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8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**  
 10

11 RIGHTHAVEN LLC, a Nevada limited-  
 12 liability company,  
 13  
 14 Plaintiff,  
 15 v.  
 16 CENTER FOR INTERCULTURAL  
 ORGANIZING, a not-for-profit Oregon entity;  
 17 and KAYSE JAMA, an individual,  
 18  
 19 Defendants.

Case No.: 2:10-cv-01322  
**COMPLAINT AND DEMAND  
 FOR JURY TRIAL**

20 Righthaven LLC (“Righthaven”) complains as follows against Center for Intercultural  
 21 Organizing (“CIO”) and Kayse Jama (“Mr. Jama”); collectively with CIO known herein as the  
 22 “Defendants”), on information and belief:  
 23

24 **NATURE OF ACTION**

25 1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.  
 26  
 27  
 28

**PARTIES**

1  
2 2. Righthaven is, and has been at all times relevant to this lawsuit, a Nevada limited-  
3 liability company with its principal place of business in Nevada.

4 3. Righthaven is, and has been at all times relevant to this lawsuit, in good standing  
5 with the Nevada Secretary of State.

6 4. CIO is, and has been at all times relevant to this lawsuit, a not-for-profit Oregon  
7 entity.

8 5. CIO is, and has been at all times relevant to this lawsuit, identified by the current  
9 registrar, Network Solutions (“Network Solutions”), as the registrant, administrative contact and  
10 technical contact for the Internet domain found at <interculturalorganizing.org> (the “Domain”).

11 6. Mr. Jama is, and has been at all times relevant to this lawsuit, identified as the  
12 executive director of CIO in the content accessible through the Domain (the content accessible  
13 through the Domain and the Domain itself, collectively known herein as the “Website”).

14  
15 **JURISDICTION**

16 7. This Court has original subject matter jurisdiction over this copyright  
17 infringement action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a).

18 8. Righthaven is the owner of the copyright in the literary work entitled:  
19 “Misdemeanor violations leading to deportations” (the “Work”), attached hereto as Exhibit 1.

20 9. At all times relevant to this lawsuit, the Work has depicted and depicts the  
21 original source publication as the Las Vegas *Review-Journal*.

22 10. The Defendants willfully copied, on an unauthorized basis, the Work from a  
23 source emanating from Nevada.

24 11. On or about July 8, 2010, the Defendants displayed, and continue to display, an  
25 unauthorized reproduction of the Work (the “Infringement”), attached hereto as Exhibit 2, on the  
26 Website.

27 12. At all times relevant to this lawsuit, the Infringement has depicted and depicts the  
28 original source publication as the Las Vegas *Review-Journal*.



1 “Registration”) and attached hereto as Exhibit 3 is evidence of the Registration in the form of a  
2 printout of the official USCO database record depicting the occurrence of the Registration.

3 24. On or about July 8, 2010, the Defendants displayed, and continue to display, the  
4 Infringement on the Website.

5 25. The Defendants did not seek permission, in any manner, to reproduce, display, or  
6 otherwise exploit the Work.

7 26. The Defendants were not granted permission, in any manner, to reproduce,  
8 display, or otherwise exploit the Work.

9  
10 **CLAIM FOR RELIEF: COPYRIGHT INFRINGEMENT**

11 27. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
12 26 above.

13 28. Righthaven holds the exclusive right to reproduce the Work, pursuant to 17  
14 U.S.C. § 106(1).

15 29. Righthaven holds the exclusive right to prepare derivative works based upon the  
16 Work, pursuant to 17 U.S.C. § 106(2).

17 30. Righthaven holds the exclusive right to distribute copies of the Work, pursuant to  
18 17 U.S.C. § 106(3).

19 31. Righthaven holds the exclusive right to publicly display the Work, pursuant to 17  
20 U.S.C. § 106(5).

21 32. The Defendants reproduced the Work in derogation of Righthaven’s exclusive  
22 rights under 17 U.S.C. § 106(1).

23 33. The Defendants created an unauthorized derivative of the Work in derogation of  
24 Righthaven’s exclusive rights under 17 U.S.C. § 106(2).

25 34. The Defendants distributed, and continue to distribute, an unauthorized  
26 reproduction of the Work on the Website, in derogation of Righthaven’s exclusive rights under  
27 17 U.S.C. § 106(3).



