Kirsha Brown-Younger
1622 N. California Rm. 217
Chicago, IL 60647
773-372-0316
Kirsha24@yahoo.com

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THOMAS G BRUTON
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UNITED STATES DISTRICT COURT

FOR THE

NORTHERN DISTRICT OF ILLINOIS

KIRSHA BROWN-YOUNGER,   ) Case No.:
)
         Plaintiff,   )
)
    vs.   )   ORIGINAL COMPLAINT
)
LULU.COM, AMAZON, BARNES AND NOBLE,)
)
ITUNES/APPLE, AND IBOOKSTORE   )
)
         Defendant   )

12-cv-01979
Judge Milton I. Shadur
Magistrate Judge Jeffrey Cole

INTRODUCTION

COMES NOW, Pro Se Litigant, Kirsha Brown-Younger, filing civil suit for copyright

infringement, and violations of The Copyright Act of 1976, §§ Title 17, U.S.C, Sec.

102, 106, 107, and 204, for the un-lawful and willful infringement upon her literary

works, Poetry Book, "Glimpses of Life". Section §§ 411 of The Copyright Act allows,

for the owner of the works to bring forth an infringement lawsuit, only if the owner

has a registered copyright with the Copyright Office. Plaintiff claims that she has

registered her copyright with The Library of Congress, Copyright Office in 2005, and

her registration number is below:

* 2005TXu001272597 / 2005-12-16

1   Plaintiff, also claims that the above Defendants violated The Digital Millennium

2   Copyright Act of 1998, §§ Title 17, U.S.C, and The Online Copyright Infringement

3   Liability Limitation Act, Title II, Sec. §§ 512 3 (c), Safe Harbor.

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6   STATEMENT OF FACTS

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8   Plaintiff claims that she submitted her Poetry Manuscript, "Glimpses of Life", for

9   self-publishing through the website, www.LuLu.com, in 2006(if she is not mistaken).

10   She claims that this site explained that Authors books can be uploaded, but Authors

11   would have to self-market their own books. The site also claimed that "they do not

12   market Authors books". Plaintiff further claims that she has recently discovered that

13   her book has in fact been "marketed", "distributed", and "sold", by Lulu.com, thus

14   contradicting their statements of non-marketing for Authors.

15

16   Plaintiff, alleges, that her book was marketed, distributed and sold without her

17   expressed knowledge, consent or permission. She claims that she had not signed a

18   Statutory or Compulsory Licensing agreement, nor did she transfer her copyright

19   ownership or sign a contractual agreement. She alleges that she was not notified, via

20   email, postal mail, or by telephone, of their desire to market, distribute or sell her

21   book to various, online or offline, book sellers or publishers. She also, claims that

22   the number of units sold has not been cached under her account, therefore, she is

23   unaware of the actual numbers of units sold, and that Lulu, is a dishonest and un-

24   ethical, self-publishing company.

25

26   She further alleges that her book was "bought", by various online book sellers, such

27   as:

28

1   1. Amazon

2   2. Barnes and Noble

3   3. ITunes with Apple

4   4. I bookstore

5   She claims that she discovered that her book was being sold with these Book sellers,

6   while conducting online research on 03/17/2012. She also has submitted printed copies

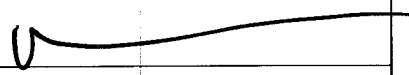7   of her book being sold on these websites.

8

9

10   JURISDICTIONAL STATEMENT

11

12

13   Plaintiff claims 28 U.S.C, 1291, and that the Federal District Court, Northern

14   District of Illinois, has Federal Question and Subject Matter Jurisdiction because she

15   has alleged a violation of the Constitution or law of the United States.

16

17

18   Prayer for Relief/Damages

19

20   Wherefore, Plaintiff claims $150,000 per works, which amounts to $750,000, in

21   statutory damages. However, she may need to amend/increase the amount of the judgment

22   demand because; she may discover more booksellers/publishers that may be currently

23   selling her book.

24

25   Dated this 19TH day of March, 2012

26

27   Kirsha Brown-Younger
                                            Pro Se Litigant
28

Kirsha Brown   All Products

Books   NOOK Books   Textbooks   Newsstand   Teens   Kids   Toys & Games   DVI
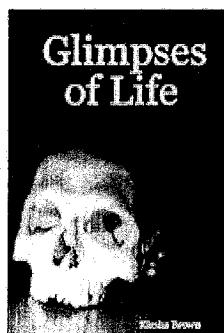
Category

Books
NOOK Books

Price Range

Under $10

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Glimpses of Life
Kirsha Brown
NOOK Book **$6.99**

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