

**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'
SECOND NOTICE OF IDENTIFICATION OF ADDITIONAL ALIASES FOR
DEFENDANT NUMBERS 19, 24, 25, 35, 48, 51, 66, AND 67 AND
ADDITIONAL FINANCIAL ACCOUNTS USED BY DEFENDANT NUMBERS 10, 11,
12, 15, 17, 18, 19, 24, 25, 29, 34, 35, 36, 38, 44, 48, 50, 51, 53, 55, 56, 57, 66, AND 67**

I, Kathleen Burns, state and declare as follows:

1. I am over 18 years of age and have personal knowledge of the truth of the matters set forth herein. I submit this Declaration in support of Plaintiffs' Notice of Identification of Additional Aliases for Defendant Numbers 19, 24, 25, 35, 48, 51, 66, and 67, and Additional Financial Accounts Used by Defendant Numbers 10, 11, 12, 15, 17, 18, 19, 24, 25, 29, 34, 35, 36, 38, 44, 48, 50, 51, 53, 55, 56, 57, 66, and 67. I am personally knowledgeable of the matters set forth in this Declaration and, 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, and I've been an investigator since 2012.

3. Counsel for Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc. ("Plaintiffs"), retained my firm to investigate the ongoing sale of counterfeit

versions of Plaintiffs' products by Defendants, the Individuals, Business Entities, or Unincorporated Associations identified on Schedule "A" hereto ("Defendants"), and to document Defendants' respective payment account data for receipt of funds paid to Defendants 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 seller names identified on Schedule "A" hereto (the "E-commerce Store Names"). Upon accessing the e-commerce stores, my firm was able to view products bearing one or more of Plaintiffs' trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data electronically with Defendants. My firm then placed an order from each Defendant for the purchase of a product – bearing and/or using one or more of Plaintiffs' trademarks at issue in this action. The orders were processed entirely online and following the submission of the orders, my firm received information for finalizing payment for the products via PayPal, Inc. ("PayPal"), and Stripe, Inc. ("Stripe") to Defendants' newly identified financial information (the "Additional Financial Information"), identified on Schedule "A" hereto. True and correct copies of the web pages my firm captured and downloaded showing the items bearing and/or using the adidas Marks ordered via Defendants' E-commerce Store Names, together with redacted copies of the order summary web page, order confirmation, payment account data, and e-mail correspondence exchanged, are attached hereto as Composite Exhibit "1."

5. In connection with the investigation, my firm discovered that Defendant Numbers 19, 24, 25, 35, 48, 51, 66, and 67, are continuing to engage in and expand their unlawful use of Plaintiffs' trademarks at issue in this matter, by registering, operating, and/or maintaining the new alias domain names dopeplugs.cc, perfectplug.cc, kksneaker.ru, sportsjerseysale.com,

kicksfreake.vip, rimisneaker.ru, buykicks.me, yoyokicks.me, popyeezy.com, and yyesyeezy.ru, respectively. This determination is based on the following data:

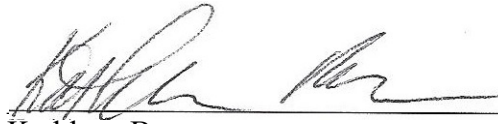
- a. Defendant Number 19 - dopestkickz.cc a/k/a perfectplug.cc and dopeplugs.cc:
Defendant Number 19's website operating under the e-commerce store name dopestkickz.cc and Defendant Number 19's websites operating under the new alias e-commerce store names perfectplug.cc and dopeplugs.cc share the same contact WhatsApp numbers, +16262068172, +16262067154, and +16262068197.
- b. Defendant Number 24 - goatkick.net a/k/a kksneaker.ru: upon accessing Defendant Number 24's website operating under the e-commerce store name goatkick.net, my firm was automatically redirected and forwarded to Defendant Number 24's website operating under the new alias e-commerce store name, kksneaker.ru. Additionally, the website goatkick.net identifies itself as kksneaker.ru on its web pages.
- c. Defendant Number 25 - oneshop1.top a.k.a. sportsjerseysale.com: upon accessing Defendant Number 25's website operating under the e-commerce store name oneshop1.top, my firm was automatically redirected and forwarded to Defendant Number 25's website operating under the new alias e-commerce store name, sportsjerseysale.com. Additionally, Defendant Number 25's websites operating under the e-commerce store name oneshop1.top and the new alias e-commerce store name sportsjerseysale.com share the same contact WhatsApp numbers, 08618649719141 and 08618159028710.
- d. Defendant Number 35 - kicksfreake.com a/k/a kicksfreake.vip: Defendant Number 35's website operating under the e-commerce store name kicksfreake.com and

Defendant Number 35's website operating under the new alias e-commerce store name kicksfreake.vip share the same contact e-mail address, service@kicksfreake.com.

- e. Defendant Number 48 - rimisnkrs.ru a/k/a rimisneaker.ru: upon accessing Defendant Number 48's website operating under the e-commerce store name rimisnkrs.ru, my firm was automatically redirected and forwarded to Defendant Number 48's website operating under the new alias e-commerce store name, rimisneaker.ru.
- f. Defendant Number 51 - shoesking.me a/k/a buykicks.me and yoyokicks.me: an email my firm received in connection with the investigation buy made from Defendant Number 51's website operating under the e-commerce store name shoesking.me identified the websites operating under the new alias e-commerce store names, buykicks.me and yoyokicks.me as additional websites owned or operated by Defendant Number 51.
- g. Defendant Number 66 - yeezysnkrs.org a/k/a popyeezy.com: upon accessing Defendant Number 66's website operating under the e-commerce store name yeezysnkrs.org, my firm was automatically redirected and forwarded to Defendant Number 66's website operating under the new alias e-commerce store name, popyeezy.com.
- h. Defendant Number 67 - yesyeezyvip.com a/k/a yyesyeezy.ru: Defendant Number 67's website operating under the e-commerce store name yesyeezyvip.com and Defendant Number 67's website operating under the new alias e-commerce store

name yyesyeezy.ru share the same contact e-mail address,
worldsneaker1@gmail.com and the same Instagram account, @yyesyone01.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed January 26, 2024, at Scottsdale, Arizona.


Kathleen Burns

SCHDULE “A”
DEFENDANT BY NUMBER, E-COMMERCE STORE NAME, AND
ADDITIONAL FINANCIAL ACCOUNT INFORMATION, AND E-MAIL ADDRESSES

Def. No.	Defendant / E-commerce Store Name	Account Information: Payment Account / Payee	Account Information: Merchant ID	Additional Email
10	8wholesale.com	chenchen0224520@outlook.com		8wholesaleservice@gmail.com
11	adyzboots.com	tesatheightmcpua@hotmail.com	GLDXBQWW5BLAW	sd-customer-service@hotmail.com
			D3H95AYTEL3KN	
			A4R2D5YD93RQS	
			ABRCGUHFBYHF2	
12	ahasneakers.cn	smy14153893379@163.com		ahasneakers@vip.163.com noreply@notice.mailzh-apollo.com
15	camisetago.com		CRJEXU7HSU7TW	support@camisetago.com
17	onlykickz.vip	2668848681@qq.com		onlykickz0706@gmail.com
		645665023@qq.com		
18	designergunews.xyz	ChenQing_101@163.com		dgu_yolanda@163.com yolanda.designergu@gmail.com lency@designergu.ru
19	dopeplugs.cc	lin126wei@163.com		sales@dopestkickz.ru joycealin0720@gmail.com
		qinghe970@163.com		
		yuan_yuan_yang999@163.com		
19	perfectplug.cc	Chen34haiyan@163.com		tinachou2021@gmail.com
		huang848xu@163.com		perfectkickz@fadsway.com
24	kksneaker.ru	huminmil2023@hotmail.com		kksneaker@hotmail.com noreply@notice.yycartapps.com
		yangyc2023@hotmail.com		
		13107985173@163.com		
25	sportsjerseysale.com	shuaihongmaoyi@proton.me	BNFP5B2JBF8WQ	sportsjerseysale@outlook.com
			J5CX8Z3FS4FMN	sportjerseysale@outlook.com

29	jersey-album.com	ppreciateit@hotmail.com		mikiandkinki@hotmail.com noreply@notice.mailzh- apolo.com
34	kegao.cn	1757990841@qq.com		noreply@notice.mailzh- apolo.com
35	kicksfreake.vip	18144621004@163.com	FMWWPLADBWX26	service@kicksfreake.vip service@kicksfreake.com
36	kickwho.xyz	Leykeyy@163.com		kickwhoofficial@gmail.com
38	ksafutbol.com	Stripe	CLOTHVAL.COM	info@camisetago.com help@clothval.com receipts+acct_1ndecgjsbiuuli 8@stripe.com
38	rofoot.com	Stripe	CLOTHVAL.COM	info@camisetago.com help@clothval.com receipts+acct_1ndecgjsbiuuli 8@stripe.com
44	newsneaker.site		BATDVWEND52W W	mysneakersservice@outlook.c om
48	rimisneaker.ru	rimi9@rimisneaker.com		rimisneaker@gmail.com
50	rsneakers.fun	xuxiaobin987@outlook.com kesongqin789@outlook.com		rwindsneakers@outlook.com
51	buykicks.me	dingna888@outlook.com majinchun19921022@outlook.com zhangshuo19931031@outlook.com		buykicks888@gmail.com fetchx001@gmail.com
51	yoyokicks.me	Libanghui888@outlook.com zeng888guolin@163.com		service@Yoyokicks.me adi@outlook.com zjrpp1983@outlook.com fetchx001@gmail.com
53	shopowlfashion.com	baduongfenwick97@hotmail.com	ZTGWBQVYP3JGG	sales@shopowlfashion.com
			6BPHUW2JFVK6E	
55	snkick.ru	aron22088@outlook.com teg550066@outlook.com		ursnkick@outlook.com 875373102@qq.com
56	snkrkicksair.com	lihekang999@163.com		snkrplaza@gmail.com roland033629@gmail.com moolecolew@gmail.com

57	snrktap1.com	yonghaojs@163.com		roland033629@gmail.com
		sales1@eucrown.com		snrkshop@gmail.com maxsnrks@gmail.com moolecolew@gmail.com
66	popyeezy.com		4RCE9WVFE LLRQ	popyeezyofficial@gmail.com
67	yyesyezy.ru		F3SJRXNHLMZHY	Yesyeezyshoes@hotmail.com
		du78sk@outlook.com	8ZEKQNSJHZFK4	worldsneaker1@gmail.com