

1 2. **Venue.** Venue is proper in this Court pursuant to 28 U.S.C. § 1391 (b),
2 (c), and § 1400(a).

3 3. **Personal Jurisdiction.** Personal jurisdiction is proper over the
4 Defendants because they reside in California and the wrongful activity at issue
5 concerns Defendant's operation of Blog activities within the County of Los Angeles,
6 through which Defendant knowingly solicits funds. Defendant, Monger therefore,
7 has purposefully availed herself of the privilege of doing business in California, and
8 material elements of Defendant's wrongdoing occurred in this State, i.e., Defendant
9 caused the infringing texts to be distributed to and displayed in Los Angeles County
10 to thousands of persons.

11 4. On information and belief, Defendant Veronica Monger ("Defendant"),
12 also known as Veronica Brooks and Veronica Verve, has, at all times relevant
13 hereto, lived and/or worked in Los Angeles County, California and has been an
14 internet blogger that at relevant times (1) operated a Blog with the website(s)
15 <http://sladeneighborsattorneyme-too.com/> ("Blog") for the purpose of defaming
16 Plaintiff; and/or (2) infringed upon Plaintiff's copyright by posting he copyrighted
17 materials on her Blog.

18 5. Plaintiff does not presently know the true names and capacities of the
19 defendants named as Does 1 through 10 and therefore sues such defendants by these
20 fictitious names. Plaintiff believes that the Doe Defendants are persons or entities
21 who are involved in the acts set forth below, either as independent contractors,
22 agents, or employees of the known Defendant, or through entering into a conspiracy
23 and agreement with the known Defendant to perform these acts, for financial gain
24 and profit. Plaintiff will amend this claim to show the true names and capacities of
25 such fictitiously named Defendants when the same have been ascertained.

26 6. Known Defendant and Doe Defendants have been or are the principals,
27 officers, directors, agents, employees, representatives, and/or co-conspirators of
28 each of the other defendants, and in such capacity or capacities participated in the

1 acts or conduct alleged herein and incurred liability therefor. At some unknown
2 time, the Defendants, or some of them, entered into a conspiracy with other of the
3 Defendants to commit the wrongful acts described herein. The actions described
4 below were taken in furtherance of such conspiracy. Defendants aided and abetted
5 each other in the wrongful acts alleged herein. Each of the Defendants acted for
6 personal gain or in furtherance of their own financial advantage in doing the acts
7 alleged below.

8 **FIRST CLAIM FOR RELIEF**

9 **(Copyright Infringement – 17 U.S.C. § 101 et seq.)**

10 **(Against All Defendants)**

11 7. Plaintiff realleges paragraphs 1 through 6.

12 8. Plaintiff had a past personal relationship with Defendant. Plaintiff
13 created the emails and text messages ("Copyrighted Works") when Plaintiff and
14 Defendants were dating or shortly thereafter.

15 9. Each of the Copyrighted Works consists of original material by
16 Plaintiff and each is copyrightable subject matter which has been registered with the
17 United States Copyright office. .

18 10. Specifically, the Copyrighted Works include a group of emails and a
19 group of text messages registered with the United States Copyright office which has
20 issued the following registration numbers:

21 TXu 2-193-010; and

22 TXu 2-192-994

23 11. Plaintiff is the owner of all right, title, and interest in and to each of the
24 Copyrighted Works.

25 12. Under Section 106 of the Copyright Act of 1976, 17 U.S.C. § 101 et
26 seq. (the "Copyright Act"), Plaintiff has the distinct, severable, and exclusive rights,
27 inter alia, to reproduce, distribute and publicly display the Copyrighted Works. (17
28 U.S.C. §§ 106(1), (3), and (5).)

1 13. Within the last three years, Plaintiff discovered that the Copyrighted
2 Works were being used on the website(s) identified above without Plaintiff's
3 permission.

4 14. Plaintiff reported the infringements to Defendant, but Defendant failed
5 to expeditiously remove the infringing items.

6 15. Defendant, without Plaintiff's permission, consent or authority, (1)
7 made or caused to be made unauthorized copies of the Copyrighted Works, (2)
8 distributed, made available for distribution, and/or facilitated the unauthorized
9 distribution of unauthorized copies of the Copyrighted Works, and/or (3) publicly
10 displayed, made available for, and/or facilitated, the unauthorized public display of
11 the Copyrighted Works.

12 16. Defendant's conduct constitutes infringement of Plaintiff copyrights
13 and exclusive rights under copyright in the Copyrighted Works in violation of
14 Sections 106 and 501 of the Copyright Act, 17 U.S.C. §§ 106 and 501.

15 17. Defendants have engaged and continue to engage in the business of
16 knowingly and systematically inducing, causing, and/or materially contributing to
17 the unauthorized reproduction, public display, and/or distribution of copies of the
18 Copyrighted Works on the websites identified above, and thus to the direct
19 infringement of the Copyrighted Works in violation of Sections 106 and 501 of the
20 Copyright Act, 17 U.S.C. §§ 106 and 501.

21 18. The infringement of Plaintiff's rights in and to each of the Copyrighted
22 Works constitutes a separate and distinct act of infringement.

23 19. Defendant's acts of infringement have been willful, intentional, and
24 purposeful, in reckless disregard of and with indifference to Plaintiff's rights in that
25 Defendant knew that she did not have the right to use Plaintiff's Copyrighted Works
26 in the manner Defendant used them and/or recklessly failed to determine whether
27 she had the right to use Plaintiff's Copyrighted Works in the manner Defendant used
28 them.

1 2. That Defendants and the Others be ordered to destroy all photographs,
2 documents, and other items, electronic or otherwise, in her or their possession,
3 custody, or control, that infringe the copyrights of Plaintiff.

4 3. For restitution in the amount of the benefit to Defendant by reason of
5 her unlawful conduct.

6 4. For Plaintiff's actual damages.

7 5. For a full accounting under supervision of this Court of all profits,
8 income, receipts, or other benefits derived by Defendant as a result of her unlawful
9 conduct.

10 6. For statutory damages under the Copyright Act.

11 7. For prejudgment interest.

12 8. For attorneys' fees and full costs.

13 9. For such other and further relief as this Court deems just and
14 appropriate.

15 Dated: May 6, 2020

COHEN BUSINESS LAW GROUP
A Professional Corporation

18 By: /s/ Jeffrey A. Cohen

19 _____
20 JEFFREY A. COHEN
21 JARED C. XU
22 Attorneys for Plaintiff, SLADE
23 NEIGHBORS

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JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demand a trial by jury on all issues raised in this complaint.

Dated: May 6, 2020

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By: /s/ Jeffrey A. Cohen

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