

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 21-61332-CIV-RUIZ**

CHANEL, INC.,

Plaintiff,

vs.

THE INDIVIDUALS, BUSINESS ENTITIES,
AND UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

**DECLARATION OF KATHLEEN BURNS IN SUPPORT OF PLAINTIFF’S *EX PARTE*
APPLICATION FOR ENTRY OF TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION, AND ORDER RESTRAINING TRANSFER OF ASSETS**

I, Kathleen Burns, declare and state as follows:

1. I am over 18 years of age and I have personal knowledge of the facts set forth herein. I submit this Declaration in support of Plaintiff’s *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for Temporary Restraining Order”). If called upon to do so, I could and would competently testify to the following facts set forth below.

2. I am an officer of Invisible Inc, a licensed private investigative firm.

3. Counsel for Plaintiff, Chanel, Inc. (“Chanel” or “Plaintiff”), retained my firm to investigate and document the suspected sale of counterfeit versions of Plaintiff’s products by Defendants, the Individuals, Business Entities, and Unincorporated Associations Identified on Schedule “A” hereto (collectively “Defendants”), and to obtain the available payment account data for receipt of funds paid to Defendants for the sale of counterfeit Chanel-branded merchandise.

4. Prior to filing this Declaration, my firm accessed Defendants' Internet based e-commerce stores and fully interactive, commercial Internet websites operating under their respective seller identification names or domain names set forth on Schedule "A" hereto (the "Seller IDs and Subject Domain Names"). Upon accessing each e-commerce store and website, my firm was able to view products bearing and/or using Chanel's trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data electronically with each e-commerce store and website. My firm then placed an order via each of the e-commerce stores and websites operating under the Seller IDs and Subject Domain Names¹ for the purchase of various products – each bearing and/or using counterfeits and infringements of at least one of Chanel's trademarks² at issue in this action, and requested each product to be shipped to the Southern District of Florida. Each order was processed entirely online and following the submission of the orders, my firm received information for finalizing payment³ for the products ordered from Defendants 40-49 via PayPal, Inc. ("PayPal") to Defendants' respective PayPal accounts⁴ and/or payee,⁵ and from Defendants 50-57 via Amazon Payments, Inc.,⁶ as identified on Schedule "A" hereto.⁷ At the conclusion of the process, the detailed web pages and images my firm captured and downloaded reflecting each product ordered, together with a photograph of a received product, were sent to Chanel's counsel.

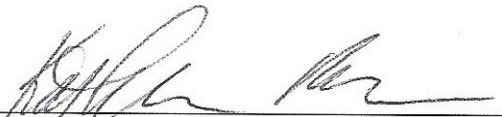
¹ Defendants 41 and 49 use multiple websites operating under their Subject Domain Names in concert with their social media accounts via the non-party social media website Facebook.com, to facilitate their counterfeiting activities and/or to ultimately complete their offer and sale of Chanel-branded products. See generally Composite Exhibit "1" hereto.

² Defendant 55 physically altered the images of the Chanel Marks on the products being offered for sale via its e-commerce store. My firm received the product purchased from this Defendant and verified the product did, in fact, bear at least one of the Chanel Marks in its entirety. A true and correct photograph of the product my firm received is included in Composite Exhibit "1."

³ My firm was instructed to not transmit the funds to finalize the sale for the orders for most of the Defendants so as to avoid adding money to Defendants' coffers.

5. True and correct copies of the web page captures and images showing the various Chanel-branded products my firm ordered via Defendants' Seller IDs and Subject Domain Names, redacted copies of the order summary web pages and order confirmations, and any electronic communication exchanged, together with a true and correct photograph of a product my firm received are attached hereto as Composite Exhibit "1."

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct. Executed the 28th day of June, 2021, at Scottsdale, Arizona.


Kathleen Burns

⁴ Defendant Numbers 40-49 operate via the non-party social media website Facebook.com and/or via commercial Internet websites, and use money transfer and retention services with PayPal, Inc. ("PayPal"). During the course of the investigation, my firm obtained multiple PayPal accounts for some of these Defendants, all of which are included on Schedule "A" hereto.

⁵ Following the submission of certain orders from Defendants' Subject Domain Names, my firm received identical PayPal payee information for finalizing payment, as noted on Schedule "A."

⁶ Defendant Numbers 50-57 operate via the non-party Internet marketplace platform, Amazon.com. Amazon.com is an e-commerce marketplace that allows Defendants to conduct their commercial transactions privately via Amazon's payment processing and retention service, Amazon Payments, Inc. As such, Defendants' payment information is not publicly disclosed.

⁷ Some Defendants provided additional contact information in connection with their respective Seller IDs or Subject Domain Names; accordingly, these additional forms of electronic contact are included in Schedule "A" hereto.

SCHEDULE “A”
DEFENDANTS BY NUMBER, SELLER ID, SUBJECT DOMAIN NAME, RESPECTIVE
FINANCIAL INFORMATION, AND ADDITIONAL MEANS OF CONTACT

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Seller ID Number	PayPal Payee	Chanel Branded Item’s ASIN ⁸	Additional Means of Contact	Social Media URL
40	corwin.store	james745119@gmail.com	Sihe Trading Co., Ltd.		hanli135790@gmail.com	
40	bluerd.shop		Sihe Trading Co., Ltd.		hanli135790@gmail.com hello@nova.com	
40	buebu.shop		Sihe Trading Co., Ltd.		hanli135790@gmail.com	
40	feieagle.shop		Sihe Trading Co., Ltd.		hanli135790@gmail.com	
40	iluivo.shop		Sihe Trading Co., Ltd.		YT@gmail.com	
40	incco.shop	james745119@gmail.com	Sihe Trading Co., Ltd.		hanli135790@gmail.com	
40	ofore.store		Sihe Trading Co., Ltd.		hanli135790@gmail.com	
40	seerlin.shop		Sihe Trading Co., Ltd.		hanli135790@gmail.com	
41	raretail.com	hotsstore@hotmail.com	Sunoutdoor Co., Ltd.		service.acx@gmail.com customer01@shopify-service.com	www.facebook.com/ Raretail-2- 101674995209115/
41	delightfuts.com		Sunoutdoor Co., Ltd.		service.acx@gmail.com boss@delightfuts.com customer05@shopify-service.com	www.facebook.com/ Delightfuts-1- 100279455408951/
41	factiones.com		Sunoutdoor Co., Ltd.		service.acx@gmail.com boss@factiones.com	www.facebook.com/ Factiones-1- 103313698388160
41	ignoreds.com		Sunoutdoor Co., Ltd.		service.acx@gmail.com	www.facebook.com/ Brandon-Simmons-1- 111122707749554/
41	ongoinges.com		Sunoutdoor Co., Ltd.		service.acx@gmail.com	www.facebook.com/ Naufal-Rafif-Fajar- Ilmi_1- 103025901791990/

⁸ The Amazon Standard Identification Number (“ASIN”) is a unique 10-digit alphanumeric identifier Amazon assigns to each product. Sellers can create a variational relationship between products in regards to name, size/count, color, style, scent, etc. When doing so, the ASIN identified in the Product Information / Description segments represents the core product and a different ASIN may be assigned based on variations thereof, as identified in the URLs. The ASIN for the various Chanel branded products were obtained from the Product Information / Description segments of the infringing Chanel branded items, all of which are identified on Schedule “A” hereto, and included in Composite Exhibit “1” hereto.

41	pendinggets.com	lacrosse.sop@aol.com heetodry@protonmail.com	Sunoutdoor Co., Ltd. Guili Liu Liandong Wu		service.acx@gmail.com	www.facebook.com/ Pendinggetscom- 104578065141218
41	beliefal.com	WAXIC996@hotmail.com	Wuhan Wangxinchao Electronic Commerce Co., Ltd.		service.acx@gmail.com dawn-fast@outlook.com	
41	amountes.com		Wuhan Wangxinchao Electronic Commerce Co., Ltd.		service.acx@gmail.com	
41	gloriousion.com	recklessjiang@zohomail.com	Wuhan Wangxinchao Electronic Commerce Co., Ltd. Haidong Ye		service.acx@gmail.com customer01@shopify- service.com	
41	dawnise.com	torquesong@yahoo.com	Zhiwei Chen		service.acx@gmail.com dawn-fast@outlook.com	
41	shineian.com	polar.shirt@yahoo.com	Dubaozhan Communication Co., Ltd.		service.acx@gmail.com	
41	yeaing.com	chair.yky@gmail.com	Ruimu Women's Shoes Store, Wuchang District, Wuhan		service.acx@gmail.com	
42	jiyuanm.com	foshanaoke001@163.com	佛山市顺强建材有限公司 (Foshan Shunli Building Material Co., Ltd.)		info@jiyuanmei.com 2911800416@qq.com jiyuanm.com@contactpri vacy.com	
42	esunnily.com		佛山市顺强建材有限公司 (Foshan Shunli Building Material Co., Ltd.)		info@esunnily.com esunnily.com@contactpri vacy.com	
43	vkrijewelry.com	2738429873@qq.com	深圳市豪佳杰贸易有限 公司 (Shenzhen Haojiajie Trading Co., Ltd.)		service@vkrijewelry.com pw- e3e30172429068a3e24c7 2e5edd81db6@privacygu ardian.org	
43	vlcase.com		深圳市豪佳杰贸易有限 公司 (Shenzhen Haojiajie Trading Co., Ltd.)		service@vlcase.com	
44	aililady.com	362506843@qq.com	深圳市天隆资产管理有 限公司 (Shenzhen Tianlong Asset Management Co., Ltd.)		contact@Aililady.com contact@AILISISI.com aililady.com@contactpri vacy.com	
45	genilicaa.com	wenhaote2022@163.com	深圳市信速进出口有限 公司 (Shenzhen Xinsu Import and Export Co., Ltd.)		contact@genilica.com genilicaa.com@contactpr ivacy.com	
46	lifefashionday.com	ppvt2020@gmail.com	Nguyen Nhat Vu		support@lifefashionday.c om 96c63f7b84fa4f048187df b24cc8d1a0.protect@wh oisguard.com	
47	luxekings.co	tungchefpayment@gmail.com	Tran Thanh Tung		customers.pod.contact@ gmail.com	

48	spitfice.com	htang8859@gmail.com	rao ping xian shun tang jian cai dian		spitfice@126.com info@spitfice.com	
49	thebrandroom.shop	info@outletbrandy.com	Outlet Brandy LTD		info@wellones.com	www.facebook.com/t hebrandroomshop/
50	Aricot	ATSPQRNXGR9TE		B094FJ29MB		
51	BRUZY&	A3PGU7TDV3J63F		B092JJTP8Q		
51	HGVVV&	A3PGU7TDV3J63F		B092JGHG6S B092JJY7CM		
52	cdybbiuviu	A2ZL9U65Q9FQDQ		B092H5FZZ1		
53	fwqvk8888	A1ACP1LLUCB7AL		B094ZSJF91		
54	GuangZhouLianJianS hiYeYouXianGongSi	A1H5AG9KXTCY1L		B092LZVGR6		
55	huajiazhiyuexianhuah unqingliyidian	A3IA7HWLGFZGDP		B08TMPSH8S		
56	taiyuanxiguaniaoyukej iyouxiangongsi	A1RDPGKKD67KVI		B092LH9K GK		
57	Yihao gift	AFOVI2H8UITLC		B092LPQTLR B092LN9ZW1		