. Today, counterfeits are being trafficked through vast e-commerce supply chains in concert with marketing, sales, and distribution networks. **The ability of e-commerce platforms to aggregate information and reduce transportation and search costs for consumers provides a big advantage over brick-and-mortar retailers. Because of this, sellers on digital platforms have consumer visibility well beyond the seller's natural geographical sales area.**

...

Selling counterfeit and pirated goods through e-commerce is a highly profitable activity: production costs are low, millions of potential customers are available online, transactions are convenient, and listing on well-branded e-commerce platforms provides an air of legitimacy.

...

The impact of counterfeit and pirated goods is broader than just unfair competition. Law enforcement officials have uncovered intricate links between the sale of counterfeit goods and transnational organized crime. **A study by the Better Business Bureau notes that the financial operations supporting counterfeit goods typically require central coordination**, making these activities attractive for organized crime, with groups such as the Mafia and the Japanese Yakuza heavily involved. Criminal organizations use coerced and child labor to manufacture and sell counterfeit goods. In some cases, the proceeds from counterfeit sales may be supporting terrorism and dictatorships throughout the world.

See Department of Homeland Security, *Combating Trafficking in Counterfeit and Pirated Goods*, Jan. 24, 2020, (<https://www.dhs.gov/publication/combating-trafficking-counterfeit-and-pirated-goods>), at 10, 19 (emphasis added) attached hereto as **Exhibit 2**.

15. The Defendant Merchant Storefronts 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 use aliases to avoid liability by going to great lengths to conceal both their identities as well as the full scope and interworking of their illegal network. Despite deterrents such as takedowns and other measures, the use of aliases enables infringers to stymie authorities:

The scale of counterfeit activity online is evidenced as well by the significant efforts e-commerce platforms themselves have had to undertake. A major e-commerce platform reports that its proactive efforts prevented over 1 million suspected bad actors from publishing a single product for sale through its platform and blocked over 3 billion suspected counterfeit listings from being published to their marketplace. Despite efforts such as these, private sector actions have not been sufficient to prevent the importation and sale of a wide variety and large volume of counterfeit and pirated goods to the American public.

...

A counterfeiter seeking to distribute fake products will typically set up one or more accounts on online third-party marketplaces. The ability to rapidly proliferate third-party online marketplaces greatly complicates enforcement efforts, especially for intellectual property rights holders. Rapid proliferation also allows counterfeiters to hop from one profile to the next even if the original site is taken down or blocked. On these sites, online counterfeiters can misrepresent products by posting pictures of authentic goods while simultaneously selling and shipping counterfeit versions.

...

Not only can counterfeiters set up their virtual storefronts quickly and easily, but they can also set up new virtual storefronts when their existing storefronts are shut down by either law enforcement or through voluntary initiatives set up by other stakeholders such as market platforms, advertisers, or payment processors.

Id. at 5, 11, 12.

16. Plaintiff has been and continues to be irreparably harmed through the loss of control over Plaintiff's reputation, goodwill, ability to license, and the quality of goods featuring the Lisa Audit Works, as well as the devaluation of the exclusivity associated with Plaintiff's art and professional reputation. The rise of eCommerce as a method of supplying goods to the public exposes brand holders and content creators that make significant investments in their products to significant harm from counterfeiters:

Counterfeiting is no longer confined to street-corners and flea markets. The problem has intensified to staggering levels, as shown by a recent Organization for Economic Cooperation and Development (OECD) report, which details a 154 percent increase in counterfeits traded internationally — from \$200 billion in 2005 to \$509 billion in 2016. Similar information collected by the U.S. Department of Homeland Security (DHS) between 2000 and 2018 shows that seizures of infringing goods at U.S. borders have increased 10-fold, from 3,244 seizures per year to 33,810.

...

The rise in consumer use of third-party marketplaces significantly increases the risks and uncertainty for U.S. producers when creating new products. It is no longer enough for a small business to develop a product with significant local consumer demand and then use that revenue to grow the business regionally, nationally, and internationally with the brand protection efforts expanding in step. Instead, with the international scope of e-commerce platforms, once a small business exposes itself to the benefits of placing products online — which creates a geographic scope far greater than its more limited brand protection efforts can handle — it begins to face increased foreign infringement threat.

...

Moreover, as costs to enter the online market have come down, such market entry is happening earlier and earlier in the product cycle, further enhancing risk. If a new product is a success, counterfeiters will attempt, often immediately, to outcompete the original seller with lower-cost counterfeit and pirated versions while avoiding the initial investment into research and design.

...

Counterfeiters have taken full advantage of the aura of authenticity and trust that online platforms provide. While e-commerce has supported the launch of thousands of legitimate businesses, their models have also enabled counterfeiters to easily establish attractive “store-fronts” to compete with legitimate businesses.

See Combating Trafficking in Counterfeit and Pirated Goods, Jan. 24, 2020, (**Exhibit 2**) at 4, 8, 11.

17. Not only are the creators and copyright owners harmed, the public is harmed as well:

The rapid growth of e-commerce has revolutionized the way goods are bought and sold, allowing for counterfeit and pirated goods to flood our borders and penetrate our communities and homes. Illicit goods trafficked to American consumers by e-commerce platforms and online third-party marketplaces threaten public health and safety, as well as national security. This illicit activity impacts American innovation and erodes the competitiveness of U.S. manufacturers and workers. The President’s historic memorandum provides a much warranted and long overdue call to action in the U.S. Government’s fight against a massive form of illicit trade that is

inflicting significant harm on American consumers and businesses. This illicit trade must be stopped in its tracks.

Id. at 3, 4. (Underlining in original).

18. Plaintiff's investigation shows that the telltale signs of an illegal piracy ring are present in the instant action. The Defendant Merchant Storefronts share unique identifiers, such as design elements and similarities of the infringing 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 attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal piracy operation. Plaintiff is forced to file this action to combat Defendants' infringement of the Lisa Audit Works, as well as to protect unknowing consumers from purchasing unauthorized reproductions of the Lisa Audit Works over the internet.

THE PLAINTIFF

19. Plaintiff, Lisa Audit, is the owner of several federal copyright registrations that protect the creative content of Plaintiff's images. The copyrights protect works of art by Lisa Audit, an artist and graphic designer who creates products and designs for various such as tableware, stationery, kitchen textiles, bedding, bath, rugs, and wall décor. She studied graphic arts in college and finds her inspiration in nature. She is proficient with oil paints, acrylics, and pen and ink. Lisa Audit derives significant profits from the sale and distribution of art prints and licensed products.

20. Plaintiff has expended substantial time, money, and other resources developing, advertising, and otherwise promoting her art, including the Lisa Audit Works. Plaintiff has also invested substantial time, money, and effort in building up and developing consumer awareness, goodwill, and recognition in the Lisa Audit Works. As a result, reproductions associated with

Lisa Audit are recognized and exclusively associated by consumers, collectors, the public, and the trade as works authorized by Plaintiff.

21. The success of the Lisa Audit Works is due in large part to Plaintiff's marketing, promotional, and distribution efforts.

22. As a result of Plaintiff's efforts, the quality of authorized reproductions, the promotional efforts for Plaintiff's products and designs, press and media coverage, and social media coverage, members of the public have become familiar with the Lisa Audit Works and associate them exclusively with Plaintiff.

23. Plaintiff has made efforts to protect Plaintiff's interests in and to the Lisa Audit Works. No one other than Plaintiff and Plaintiff's licensees are authorized to manufacture, import, export, advertise, create derivative works, offer for sale, or sell any goods utilizing the Lisa Audit Works images without the express written permission of Plaintiff.

THE DEFENDANTS

24. Defendants are individuals and business entities who, upon information and belief, reside in the People's Republic of China or other foreign jurisdictions. Defendants conduct business throughout the United States, including within Pennsylvania and in this judicial district, through the operation of the fully interactive commercial websites and online marketplaces operating under the Defendant Merchant Storefronts. Each Defendant targets the United States, including Pennsylvania, and has offered to sell and, on information and belief, has sold and continues to sell illegal reproductions of the Lisa Audit Works to consumers within the United States, including Pennsylvania and in this judicial district.

THE DEFENDANTS' UNLAWFUL CONDUCT

25. The success of the Lisa Audit Works has resulted in significant copying of the creative content protected by Plaintiff's copyright registrations. Plaintiff has identified numerous fully interactive marketplace listings on Amazon, Temu, and Walmart. Each Defendant targets consumers in the United States, including the Commonwealth of Pennsylvania, and has offered to sell and, on information and belief, has sold and continues to sell infringing products that violate Plaintiff's intellectual property rights in the Lisa Audit Works to consumers within the United States, including the Commonwealth of Pennsylvania.

26. Upon information and belief, Defendants facilitate sales by designing the Defendant Merchant Storefronts so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers selling genuine reproductions of the Lisa Audit Works.

27. The Defendant Merchant Storefronts intentionally conceal their identities and the full scope of their piracy operations in an effort to deter Plaintiff from learning Defendants' true identities and the exact interworking of Defendants' illegal operations. Through their operation of the Defendant Merchant Storefronts, Defendants are directly and personally contributing to, inducing, and engaging in the sale of Infringing Products as alleged, often times as partners, co-conspirators, and/or suppliers. Upon information and belief, Defendants are an interrelated group of infringers working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell Infringing Products.

28. Upon information and belief, at all times relevant hereto, the Defendants in this action have had full knowledge of Plaintiff's ownership of the Lisa Audit Works, including Plaintiff's exclusive right to use and license such intellectual property and the goodwill associated therewith.

29. Defendants often go to great lengths to conceal their identities by often using multiple fictitious names and addresses to register and operate their massive network of Defendant Merchant Storefronts. Upon information and belief, Defendants regularly create new websites and online marketplace accounts on Amazon, Temu, and Walmart using the identities listed in Schedule A to the Complaint, as well as other unknown fictitious names and addresses. Such Defendant Internet Store registration patterns are one of many common tactics used by the Defendants to conceal their identities, the full scope and interworking of their massive pirating operation, and to avoid being shut down.

30. The Infringing Products for sale in the Defendant Merchant Storefronts bear similarities and indicia of being related to one another, suggesting that the Infringing Products were manufactured by and come from a common source and that, upon information and belief, Defendants are interrelated.

31. In addition to operating under multiple fictitious names, Defendants in this case and defendants in other similar cases against online infringers use a variety of other common tactics to evade enforcement efforts. For example, infringers like Defendants will often register new online marketplace accounts under new aliases once they receive notice of a lawsuit. Infringers also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border Protection. A 2021 U.S. Customs and Border Protection report on seizure statistics indicated that e-commerce sales accounted for 13.3% of total retail sales with second quarter of 2021 retail e-commerce sales estimated at \$222.5 billion. U.S. Customs and Border Protection, *Intellectual Property Right Seizure Statistics, FY 2021* (<https://www.cbp.gov/sites/default/files/assets/documents/2022-Sep/202994%20-%20FY%202021%20IPR%20Seizure%20Statistics%20BOOK.5%20->

%20FINAL%20%28508%29.pdf) at 23. A true and correct copy of CBP’s FY 2021 report is attached hereto as **Exhibit 3**. In FY 2021, there were 213 million express mail shipments and 94 million international mail shipments. *Id.* Nearly 90 percent of all intellectual property seizures occur in the international mail and express environments. *Id.* at 27. The “overwhelming volume of small packages also makes CBP’s ability to identify and interdict high risk packages difficult.” *Id.* at 23.

32. Further, infringers such as Defendants, typically operate multiple credit card merchant accounts and third-party accounts, such as PayPal, Inc. (“PayPal”) accounts, behind layers of payment gateways so that they can continue operation in spite of Plaintiff’s enforcement efforts. Upon information and belief, Defendants maintain offshore bank accounts and regularly move funds from their PayPal accounts to offshore bank accounts outside the jurisdiction of this Court. Indeed, analysis of PayPal transaction logs from previous similar cases indicates that offshore infringers regularly move funds from U.S.-based PayPal accounts to foreign-based bank accounts, such as China-based bank accounts, outside the jurisdiction of this Court.

33. Defendants, without any authorization or license, have knowingly and willfully pirated Plaintiff’s Lisa Audit Works copyrights in connection with the advertisement, distribution, offering for sale, and sale of illegal products into the United States and Pennsylvania over the internet. Each Defendant Internet Store offers shipping to the United States, including Pennsylvania, and, on information and belief, each Defendant has offered to sell Infringing Products into the United States, including Pennsylvania.

34. Each Defendant was, and is currently, offering for sale and selling the Infringing Products to the consuming public via Defendants’ online storefronts using their Seller IDs. Defendants provide shipping, have actually shipped, and/or stand ready, willing, and able to ship the Infringing Products to customers located within this Judicial District.

COUNT I
COPYRIGHT INFRINGEMENT

35. Plaintiff repeats and incorporates by reference herein the allegations contained in the above paragraphs of this Complaint.

36. The Lisa Audit Works and authorized reproductions have significant value and have been produced and created at considerable expense.

37. At all relevant times, Plaintiff has been the holder of the pertinent exclusive rights infringed by Defendants, as alleged hereunder, including but not limited to the Lisa Audit Works, including derivative works. The Lisa Audit Works are the subject of valid Copyright Registration Certificates issued by the Register of Copyrights. (**Exhibit 1**).

38. Each Defendant, without the permission or consent of Plaintiff, has sold and continues to sell online pirated derivative works of the copyrighted Lisa Audit Works. Each Defendant has violated Plaintiff's exclusive rights of reproduction and distribution. Each Defendant's actions constitute infringement of Plaintiff's exclusive rights protected under the Copyright Act (17 U.S.C. §101 et seq.).

39. The foregoing acts of infringement constitute a collective enterprise of shared, overlapping facts and have been willful, intentional, and in disregard of and with indifference to the rights of the Plaintiff.

40. As a result of each Defendant's infringement of Plaintiff's exclusive rights under copyright, Plaintiff is entitled to relief pursuant to 17 U.S.C. §504 and to Plaintiff's attorneys' fees and costs pursuant to 17 U.S.C. §505.

41. The conduct of each Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C.

§§502 and 503, Plaintiff is entitled to injunctive relief prohibiting each Defendant from further infringing Plaintiff's copyrights and ordering that each Defendant destroy all unauthorized copies.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1) That Defendants, their affiliates, officers, agents, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:

- a. Using the Lisa Audit Works or any reproductions, copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not an authorized reproduction of the Lisa Audit Works or is not authorized by Plaintiff to be sold in connection with the Lisa Audit Works;
- b. passing off, inducing, or enabling others to sell or pass off any product or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale under the Lisa Audit Works;
- c. further infringing the Lisa Audit Works and damaging Plaintiff's goodwill;
- d. shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not authorized by Plaintiff to be sold or offered for sale, and which directly use the Lisa Audit Works images, and which are derived from Plaintiff's copyrights in the Lisa Audit Works; and
- e. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendant Merchant Storefronts, or any other online marketplace account that is being

used to sell products or inventory not authorized by Plaintiff which are derived from Plaintiff's copyrights in the Lisa Audit Works;

2) Entry of an Order that, upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including any online marketplaces, social media platforms, Facebook, YouTube, LinkedIn, Twitter, internet search engines such as Google, Bing, and Yahoo, web hosts for the Defendant Merchant Storefronts, shall:

- a. disable and cease providing services for any accounts through which Defendants engage in the sale of products not authorized by Plaintiff which reproduce the Lisa Audit Works or are derived from the Lisa Audit Works, including any accounts associated with the Defendants listed on Schedule A;
- b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of products not authorized by Plaintiff which are derived from the Lisa Audit Works; and
- c. take all steps necessary to prevent links to the Defendant accounts identified on Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant accounts from any search index;

3) For Judgment in favor of Plaintiff against Defendants that they have: a) willfully infringed Plaintiff's rights in Plaintiff's federally registered copyright pursuant to 17 U.S.C. §501; and b) otherwise injured the business reputation and business of Plaintiff by Defendants' acts and conduct set forth in this Complaint;

4) For Judgment in favor of Plaintiff against Defendants for actual damages or statutory damages pursuant to 17 U.S.C. §504, at the election of Plaintiff, in an amount to be determined at trial;

- 5) That Plaintiff be awarded Plaintiff's reasonable attorneys' fees and costs; and
- 6) Award any and all other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff respectfully demands a trial by jury on all claims.

Respectfully submitted,

Dated: October 31 , 2025

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

courts@ferencelaw.com

FERENCE & ASSOCIATES LLC

409 Broad Street

Pittsburgh, Pennsylvania 15143

(412) 741-8400 - Telephone

(412) 741-9292 - Facsimile

Attorneys for Plaintiff

Schedule "A"

Defendant Number	Store/Seller Name	Seller ID
1	taoaixuemaiwazi	A5HY1CWT6YL9W
2	ZHANGHONGWEIMAIYIFU	A1HRM0L6GV1EDW
3	GuangZhouTingShaMaoYiYouXianGongSi	A1TXVGQWELWZTI
4	shdagg	A2SX16JSLTRE8K
5	GuiZhouHongMingJianZhuZhuangShiGongChengYouXianGongSi	A3YSZIJCP3BGB
6	FFYS	A3P7NIQZ8C2D4H
7	zhangpenggongju	A2Y5F0THM5JS0N
8	xiaosongd	A20FZO0TEXHZMT
9	anqingshenqiangshangmaoyouxiangongsi	AL9TI4DQE3IEZ
10	Guangmaoda trading store	A27DQV6O2PJRNJ
11	luoyangzhadashangmaoyouxiangongsi	A2GL9E8STCAGB7
12	plain tea ypx	A1YK4QINMHENSR
13	LiuJi-us	A3BSOX65TJTDF5
14	Rishima_Store	A3M42V6TSVNTG4
15	Olivia_ste	A14FTU45Y50SW5
16	luofeng shop	A3410PZLYBJH71
17	YUMIYA	A29K0CQF8KJNUI
18	SXWPFZDZSW	A3U1SQ7A4V8PRM
19	tjingle	AH88COU8F5JUG
20	lanlingxianjuxinshucaijiagongyouxiangongsi	AOIT8E7TU9XS1
21	ShangYouMaoYiLOVE	A246V302ZH73PC
22	Xiangxiang Qisha Trading Co., Ltd.	A30RIDO6ZGUQFO
23	Yiwu Yuheng Trading Co., Ltd.	A331W6E0D48GQU
24	loquns772hhs9	A10LMT677ENIRH
25	zhongqingenhukejiyouxiangongsi	A15M64FXTZG8IO
26	Jinhua Oushi E-commerce Company	A29Y10C7BPEQR5
27	Jinhua Yingrui Trading Co., Ltd.	A3ML0VAB6KTMJ3
28	THEEORTHREE	A2JHOA5XRCGJ02
29	S amun	A3UZ16UARV80D9
30	Yiwushi Qiaoliu Maoyi Youxiangongsi	A3F20OZ1HCVC83
31	Yue home	A2EDH5599QUD6M
32	AECW65H5N	A2I2IHLVSEPF0U
33	zhibin266	A1X2F5ZX0EFHQA
34	Joymaison US	A2Y1WKTNOC9JFK

Defendant Number	Store/Seller Name	Seller ID
35	7 Wall Arts	A2BKNW4RKZQ5HM
36	Shaoxing Keqiao Lingyi Textile Co., Ltd.	A2B0ULGNURYKTO
37	Ssdkf	A1EO2NDGMB9ABU
38	Jinhua Yinhang E-commerce Firm	A2PFF1QFLAGQ23
39	xianningshidaobanshangmao	A13P080D898P2X
40	YNSLe	AEZROP25PXRUO
41	clearance deals SALE	A3RT5LLV1E7KS1
42	Yiwu City Longlong Trading Co., Ltd.	A1IHF03VZTUMSV
43	Yiwu Chenghu Trading Co., Ltd.	A21OP6N3V94S5K
44	qinagzz	A54S4IWKV26P3
45	Xinqishun Store	AZJDWZEG5EHGL
46	luoyanggeheshangmaoyouxiangongsi	A32YLVU62X4SCZ
47	YiMingWireless	102487714
48	Yonglu Liu	102823743
49	MIQIN Co.Ltd	101682005
50	wunikou	101100121
51	ChYoung Choicest	101261728
52	SOFEIYA HOME	101556636
53	Smile Home	101175171
54	Bosisa	101556227
55	Annes	101182825
56	Zriyin	102514225
57	zhimaoxi	102486768
58	feiliansheng	102488721
59	sentaili	102488754
60	Ylevwnt	101269961
61	Bzarxt	101685562
62	qer&kcoeg Co.Ltd	101646436
63	sgaqyqTQR	102521193
64	QUNPIU	102500280
65	Lightup	102503885
66	XiYing	102706326
67	baohanbao	102738363
68	Tupukom	102589618
69	wowotier	102489097
70	AiTongShang	102508574
71	White Ghost	102622178
72	hyzsp	101632388
73	ChangXiYu	101656018

Defendant Number	Store/Seller Name	Seller ID
74	Kojanyu Home	102508524
75	Dutchman	101655142
76	yingfei Co.Ltd	102499438
77	langyupeikv	101574873
78	BAIsy	102719190
79	ermei tan	101682780
80	Lyang0sun	102482052
81	Menrkoo Decoration Shop	101184590
82	Wrdfgsd.cld	101638408
83	YMARPT	101574814
84	FANGQ SHOP	101670052
85	HWRETIE	101184981
86	SCGSY Clearance Shop	101633834
87	JunSaiXu	102509946
88	QUANLONG Co.Ltd	101682094
89	Lydiaunistar Clearance	101309414
90	Surpdew Decoration Shop	101186699
91	kcavykas Home Co. Ltd	101127403
92	ShenZhenShiMuYanXingMaoYiYouXian GongSi	101614932
93	Tunhighl	101687365
94	honuli	102529424
95	MGDIAWEN	101690818
96	ranranYI	102738669
97	JUNJIE Co.Ltd	101681902
98	xinti	101677949
99	BAOBIN Co.Ltd	102486408
100	Aorijia Co.Ltd	102598029
101	Mei Toys	102587341
102	yanhgstysJY	102495378
103	feishke	101685318
104	YOBOLK HOME	101596271
105	HemAndi	101568209
106	Byujiro Toys	102520549
107	Zhaensshaii	102637074
108	Yekoi	102632235
109	TIKMODERN	102724848
110	TaTaai	102744483
111	Beautynvta	101567236
112	fengtian	102600208

Defendant Number	Store/Seller Name	Seller ID
113	RanBlesu	102486184
114	BestHomeSale	101655226
115	Opehuo-US	102561027
116	Wishingn	102597089
117	Rojia Clearance	101638569
118	Dadiaei Store	102603564
119	Specollect	101578113
120	Morepick	101474877
121	OutmaxHome	102706341
122	NSESSHHome	101618308
123	Youyou	101487727
124	Tokeaaoa	102606593
125	KZL Store	102740044
126	yoieasn	101662954
127	Guixla	101662878
128	zuifenyu	102847041
129	Zxuyon	101679104
130	cc one poster	634418220398282
131	Four STAR Four STAR	634418219528648
132	THREE STAR THREE STAR	634418219528709
133	STAR SHOPACART	634418216424349
134	Chi Jin Arts and Crafts	634418220985601
135	one view magic	634418219739628
136	WEINAN Poster	634418221393480
137	Velvet Aurora	634418219902336
138	IND WALL DECOR	634418218088918
139	LINGZI ART	634418221045062
140	Tin Treasures Gallery	634418217957106
141	NZZ Wall Art	634418217484506
142	One Decoration Painting	634418222041539
143	A painting worth appreciating	634418218560668
144	ZcoNest	634418221608071
145	XQY Art B	634418220940059
146	ERTDD	634418223556031
147	Local nansha	634418222295731
148	Smart Print Local	634418216999799
149	Haroloen	634418214458724
150	ThreadWish	634418222155156

Defendant Number	Store/Seller Name	Seller ID
151	Life MengYu local	634418215480695
152	MadeForU	634418219318186
153	HOME STORAGE CHICE	634418220582627
154	BespokeBox	634418221002903
155	SewDream	634418222150081
156	SDHK	634418218405851
157	Yanlong	634418213654691
158	Yang textile	634418209629105
159	Oxygen seeds	634418217542529
160	paintingartfufu	634418220619128
161	metaltinart	634418222004690
162	Xm Artistic tin painting	634418221071418
163	RangDaQing	634418220387019
164	Sapphire Skies	634418213747483
165	MugMyWay	634418217308301
166	HOME DECORATI	634418219222217
167	top table runner	634418212007555
168	TenderLumos	634418220570347
169	Daisy Vibes	634418220913494
170	U SEE Z	634418213609529
171	YW hong	634418212645843
172	pink poster	634418221284115
173	WanWanWan	634418218758588
174	CCharming	634418221769949
175	SheChuu	634418217752390
176	Preferably shop	634418221493644
177	PQL MAT	634418218712237
178	Instyle Men Shirt	634418217015310
179	T Fashion Clothing T	634418216907800
180	Art Painting	634418221759863
181	linliting	634418220787366
182	Prosperous Home Furnishings	634418218372832
183	TS homeware	634418217972190
184	ChaoJiYouQian	634418211836695
185	PureBuy	634418221489022
186	The Marvelous Market Street	634418218044761
187	FXR HOME	634418213091588
188	Yipinghui Home Textile	634418219597102

Defendant Number	Store/Seller Name	Seller ID
189	SEHNG JU	2272438801156
190	CX Homeshop	634418219714478
191	Uncertain tools	634418221493194
192	YULONG Warm decoratio	634418218955239
193	JinHua home textile	634418213118532
194	Furnishing dashi Home	634418218575552
195	SHUAIDA	634418219760758
196	YAOYAODITAN	634418218298690
197	Jsdsshop	634418220938557
198	imyhome local	634418219840318
199	HOUXI ARTFUL DECOR	7747343943
200	YM Art BTB	634418223447736
201	wenxiao poster	634418220800927
202	Infinite Energ Shop	634418222012093
203	AG ART	634418217463473
204	Alaire	634418211881901
205	Wall Art Wholesale	634418211456528
206	Nebula Brushworks	634418218863050
207	Wall Art Shop	634418211456063
208	Artistic creator	634418217232517
209	L Blue Sky t	634418222043334
210	HHW Art Painting	634418219461385
211	Dk Decorative painting	634418217389982
212	ElegantCanvas Art AA	634418220908567
213	CTY Painting SHOP	634418220227243
214	UV Decorative painting	634418217976491
215	WP O Pique Shop	634418219064268
216	Cingo Decorative painting	634418216124527
217	S ART Canvas painting	634418220213882
218	Embellish a room	634418219571030
219	Fineness Sign	634418219556995
220	Lthg succeed in	634418219563152
221	S Q Decorative painting monopoly	634418220124141
222	Picturesque ART	634418218099589
223	Sereincl ART	634418218752422
224	D The art of beckoning	634418218306991
225	Reviewesss	634418217756454
226	jaksaa shop	634418220858505

Defendant Number	Store/Seller Name	Seller ID
227	ArtPrintShop	634418217836814
228	ArtSight	634418220527178
229	GULUMU	634418220526694
230	Cloudypath	634418219462015