

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

CHANEL, INC.,

Plaintiff,

vs.

ANALUXURYFASHION, *et al.*,

Defendants.

---

**DECLARATION OF ERIC ROSALER IN SUPPORT OF PLAINTIFF'S  
NOTICE OF IDENTIFICATION OF ADDITIONAL PAYPAL ACCOUNTS  
USED BY DEFENDANT NUMBERS 11, 16, 40-44, AND 47**

I, Eric Rosaler, 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 Notice of Identification of Additional PayPal Accounts Used by Defendant Numbers 11, 16, 40-44, and 47. 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 AED Investigations, Inc., a licensed private investigative firm.


3. Counsel for Plaintiff, Chanel, Inc. ("Chanel" or "Plaintiff"), retained my firm to investigate the ongoing sale of counterfeit versions of Plaintiff's products by Defendant love\_brand\_collection ("Defendant Number 11"), and to determine Defendant's payment account data for receipt of funds paid to Defendant for the sale of counterfeit Chanel-branded goods.

4. On June 29, 2021, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the "Application for Temporary Restraining Order") [ECF No. 6]. I hereby incorporate by reference

all factual allegations contained in my Declaration in Support of Plaintiff's Application for Temporary Restraining Order [ECF No. 6-4].

5. Prior to filing this Declaration, my firm accessed Defendant Number 11's Internet based, interactive photo album operating under the seller identification name set forth on Schedule "A" hereto (the "Seller ID"), via the non-party social media website, Instagram.com. Upon accessing Defendant Number 11's interactive photo album operating under the Seller ID, my firm was able to view products bearing Chanel's trademarks and actively communicate and exchange data electronically with Defendant using Instagram.com's direct messaging system. My firm then selected a product bearing counterfeits of, at least, one of Chanel's trademarks at issue in this action via Defendant Number 11's Seller ID, and requested payment information to finalize the order.<sup>1</sup> Through Instagram.com's direct messaging system, Defendant Number 11 provided my firm information for finalizing payment for the Chanel-branded product selected, via PayPal, Inc. ("PayPal") to Defendant's newly identified PayPal account (the "Additional PayPal Account"), as set forth on Schedule "A" hereto. True and correct copies of the detailed web page captures reflecting the Chanel-branded product my firm ordered via Defendant Number 11's Seller ID, together with redacted copies of the electronic communication exchanged and newly identified payment information provided by Defendant Number 11, 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 is true and correct. Executed the 20<sup>th</sup> day of July, 2021, at Aventura, Florida.

  
Eric Rosaler

---

<sup>1</sup> My firm did not transmit the funds to finalize the sale for the order from Defendant Number 11 so as to avoid adding additional money to Defendant's coffers.

**SCHEDULE "A"**  
**DEFENDANT BY NUMBER, SELLER ID, AND ADDITIONAL PAYPAL ACCOUNT**

<b>Def. No.</b>	<b>Defendant / Seller ID</b>	<b>Additional PayPal Account</b>
11	love_brand_collection	376428493@qq.com