

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 23-61084-CIV-SMITH**

ADIDAS AG, *et al.*,

Plaintiffs,

vs.

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

Defendants.

**DECLARATION OF KATHLEEN BURNS IN SUPPORT OF PLAINTIFFS'
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 make this declaration in support of Plaintiffs' *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets. If called upon to do so, I could and would competently testify to the following facts set forth below.

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

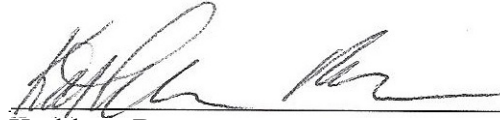
3. Counsel for Plaintiffs adidas AG, adidas International Marketing B.V., and adidas America, Inc. ("Plaintiffs"), retained my firm to investigate and document the suspected sale of counterfeit versions of Plaintiffs' branded products by Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto ("Defendants"), and to determine Defendants' payment account data for receipt of funds paid for the sale of counterfeit versions of Plaintiffs' branded products.

4. Prior to filing this Declaration, my firm accessed Defendants' Internet based e-commerce stores operating under their respective seller names identified on Schedule "A" hereto (the "E-commerce Store Names"). Upon accessing each e-commerce store, my firm was able to view products bearing and/or using Plaintiffs' 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. My firm then placed an order from each Defendant via their E-commerce Store Names for the purchase of various products – each bearing or sold under, one or more of Plaintiffs' 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 obtained information for finalizing payment¹ for the products ordered from Defendants to their respective PayPal, Inc. ("PayPal") or Stripe, Inc. ("Stripe") payment accounts, as identified on Schedule "A" hereto.² As part of the investigation, my firm captured the PayPal Merchant Identification Numbers ("Merchant IDs") identified in connection with Defendant's PayPal account data, as indicated on Schedule "A" hereto. At the conclusion of the process, the detailed web pages my firm captured and downloaded reflecting each product ordered were sent to Plaintiffs' counsel. True and correct copies of the web pages my firm captured showing Plaintiffs' branded items my firm ordered via Defendants' E-commerce Store Names, including redacted copies of the order summary web pages, order confirmation, payment account data, Merchant IDs data, and additional contact e-mail addresses are attached hereto as Composite Exhibit "1."

¹ My firm did not transmit the funds to finalize the sale for the orders from some of the Defendants so as to avoid funding Defendants' coffers.

² Additional contact email addresses for Defendants are also identified on Schedule "A."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 7, 2023, at Scottsdale, Arizona.


Kathleen Burns

SCHEDULE “A”
DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME,
FINANCIAL ACCOUNT INFORMATION, AND E-MAIL ADDRESS

Def. No.	Defendant / E-commerce Store Name	Account Information: Payment Account / Payee	Account Information: PayPal Merchant ID	E-mail Address
1	adidasecostarica.com	rairalazaders@mail.com		
		markswansonwm3j@gmail.com	NQMPZG6C6ZZLC	
2	adidasepanama.com	faedotilhami@mail.com	PPZM9FJJFRLE	
3	adidasoutletshoes.us.com	brookedszymanski@outlook.com		support@tradestore.us
4	adidass.us.com	christinemalanid@hotmail.com	696Q6W6NC9U5Y	tradeservicedirect@outlook.com cassidiecharnisejomara@gmail.com businessservice480@hotmail.com
5	adidasshoesonline.us.com	briancumberlands@hotmail.com	PAA2KA6XG3RPS	support@tradestore.us
5	adidasstoreoutlet.us.com	briancumberlands@hotmail.com	PAA2KA6XG3RPS	businesshelpteam@outlook.com
5	adidasyezyofficialwebsite.us.com	paulnbrown9550@hotmail.com		support@tradestore.us
6	hypeboost.shop	cutomplg@outlook.com		hypeboosts@hotmail.com
		yuhyes@hotmail.com	QBJ833UE6NDVS	noreply@hypeboost.shop joyce@hypeboosts.com
6	hypeboosts.ru	cutomplg@outlook.com	SHN38B5ZWHNFJ	hypeboosts@hotmail.com service@hypeboosts.ru service@hypeboosts.com
7	yeezy-boost350v2.us.org	paulmorefield95@outlook.com		
7	yeezys-boost.us.org	paulmorefield95@outlook.com		
8	ultra-boosts.us.com	dwrightcoffey@hotmail.com	F7DZ6HBF6DKNY	cassidiecharnisejomara@gmail.com
9	365kitshirts.com	779121437@qq.com	77HJXFHJWS6EG	service@365kitshirt.com
9	77footsfr.com	779121437@qq.com	77HJXFHJWS6EG	
9	calcio2024it.com	779121437@qq.com	77HJXFHJWS6EG	sport@calcio2021-it.com
10	8wholesale.com	bajiang168@163.com		
11	adyzboots.com	maysesososad@gmx.com	39LF36T267KY2	sd-customer-service@hotmail.com
12	ahasneakers.cn	18712728771@163.com	25KX6AAP35FZ	ahasneakers@vip.163.com noreply@notice.mailzh-apolo.com

13	amjerseys.com	customercare@socccservice.com	BXGNQ7AYZU3SU	customercare@socccservice.com
13	soccerum.com	sfsport inc	BXGNQ7AYZU3SU	soccerssss@hotmail.com
14	buyjerseys.shop	861765699@qq.com		sysnkr@gmail.com
15	camisetago.com	heycloth@outlook.com	HMRREZKAHG5A	info@camisetago.com
15	futbols24.com	heycloth@outlook.com	HMRREZKAHG5A	shop@camisetago.com
15	kacalcio.com	heycloth@outlook.com	HMRREZKAHG5A	
15	magliago.com	heycloth@outlook.com	HMRREZKAHG5A	info@camisetago.com
15	maillotgo.com	heycloth@outlook.com	HMRREZKAHG5A	info@camisetago.com
16	cheapjordan2023.com	guilfo	D2XC9UAWSA3BU	business@oaaoo.com
		ursuka	FVSYZX2JK4YG8	
16	discountjordan2023.com	sc929@guilfo.com	D2XC9UAWSA3BU	business@oaaoo.com no-reply@sellermail.net
17	onlykickz.vip	zypbox@126.com	HYXKHUZDFRBQU	onlykickz0706@gmail.com
18	designergunews.ru	yang698xiong@126.com		yolanda.designergu@gmail.com edrsales@kickztalk.com service@kickztalk.com lency@designergu.ru sales@kickztalk.com
18	designergunews.xyz	weian0602@yeah.net		yolanda.designergu@gmail.com edrsales@kickztalk.com service@kickztalk.com lency@designergu.ru sales@kickztalk.com
19	dopestkickz.cc	man22tin@outlook.com		missy@fadsway.com sales@dopestkickz.ru pkz@fadsway.com
19	dopestkickzclub.ru	jinhechen_2018@outlook.com		missy@fadsway.com sales@dopestkickz.ru pkz@fadsway.com
19	dopestkickzfans.ru	xiaozhu2852@126.com		missy@fadsway.com sales@dopestkickz.ru pkz@fadsway.com

19	dopestkickznews.ru	chenxiumei58@163.com		missy@fadsway.com sales@dopestkickz.ru pkz@fadsway.com
20	fakeyeezyshop.com	1637462723@qq.com	V7LQPRE4N95KQ	fakeyeezyshop@gmail.com
20	songsneaker.net		V7LQPRE4N95KQ	maysong@songsneaker.com
21	fashionkicks.xyz	xie905chai@163.com		fashionkicksbusiness@gmail.com
22	februn.com	oilgumjug@sendnow.win	UU485B74QT7EE	customerservice@emrhsgasre.xyz
			XDR7J4QCW3AWS	sale@februn.com
			28P8VN47MLUVQ	febsales@dswsports.com
22	febsale.com	eronitacostashd31@gmail.com	XDR7J4QCW3AWS	customerservice@emrhsgasre.xyz sale@febsale.com
23	floadty.com		H9CKAMLM9Y6DC	support@floadty.com support@lusxi.com
23	pejane.com	manhnguyenvpp4290983@gmail.com	H9CKAMLM9Y6DC	support@pejane.com
24	goatkick.net	zhengqx2023@hotmail.com		
25	honejersey.top	wjy19931222@outlook.com		sportsjerseysale@outlook.com
25	oneshop1.top	wjy19931222@outlook.com		sportsjerseysale@outlook.com
26	hotkicks.cc	ericmoraleson@gmail.com	UHSZCVPC948MG	hotkicks.cc@gmail.com
27	hwh.com.co	maryrperez98@hotmail.com	T8WYJGK5AGYTA	hwshsneakers@gmail.com
28	icystar.net	lucylianghua@163.com	JD3VVFRZCW4VN	stockxreviews@gmail.com icystarnet@gmail.com
29	jersey-album.com	nathnazo@hotmail.com	ND4JPUVUPPULY	mikiandkinki@hotmail.com
30	jerseydor.com	jerseydor@gmail.com	6G9F7CP7EKFP2	hello@jerseydor.com
31	jerseyflagshipstore.com	2393242464@qq.com	AR43T4XL59ULW	daisy900811@gmail.com 1051138349@qq.com
32	jerseylockers.com	jerseylockersinfo@gmail.com	SBHFBMS8RRZD2	jerseylockersinfo@gmail.com
33	jerseysnew.cn	masonchen2020@outlook.com	JX5VDSLEANAVW	bugat2022@hotmail.com noreply@notice.mailzh- apolo.com
34	kegao.cn	meide1688@outlook.com		
35	kicksfreake.com	goayoson@gmail.com		service@kicksfreake.com
36	kickwho.xyz	yhj090121@163.com		
37	kickx.ru	putthipong111@outlook.com		kickx6568@outlook.com goodao@globalso.com.cn kickx@outlook.com

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38	r7futbol.com	dersspl@yeah.net	PQGMCRRL6B7EG	info@camisetago.com
38	rofoot.com	dersspl@yeah.net	PQGMCRRL6B7EG	info@camisetago.com
39	leekicks.ru	yeg879678@outlook.com		leekicktop@outlook.com goodao@globalso.com.cn refgasamim@gmail.com
40	luckick.shop	cnmrjianyu@163.com	9XU3FWXB2TYGC	bestshoesstore365@gmail.com luckick.shop@gmail.com
41	maryjersey.cn	feb331@hotmail.com		maryjerseyservice@gmail.com
42	mkkickz.com	dispute@mondiecenter.com	QEBHFFY9ALGQA	getsupport@fulfillments.live support@ticokickz.com
43	newfirstsoccershop.com	fangjbonline@hotmail.com	S8CLJQ8DBLC8E	daniel-online@hotmail.com
44	newsneaker.site	mysneakers_vip04@163.com		mysneakersservice@outlook.co m
45	ogtonysneaker.com	obynt60544@gmail.com	92W8G24SZAYUJ	ogtonysneaker2012@gmail.com obynt60544@gmail.com
46	okick.store	lijianxin2043@hotmail.com		lightkick06@gmail.com
47	pkgiz.com	in0594@qq.com		kick333444@hotmail.com sneakernews666@hotmail.com kicksbbs@gmail.com
		in88889@qq.com		kicksbbs@hotmail.com 33210513@qq.com
48	rimisnkrs.ru	zhengjh2023@hotmail.com		rimisneaker@gmail.com
49	rjersey.com	yuyifan965@outlook.com		rjersey001@outlook.com
50	rsneakers.fun	keliyong7895@outlook.com		rwindsneakers@outlook.com
51	shoesking.me	chenzhiyongshop@outlook.com	GA4SZVBN2CLSL	service@shoesking.me
52	shoeslegends.com	linjk123@126.com		service@shoeslegends.com
53	shopowlfashion.com	pay.dornforest@gmail.com	ZW4B8ENMARZ3U	sales@shopowlfashion.com
54	smeshsportos.shop	thoidung49@gmail.com	MYV6V3JPACQHE	hszsbananas@gmail.com
55	snkick.ru	qaqa1997@outlook.com		ursnkick@outlook.com
56	snkrkicksair.com	xiefenglialian666@163.com		snkrplaza@gmail.com
57	snrktap1.com	a13960562553@163.com		snrkshop@gmail.com maxsnrks@gmail.com roland033629@gmail.com
58	socceremo.com	iinsuinc@yeah.net	DBVB73PECVM58	umarslist@outlook.com customercare@socccservice.com
59	stealstock.net	sneakerstore66@gmail.com	QNUU7ZWBPKUE U	support@stealstock.net
60	trustykickz.com	yfvitaminstraps@gmail.com		trustykickz88@gmail.com

61	vssdhporto.shop	fwbuncgu@hotmail.com	9R9LD784NQ69Q	hszsbananas@gmail.com
62	weekknight.com	dingnawill@gmail.com	MUURHK8GUA89A	service@weekknight.com
63	xfjerseymall.com	llc523@qq.com	CFXMQ764QAHD8	
64	yeezy365.com	haackzsjybh3723@aol.com		c@scvmtg.com
65	yeezyshoess.us.com	clairecrofts@hotmail.com	4G8XKCK9TYQKY	sneakersoutletshoes-help@outlook.com
66	yeezysnkrs.org	3633739782@qq.com	QQYFD6TX8G95L	yeezysnkrsofficial@gmail.com yeezystatic@gmail.com
67	yesyeezyvip.com	pind344@outlook.com	UJXY5XP7ZF588	worldsneaker1@gmail.com
68	jollyfamilygifts.com	Stripe Order No.: 45859 Transaction Date: Feb 2, 2023 Total: \$35.97 Payment Method: Visa CC Description: DANAKK LTD Product Title: Argentina Messi Premium Soccer 2022 Jersey Kit	DANAKK LTD	support@jollyfamilygifts.com
69	kessoi.com a/k/a dletmea.com	Stripe Order No.: 238181 Transaction Date: Apr 4, 2023 Total: \$21.98 Payment Method: Visa CC Description: RH *dletmea.com Product Title: Yz Boost 350 V2 'Dazzling Blue' GY7164	RH *dletmea.com	service@dletmea.com