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2026 Review of Notorious Markets for Counterfeiting and Piracy: Comment Request
(Docket No. USTR-2026-0529)
October 2, 2026

This submission by the Association of American Publishers (AAP) is made in response to the request for comments in the 2026 Review of Notorious Markets for Counterfeiting and Piracy by the Office of the U.S. Trade Representative (USTR).¹

AAP is the national trade association of the U.S. book and journal publishing industry. AAP represents the leading book, journal, and education publishers in the United States on matters of law and policy, advocating for outcomes that incentivize the publication of creative expression, professional content, and learning solutions. U.S. publishing industry revenue in 2025 reached \$33.4 billion,² and as an integral part of the broader core U.S. copyright industries, contributed to the more than \$2.09 trillion in annual value to U.S. gross domestic product in 2023.³ Beyond these important contributions to the U.S. economy, an independent and thriving publishing industry supports the nation's political, intellectual, and cultural systems.

As called for in the request for comments, this submission identifies online sites that traffic in infringing copies of books and journal articles, to the detriment of U.S. publishers and the authors, writers, editors, illustrators, researchers, and scholars whose creative works and research scholarship publishers curate and disseminate.

The issue focus for the 2026 Notorious Markets Review Process examines the issue of "high-quality counterfeit trademark goods known as superfakes or superclones." While the term "superfakes" is associated with luxury goods items, high-quality counterfeits that so closely approximate the legitimate product as to dupe even an informed buyer are also a problem for the publishing industry. Indeed, publishers report that there has been an increase in counterfeit print activity across both trade and education titles, of frontlist and bestselling titles, reproducing the legitimate works' covers, ISBNs, and trim with increasing fidelity, and which are made available through e-commerce marketplaces and rogue sellers across multiple geographies.

Certain types of hardcover books, such as coffee table books replete with photographs and printed on high gloss paper, have also been susceptible to counterfeit production akin to superfakes. The counterfeits can be of such quality as to rival the legitimate copies (in some instances, even using higher-grade paper) and require that the book be disassembled (the spine cut open, the crash or other book binding material examined), the counterfeit becoming distinguishable from legitimate editions only through a detailed and thorough side-by-side trait comparison. Such counterfeit books have often surfaced in China and certain in-country platforms, which remain an ongoing concern as a source and distribution channel for counterfeit print books. For the

¹ [2026 Review of Notorious Markets for Counterfeiting and Piracy: Comment Request](#), 91 Fed. Reg. 55154 (Aug. 26, 2026).

² Association of American Publishers. (2026, August 10). [AAP StatShot Annual Report: Publishing Revenues Totaled \\$33.4 Billion for Calendar Year 2025](#).

³ Jessica Dutra and Robert Stoner, Economists Incorporated. Copyright Industries in the U.S. Economy: The 2024 Report. (2025). https://www.iipa.org/files/uploads/2025/02/IIPA-Copyright-Industries-in-the-U.S.-Economy-Report-2024_ONLINE_FINAL.pdf.

publishing industry, continued (and growing) physical counterfeiting is a distinct and worsening vector alongside digital piracy.

We appreciate the efforts of USTR and the inter-agency subcommittee to identify problematic online marketplaces, to highlight such problems with U.S. trading partners, and thereby encourage the adoption of measures that more effectively address commercial piracy and counterfeiting, whether occurring through online piracy sites, ecommerce platforms, or in physical markets.

Online platforms that make available, without the permission of or compensation to publishers, unauthorized, infringing copies of books (consumer trade, professional books, and textbooks) and journal articles include online distribution hubs (“cyber lockers”), auction sites, P2P technologies, apps, ecommerce platforms or marketplaces, social media platforms, and other online services that facilitate access to pirated copies of books and journal articles. The infringing activity occurring on some of these platforms is supported by third-party service providers such as hosting providers, payment processing services, advertising networks, domain name registrars, and content delivery networks (CDN)—unfortunately, with some providers ignoring the infringing activity occurring via the platform. While some platforms assist rights holders in mitigating the availability of infringing content, many continue to remain indifferent to the efforts of rights holders to take meaningful action against the infringing activity occurring on their sites or through their services.

Online enforcement remains a frustrating endeavour, and unfortunately, the online piracy ecosystem affecting book and journal publishers only continues to evolve in ways that make traditional enforcement increasingly difficult. Several of the sites and platforms identified below no longer operate merely as stand-alone websites offering individual works for unauthorized download. They increasingly function as interconnected and resilient distribution networks, using rotating domains, mirror sites, decentralized file-distribution technologies, messaging applications, offshore hosting providers, and other intermediaries to maintain access to infringing collections following an enforcement action.

Of particular concern over the last few years is the emergence of a new commercial use for large-scale repositories of pirated publishing content: the acquisition and exploitation of these infringing repositories for the training and development of generative artificial intelligence models. Notorious pirate sites holding millions of infringing copies of books and journal articles can provide AI developers with bulk, high-speed access to collections that should be the subject of licenses from the rights holders such as publishers and authors. Anna’s Archive (discussed further below), for example, has publicly invited large language model (LLM) developers to obtain high-speed access to its infringing collections in exchange for what it describes as an “enterprise-level donation.” In copyright litigation brought by publishers against Anna’s Archive earlier this year, the plaintiffs alleged that the operators offered unrestricted high-speed access to their collections for a \$200,000 cryptocurrency payment or in exchange for additional collections.⁴ Separately, in litigation concerning Meta’s development of its Llama models, a federal district court noted that Meta downloaded Anna’s Archive in early 2024 after previously obtaining Libgen datasets.⁵

These developments exacerbate the harm already caused by industrial-scale piracy of book and journal publishing content. An infringing copy made available to an individual reader represents a form of harm already well documented and familiar to USTR and the interagency committee. The bulk transfer of a corpus containing millions of books and journal articles to an AI developer may enable the same unauthorized copies to be

⁴ Apress Media, L.L.C. v. Anna’s Archive, No. 1:26-cv-01850 (S.D.N.Y. Mar. 6, 2026). <https://publishers.org/wp-content/uploads/2026/03/Apress-v-Annas-Archive-Complaint.pdf>. The U.S. District Court for SDNY entered a default judgment against the site on May 19, 2026.

⁵ Kadrey v. Meta Platforms, Inc., 788 F. Supp. 3d 1026, 1041 (N.D. Cal. 2025).

incorporated into downstream technological and commercial products. As such, the increasing availability of pirated publishing corpora as training dataset resources for AI-development represents an urgent and compelling reason for governments to effectively address not only the consumer-facing piracy sites themselves, but also the services and infrastructure that allow such repositories to persist, replicate, and distribute their infringing collections at industrial scale.

Notorious Online Sites and Marketplaces

Anna's Archive (.org/.li/.se) — a metasearch engine that provides access to pirated copies of books and journal articles which are also available on Sci-Hub, Library Genesis, Z-Library, and other piracy sites. While there were successful enforcement actions against the site in 2026 (as detailed below), the site continues to operate under several domain extensions, including **.gl**, **.pk**, and **.gd**.

On May 19, 2026, the U.S. District Court for the Southern District of New York entered a default judgment against the site and its operators, awarding \$19.5 million in statutory damages (for the 130 works in suit) and issued a permanent injunction against the site and ordering more than twenty named registries, registrars, hosts, and service providers — including Cloudflare, Njalla, Tucows Domains, Inc., and DDoS Guard — to permanently disable the site's domains and block their transfer.⁶

In a January 2026 suit brought by major record labels and Spotify over the site's scraping of Spotify content (initially under seal and unsealed on January 16, 2026),⁷ the same court entered a default judgment of approximately \$322 million (for the 120,000 music files obtained via the circumvention of Spotify's access control measures) and issued a permanent injunction against the site on April 14, 2026.⁸ An earlier January 2026 preliminary injunction order resulted in the suspension of the primary annas-archive.org domain, and Cloudflare disabling nameservers for several domains.⁹ Per the injunction, the **.org** domain was placed on serverHold by the Public Interest Registry; the **.se** domain was also suspended; and the **.li** domain (registered via Njalla) was deleted from the registry on March 1, 2026.¹⁰ The operators have rotated through several replacement ccTLDs (**.gl**; **.pk**; **.gd**; **.in**; **.pm** among others), directing users to third-party pages for current domain lists.¹¹

The site was also the subject of litigation brought by the operator of WorldCat (OCLC) in January 2024, where OCLC alleged that the site engaged in persistent attacks against WorldCat and ultimately "illegally

⁶ Apress Media, L.L.C. v. Anna's Archive, No. 1:26-cv-01850 (S.D.N.Y. May 19, 2026). <https://publishers.org/wp-content/uploads/2026/05/Annas-Achive-Default-Order-copy.pdf>.

⁷ Atl. Recording Corp. v. Anna's Archive, No. 1:26-cv-00002-JSR (S.D.N.Y. filed Jan. 16, 2026). *Complaint*. <https://www.musicbusinessworldwide.com/files/2026/01/Annas-Archive.pdf>.

⁸ Atl. Recording Corp. v. Anna's Archive, No. 1:26-cv-00002-JSR (S.D.N.Y. filed Jan. 16, 2026). *Default Judgment*. <https://storage.courtlistener.com/recap/gov.uscourts.nysd.655608/gov.uscourts.nysd.655608.41.0.pdf>.

⁹ Atl. Recording Corp. v. Anna's Archive, No. 1:26-cv-00002-JSR (S.D.N.Y. filed Jan. 16, 2026). *Preliminary Injunction*. <https://storage.courtlistener.com/recap/gov.uscourts.nysd.655608/gov.uscourts.nysd.655608.17.0.pdf>.

¹⁰ Ernesto Van der Sar, *Anna's Archive Loses .Org Domain After Surprise Suspension (Update, .Se Too)*, TORRENTFREAK (Jan. 13, 2026) [hereinafter *Anna's Archive Loses .Org Domain*], <https://torrentfreak.com/annas-archive-loses-org-domain-after-surprise-suspension/>; Ernesto Van der Sar, *Ann's Archive Loses .LI Domain as Legal Pressure Mounts*, TORRENTFREAK (Mar. 2, 2026), <https://torrentfreak.com/annas-archive-loses-li-domain-as-legal-pressure-mounts/>.

¹¹ Id. *Anna's Archive Loses .Org Domain*. Also, Ernesto Van der Sar, *Anna's Archive Owes \$340 Million, Lost Several Domains, But It's Still Online*, TORRENTFREAK (Aug. 24, 2026), <https://torrentfreak.com/annas-archive-owes-340-million-lost-several-domains-but-its-still-online/>.

hacked WorldCat.org” to steal 2.2TB of data.¹² Earlier this January (2026), the OCLC won a default judgment against the site, with the U.S. District Court for the Southern District of Ohio ruling that the pirate site delete all copies of OCLC’s WorldCat data and “stop scraping, using, storing, or distributing the data.”¹³

Of increasing concern to the publishing industry is the platform’s efforts to position its repository of infringing published works as a source of training datasets to LLM developers. The site publicly invites LLM developers to obtain high-speed bulk access through an “enterprise-level donation.” As alleged in the publisher copyright suit against the site (see above), following an inquiry regarding access to its repository for AI training, the site operators reportedly offered unrestricted high-speed SFTP access for a donation of \$200,000, payable in cryptocurrency (or in exchange for collections not already in its repository).¹⁴ This activity represents a commercialization model in which repositories accumulated through industrial scale copyright infringement may be utilized and monetized as bulk data resources for AI developers.

The foregoing is not a hypothetical concern. In the *Kadrey v. Meta Platforms, Inc.* case, the U.S. District Court for the Northern District of California order noted that “[i]n early 2024, Meta also downloaded Anna’s Archive, a compilation of shadow libraries including Libgen, Z-Library, and others.”¹⁵

Despite the positive outcomes achieved in the above-described enforcement actions against Anna’s Archive, the site remains accessible via rotating domains and continues to grow. As of August 2026, the site claims to hold over seventy-one million books and 157 million papers, distributed via direct download, IPFS, and BitTorrent. With Cloudflare’s compliance with the court order in the sound recording case, some domains have shifted to DDoS-Guard, a Russian DDoS protection/CDN provider (which USTR has named to the Notorious Markets List over the last several years). Donations continue to be solicited by the site (via cryptocurrencies among other payment channels) and has openly offered high-speed bulk access to its corpus of infringing books and articles to interested parties.¹⁶

The group claims to have liberated tens of millions of books and to have organized large-scale scraping operations. The operators continue to solicit donations to cover operational costs as well as ongoing and future projects, accepting donations in cryptocurrencies (Bitcoin, Ethereum, Monero, Solana) as well as Amazon Gift Cards, Alipay (China), WeChat (Weixin Pay), Pix (Brazil), and Revolut (UK). The site also solicits volunteers by offering rewards and bounties for promoting the site, undertaking programming work, and securing additional digital content.¹⁷

¹² *OCLC, Inc. v. Anna’s Archive*, No. 2:24-cv-00144 (S.D. Ohio filed Jan. 12, 2024).

<https://www.courtlistener.com/docket/68157923/1/oclc-online-computer-library-center-inc-v-annas-archive/>.

¹³ *Id.* See also Brodtkin, John. (2026, January 16). “[Judge orders Anna’s Archive to delete scraped data; no one thinks it will comply.](#)”

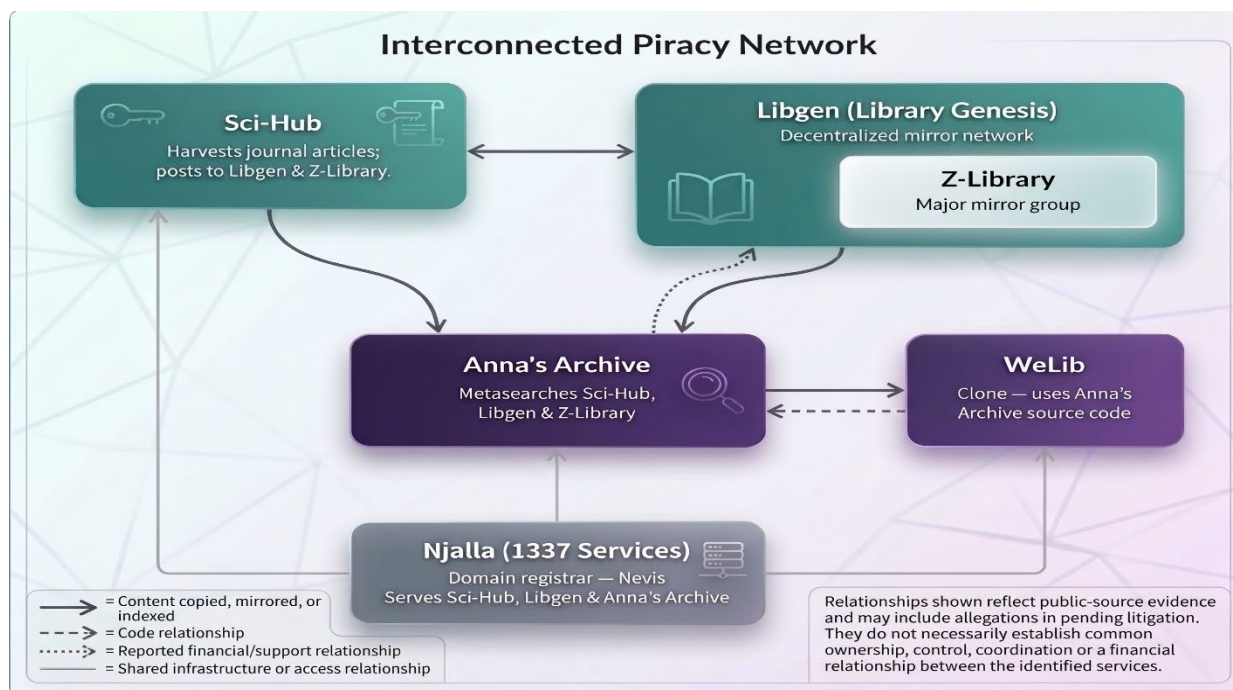
¹⁴ *Supra* at 4.

¹⁵ *Id.* at 5. The court in *Kadrey* said, “In cases involving uses like Meta’s, it seems like the plaintiffs will often win, at least where those cases have better-developed records on the market effects of the defendant’s use,” although it found on the record in front of it that Meta was ultimately entitled to summary judgment on fair use for copying books from pirate sites for use as LLM training data. *Kadrey v. Meta Platforms, Inc.*, 788 F. Supp. 3d 1026, 1059 (N.D. Cal. 2025). Meta is still facing a claim that it infringed by distributing books via bittorrent.

¹⁶ See <https://annas-archive.gl/donate> (last visited Sept. 30, 2026), where the operators note that “large donations from wealthy individuals or institutions” are welcomed and requests parties intending to make “donations over \$5,000” to contact the site operators directly, while also noting an “Experts access” option, providing for unlimited high-speed access and direct SFTP servers for “enterprise-level donation,” and also https://www.linkedin.com/posts/ed-newton-rex_a-few-months-ago-i-was-curious-to-know-how-activity-7420048307655200768-buog/.

¹⁷ See <https://annas-archive.gl/blog/an-update-from-the-team.html>.

Annas-archive.gl and *Annas-archive.gd* are hosted by IQWEB-LLC NET in the United Arab Emirates. *Annas-archive.pk* is hosted by IQWEB-LLC NET in Belize. The site also uses the domain registration services provided by Sarek Oy and Njalla (1337 Services) to mask its identity. *Anna's-archive.gl* typically receives twenty-eight million total monthly visits, with U.S. traffic accounting for 19% of global traffic, according to SimilarWeb.com. Combined, the Anna's Archive group sees an average of forty-one million visitors a month—a 28% increase in traffic to the group's sites despite publishers' enforcement efforts.



Libgen.li (also Libgen.bz; Libgen.is; Libgen.gl; Libgen.la; and Libgen.vg) and its multiple mirror sites (collectively the Library Genesis Project) — is a decentralized network of infringing locker sites, believed to be operated from Russia. The infringing network hosts a vast repository of infringing content — from consumer trade books, scientific, technical, and medical (STM) journal articles, technological standards, magazine articles, comic books to academic and scholarly materials, which is also being made available through multiple mirror sites, IPFS public gateways, and other piracy sites. The Libgen network remains among the most problematic piracy groups plaguing the trade, education, and journal publishing sectors.

Libgen.li averages nine million site visits a month, with the U.S. having the highest number of site visitors at 24%. The Libgen group of sites averages some twenty million site visits per month, with average U.S. site traffic at 28%—the highest traffic to the site. The many mirror sites are hosted by the following ISPs:

Libgen.li; .bz: Host IP: 179.43.167.164
ISP: PRIVATE LAYER INC, PA

Libgen.la: Cloudflare: 172.67.155.199, 104.21.34.70
Underlying Host IP: 81.17.21.234
ISP: PRIVATE LAYER INC, PA

Libgen.bz: Host IP: 179.43.167.165

Libgen.vg: ISP: PRIVATE LAYER INC, PA
Host IP: 101.99.89.48
Libgen.gl: ISP: Shinjiru Technology Sdn Bhd, MY
Cloudflare: 172.67.139.134
ISP: 104.21.8.141
Underlying Host IP: 101.99.89.48
ISP: Shinjiru Technology Sdn Bhd, MY

Over the years, several mirrors in the network have been subject to lawsuits or applications for site blocking orders. In 2015, publishers obtained an injunction under Section 97A of the UK Copyright, Designs and Patent Act (1988) to compel UK service providers to block access to Libgen-related sites, which sites continue to be subject of a blocking order. Some of the site's mirrors are also subject to blocking orders in Belgium, Denmark, France, Germany, Italy, Portugal, Russia, Spain, and Sweden.

The group continues to receive donations and other contributions. Showing that many of these sites are likely to be acting in concert, the original founder of Library Genesis reportedly facilitated a donation of \$10,000 to the piracy site *Anna's Archive* in October 2022.¹⁸

Nitroflare.com — provides free file hosting and sharing services. Nitroflare's current U.S. traffic accounts for approximately 15% of the visits and the service has an average of five million visits per month globally. The service is monetized through premium and affiliate accounts.¹⁹ The domain was registered in 2014, and its current hosting provider is GLOBALLAYER B.V. (IP:213.152.167.194), NL via Cloudflare.

Oceanofpdf.com — is a stand-alone pirate site dedicated to distributing infringing eBooks. The domain was first registered in December 2017, and its current hosting provider is Host IP: 31.7.57.170 ISP: Private Layer INC, PA via Cloudflare, Inc. The site averages twenty-three million visits a month. The U.S. comprises 30% of the site's overall traffic. Despite a temporary shutdown in 2018, the site remains active and non-compliant.

Rapidgator.net — provides free file hosting and sharing services. It advertises features such as "extra fast downloads" and "unlimited file storage." The site also advertises an affiliate program through which users earn money for uploading files. Rapidgator averages twenty-three million site visits per month. The service is most popular in Japan (37%), with the highest combination of visitors and page views for the site, followed by the U.S. (12%). The domain was registered in 2010, and its current hosting provider is Melbikomas UAB (195.211.222.2, 195.211.222.7).

Sci-hub.ru (also *sci-hub.box*; *sci-hub.fr*; *sci-hub.sg*; *sci-hub.st*; and *sci-hub.su*), first encountered in May 2013 (as *Sci-Hub.org*) — continues its flagrantly infringing conduct, facilitating unauthorized access to over 88.34 million journal articles and academic papers (at least 90% of all toll access journal articles published). Sci-Hub obtains infringing copies of publishers' copyright protected works by illegally accessing the computer networks of universities, using hijacked proxy credentials (through which university personnel and students remotely access the university's intranet systems and databases).

¹⁸ See <https://annas-archive.gl/blog/blog-how-to-become-a-pirate-archivist.html>: "The first was \$10k from the anonymous individual who also has been supporting bookwarrior, the original founder of Library Genesis. Special thanks to bookwarrior for facilitating this donation."

¹⁹ E.g., <https://nitroflare.com/payment>; <https://nitroflare.com/affiliate>.

The site and its operator are believed to be in Russia and continue to operate with impunity. Though the site operator claims to have no knowledge of illegal tactics used to trick legitimate subscribers into disclosing their personal credentials, there have been reported incidences of students and academic personnel, at university institutions whose systems have been compromised, being subjected to phishing schemes.²⁰ Reports indicate that Sci-Hub has compromised the networks and data of universities and institutions, with academia and students warned against using said site to avoid compromising both institutional and personal security.²¹ Further, the site also poses potential damage to the research process, as the site's operator/s has/have no incentive to ensure the accuracy of the articles posted to the site, which articles may have been subject to correction, modification, or retraction.

The site continues to solicit donations from users, accepting a variety of cryptocurrencies. ISPs in Belgium, Denmark, France, Germany, Italy, Portugal, Russia, Spain, and Sweden are required to block access to the site, per injunctions secured by a group of scientific, technical, and medical (STM) journal publishers. The site has been the subject of a site blocking application in India, and on August 19, 2025, the Delhi High Court granted an interim blocking order against Sci-Hub (and also Sci-Net),²² citing the operator's willful disregard of its prior undertakings to the court.²³ In its order, the Court describes the platforms as "rogue websites" that primarily facilitate copyright infringement. The blocking order also covers [Sci-Net](#), a sister platform launched by the Sci-Hub operator where researchers can request papers not available on Sci-Hub.²⁴ Due to efforts to circumvent the court ordered blocks via the creation of new domains, including instructions from the operator informing its users of ways to circumvent the blocks, in December 2025, the Delhi High Court extended its earlier August blocking order to 40 additional mirror, redirect, and associated domains.²⁵

Despite being an adjudged pirate site, including before U.S. courts,²⁶ Sci-Hub's operations remain active, due to the difficulty of addressing online entities located in jurisdictions that are not IP-friendly. Exacerbating its deleterious impact on scientific publishing, in April 2026, the site launched a so-called "Sci Bot," its own AI-assisted research tool, expanding its functionality beyond that of an unauthorized

²⁰ City of London Police, Police Intell. Prop. Crime Unit. [Police warn students and universities of accessing an illegal website to download published scientific papers](#). (March 19, 2021); Peter Stubley, Sci-Hub: Police warn Students and Universities Not to Use Pirate Website Offering Academic Papers for Free, *The Indep.* (Mar. 19, 2021), <https://www.independent.co.uk/news/education/education-news/sci-hub-police-warning-science-b1819912.html>; and <https://snsi-new.squarespace.com/librarians> (last visited September 23, 2026) (noting that the cybersecurity dangers libraries face include intellectual property theft and the compromise of research and personal data which could result in corporate espionage and identity theft).

²¹ *Id.*

²² *Delhi High Court orders Sci-Hub to be blocked in India*, *The Hindu Bureau*, (Aug. 23, 2025), <https://www.thehindu.com/sci-tech/technology/delhi-high-court-orders-sci-hub-to-be-blocked-in-india/article69967768.ece> and *Suns Legal, Patent & Trademark Lawyers, Delhi High Court Orders Blocking of Sci-Hub and Sci-Net for Copyright Infringement*, *Suns Legal*, (Sept. 3, 2025), <https://sunslegal.com/2025/09/03/delhi-high-court-orders-blocking-of-sci-hub-and-sci-net-for-copyright-infringement/>.

²³ On December 24, 2020, the site operator had committed to the court (enjoining itself) that there would be no uploads of new articles until the court rules upon the application. However, on September 5, 2021, the operator uploaded 2,337,229 new articles to the site.

²⁴ *Sci-Hub Established the Scientific Literature Sharing Platform Sci-Net, Empowering the SCIHUB Token*, *ChainCatcher*, Mar. 14, 2025, <https://www.chaincatcher.com/en/article/2172582>.

²⁵ *Elsevier Ltd. v. Alexandra Elbakyan* (Delhi High Court, Dec. 9, 2025). Order available at <https://indiankanoon.org/doc/123696040/>.

²⁶ In 2015 and 2017, AAP member publishers, American Chemical Society and Elsevier, secured default judgments against Sci-Hub and its operator in the U.S., resulting in injunctions requiring U.S. domain name registries to suspend the site's U.S. administered domains.

repository facilitating access to infringing copies of publisher-curated content to an AI application built on and deriving its (questionable) functionality from its illegal database of infringing copyright works.²⁷

Shopee — an online (e-commerce) marketplace popular in several markets in Southeast Asia (Indonesia, Malaysia, the Philippines, Singapore, Thailand, Taiwan, and Vietnam), and which also operates in Brazil, Chile, Colombia, and Mexico. The site provides third-party sellers the platform through which to post listings of products they sell, from clothing to electronics, but, unfortunately, also counterfeit and pirated copies of academic textbooks, English-language teaching materials, and trade books.

The issues publishers face with respect to effecting the expeditious removal of infringing material from the site continue. The process for filing copyright infringement reports requires the publisher to register each book individually and regionally in the platform's IP program to enable enforcement actions. The process for reporting infringing activity remains slow and inefficient, particularly for publishers with large catalogues as they would be required to register thousands of copyright protected books. Furthermore, verification of third-party seller information is inadequate, and sellers already subject of an infringement report are permitted to continue to sell counterfeit products, including books, and pirated copies of eBooks on the platform. While links to infringing product(s) subject of rights holder notifications are eventually removed, effective action against vendors subject of the notifications, including repeat offenders, is lacking. AAP acknowledges the operator's outreach to the industry and its efforts to respond to the concerns raised.

Taobao (and Goofish) — Infringing PDF copies of books, counterfeit books sold individually or in bulk, leaked exam papers and test banks remain prevalent on the site. The process to remove or takedown infringing content continues to be challenging for rights holders as detailed reports listing supposed piracy indicators, which are difficult to identify as product listings are deliberately vague to avoid enforcement, continue to be required. In addition, the site requires rights holders to register each title with the site, including providing copyright registration and ownership information—further encumbering what should otherwise be an expeditious process of reporting infringing conduct. In addition, sales of access credentials continue, facilitating unauthorized access to publisher platforms and their online libraries, by allowing users to request paywalled articles through the “Contact Seller” function.

Uploadgig.com — provides free file hosting and sharing services. The service offers faster downloads with “premium” accounts and promotes a “partner” program where users can earn money by importing and sharing files. The services receive approximately 1.0 million visitors a month and is most popular in Japan, with 32% of the site's traffic, while the U.S. traffic accounts for 14%. The domain was registered in 2015, and its current hosting provider is DDOS-GUARD LTD (IP: 185.178.208.165), RU.

Welib.org — (also as *pdfdrive.com*; *welib.li*; *welib.link*; *welib-public.org*; *welib.st*; and *x-cdn-x.com*) was registered on March 3, 2025, via Tucows and managed by Cloudflare. The site is hosted by Uthost, Inc. (185.82.73.87) NL, and holds itself out as a “free library,” claiming to hold “43 million books and 98 million articles.” The site has an average of five million visits a month. Traffic from the United States is the highest at 33% according to SimilarWeb. The site offers read online and downloadable eBooks, of both trade and education books, and academic papers, including journal articles and reference materials. *Welib.org* does not respond to takedown notices. The site accepts donations on a membership model through bitcoin, Alipay, WeChat, Revolut, Cash App, and Amazon gift cards. The source code link for the site leads to an Anna's Archive database and software management site <https://software.annas-archive.li/AnnaArchivist/annas-archive>.

²⁷ Dalmeeth Singh Chawla, *Sci-Hub has created a new AI chatbot. Is it any good?* Am. Chem. Soc'y: Chem. & Eng'g News. (Apr. 22, 2026), <https://cen.acs.org/policy/publishing/Sci-Hub-created-new-AI/104/web/2026/04>.

The site is the subject of a copyright infringement suit filed by 13 AAP member publishers before the U.S. District Court for the Southern District of New York in June 2026.

Z-Library (z-lib.id) — (also *z-library.ec; z-lib.fm; z-lib.gd; z-lib.gl; z-library.gy; z-library.im; z-library.la; z-lib.li; z-library.sk; z-lib.sk; and 1lib.sk*) an online e-book piracy website, active since approximately 2009. Z-Library bills itself as “the world’s largest library” and claims to offer more than eleven million eBooks for download. The sites make available infringing eBooks in a variety of file formats, stripped of copyright protections, while also encouraging users to upload and download titles.

In November 2022, U.S. law enforcement seized approximately 249 interrelated domains of the Z-Library network.²⁸ Several more Z-Library domains were seized in May 2023. Following the piracy group’s failure to respond to a lawsuit²⁹ brought by four education publishers against the site in 2023, the U.S. District Court for SDNY granted the plaintiffs’ motion for default judgment, holding Libgen liable for \$30 million in damages, as well as issuing an injunction order that would enjoin third party service providers from continuing to provide support to the site.³⁰ While various mirror sites have been seized and taken down, the group remains active and new domains are repeatedly cycled in to replace the old.³¹

Recently (June 2026), in an effort to circumvent the blocking actions and seizures of its various domains, the site launched custom-branded, login-only “white label” mirrors, “creating a network of stealthy, white-label pirate sites” that its users can create and run, with Z-Library offering these user-operators a 20% share of donations to the site as compensation—paid in cryptocurrency to cover domain and other costs.³²

Other Problematic Services

Read Online Sites — are platforms that provide the text of an eBook to be viewed or “read” online. “Read online” sites are supported by ads served up by Google Ads, Microsoft Advertising, Steepto, and MGID. As “read online” sites are optimized to allow for “viewing” or “reading” on mobile devices, these sites reach more consumers than sites optimized for desktop or laptop devices given the ubiquity of mobile devices through which infringing works can be accessed without having to download the work. This type of online book piracy is particularly problematic as it significantly increases enforcement costs for publishers. In the “read online”

²⁸ U.S. Att’y’s Off., E.D.N.Y., *Two Russian Nationals Charged with Running Massive E-Book Piracy Website* (Nov. 16, 2022), <https://www.justice.gov/usao-edny/pr/two-russian-nationals-charged-running-massive-e-book-piracy-website>, and Maham Havaid, *Library, and readers and authors clashed*, *The Washington Post* (Nov. 17, 2022), <https://www.washingtonpost.com/nation/2022/11/17/fbi-takeover-zlibrary-booktok-impacted/>.

²⁹ Ernesto Van der Sar, *U.S. Hits Z-Library with New Domain Name Seizures*, *Torrent Freak* (May 5, 2023), <https://torrentfreak.com/u-s-hits-z-library-with-new-domain-name-seizures-230505/>.

³⁰ Ernesto Van der Sar, *U.S. Court Orders LibGen to Pay \$30m to Publishers, Issues Broad Injunction*, *Torrent Freak* (Sept. 25, 2024), <https://torrentfreak.com/u-s-court-orders-libgen-to-pay-30m-to-publishers-issues-broad-injunction-240925/>.

³¹ In July 2025, a Belgian court ordered ISPs to block *Libgen*, *Z-Library*, and *OceanOfPDF* simultaneously. The first European jurisdiction to move against all three platforms at once. See *Belgian Courts Block Websites Providing Free Pirated Books*, *The Brussels Times* (July 18, 2025), <https://www.brusselstimes.com/1669291/belgian-courts-block-websites-providing-free-pirated-books>. In March 2026, the Delhi High Court ordered MeitY and DoT to block Libgen (with Sci-Hub) in India, with blocking orders directed within 72 hours. Blocking orders in the UK, Belgium, Denmark, France, Germany, Italy, Portugal, Russia, Spain, and Sweden remain in place.

³² Ernesto Van der Sar, *Z-Library Lets People Run White-Label, Login-Only Pirate Mirrors*, *TorrentFreak* (June 8, 2026), <https://torrentfreak.com/z-library-lets-people-run-white-label-login-only-pirate-mirrors/> and also Z-Library Official (@https://x.com/Z_Lib_official/status/2062152671176392849 (“In practice, this means you can run your “own” version of the library at a separate domain, with your visuals and your access rules.”)).

scenario, the infringing content is displayed across several linked pages on a website. For the typical download site, one takedown notification will address the complete work. In contrast, for a “read online” site, a takedown notification must be sent for every online page (i.e., every URL) associated with a single title. As such, hundreds of takedown notifications will be necessary to remove access to a single work, and thus, thousands of notifications by a publisher for the many copyrighted works they protect. Examples of such sites include *freenovelread.com* (IP: 179.43.181.74 ISP: PLI-PA), which includes a subdomain for every author name listed (e.g., david-baldacci.freenovelread.com) and *lokepub.com* (IP: 45.129.84.139 ISP: AMARUTU-TECHNOLOGY - Amarutu Technology Ltd, SC (via Cloudflare, Inc.)).

Others include: *graycity.net* (registered 2018, using Google ad choices to serve ads, hosted by AlexHost SRL, BG, (131.123.42.41)), which appears to be part of a group of related read-online sites, *bookfrom.net*; *archive.bookfrom.net*; and *readfrom.net* — all of which use the same IP and hosting address (IP: AlexHost SRL, BG, (131.123.42.41)). While the group remains heavily visited by U.S. users, with 43-59% traffic, overall, the site’s visits per month have decreased to 335,000 a month combined (from the reported 1.2 million visits per month last year).

The ***ldoc.pub*** is among the network of read online sites in the Vdoc network, operated from Vietnam, and has an estimated 100,000 site visits per month. Ninety percent of the sites in the network are hosted by IncogNET LLC., located at IP address 185.148.3.89 with the ISP Magna Capax Finland Oy (via Cloudflare). Numerous sites in the network also use Google AdSense services to generate revenue from advertisements placed on the site. Among the network’s domains with the highest traffic are: *pdfcoffee.com* (with 16.14 million visitors in August 2026); *dokumen.pub* (12.31 million monthly visitors); and *vdoc.pub* (1.098 million monthly visitors). Other domains include *epdf.pub*; *xdocs.net*; *zoboko.com*; and *zlib.pub*.

Audio Book Piracy Sites — Audiobook piracy sites remain a persistent problem. While U.S. platforms are still a prime source of unauthorized copies of audiobook files, there continue to emerge stand-alone sites that rely on a few central servers of their own for serving-up pirated audio book files. These stand-alone sites are largely non-compliant with take down notifications. Some offer downloads while others only provide files in streaming format, while still others also offer pirated eBooks for download alongside audiobook files. Akin to “read online” piracy sites described above, audiobook sites are accessed on mobile devices making their reach much broader than traditional desktop webpage-based piracy. The sites are often optimized for mobile and streaming, making them appealing to a wider audience. Below is a sampling of the most problematic audiobook piracy sites, and the problem only continues to grow.

ipaudio.club — 193.142.146.53 - ColocationX Ltd. - abuse@colocationx.com (NL), this site serves as a file host for several audiobook piracy sites (*dailyaudiobooks.com*; *dailyaudiobooks.net*; *findaudiobook.com*; *sharedaudiobooks.com*; *sharedaudiobooks.co*; *bigaudiobooks.club*; *goldenaudiobook.co* and *goldenaudiobook.net*), which sites combined receive approximately 350,000–400,000 combined visits per month.

In addition to the above cluster of audiobook piracy sites, there is also the *galaxyaudiobook.com* group (Host IP: 185.224.82.115 - Abellohost BV, - abuse@colocationx.com; NL): *galaxyaudiobook.com*; *audiobookss.com*; *fantasyaudiobook.com*; *tokybook.com*, all hosted by Cloudflare. *Galaxyaudiobook.com* and its related sites have a combined average of 20,000 site visits per month.

Telegram — an instant messaging app, is now a platform of choice for pirates, with private groups linked to public channels and Telegram bots used to automate requests for and downloads of content. The app currently has one billion monthly active users, “with 500 million daily active users and over 15 million premium

subscribers,”³³ making it the fourth most popular messaging app across the world. The platform’s copyright infringement reporting mechanism does little to mitigate the rampant piracy facilitated by the private groups operating in violation of the platform’s policy guidelines. Further, the encrypted nature of the platform presents significant enforcement difficulties for penetrating the private groups dedicated to distributing infringing content. Other notorious piracy networks (such as *oceanofpdf.com* and *Libgen*) have established Telegram bots and host public telegram groups to distribute copyright protected content or provide links to piracy sites hosting and disseminating pirated materials.

A number of Telegram groups and channels engage in hosting or distributing copyrighted materials, with some engaging in crowdsourcing copyrighted content from users with institutional access. The trend of crowdsourcing copyrighted content has gained prominence with private groups on the platform, where users actively participate in requesting and sharing copyright protected content. Despite this continuing problem, Telegram has not implemented adequate measures to effectively enforce its policies and address the infringing activities occurring within private groups or those related to linking to public channels. While the platform’s adherence to privacy and security has been lauded, its failure to adequately address the infringing activity occurring via the app continues. Piracy activity is often evident, as infringers openly promote their private groups across various social media platforms and encourage other users to join them. The platform should take meaningful action to address the issues of crowdsourcing, linking, and Telegram bots, including adapting and adjusting policies to confront these challenges effectively.

1337 Services (Njalla) — the service, founded by The Pirate Bay co-founder Peter Sunde and based in Nevis, acts as an intermediary for domain name registration purposes. Clients utilize the service to procure and “own” domain names on their behalf, providing the client with anonymity by obscuring the identity of the actual domain owner. The service is utilized by piracy sites such as *Z-Library*, *Sci-Hub*, *Libgen*, and *Annas-Archive*, and now hosts some one hundred publishing-related piracy sites, including some registered via **Immaterialism Limited**.

Rogue Hosting Providers — offer support to the large piracy networks engaged in criminal copyright infringement. These providers are typically uncooperative, often disregarding requests for assistance from rights holders, even law enforcement agencies. Not only do rogue hosting providers take pains to remain oblivious to the activities of the entities to which they provide services, some may purposefully create conditions that facilitate unlawful activity, such as spamming, phishing, malware distribution, hacking, and piracy.

Problematic hosting providers include:

Contabo (contabo.com/en — located in Germany) provides hosting services to, among others, gradespush.com/; intereseducation.com/; and papacambridge.com, and routinely ignores takedown notifications received from rights holders.

DDoS Guard is a hosting, reverse-proxy, and DDoS-protection provider associated with Russia and used by large-scale piracy operations such as notorious cyberlockers as well as streaming and downloading sites. As noted in the 2025 Review of Notorious Markets for Counterfeiting and Piracy, it provides “bullet proof hosting” services. DDoS-Guard’s role is particularly relevant to publishing because Anna’s Archive shifted certain domains to its infrastructure following enforcement against other service providers, demonstrating how piracy operators can migrate among infrastructure providers following successful enforcement.

³³ Shubham Singh, *Telegram Users Statistics 2026 (Latest Global Data)*, DemandSage (Aug. 12, 2026), <https://www.demandsage.com/telegram-statistics/>.

IP Volume Inc. (aka FiberXpress B.V.; Nogovara, DataOne B.V., Incrediserve Ltd., REBA Communications, B.V. at www.ipvolume.net) — located in The Netherlands and providing services to the Libgen network.

Shinjiru Technology Snd Bhd (shinjiru.com.my - Malaysia) provides hosting services to Libgen mirror sites and numerous read online sites. The provider does not respond to notices.

Ultahost, Inc. (ultahost.com - Netherlands) - is a hosting provider for WeLib.org and has not been responsive to publishers' notices.

Verdina/IWS Networks — This network hosts a cluster of websites that provide links to pirated copies of books, most in PDF format. Publisher requests for assistance are typically ignored. The sites are hosted by IWS Networks (abuse@iws.co), a company registered in Armenia. The transit provider is Verdina Ltd, with servers located in Bulgaria, although the company is registered in Belize. Verdina Ltd does not conduct any know-your-business-customer due diligence during customer registration and promotes its services on underground forums.

Alexhost SRL — Moldova-based hosting provider (Chişinău) that openly advertises "DMCA Ignored Hosting," acts only on Moldovan court orders, and requires no identity verification from customers. AlexHost hosts the read-online piracy cluster graycity.net, bookfrom.net, archive.bookfrom.net, and readfrom.net (IP: 131.123.42.41), and also some Z-Library domains.

PonyNet / FranTech Solutions / BuyVM — Canadian-operated hosting network with data centers in the United States (Las Vegas, Miami, New York) and Luxembourg. Security researchers have repeatedly identified AS53667/PONYPNET as a "bulletproof" host and malware distribution center, with at least ten malware families traced to its servers. Rightsholders report that the company ignores DMCA notices and redirects complainants to Cloudflare.

Privatelayer — Swiss-based hosting provider (Zurich/Ticino) with Panama corporate registration, previously identified in USTR's Notorious Markets List as a host of numerous notorious sites. Private Layer continues to host publishing piracy operations, including Libgen (libgen.li) and Z-Library (z-lib.by) domains, and is promoted in offshore-hosting communities as ignoring copyright notices.

Conclusion

Industrial scale infringing activity facilitated by piracy sites and networks, and the rogue platforms that provide services to these pirate actors continue to inflict significant harm to book and journal publishers, their authors, and the editors, illustrators, and other industry personnel instrumental to the publication and dissemination of books and journal articles. This harm is made more pernicious as the nature of this industrial scale piracy is no longer merely that of websites facilitating access to pirated copies of publisher-curated content. Rather, the most egregious sites, some of which have already been named to the Notorious Markets List by USTR, are evolving into distributed, enforcement-proof infrastructures — networks deliberately engineered to circumvent site blocking and domain seizures. Some of these same sites also openly advertise themselves as suppliers of infringing content available for AI training, for the right price, enabling AI applications built directly on corpora consisting of pirated copyright works.

Given the evolution in the scale and nature of piracy, enforcement must increasingly address piracy activity as an ecosystem, rather than the successive pursuit of individual, stand-alone domains. The most

sophisticated services identified in this submission use multiple domains, affiliated mirrors, distributed storage, private messaging channels, offshore hosting, reverse proxies, cryptocurrency payments, and other masking infrastructure to ensure operational persistence despite domain seizures, injunctions, and blocking orders. At the same time, the growth of artificial intelligence has created an additional potential market for the massive repositories accumulated by these notorious pirate sites: bulk access to tens of thousands of unauthorized copies of books and journal articles — the content necessary for LLM training. Effective enforcement now increasingly requires coordinated action against operators of piracy sites and services *and* against intermediaries that knowingly and persistently enable these piracy services to remain accessible and commercially useful even after infringement has been repeatedly documented.

American creativity and innovation have long been strong economic drivers, and in order to maintain America's strength in intellectual property creation, the U.S. government should continue to promote a strong copyright framework, with human creativity at its core.

The continued viability of the U.S. publishing industry depends on a robust copyright protection and enforcement framework, and the industry trusts that the U.S. government will continue to meaningfully collaborate with U.S. trading partners to address the borderless nature of online piracy more effectively. AAP and its member publishers appreciate the efforts of the U.S. government to identify and highlight notorious, networked markets that traffic in infringing content and counterfeit products, whether in physical markets or online.

Respectfully submitted,

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