

**LDD**

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

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|------------------------------------|---|---------------------|
| Joseph E. Carlin                   | : | CIVIL ACTION        |
| P.O. Box 26972                     | : |                     |
| Philadelphia, PA 19134             | : |                     |
| Plaintiff                          | : |                     |
| vs.                                | : |                     |
|                                    | : | NO. <b>14 2406</b>  |
| Jeffrey Bezos                      | : |                     |
| 1200 12th Avenue South, Suite 1200 | : |                     |
| Seattle, Washington 98144          | : |                     |
| Defendant                          | : |                     |
| and                                | : |                     |
| Amazon.com, Inc.                   | : | JURY TRIAL DEMANDED |
| 1200 12th Avenue South, Suite 1200 | : |                     |
| Seattle, Washington 98144          | : |                     |
| 206-266-1000                       | : |                     |
| Defendant                          | : |                     |

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**COMPLAINT**

TO THE HONORABLE, THE JUDGES OF THE SAID COURT:

Joseph E. Carlin, Plaintiff, brings forth this Complaint and avers as follows:

1. Joseph E. Carlin, Plaintiff, with an address as noted in the above caption, and is a citizen of the United States of America.
2. Jeffrey Bezos, also known as Chairman, President and CEO of Amazon.com, Inc., is a Defendant in this Civil Action, with an address as noted in the above caption, and is a citizen of the United States of America.
3. Amazon.com, Inc., Defendant in this Civil Action, with an address as noted in the above

caption, is a corporation formed according to the laws of the United States of America and is a citizen of the United States of America.

4. This Honorable Court has jurisdiction to hear this Complaint.

**DEFINITIONS**

5. Plaintiff incorporates the averments made in Paragraphs 1 through 4 as through fully contained herein.

Amazon.com means an on line internet sales company  
which sells, among other items,  
books

Createspace means an on line internet subsidiary company  
in control of Defendant(s) which exists  
to solicit author(s) to self publish their  
material and use Createspace as the outlet  
to reach a world-wide purchasing audience

Third Party Distributors means a separate sales organization or on line book  
selling distributor that secretly operates under the  
umbrella of Defendant(s) on line company

**DISCUSSION**

6. Plaintiff incorporates the averments made in Paragraph 1 through 5 as though fully contained herein.

7. Defendants control an on line internet based sales organization and more specifically control an on line internet self publishing book distributorship known as Createspace.

8. In this instance Defendants accepted several copyrighted materials (original works in book form) from Plaintiff with the promise of on line sales through promotion in the Createspace community to a world-wide audience while, unknown to Plaintiff, unlawfully permitted his copyrighted material to be marketed and sold through third party distributors.

### **COPYRIGHT INFRINGEMENT**

9. Plaintiff incorporates the averments made in Paragraphs 1 through 8 as though fully contained herein.

10. Defendants entice self published on line book sales from authors, such as Plaintiff, with the promise of a world-wide purchasing audience with the underlying motivation to secretly and underhandedly permit on line sales from third party distributors without just compensation to the author(s) and Plaintiff will show, through discovery, that this is an ongoing technique used by Defendants against any number of authors seeking to find an outlet to self publish their books.


11. Plaintiff established a sale price of the submitted copyrighted material only to have Defendants lower the price for easier sales through third party distributors.

12. Defendants permit the third party distributors to advertise "new" and "used" books from the self published author(s) copyrighted material, unbeknownst to author(s), to lure buyers, boost sales and split more profits.

13. The only world-wide audience in this scheme to sell self published books are the third party distributors Defendants have a deal with to sell these copyrighted books and dole out

profits between them, with no just compensation going to the author(s), in violation of Title 17, United States Code.

**W H E R E F O R E**, Plaintiff prays this Honorable Court will find in favor of Plaintiff's Complaint and Order Defendants to pay the sum of One Hundred Million Dollars (\$100,000,000.00) in punitive damages to Plaintiff, along with Court Costs, Attorney fees if any and any other damages this Honorable Court deems appropriate to punish Defendants and dissuade them from similar actions in the future.

  
Joseph E. Carlin, Pro Se

4/25/14  
Date