UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 23-60409-CIV-SINGHAL/VALLE

OMEGA SA,

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. 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 Plaintiff, Omega SA ("Plaintiff"), retained my firm to investigate and document the suspected sale of counterfeit versions of Plaintiff's 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 Plaintiff's branded products.

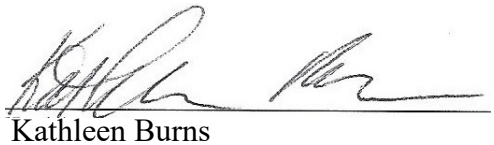
4. Prior to filing this Declaration, my firm accessed Defendants' Internet based e-commerce stores operating under their respective seller names identified on Schedule "A" hereto

(the "E-commerce Store Names"). Upon accessing each e-commerce store, my firm was able to view products using one or more of Plaintiff's 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 products, each bearing or sold under one or more of Plaintiff's trademarks at issue in this action, and requested each product to 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 payment[1] for each of the products ordered from Defendants to their respective PayPal, Inc. ("PayPal") 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 Plaintiff's counsel. True and correct copies of the web pages my firm captured showing Plaintiff's 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, and additional contact e-mail addresses are attached 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 the 2nd day of March, 2023, at Scottsdale, Arizona.



Kathleen Burns

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

Def. No.	Defendant / E-commerce Store Name	Account Information: PayPal Account / Payee	Account Information: PayPal Merchant ID	E-mail
1	akikos.shop	bvjjwivuf@hotmail.com	VPQ4KYTQZZH4A	afjno@hotmail.com
		Parturient Montes Limited	MVYY6W7NSUYNA	rosiemarisama8@hotmail.com
1	allexzza.shop	hpyxtqanvboang@hotmail.com	NG8QKWCQUBLWU	okazabryanas47@gmail.com ruddensesudolax@outlook.com
1	caneo.shop	vdfsejiiimboa@hotmail.com	Q4Y9J99TQ6ZR6	afjno@hotmail.com
1	clovee.shop	vwoirlfjkczy@hotmail.com		wiecepasitzn@hotmail.com
1	comalls.shop	Commodo Corp	NG8QKWCQUBLWU	ruddensesudolax@outlook.com
1	cooke.shop	mfyttrdpsevvla@hotmail.com		wiecepasitzn@hotmail.com
1	dupos.shop	lawcppcqqf@hotmail.com		olivia72cara@hotmail.com
1	ewuvnmj.shop	tsmquvwkrpj@hotmail.com		wiecepasitzn@hotmail.com
1	kaak.shop	mcrgpx@hotmail.com		wiecepasitzn@hotmail.com
		ghapprt@hotmail.com		
		bysxhcqn@hotmail.com		
		emdcdbwnsnw@hotmail.com		
		bvpdeswjtpj@hotmail.com		
		mdvddfvkwwn@hotmail.com		
1	kiwie.shop	tdntxxeyfi@hotmail.com		afjno@hotmail.com wiecepasitzn@hotmail.com
		kokfqiv@hotmail.com		
		zacmjnukyf@hotmail.com		
		tglzne@hotmail.com		
1	lesplages.shop	ostpcxyfkuoprr@hotmail.com	FX3JDKCNDKTK2	service@merakivo.shop support@merakivo.shop konkes.shop@hotmail.com
1	lovestars.shop	dcfmoaryusf@hotmail.com	M299PULMZSEX2	wiecepasitzn@hotmail.com service@shopplus.com
1	noemie.shop	laurelglharelll1z@hotmail.com	CSWATC6598GWG	wiecepasitzn@hotmail.com service@shoplus.com
			2NG8SJYNAJB8A	
1	otson.shop	krowgi@hotmail.com	2MZUH2GF3PHV6	afjno@hotmail.com rosiemarisama8@hotmail.com
1	phitcetera.shop	bllwntrf@hotmail.com	RCLH558FN3YQ6	wiecepasitzn@hotmail.com
		Vel Arcu Curabitur Institute	EZDRC43K4AWFS	
1	pivene.shop	Commodo Corp	NG8QKWCQUBLWU	ruddensesudolax@outlook.com
1	ravalch.shop	virplarmpdh@hotmail.com		wiecepasitzn@hotmail.com
1	shokzs.shop	wioobbnnqqp@hotmail.com	FWSXSJK5TYD44	wiecepasitzn@hotmail.com
		Sed Pharetra Felis Institute	B26GLGUK8XJYS	

1	shopdaily.shop	zahvjudv@hotmail.com	2THGX5AUMKVS6	wiecepasitzn@hotmail.com
		tdsnaldngz@hotmail.com	PYMXVQH7K7Y6A	service@shoplus.com
1	shopeco.shop	ltiwaaz@hotmail.com	P5JKS6MLA8HWY	afjno@hotmail.com friessrvhopps1n@hotmail.com
1	soover.shop	kbimxiojnlxe@hotmail.com	G6SLWVD8LF5VG	olivia72cara@hotmail.com
1	thetimers.shop	esxpnlcmvdimqt@outlook.com		wiecepasitzn@hotmail.com
1	tolik.shop	qpntho@hotmail.com	67FN36VB7N9CG	olivia72cara@hotmail.com
1	unitoki.shop	sbotllkw@hotmail.com	JHZLV39QL3FQU	olivia72cara@hotmail.com
		ShopMall	67FN36VB7N9CG	
1	veloretti.shop	Convallis Erat Institute	8NS4AX4QWVKRL	wiecepasitzn@hotmail.com okazabryanas47@gmail.com
1	veretstaf.shop	yguummyyfyyyk@hotmail.com	8NS4AX4QWVKRL	wiecepasitzn@hotmail.com okazabryanas47@gmail.com
1	wisema.shop	Commodo Corp	NG8QKWCQUBLWU	okazabryanas47@gmail.com ruddensesudolax@outlook.com kpfoobn@hotmail.com
2	arays.shop	tfvwkxp@hotmail.com	5LY2TQKW3KW26	sbchki@hotmail.com
2	cetrobon.shop	siyawxmhw@hotmail.com	PY49MBHPN2B24	sbchki@hotmail.com
2	oshua.shop	SHOP	5LY2TQKW3KW26	
2	salems.shop	fwsnhpfvw@hotmail.com	U6ML5XKBAX9G4	sbchki@hotmail.com
3	admancy.com	anneliu957@gmail.com	622W84RSTDKLE	helloadmancy@outlook.com vancycc-1@outlook.com
4	beterro.com	cuongmtv@gmail.com	C8G6C94T7C3Q8	support@beterro.com
5	blinged.shop	qhtsyrdjhtyj@hotmail.com	UE2K43PXLXPUJ	124541412@hotmail.com
5	lovelystar.shop	spcryfpc@hotmail.com	E4EF8BQE46HE4	124541412@hotmail.com support@blinged.shop
6	gemmacstore.com	luskshamore@gmail.com	83VUWPRE6GXPE	wjt@datoit.com service@gmeoshop.com
7	homas.shop	qorlshiyyiuyzu@hotmail.com	JSJ5ZSFXCYGDW	support@domain.com shopling@gmail.com
8	hyperkickzclub.com		CSLQGHS2WL7R2	support@ticokichz.com support@hypekichzclub.com support@ticokickz.com
9	mirrorkk.com	nikolasguard8@gmail.com	HN3QQP4EV53PC	service@anodertolife.top service@mirrorkk.com service@summerkk.com
10	neverha.com	haerbinjiuling@outlook.com	9TVA3RZBL6Y8N	neverha@hotmail.com somelovelydays@outlook.com
11	polisw.com	tommyliu0322@outlook.com	Y3H2G8MPMTH9Y	contact@polisw.com support@polisw.com

12	printdating.com	taramiriam2tz7@hotmail.com	QGNZTP4RWESN2	contact@sample.com support@sample.com zihanpu275487813@163.com printdating@vip.com
13	psoutletsgo.com	service@dfmgpte.com	J9GVG3TA26SHE	support@clientvip.asia
14	troge.shop	eazurr@hotmail.com		
15	vanizshop.com	payment@goodstravelshop.com	2DZBV986P9FYN	support@vanizshop.com support@zekabee.com cs@gustodecor.com
16	freeladyy.com	mitryakhin2021@mail.ru		jiangsuchangrui@sturme.net
16	rorax1999.com	Stripe Order No.: 59196 Transaction Date: July 14, 2022 Total: $81.99 Payment Method: Visa CC Description: PAPAMEKAJI.COM Product Title: Omega Aqua Terra 150M Co-Axial Chronometer 30 mm Grey Dial (231.23.30.20.06.001)		jiangsuchangrui@sturme.net contact@papamekaji.com