

IN THE
UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

ALLEN LEE ASHER-BUTLER,
Plaintiff,

Case Number:

FILED
10/04/2024
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk

-v-

AMAZON KDP,
JEFF BEZOS

1:24-cv-01776-SEB-MJD



Provided by:
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A. PARTIES
PLAINTIFF:

1. Plaintiff is a citizen of Plainfield, Indiana and is located at Plainfield Correctional Facility, 727 Moon Road, Plainfield, Indiana 46168.

DEFENDANT(S):

2. Amazon KDP is a corporate entity registered and incorporated in the United States and is located at P.O. Box 81226 Seattle, Washington 98108-1226

Defendant Jeff Bezos is a citizen of the United States, and is the of Amazon located at 710 Terry Street Seattle, Washington

B. STATEMENT OF CLAIM

In early 2009, Plaintiff, through a headhunter service located online, was introduced to an author, William C. Wills.

Author William C. Wills and the Plaintiff entered into an agreement and mutual understanding that the Author would use Plaintiff's artwork to promote his writing and Plaintiff would use Author Wills' writing to promote Plaintiff's artwork. Additionally, it was understood that the Plaintiff retained all copyrights and royalties rights arising from Plaintiff's artwork.

The Author, pursuant to the original agreement with the Plaintiff, paid Plaintiff a base rate for each piece of artwork used.

In late 2009, Amazon Kdp published four (4) titles containing the Plaintiff's artwork, which were self-published by Author William C. Wills through Amazon Kdp. These titles are: The Treehouse Voyage, Skoolie, Guantanamo Island and Suburbia.

In late 2009, Amazon Kdp violated the Plaintiff's rights by committing copyright infringement and theft in direct violation of Amazon Kdp's user agreement.

To date, the Plaintiff has not received any compensation from Amazon Kdp from the sales of Author William C. Wills' books published through Amazon Kdp which contain the Plaintiff's artwork. Amazon Kdp has not compensated Plaintiff for any royalties fees owed to Plaintiff.

E- RELIEF WANTED: \$250,000.00 in punitive damages. The percentage of royalties owed to Plaintiff

F. JURY DEMAND

Jury Demand - I want a jury to hear my case

Court Trial - I want a judge to hear my case.

Dated this 27 day of September 2024

Respectfully Submitted,
Allen C. Sher Butler
Plaintiff Pro-Se

IDOC Number 108859

Plainfield Correctional Facility
727 Moon Road
Plainfield, Indiana 46168

G OPTIONAL CERTIFICATION

Under penalty of perjury, I declare that the facts alleged in this complaint are true and correct to the best of my knowledge and belief.

Plaintiff
Allen Oster-Butler

REQUEST TO PROCEED IN THE DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

- I DO request that I be allowed to file this complaint without prepaying the filing fee. I have completed a request to proceed in the District Court without prepaying the fee and have attached it to the complaint.
- I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.