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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON CONTENT SERVICES LLC, a
Delaware corporation, PENGUIN RANDOM
HOUSE LLC, a Delaware corporation, LEE
CHILD, SYLVIA DAY, JOHN GRISHAM, C.J.
LYONS, DOUG PRESTON, JIM
RASENBERGER, T.J. STILES, R.L. STINE,
MONIQUE TRUONG, SCOTT TUROW,
NICHOLAS WEINSTOCK, AND STUART
WOODS,

Plaintiffs,

v.

KISS LIBRARY d/b/a KISSLY.NET,
WTFFASTSPRING.BID, LIBLY.NET, and
CHEAP-LIBRARY.COM, RODION
VYNNYCHENKO, ARTEM
BESSHAPOCHNY, JACK BROWN, and
DOES 1-10,

Defendants.

No.

COMPLAINT FOR DAMAGES
AND EQUITABLE RELIEF

I. INTRODUCTION

1. Amazon Content Services LLC and Penguin Random House LLC (“PRH”) (together, “Publishers”), and authors Lee Child, Sylvia Day, John Grisham, C.J. Lyons, Doug Preston, Jim Rasenberger, T.J. Stiles, R.L. Stine, Monique Truong, Scott Turow, Nicholas Weinstock, and Stuart Woods (together, the “Authors”) (collectively, “Plaintiffs”) bring this

1 suit to stop Defendants Kiss Library, Rodion Vynnychenko, Artem Besshapochny, Jack Brown,
2 and Does 1-10 (collectively, “Defendants”) from illegally copying, distributing, and selling
3 works written or published by Plaintiffs.

4 **2.** Since opening its virtual doors in 1994 as an online bookstore for print books,
5 Amazon.com, Inc. and its subsidiaries (“Amazon”) have invested in making more books by
6 more authors available to more customers in the format of their choice. For example, Amazon
7 launched the Kindle e-reader in 2007 and its own publishing unit called Amazon Publishing
8 (“APub”) in 2009. Each day, millions of consumers visit Amazon websites to browse,
9 discover, and purchase a wide range of products, including ebooks published by APub, PRH,
10 and others.

11 **3.** With a publishing history dating back to the 1800s, PRH is one of America’s
12 most prestigious and largest book publishers. PRH’s expansive publishing portfolio includes
13 nearly 275 independent publishing imprints and brands on 5 continents and contains books for
14 readers of all ages and every stage of life. PRH publishes approximately 15,000 new titles
15 annually and sells close to 600 million print, audio, and ebooks annually. PRH also works
16 tirelessly to protect its authors’ intellectual freedom and properties, giving them access to
17 support and resources that help their works reach readers around the world. PRH’s many
18 authors include more than 80 Nobel Laureates and hundreds of the world’s most widely read
19 authors.

20 **4.** The Authors are a collection of some of the most successful authors, both
21 critically and in terms of sales, with millions of copies of their works sold around the world.
22 Because of the Authors’ fame and the success of their works, both the Authors and their
23 publishers—who own certain exclusive rights in their protected works—are forced to regularly
24 defend and protect their intellectual properties from infringers.

25 **5.** Defendants, who created and operate Kiss Library’s various websites, claim to
26 offer a “premium selection” at “unbeatable prices” that “are hard to beat.” *See, e.g.,*
27 <https://libly.net/>; <https://cheap-library.com/>. On information and belief, Kiss Library is able to

1 offer “unbeatable prices” for a simple reason: its catalogs are replete with pirated ebooks,
 2 including titles for which Plaintiffs individually own and/or control exclusive copyrights in the
 3 United States.

4 **6.** Through Kiss Library, Defendants engage in rampant and willful infringement
 5 of Plaintiffs’ intellectual property rights and divert potential customers to Defendants’ sites—
 6 where the Plaintiff Authors and Publishers do not receive any royalties for the sales—to
 7 purchase and download the unauthorized works.



17 **7.** As set forth above, Kiss Library has been described as the “[b]iggest pirate book
 18 site [the] world has ever seen,” which this lawsuit aims to bring down.

19 **8.** Plaintiffs bring this lawsuit to stop Defendants’ notorious pirating and unlawful
 20 copying, display, distribution, and sale of their ebooks in the United States, and to prevent
 21 further harm to the Publishers¹ and Authors.

22 **II. PARTIES**

23 **9.** Amazon Content Services LLC is a Delaware corporation with its principal
 24 place of business in Seattle, Washington.

25 **10.** Penguin Random House LLC is a Delaware corporation with its principle place
 26 of business in New York, New York.

27 ¹ Publishers, as used in this Complaint, include all APub imprints and all PRH subsidiaries,
 affiliates, or imprints.

1 **11.** Lee Child is the author and beneficial owner of the book, *Persuader*.

2 **12.** Sylvia Day is the author and beneficial owner of the book, *Afterburn*.

3 **13.** John Grisham is the author and beneficial owner of the book, *The Litigators*.

4 **14.** C.J. Lyons is the author and beneficial owner of the book, *Fight Dirty*.

5 **15.** Doug Preston is the author and beneficial owner of the book, *Tyrannosaur*
6 *Canyon*.

7 **16.** Jim Rasenberger is the author and beneficial owner of the book, *The Brilliant*
8 *Disaster: JFK, Castro, and America's Doomed Invasion of Cuba's Bay of Pigs*.

9 **17.** T.J. Stiles is the author and beneficial owner of the book, *Jesse James: Last*
10 *Rebel of the Civil War*.

11 **18.** R.L. Stine is the author and beneficial owner of the book, *Red Rain: A Novel*.

12 **19.** Monique Truong is the author and beneficial owner of the book, *The Book of*
13 *Salt*.

14 **20.** Scott Turow is the author and beneficial owner of the book, *The Burden of*
15 *Proof*.

16 **21.** Nicholas Weinstock is the author and beneficial owner of the book, *As Long As*
17 *She Needs Me: A Novel*.

18 **22.** Stuart Woods is the author and beneficial owner of the book, *Short Straw*.

19 **23.** On information and belief, Defendant Kiss Library d/b/a kisslibrary.com,
20 kisslibrary.net, kissly.net, wtffastspring.bid, libly.net, and cheap-library.com, operates online
21 ebook websites from Ukraine, and is owned and/or controlled by the named and unnamed
22 Defendants.

23 **24.** On information and belief, Defendant Rodion Vynnychenko is a Ukrainian
24 national and software engineer who created, registered, and operates Defendant Kiss Library
25 with other named and unnamed Defendants. Vynnychenko personally participates in and has
26 the ability to supervise, direct, and control the wrongful conduct alleged in this Complaint, and
27 derives a direct financial benefit from that wrongful conduct.

1 **25.** On information and belief, Defendant Artem Besshapochny is a Ukrainian
2 national who created, registered, and operates Defendant Kiss Library with other named and
3 unnamed Defendants. Besshapochny personally participates in and has the ability to supervise,
4 direct, and control the wrongful conduct alleged in this Complaint, and derives a direct
5 financial benefit from that wrongful conduct.

6 **26.** On information and belief, Defendant Jack Brown is an Australian national and
7 software developer. He is listed as a customer service representative for Kiss Library,²
8 responds to email inquiries on behalf of Kiss Library, and on information and belief, aids and
9 abets Defendants Vynnychenko and Besshapochny in the creation and operation of Defendant
10 Kiss Library and the illegal distribution of the copyrighted works for his own financial benefit.

11 **27.** On information and belief, Defendants Does 1-10 (the “Doe Defendants”) are
12 individuals and entities working in active concert with Defendants Vynnychenko,
13 Besshapochny, and Brown in the creation and operation of Defendant Kiss Library and the
14 illegal distribution of Plaintiffs’ copyrighted works.

15 **III. JURISDICTION & VENUE**

16 **28.** The Court has subject matter jurisdiction over Plaintiffs’ copyright infringement
17 claims under 17 U.S.C. § 501, pursuant to 28 U.S.C. §§ 1331 and 1338(a).

18 **29.** The Court has personal jurisdiction over all Defendants because they transacted
19 business and committed tortious acts within and directed at the State of Washington. On
20 information and belief, Defendants also have obtained copyrighted works that are contracted
21 for by Amazon, published by Amazon, and/or distributed by Amazon from Washington,
22 thereby purposefully directing their unlawful conduct at Washington. Additionally, Defendants
23 have committed intentional acts with actual or constructive knowledge that they would cause
24 substantial injury to Amazon and its licensing relationships in Washington.

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27 _____
² <https://www.zoominfo.com/p/Jack-Brown/-795646435>.

1 **30.** Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because a
2 substantial part of the events giving rise to the claims occurred in the Western District of
3 Washington, where Amazon is headquartered and resides.

4 **31.** Pursuant to Local Civil Rule 3(d), intra-district assignment to the Seattle
5 Division is proper because the claims arose in this Division, where (a) Amazon resides, (b) a
6 substantial part of the injuries giving rise to suit occurred, and (c) Defendants directed their
7 unlawful conduct.

8 **IV. FACTS COMMON TO ALL CLAIMS**

9 **32.** The Authors own registered copyrights in each of the works identified above
10 and have granted certain exclusive copyrights to publishers, including the exclusive right to
11 publish and distribute their works as ebooks in the United States.

12 **33.** Amazon acquires content through different programs and services, including
13 from APub, other traditional publishers, and self-publishing authors. APub, including its
14 sixteen imprints, is a publisher of commercial and literary fiction, nonfiction, and children’s
15 books. In exchange for royalties, authors grant APub the exclusive right to distribute their
16 work.

17 **34.** PRH, along with its 250 imprints, is a publisher of commercial and literary
18 fiction, nonfiction, and children’s books. In exchange for royalties, authors grant PRH the
19 exclusive right to distribute their work.

20 **35.** On information and belief, Kiss Library—first located at kisslibrary.com—was
21 established as a website and online ebook marketplace on June 14, 2017, when it was registered
22 to Defendant Vynnychenko in Kiev, Ukraine. Since that initial registration, Defendant Kiss
23 Library and other individual Defendants have also registered or are associated with numerous
24 mirror websites, including kisslibrary.net, kissly.net, wtffastspring.bid, libly.net, and [cheap-](http://cheap-library.com)
25 library.com, as well as others yet uncovered (collectively, the “Mirror Websites”).

26 **36.** On information and belief, after shifting their offerings from the kisslibrary.com
27 website due to increased negative reviews and assertions of piracy, Defendants began

1 registering the Mirror Websites to evade detection. As new iterations of Kiss Library attracted
2 the ire of authors and publishers around the world, Defendants simply migrated to a new
3 website and redirected the domains. Despite some minor differences with each site’s fictitious
4 address, non-responsive Google phone number, or purported representatives, the Mirror
5 Websites use the same language, phone numbers, and format—in addition to offering
6 substantially the same unauthorized ebooks as the original Kiss Library—as can be seen at
7 libly.net and cheap-library.com today.

8 **37.** For example, Defendants’ Mirror Websites include the same language and
9 format in describing the website and its offerings. They each claim to offer a “[p]remium
10 selection” of books at “unbeatable prices,” *see* Exhibit A (<https://libly.net/>; [https://cheap-](https://cheap-library.com/)
11 [library.com/](https://cheap-library.com/); <https://kissly.net/>; <http://wtffastspring.bid/>), and to “handle everything from
12 product hosting and payment processing to automatically sending download emails and
13 delivering the products,” *see* Exhibit B (<https://libly.net/about/>; [https://cheap-](https://cheap-library.com/about/)
14 [library.com/about/](https://cheap-library.com/about/); <https://kissly.net/about/>; <http://wtffastspring.bid/about>), and their operators
15 “are humans too, so on the weekends the response times may be delayed. Don’t worry - no
16 message is left unanswered,” *see* Exhibit C (<https://libly.net/contact/>; [https://cheap-](https://cheap-library.com/contact/)
17 [library.com/contact/](https://cheap-library.com/contact/); <https://kissly.net/contact/>; <http://wtffastspring.bid/contact>).

18 **38.** On information and belief, the contact information provided by Defendants on
19 their websites are intentionally misleading and false, intended to obscure their true identities,
20 contact information, and activities. These details include, but are not limited to, the following
21 representations:

22 **a. Libly.net:** Purportedly operating out of Montréal, Canada, libly.net is an
23 online ebook retailer that omits its owners’ purported names, claims it is located at 1341
24 Avenue du Mont-Royal Est, H2J 3P6, Montréal, QC, Canada, and can be contacted at
25 +1 (213) 394-9806 or +1 (941) 315-8427. *See* Exhibit B; <https://libly.net/about/>. On
26 information and belief, no entities are registered in Québec, Canada under any variant
27 of the Defendant Kiss Library’s various names, no one answers the purported contact

1 telephone phone number provided by libly.net despite multiple attempts during normal
2 business hours, and no commercial or retail spaces exist at libly.net's listed address.

3 **b. Cheap-library.com:** Purportedly operating out of Sofia, Bulgaria,
4 cheap-library.com is an online ebook retailer that omits its owners' purported names,
5 claims it is located at "Bulgaria, ul. Sofia, Sofia Center, 1202, 'Rodopi' 38," and can be
6 contacted at +1 (800) 712-4214. *See* Exhibit B; <https://cheap-library.com/about/>. On
7 information and belief, no entities are registered in Sofia, Bulgaria under any variant of
8 the Defendant Kiss Library's various names, no one answers the purported contact
9 telephone phone number provided by cheap-library.com despite multiple attempts
10 during normal business hours, and no commercial or retail spaces exist at cheap-
11 library.com's listed address.

12 **c. Kissly.net:** Purportedly operating out of Alberta, Canada, kissly.net was
13 an online ebook retailer that claimed it was "[o]riginally founded in 2015 by Jack
14 Comstock and Nikolay Korolev," was located at 2510 Centre St S Calgary, AB T2G
15 5A6, and could be contacted at +1 (213) 394-9806. *See* Exhibit B. On information and
16 belief, no entities were registered in Alberta, Canada under any variant of the Defendant
17 Kiss Library's various names, nobody by the names Jack Comstock or Nikolay Korolev
18 is associated with Kiss Library, no one answered the purported contact telephone phone
19 number provided by kissly.net despite multiple attempts during normal business hours,
20 and no commercial or retail spaces existed at kissly.net's listed address. After operating
21 as the primary Mirror Website following the shutdown of kisslibrary.net, this Mirror
22 Website began redirecting to libly.net as the primary website in June 2020.

23 **d. Wtffastspring.bid:** Purportedly operating out of Alberta, Canada,
24 wtffastspring.bid was an online ebook retailer that claimed it was "[o]riginally founded
25 in 2015 by Jack Comstock and Nikolay Korolev," was located at 2510 Centre St S
26 Calgary, AB T2G 5A6, and can be contacted at +1 (213) 394-9806. *See* Exhibit B. On
27 information and belief, no entities were registered in Alberta, Canada under any variant

1 of the Defendant Kiss Library’s various names, nobody by the names Jack Comstock or
 2 Nikolay Korolev are associated with Kiss Library, no one answered the purported
 3 contact telephone phone number provided by kissly.net despite multiple attempts during
 4 normal business hours, and no commercial or retail spaces existed at wtffastspring.bid’s
 5 listed address. On information and belief, this Mirror Website was created in response
 6 to problems with Kiss Library’s payment processor, FastSpring. It went down for
 7 “maintenance” in June 2020, approximately the same time kissly.net began redirecting
 8 its traffic to libly.net, apparently as part of Defendants’ coordinated effort to again
 9 migrate to new sites.

10 **39.** On information and belief, Defendants also maintained the website
 11 www.kisslibraryemails.com, a website that previously automatically redirected the user to
 12 kissly.net until that Mirror Website’s own traffic began redirecting to libly.net.

13 **40.** Defendants, through these and other known and unknown Kiss Library websites,
 14 engage in the rampant, illegal copying, display, and distribution of copyright-protected ebooks
 15 for their direct financial benefit, including works written by the Authors and exclusively
 16 published or distributed by the Publishers.

17 **41.** Examples of works infringed by Defendants for which the Authors have
 18 registered copyrights and/or in which the Publishers control exclusive distribution rights (the
 19 “Works”) include but are not limited to:

20 **a.** *A Dark Mind*, authored by T. R. Ragan, with exclusive publication and
 21 distribution rights held by Amazon (copyright number TX0007728631), is or was sold
 22 by Defendants without license on the Mirror Websites. *See, e.g.,*

23 <https://kissly.net/book/77131c36d643ec519ca7> (Exhibit D);³

24
 25
 26 ³ On information and belief, Defendants have repeatedly migrated sites to hide evidence of their
 27 misconduct and avoid accountability for their piracy. Although the kissly.net site was recently
 disabled for those purposes, the Works were sold on that site and other works by the Authors
 and Publishers are currently being sold on other Mirror Websites as well. *See* Exhibit D.

1 **b.** *Abducted*, authored by T. R. Ragan, with exclusive publication and
2 distribution rights held by Amazon (copyright number TX0007670441), is or was sold
3 by Defendants without license on the Mirror Websites. *See, e.g.*,
4 <https://kissly.net/book/26496177a96ffafedb29> (Exhibit D);

5 **c.** *Afterburn*, authored by Sylvia Day, with exclusive publication and
6 distribution rights held by Harper Collins (copyright number TX0008280509), is or was
7 sold by Defendants without license on the Mirror Websites. *See, e.g.*,
8 <https://kissly.net/book/884ea6a173f6ef1e51cb> (Exhibit D);

9 **d.** *As Long As She Needs Me: A Novel*, authored by Nicholas Weinstock,
10 with exclusive publication and distribution rights held by Harper Collins (copyright
11 number TX0005380194), is or was sold by Defendants without license on the Mirror
12 Websites. *See, e.g.*, <https://libly.net/book/0310008cf18e86efaa748a959b1bee70>;

13 **e.** *Blood on the Tracks*, authored by Barbara Nickless, with exclusive
14 publication and distribution rights held by Amazon (copyright number TX0008334746),
15 is or was sold by Defendants without license on the Mirror Websites. *See, e.g.*,
16 <https://cheap-library.com/book/c4293b18edb0468046dce71dd75a3f2f>;

17 **f.** *Fight Dirty*, authored by C.J. Lyons, with exclusive publication and
18 distribution rights held by Amazon (copyright number TX0008076233), is or was sold
19 by Defendants without license on the Mirror Websites. *See, e.g.*,
20 <https://kissly.net/book/70924dc73c193608db30> (Exhibit D);

21 **g.** *Jesse James: Last Rebel of the Civil War*, authored by T.J. Stiles, with
22 exclusive publication and distribution rights held by PRH (copyright number
23 TX0005703845), is or was sold by Defendants without license on the Mirror Websites.
24 *See, e.g.*, <https://cheap-library.com/book/45a5e2748d39bf66d745ec5d524a327c>;

25 **h.** *My Sister's Grave*, authored by Robert Dugoni, with exclusive
26 publication and distribution rights held by Amazon (copyright number TX0008009209),
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1 is or was sold by Defendants without license on the Mirror Websites. *See, e.g.*,
2 <https://kissly.net/book/f20671f38204d4377d3a> (Exhibit D);

3 **i.** *Persuader*, authored by Lee Child, with exclusive publication and
4 distribution rights held by PRH (copyright number TX0006919613), is or was sold by
5 Defendants without license on the Mirror Websites. *See, e.g.*,
6 <https://libly.net/book/bae5c93fc28b3f195558c4ca08c72804>;

7 **j.** *Red Rain: A Novel*, authored by R.L. Stine, with exclusive publication
8 and distribution rights held by Simon & Schuster, Inc. (copyright number
9 TX0007603027), is or was sold by Defendants without license on the Mirror Websites.
10 *See, e.g.*, <https://kissly.net/book/9f40292160d1e5ec973a> (Exhibit D);

11 **k.** *Short Straw*, authored by Stuart Woods, with exclusive publication and
12 distribution rights held by PRH (copyright number TX0006465649), is or was sold by
13 Defendants without license on the Mirror Websites. *See, e.g.*, [https://cheap-](https://cheap-library.com/book/df02bda1c81d7ebce5e9f23b6c22b993)
14 [library.com/book/df02bda1c81d7ebce5e9f23b6c22b993](https://cheap-library.com/book/df02bda1c81d7ebce5e9f23b6c22b993);

15 **l.** *The Book of Salt*, authored by Monique Truong, with exclusive
16 publication and distribution rights held by Houghton Mifflin Harcourt (copyright
17 number TX0005745355), is or was sold by Defendants without license on the Mirror
18 Websites. *See, e.g.*, <https://libly.net/book/627b6eb5da70d45c076d85abd9702ecc>;

19 **m.** *The Brilliant Disaster: JFK, Castro, and America's Doomed Invasion of*
20 *Cuba's Bay of Pigs*, authored by Jim Rasenberger, with exclusive publication and
21 distribution rights held by Simon & Schuster, Inc. (copyright number TX0007373794),
22 is or was sold by Defendants without license on the Mirror Websites. *See, e.g.*,
23 <https://libly.net/book/128faaa6909f747e2e241671773ea1a5>;

24 **n.** *The Burden of Proof*, authored by Scott Turow, with exclusive
25 publication and distribution rights held by Macmillan (copyright number
26 TX0002844794), is or was sold by Defendants without license on the Mirror Websites.
27 *See, e.g.*, <https://cheap-library.com/book/35b88038587b30eff3cff24d8d583f9a>;

1 **o.** *The Litigators*, authored by John Grisham, with exclusive publication
2 and distribution rights held by PRH (copyright number TX0007494080), is or was sold
3 by Defendants without license on the Mirror Websites. *See, e.g.,*

4 <https://libly.net/book/4ff12fd39e650b52895665e5e56d068d>;

5 **p.** *Tyrannosaur Canyon*, authored by Doug Preston, with exclusive
6 publication and distribution rights held by Macmillan (copyright number
7 TX0006206315), is or was sold by Defendants without license on the Mirror Websites.

8 *See, e.g.,* <https://cheap-library.com/book/935dde12ac9622c64733bbba862c5f52>; and

9 **q.** *You Are Not Small*, authored by Anna Kang, illustrated by Christopher
10 Weyant, with exclusive publication and distribution rights held by Amazon (copyright
11 numbers TX0007970793, TX0007970795), is or was sold by Defendants without
12 license on the Mirror Websites. *See, e.g.,*

13 <https://kissly.net/book/29cfeb176b308057ad2c> (Exhibit D).

14 **42.** Defendants’ rampant infringement is not limited to the above Works; instead,
15 Defendants’ ring of Websites are replete with unauthorized and infringing offerings of many of
16 Plaintiffs’ Works.

17 **43.** On information and belief, Kiss Library serves primarily, if not exclusively, as a
18 scheme to obtain illicit proceeds by violating the intellectual property rights of the owners of
19 thousands of copyrighted works.

20 **44.** Defendants copy, upload, display, and distribute the Works without the
21 copyright owners’ approval or a license from an exclusive rights holder.

22 **45.** Although Kiss Library purports to invite and allow authors or publishers to
23 upload and sell their works for a license fee or royalty through a “seller registration invitation,”
24 *e.g.* Exhibit E (“If you’re willing to get a seller registration invitation, please describe what
25 kind of stuff you’re willing to sell with our site to invite@kisslibrary.net.”); Exhibit C (Mirror
26 Websites), upon information and belief, Defendants do not actually invite or accept
27 applications from authors or publishers seeking to license their works.

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46. Features on Defendants’ websites patently show that they know the Works are copyrighted and require a license from the rights holder to be lawfully copied, displayed, or distributed—yet Defendants intentionally and willfully continue to copy, display, and distribute the Works without permission. For example, on the listing for each Work, Defendants include the name of the publisher that published that version of the title. In addition, Defendants provide a free, downloadable 20-page sample of each Work that includes the rights page that identifies when and by whom each Work was copyrighted. Defendants feature this information on their websites and then willfully and intentionally ignore the law’s requirements.

47. While Kiss Library and its Mirror Websites purport to have a Digital Millennium Copyright Act-compliant copyright agent, the Copyright Office’s directory of registered agents (including terminated ones) includes no record of one for any of the Kiss Library names (or any variation thereof).

48. Further, on information and belief, despite Kiss Library’s promise to remove infringing works when notified by rights holders, it continues to display the copyrighted works for sale or relists Works after briefly taking them down.

49. Defendants’ infringing activities are so widespread and notorious that countless other authors have publicly posted about them—again putting Defendants on clear notice that they are displaying, reproducing, selling, and distributing copyrighted works without permission. *See, e.g.,* Writer Beware, *Kiss Library: Pirate Site Alert*, Aug. 9, 2019, <https://accrispin.blogspot.com/2019/08/kiss-library-pirate-site-alert.html> (“I’ve gotten several alerts over the past week about a pirate site that’s new to me (though not new: this warning was first published in September 2017): Kiss Library, where many authors are finding unauthorized electronic versions of their books.”).



Linda Catherine
@LindaCa57887027

Russian website Kissly bought my books & sell them in pdf form for 1/2 price Type your name & book title on google & this site comes up with your book Complain & they block your IP address or remove your book & put it back later Buy & they steal your card details
#copyrighttheft

10:25 AM · Oct 22, 2019 · Twitter Web Client



Bev Spicer Novelist
@BevSpicer1

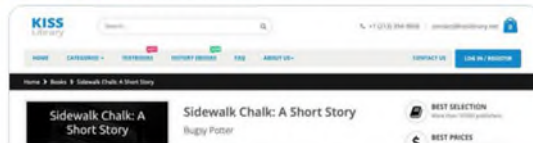
PIRATED BOOKS! - Beware of Kiss Library/Kissly
aelliottbooks.com/2019/07/13/pir... I just found one of mine on this site being sold for twice the price...



PIRATED BOOKS! - Beware of Kiss Library/Kissly
If you have a published eBook(s), please check the Kiss Library or Kissly sites to see if your property has been pirated. Yes - it ...
aelliottbooks.com



Bugsy Potter @Bugsy_Potter · Aug 14, 2019
Just found a pirated copy of my amazon kindle book on #kisslibrary and they are selling it for like \$7 after I put it up for free. Checked my #amazon account, and it had been flagged for copyright. Wow. Looks like it'll be on #fictionpress for the rest of my life.



50. By selling pirated and unauthorized ebook copies, Defendants cause damage and harm to the Authors because they do not receive any royalties or proceeds from sales on Defendants' sites, and Authors suffer losses to prospective customers, goodwill from customers who receive Defendants' inferior ebook copies and service, and resources expended in discovering and combatting infringement, as well as disruption to their distribution arrangements.



Laurann Dohner
November 5, 2019 · 🌐

I always TRY to be nice to everyone. But sometimes...OMG. I'm tested. LOL. That's putting it politely. I'm going to show you an example of someone who made me loose my sh!t and then threatened to out me for being a 'bad author'. So here's the story. This woman bought a book from this 'site'. It's not an authorized site. I don't even know what this thing is but it's not supposed to have any of my books. So this woman bought this book. I'm going to include a link so you can see what she bought. THEN...when it wasn't my book --- she demanded that I refund her the money she spent on this 'site'. She got nasty, despite me pointing out that A) I never got any money from that sale since NOT somewhere I loaded my books to be sold. B) Did you not see the problem just by looking at where you bought it from??? C) I did ask if she had any common sense because it was a valid question. Look and you'll understand. Anyway, she got nasty and yeah. I finally told her...I can't deal with your stupid. Does that make me a bad person? No. It makes me human and fed up with dealing with someone unreasonable who was growing ruder. So check this out, y'all. I want to say 'hold my beer' just because it was that...shakes head. LOL.

KISSLYNET
Fang and Claw by Laurann Dohner / Kissly: Affordable Ebooks

👍 🤔 😬 198

98 Comments 1 Share

1 **51.** This economic harm caused by Defendants’ digital piracy has been compounded
2 during the COVID-19 pandemic—when readers are quarantined to their homes and
3 increasingly reliant on ebooks. But the detrimental impact of such blatant piracy extends well
4 beyond those obvious tangible harms. Books play an immensely important role in our society,
5 whether furthering the arts and sciences or contributing to the historical marketplace of ideas.
6 Defendants’ piracy ignores the intense dedication, perseverance, and creativity required to
7 bring those Works to life; instead exploiting that investment for their own gain.

8 **52.** As a result of Defendants’ wrongful conduct, Defendants also damage and harm
9 the Publishers in the form of losses to sales, prospective customers, goodwill from authors who
10 exclusively publish with them, goodwill from customers who receive Defendants’ inferior
11 ebook copies, and resources expended in discovering and combatting infringement, as well as
12 disruption and harm to their distribution arrangements, brands, and prospective business
13 relationships with authors and others.

14 **V. CAUSES OF ACTION**

15 **FIRST CAUSE OF ACTION**

16 **Copyright Infringement – 17 U.S.C. § 501**

17 **53.** Plaintiffs incorporate by reference the allegations of the preceding paragraphs.

18 **54.** Plaintiffs are the exclusive or beneficial rights holders of the copyrighted Works,
19 including the Example Works identified above, and have the right to exclude others from
20 copying, distributing, or displaying the Works.

21 **55.** Defendants have created and operated Kiss Library as a means of unlawfully
22 distributing the Works for profit.

23 **56.** Defendants have infringed, and continue to infringe, Plaintiffs’ copyrights
24 and/or exclusive rights in the Works by reproducing, distributing copies of, publicly displaying,
25 and/or creating derivative works of the copyrighted written works without authorization.
26
27

1 **57.** Defendants knew of and intentionally contributed to and furthered the infringing
2 activity. At a minimum, Defendants act with willful blindness or reckless disregard of the
3 Authors’ beneficial ownership and copyrights and the Publishers’ exclusive copyrights.

4 **58.** Defendants have committed, and continue to commit, acts constituting willful
5 infringement of the copyrighted Works.

6 **59.** As a result of Defendants’ wrongful conduct, Plaintiffs are entitled to recover
7 their actual damages and Defendants’ profits attributable to the infringement. Alternatively,
8 Plaintiffs are entitled to statutory damages under 17 U.S.C. § 504(c).

9 **60.** The award of statutory damages should be enhanced in accordance with 17
10 U.S.C. § 504(c)(2).

11 **61.** Plaintiffs are further entitled to injunctive relief, including an order impounding
12 all copies of the infringing materials, 17 U.S.C. § 503, and ordering Defendants to cease their
13 tortious activity, 17 U.S.C. § 502.

14 **SECOND CAUSE OF ACTION**

15 **Vicarious and/or Contributory Copyright Infringement – 17 U.S.C. § 501**

16 **62.** Plaintiffs incorporate by reference the allegations of the preceding paragraphs.

17 **63.** In addition to direct copyright infringement, Defendants are also secondarily
18 liable for copyright infringement.

19 **64.** Defendants are liable for contributory infringement because they knew or had
20 reason to know of the infringement of Plaintiffs’ copyrights and/or exclusive rights in the
21 Works by the named and unnamed operators of Kiss Library, and Defendants intentionally
22 encouraged, induced, or materially contributed to such infringing activity.

23 **65.** Defendants are liable for vicarious infringement because they directly benefit
24 from the infringement of Plaintiffs’ copyrights and/or exclusive rights in the Works by the
25 named and unnamed operators of Kiss Library, and have the right and ability to supervise or
26 control such infringing activity.
27

1 C. That the Court enter an order pursuant to 15 U.S.C. § 1116 and/or 17 U.S.C.
2 § 503 impounding all digital copies of infringing products, and any related item, including
3 business records, that are in Defendants’ possession, custody, or control;

4 D. That the Court enter an order that the websites used by Defendants to distribute
5 products that infringe Plaintiffs’ copyrights in the Works and/or the corresponding domain
6 names be disabled or transferred to Plaintiffs’ possession by the appropriate domain name
7 registries or registrars;

8 E. That the Court enter an order that any banks, credit card companies, payment
9 providers, or third party processors for Defendants, any of Defendants’ operations, or any other
10 website or commercial operation owned or controlled by Defendants shall immediately locate
11 all accounts connected to Defendants and their operations, and that such accounts be
12 temporarily restrained or enjoined from transferring or disposing of any money or other assets
13 purportedly belonging to Defendants;

14 F. That the Court enter an order requiring Defendants to provide Plaintiffs a full
15 and complete accounting of all sales, copying, and/or reproductions of all infringed works, and
16 all amounts due and owing to Plaintiffs as a result of Defendants’ unlawful activities;

17 G. That each Plaintiff be awarded all profits of Defendants, plus all losses of that
18 Plaintiff, realized as a result of Defendants’ infringement of that Plaintiff’s copyright and/or
19 exclusive rights in the Works (or any of them), the exact sum to be proven at the time of trial,
20 or, if elected before final judgment, statutory damages as available under 17 U.S.C. § 504(c);

21 H. That Defendants be required to pay the costs of this action and the reasonable
22 attorneys’ fees incurred in prosecuting this action, as provided for by 17 U.S.C. § 505, or
23 otherwise by law; and

24 I. That the Court grant Plaintiffs such other, further, and additional relief as the
25 Court deems just and equitable.

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DATED this 7th day of July, 2020.

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