

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 5, 16, AND 19**

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 5, 16, and 19. 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 Defendants, the Individuals, Business Entities, or Unincorporated Associations identified on Schedule "A" hereto (collectively "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. 6-4].

5. Prior to filing this Declaration, my firm accessed Defendants' respective Internet based, interactive photo albums operating under the seller identification names set forth on Schedule "A" hereto (the "Seller IDs"), via the non-party social media website, Instagram.com. Upon accessing Defendants' interactive photo albums operating under the Seller IDs, my firm was able to view products bearing Chanel's trademarks and actively communicate and exchange data electronically with each Defendant using the private messaging application and/or service such as WhatsApp and/or Instagram.com. My firm then selected a product bearing counterfeits of, at least, one of Chanel's trademarks at issue in this action via each Defendant's Seller ID, and requested payment information to finalize the orders.¹ Through WhatsApp, Defendants provided my firm information for finalizing payment for the Chanel-branded products selected, via PayPal, Inc. ("PayPal") to Defendants' respective newly identified PayPal accounts (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 my firm ordered via Defendants' Seller IDs, together with redacted copies of the electronic communication exchanged 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 8th day of September, 2021, at Aventura, Florida.


Eric Rosaler

¹ My firm was instructed to not transmit the funds to finalize the sale for the orders for Defendants so as to avoid adding money to Defendants' coffers.

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

Def. No.	Defendant / Seller ID	Additional PayPal Account
5	cuiyeye2	5175209@qq.com
16	yifeichong36241	1969970170@qq.com
19	yaojiany	cuimingying1@yeah.net