

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 23-61007-CIV-SMITH**

GUCCI AMERICA, INC.,

Plaintiff,

vs.

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

Defendants.

**DECLARATION OF KATHLEEN BURNS IN SUPPORT OF
PLAINTIFF’S *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 Plaintiff’s *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for Temporary Restraining Order”). 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 Plaintiff, Gucci America, Inc. (“Plaintiff” or “Gucci”), retained my firm to investigate and document the suspected sale of counterfeit versions of Plaintiff’s products by Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” hereto (collectively “Defendants”) and to determine Defendants’

payment account data for receipt of funds paid for the sale of counterfeit Gucci-branded merchandise.

4. Prior to filing this Declaration, my firm accessed Defendants' Internet based e-commerce stores operating under the 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 using Gucci's trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data with each Defendant.¹ My firm then placed an order from each Defendant via their E-commerce Store Names for the purchase of various products – all bearing counterfeits and infringements of one or more of Gucci's trademarks at issue in this action – and requested each product be shipped to addresses in 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 products ordered via Defendants' respective payment accounts, as identified on Schedule "A" hereto.³ At the conclusion of the process, the detailed web pages and images my firm captured and downloaded reflecting each product ordered were sent to Gucci's counsel. True and correct copies of the web pages and images my firm captured and downloaded showing the various Gucci-branded items ordered via Defendants' E-commerce Store Names, together with

¹ Certain Defendants use their E-commerce Store Names in tandem with image hosting websites and electronic communication via private messaging applications and/or services to complete their offer and sale of counterfeit and infringing Gucci-branded products. See generally Comp. Ex. 1, hereto.

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.

³ Some Defendants provided additional contact information in connection with their respective E-commerce Store Names; accordingly, all forms of electronic contact provided by Defendants are included in Schedule "A" hereto.

redacted copies of the order summary web pages, order confirmation, payment account data, and any e-mail correspondence exchanged, 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: 2023-05-30 at Scottsdale, Arizona.

Kathleen Burns

Kathleen Burns

SCHEDULE “A”
DEFENDANTS BY NUMBER, SELLER ID,
FINANCIAL ACCOUNT INFORMATION, AND E-MAIL ADDRESS

Def. No.	Defendant by E-commerce Store Name	Payee Information	Merchant ID	Financial Account Information	Contact E-mail Address
1	guccieyewear-fr.com	x487794@163.com	SSFT89P37R85Y		admin@kobaltstore.com schlettehollis@gmail.com
		nn278556@163.com	Y5TGNHHQC4FF Y		
		w285137@163.com	CSJ3AGXKBQE2Q		
		Ginger & Spice Baking Creations	PK7PBPVFYP9XQ	tpretecosgrunh@gmail.com	
		gaming	P82CNGWNUG62 U		
2	alishirts.com a/k/a alishirts.shop	HOANG BA DUONG	ZTGWBQVYP3JG G	baduongfenwick97@hotmail.com	sales@alishirts.shop
3	borseluxe.com	borseluxe	WBSGY568SCX5S	burak_klc@rocketmail.com	
4	brandoff-store.com	株式会社ジグザグ	B2LQMW82VELM U	paypaljp@zig-zag.co.jp	noreply@worldshopping.global
5	braytime.com	Upton-Zemlak Technology Co., Ltd	VJ8QJPUWU7NDJ		541771209@qq.com
5	connder.com	Upton-Zemlak Technology Co., Ltd	VJ8QJPUWU7NDJ	info@xtdtp.com	support@outlets.services
		Kshlerin-Schumm Technology Co., Ltd	FY755F9JQZD8J		
		Kgeki GL Group Co., Ltd	GYW844585FH9S		
		Conner-Schmeler Technology Co., Ltd	N5EVZ7MR2ZECU		
		Conner-Schmeler Technology Co., Ltd	N5EVZ7MR2ZECU	cs@xlqua.com	
5	garexvvr.com	Kgeki GL Group Co., Ltd	GYW844585FH9S		support@outlets.services moorains@hotmail.com
		Kshlerin-Schumm Technology Co., Ltd	FY755F9JQZD8J		
		YNT E-commerce Co. LTD	ZZ9NYFS932GZE		

5	slivvie.com	Kshlerin-Schumm Technology Co., Ltd	FY755F9JQZD8J	info@omefj.com	sectrl1@hotmail.com support@outlets.services
		Conner-Schmeler Technology Co., Ltd	N5EVZ7MR2ZECU		
6	chandeco.com	Mark Asbury Variety Store	5DVJ6CHUA7CSJ		hello@chandeco.com
		Didier Thomas Special Store	GJ9B6A5ZN9CT4	DidierThomas4123@hotmail.com	hello@foreswatch.com hello@chanccoco.com hello@chandeco.com
7	COCOSneakers.to			suninglei@outlook.com	mozmind@gmail.com adsmccinc@gmail.com
7	mineme_canico	Mees Johannes Toonen	H4TFACWFUF9PS	suninglei@outlook.com	
8	dengyun778 a/k/a Luxury1688 a/k/a Luxury1234	雅云 邓		1607119283@qq.com	
9	discreetcouture.com	Stripe payment	MEIMEI MEDIA		discreetcouture@gmail.com
10	dreamluxuryshop.com	厦门亘越进出口有限公司	YNG2Q3VDZ7CRL	spring66@vip.163.com	xmhighend@gmail.com
		厦门市思明区器闻堂茶具店	U8ERHYP7PDNEW		
11	evelyngifts.com	good trade	KFVMHZ9TMRC86	halloimkai@hotmail.com	service@lenejewelry.com EvelynGifts@hotmail.com
		Jiazhidao Jewelry International Trade Co., Ltd.	GJFJ9JKX2MD4J		
12	evoss.shop	Trung Đoàn	MNG67AQQTBP3G	dttrung256@outlook.com	baooanh6689@gmail.com support@Farace.com
13	factorylux.shop	Credit Card			info@factorylux.shop
14	fashionprint.top	Fashionsuitset	QVGFYZ4LRJEC6	ai17897544054@hotmail.com	ai17733470717@163.com
15	fdeew.shop	伟明 高	6VBQM5U6ZEGW8	729142914@qq.com	lyyetrmbwbv@hotmail.com
15	rotuer.online	伟明 高	6VBQM5U6ZEGW8	729142914@qq.com	lyyetrmbwbv@hotmail.com
16	foumin.shop	PEMBERTON-BILLING MARY	J7JU2SJXDRCC6	MARYPEMBERTON1227@outlook.com	service@billuxury.com HAMIDABANO1227@outlook.com
17	gocacoka.com	福州市晋安区薇诺尔达网络科技有限公司	UV2KBX2VXX7KE	weinuoerda@outlook.com	welokf001@gmail.com garetaltonio@gmail.com
17	yespersn.com	RUI TU TRADING CO., LIMITED	UP7QD9FEZKNUW	ruitu@zhuyouyun.com	garetaltonio@gmail.com
		福州市晋安区薇诺尔达网络科技有限公司	UV2KBX2VXX7KE		

18	hightopcustom.com	Nguyen Bao Ngoc	CJWGJMBFNYMH E	brendonjenny3251@gmail.com	hightopcustom@hotmail.com
19	insunglass.com	Lee Clark Variety Store	JFGZRUTKRSYU U	LeeClark4541@hotmail.com	hello@insunglass.com
		Clément Olivier Category Store	LXMCRYR743H4 U		
		Nitya Rabouille Category Store	ARG48G8FN6Q3N		
		Ludivine Noiraud Special Store	8UYBVWGETJRJJ		
		Jose Guimaraes Special Store	TZV5GA7AT6AYS		
		Christian Barno Special Store	ENX5FT3MC8XA U		
		Kerry James Category Store	LZFUJ3NVYZDYS		
20	jacquemusuk.shop	WOODLAND WALLIS	6DKK3ZCE8MDP Q	WALLISWOODLAND@gmail.com	WEWHFDKK@outlook.com hello@allwatch.store vinterety@gmail.com MARIEWALKER12272@outlook.com
20	senmonten.shop	ELAM FRANCES	6DKK3ZCE8MDP Q	FRANCESELAM1228@gmail.com	annedwards1227@outlook.com
21	jacquemusus.shop	FORDHAM LOUISE	A8P4M883QXL36	LOUISEFORDHAM1224@gmail.com	RGDNVVFDDGJK@outlook.com rfhfghdg@outlook.com hello@allwatch.store
22	kananasu.com	Yuekong Technology Co., Ltd.	9A37UUB56Y34	13266664188@163.com	kanasumi.com@hotmail.com
23	kelvingift.com	Kelvin Store	6WXPMA5A7A3 W	akiakivania3@gmail.com	support@kelvingift.com support@enstyleens.com
24	kickside.com.br	小凤 谢		xiao5feng6x@163.com	edrsales@kickztalk.com yolanda.designergu@gmail.com service@kickztalk.com sales@kickztalk.com lency@designergu.ru
25	kingofbag.com	KingOfBag	H583ENS9NW7BA		kingofbaghelp@gmail.com
25	strangetrend.shop	NGUYEN THI GIANG	H583ENS9NW7BA	nguyenthigiang94at@gmail.com	contactstrangetrend@gmail.com
			4XYHFTSJWURZL		
26	kingshooz.com	Luong Ngoc Toan	JM49ZLBCLB94G	xuandinh32346@gmail.com	kingshooz.help@gmail.com
27	luckyluxshop.com	绪鹏 周		1561763932@qq.com	noreply@luckyluxshop.com
27	topluxshoes.cn	株式会社Mr.circulate		1561763932@qq.com	Service@topluxshoes.cn
27	topluxshoes.com	株式会社Mr.circulate		1561763932@qq.com	service@topluxshoes.com
27	topluxshop.com	株式会社Mr.circulate		1561763932@qq.com	info@topluxshop.com
28	luxuriousgoods.shop	TAYLOR BRADLEY	36HFQ4XXERMZ Y	BRADLEYTAYLOR0110@gmail.com	annedwards1227@outlook.com

28	rorekkusup.shop	TAYLOR BRADLEY	CKR9Q3A2W5XN L	BRADLEYTAYLOR0110@g mail.com	HAMIDABANO1227@outlook. com service@billuxury.com
29	luxury goods a/k/a ygshoes188.com	俊恒 朱		16582949310@163.com	
30	luxury-bags-shoes a/k/a Beatrice	刚 郑		2361373382@qq.com	
31	luxurydiscount1.com	四川省康宠宠 物用品有限责 任公司	MKCALGY7Y3DH J	frankhuang0918@gmail.com	devonflood87@gmail.com
32	lvgucci188.com a/k/a weinifuwul4	安平 刘		17108611455@163.com	
33	mousuni.shop	WALKER MARIE	FSYVSJD45JU2G	MARIEWALKER12272@gm ail.com	MARIEWALKER12272@outlo ok.com HAMIDABANO1227@outlook. com
		WATHEN FREDERICK	NK9EAQ5BJ3MV Y		
		DIMOND JANE	6EAGHH28QQBPJ	JANEDIMOND10@gmail.co m	
34	ohhhcasetie.com	广州雄德跨境 电子商务有限 公司	AGL2SD86J4ZY4	gzxiongde123@163.com	info@casetie.com
35	perfectkickznews.ru	秀美 陈		chenxiumei58@163.com	missy@fadsway.com sales@dopekickz.ru pkz@fadsway.com
36	repgod.ru		SVPD6EESMQHL8	nugakopjvhuy@gmail.com	repgod.official@gmail.com werep.teamsp@gmail.com
37	sgvipsbags.com a/k/a bags.ygshoes188	玉买尔 佐合热阿依·		zy16525913062@hotmail.com	
38	shop.xieehop.ga	William Webster @WilliamWebs ter173		cddjkovmgaegbb@hotmail.co m	services@vkvtomall.top d@scvmtg.com
39	sneakerhomie.su		GZPBGC9V9RJ93C	trangvubhbm5311xt@outlook. com	sneakerhomiez@gmail.com sneakerhomie.global@gmail.co m account @design.sneaker sneakerhomie.official@gmail.co m
40	tyclocet.com	Stripe payment	DESIGNFULLPRI NT		support@tyclocet.com bydcorporation@gmail.com
41	usbestyle.com	CAO TRUNG TIEN	SRT672S9W24Q8	caotrungtien0201@gmail.com	support@usbestyle.com
42	vvs.lyc a/k/a ZY shoes	Bing Bing Zhang		zhangbingbing0201@hotmail. com	
43	wemadecases.com	Online Shop	9ML8GK96XWD34	yassinebenhichame@gmail.co m	contact@wemadecases.com
44	womenbags.nl	Trang Nguyen		alimordesinger@gmail.com	womenbags7@gmail.com admin@womenbags.nl
45	xirance.top	广州以显贸易 有限公司	LHETWTHCS654G	xinqidian1126@outlook.com	xinqidian1126@outlook.com

46	yyaaho.com	PARSLOW VIOLET	FGBVDKV2HW5J N	VIOLETPARSLOW@outlook .com	RGDNVVFDGJK@outlook.co m rfhfghdg@outlook.com hello@allwatch.store
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