

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

CHANEL, INC.,

Plaintiff,

vs.

ANALUXURYFASHION, *et al.*,

Defendants.

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

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 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 Invisible 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 Defendants, the Individuals, Business Entities, or Unincorporated Associations identified on Schedule "A" hereto ("Defendants"), and to determine Defendants' payment account data for receipt of funds paid to Defendants 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. 6-15].

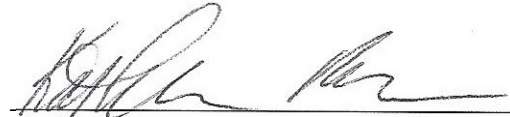
5. Prior to filing this Declaration, my firm accessed Defendants' Internet based interactive photo album operating under the seller identification name set forth on Schedule "A" hereto (the "Seller ID"), and fully interactive, commercial Internet websites operating under the respective domain names, set forth on Schedule "A" hereto (the "Subject Domain Names"). Upon accessing each interactive photo album and website, my firm was able to view products bearing Chanel's trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data electronically with each Defendant. My firm then placed an order from each Defendant via their Seller ID¹ and Subject Domain Names for the purchase of various products – each bearing counterfeits and infringements of at least one of Chanel's trademarks 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 payment² for the Chanel-branded products via PayPal, Inc.

¹ Defendant Number 16 operates its photo album under its Seller ID through the non-party social media website, Instagram.com. This Defendant uses its Seller ID in tandem with electronic communication via private messaging applications and/or services such as WhatsApp and Instagram.com in order to complete its offer and sale of counterfeit and infringing Chanel-branded products. Specifically, upon accessing the photo album, my firm was able to view products bearing Chanel's trademarks and actively communicate and exchange data electronically via the contact information provided by Defendant Number 16 on its Seller ID. My firm then selected a product bearing counterfeits of, at least, one of Chanel's trademarks at issue in this action, via Defendant's photo album operating under the Seller ID, and arranged for the order to be shipped to the Southern District of Florida via Defendant's respective private messaging account. The order was processed electronically.

² My firm was instructed to not transmit the funds to finalize the sale for the orders for some of the Defendants so as to avoid adding money to Defendants' coffers.

(“PayPal”) to Defendants’ newly identified PayPal accounts³ and/or payee⁴ (the “Additional PayPal Accounts”), as set forth on Schedule “A” hereto. True and correct copies of the detailed web page captures reflecting the Chanel-branded products offered for sale and ordered via Defendants’ Seller ID and Subject Domain Names, together with redacted copies of the order summary web pages and newly identified payment information provided by Defendants, 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 20th day of July, 2021, at Scottsdale, Arizona.


Kathleen Burns

³ 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

⁴ 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.”

SCHEDULE “A”
DEFENDANTS BY NUMBER, SELLER ID, SUBJECT DOMAIN NAME,
AND ADDITIONAL PAYPAL ACCOUNT

Def. No.	Defendant / Seller ID / Subject Domain Name	Additional PayPal Account	PayPal Payee Name	Email Address
16	yifeichong36241	675319957@qq.com		
40	wendco.shop	hytc201509@126.com	淄博浩源陶瓷材料有限公司 (Zibo Haoyuan Ceramic Material Co., Ltd.)	hello@nova.com hanli135790@gmail.com
40	bluediem.shop		淄博浩源陶瓷材料有限公司 (Zibo Haoyuan Ceramic Material Co., Ltd.)	hanli135790@gmail.com prediselhou50@gmail.com
40	furta.shop		淄博浩源陶瓷材料有限公司 (Zibo Haoyuan Ceramic Material Co., Ltd.)	hanli135790@gmail.com lavilyon.shop@ace.com jannegravie@gmail.com
40	guuliy.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
40	inscon.shop		淄博浩源陶瓷材料有限公司 (Zibo Haoyuan Ceramic Material Co., Ltd.)	hanli135790@gmail.com
40	potark.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com wanlvyan502@gmail.com
40	ronio.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
40	soloic.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
40	viennais.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
40	wesroles.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
41	beliefal.com	attorney_float@zohomail.eu han85.yan@outlook.com complientne@zohomail.eu pengyong.leaf@yahoo.com finch.flam@gmail.com corn.pheasant@gmail.com peoriasing@yahoo.com jiaenjinshop@outlook.com mercifulodop@aol.com suicideop@yahoo.com mallliul@hotmail.com qizhong.linden@yahoo.com hu.baoping@outlook.com	Fun Pack Technology Co., Ltd. Yi Han Hao Clothing Co., Ltd Guangjian Intelligent Technology Co., Ltd. Jinxin Biwang Technology Co., Ltd. Tupaco Entertainment Co., Ltd. Anshiyu Co., Ltd. Yizeyan Co., Ltd. Jia Enjin Network Technology Co., Ltd. James Hannah Henan Ziliang Network Technology Co., Ltd. Fanao E-Commerce Co., Ltd. Xinnike Trading Co., Ltd.	
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41	serioususes.com	junqing.bark@hotmail.com	Yushun Trading Company	hotsstore@hotmail.com

41	welcomeal.com	cheng84.cosmos@outlook.com zhuchen.pea@outlook.com jianchun.78li@outlook.com li86.peng@outlook.com ants.eagle@yahoo.com yew_serw@yahoo.com parsley.eng@zohomail.eu fwierb@zohomail.com violentxiao@outlook.com cockedyu@aol.com giraffedeer@hotmail.com fujun.bitter@outlook.com routgfs@yahoo.com xiaomin.twig@outlook.com	Dan Ford Trading Company District Haiyu Non-staple Food Shop Chuangshicheng Network Technology Co., Ltd. Linwen Electronic Commerce Co., Ltd. Lancheng Fitness Management Co., Ltd. Laomipi Co., Ltd. Youdeka Technology Co., Ltd. Jingshi Co., Ltd. Aaron Sparks Linlinyu Hotel Management Co., Ltd. Xiangyun Hongyi Technology Co., Ltd. Zi'an Decoration Co., Ltd.	service.acx@gmail.com dawn-fast@outlook.com
42	tousikey.com	foshanak001@163.com	Foshan Jiyuanmei Electronic Commerce Co., Ltd.	tousikey@126.com
43	vlcase.com	2738429873@qq.com	深圳市豪佳杰贸易有限公司 (Shenzhen Haojiajie Trading Co., Ltd.)	
44	aililady.com	kyosal@163.com	聚优国际电子商务(深圳)有限公司 (Juyou International Electronic Commerce (Shenzhen) Co., Ltd.)	
44	alicemini.com	kyosal@163.com	聚优国际电子商务(深圳)有限公司 (Juyou International Electronic Commerce (Shenzhen) Co., Ltd.)	contact@alicemini.com 403592758@qq.com
47	luxekings.co	naman.paymentonline@gmail.com	Nguyễn Tấn Nam An	customers.contact.luxekings@gmail.com