

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-21058-CIV-ALTMAN**

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, and I've been an investigator since 2012.

3. Counsel for Plaintiff, Omega SA ("Plaintiff" or "Omega"), retained my firm to investigate and document the suspected sale of counterfeit versions of Omega's branded products by Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto ("Defendants") and to document Defendants payment account data for receipt of funds paid for the sale of counterfeit Omega 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 one or more of Omega's trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data with each Defendant electronically. 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 Omega's trademarks at issue in this action, and requested a product from each Defendant 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 documented the information for finalizing payment¹ for the products ordered using Defendants' respective financial account information, as identified on Schedule "A" hereto.² At the conclusion of the process, the detailed web pages my firm captured and downloaded reflecting each product ordered were sent to Omega's counsel. True and correct copies of the web pages my firm captured showing the Omega 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, and any e-mail correspondence exchanged are attached hereto as Composite Exhibit "1."

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

² Additional means of contact for Defendants, including customer service e-mail addresses and WhatsApp phone numbers, are also included on Schedule "A" hereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 2025-03-06, at Scottsdale, Arizona.

Kathleen Burns

Kathleen Burns

SCHEDULE “A”
DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME,
FINANCIAL ACCOUNT INFORMATION, AND MEANS OF CONTACT

| Def. No | Defendant / E-commerce Store Name | Merchant ID / Payment Account | Payee | Means of Contact Email and WhatsApp |
|---------|-----------------------------------|-------------------------------|---|---|
| 1 | elitetimepiecesusa.com | XF8JX56CLQ4W2 | | support@elitetimepiecesusa.com support@6188530.brevosend.com WhatsApp: +1 (479) 3852889 |
| 1 | coolsar.com | J79H4KM6LZZ84 | | support@coolsar.com WhatsApp: 1 (479) 3852889 |
| 1 | doxsd.com | 7KWHCH8PYSKH2 | | support@doxsd.com WhatsApp: 1 (479) 3852889 |
| 1 | atinowatch.com | ZFVH3DZH2EV2J | | support@atinowatch.com |
| 1 | luxyswear.com | ZFVH3DZH2EV2J | | support@luxyswear.com WhatsApp: 1 (479) 3852889 |
| 1 | opulencewrist.com | XF8JX56CLQ4W2 | | support@opulencewrist.com support@6188530.brevosend.com WhatsApp: +1 (479) 3852889 |
| 2 | ksisx.shop | TVRR7LL3B9XEA | Hong Kong M&K Technology & Tradinglimited | watchbuybuy@outlook.com hibuynew@gmail.com WhatsApp: 12812360702; 17622611080 |
| 2 | euex.shop | 2ZUFV3JK8Z8JC | Sen Yue Trade Limited | watchbuybuy@outlook.com hibuynew@gmail.com WhatsApp: 12812360702; 17622611080 |
| | | 3AMZJVC87CY74 | Guoqi Trading Co., Limited | |
| | | 3RA3PR444BTDY | HK Xinyue Trading Co., Limited | |
| | | CHCDN2AFTE26S | HK Houyu Trading Limited | |
| | | TVRR7LL3B9XEA | Hong Kong M&K Technology & Tradinglimited | |
| | | W2HXY878SLV3S | Zhikang Limited | |
| | | Z3PJH9X3NGRXJ | Tung Ho Shing Taitrading Co.. Limited | |
| | | EG2PXB8AKBT6Q | Hong Kong Ideal Culture Limited | |

| | | | | |
|---|-----------------|---------------|---|--|
| 2 | kibux.site | 38WL7SQ4N9H26 | Kingdem Culture Industrial Investment(Hong Kong)Company Limited | ultramall@zohomail.com |
| | | 78DSD3BNVUY2Y | HK Fanlanoi Clothing Limited | |
| | | DPKQU7PDGXE7U | Haoyuan Home Furnishiing Co., Limited | |
| | | FPRLYDVL5Y6VY | Hong Kong Step Trading Co., Limited | |
| | | JVHPBY2J62WTE | Sino Explore Investment Limited | |
| | | W2HXY878SLV3S | Zhikang Limited | |
| 2 | bezs.shop | DPKQU7PDGXE7U | Haoyuan Home Furnishiing Co., Limited | ultramall@zohomail.com |
| | | Z3PJH9X3NGRXJ | Tung Ho Shing Taitrading Co.. Limited | |
| | | 7YUQTNJ8G4P7N | Xinyuan Ornaments Co.. Limited | |
| | | CHUHR5JWZADZC | Weinuo Clothing Limited | |
| | | E62QV2AG8JH3S | Hong Kong Xian Litong Trading Co.Limited | |
| | | KUWBAFX832SFY | HK Shiji Jiali Trading Limited | |
| | | PB8AQLX2JQVEC | Sanbao Jewelry Limited | |
| 2 | slrw.shop | DPKQU7PDGXE7U | Haoyuan Home Furnishiing Co., Limited | ultramall@zohomail.com |
| | | W2HXY878SLV3S | Zhikang Limited | |
| | | 78DSD3BNVUY2Y | HK Fanlanoi Clothing Limited | |
| | | R34R69PFFDG4G | Goodluck Jewelry Co.. Limmited | |
| 3 | aniwattey.shop | WR76DQM5YWGGs | wuyang store | |
| 4 | zenithluxys.com | EY6D9CE8EGD6J | | support@zenithluxy.com WhatsApp: (+1469) 587-0120 |

| | | | | |
|----|--------------------|---------------|--|---|
| 4 | luxurytick.com | JPBUGW5YVU24A | | support@luxurytick.com WhatsApp: (+1469) 587-0120 |
| 4 | atinolux.com | K7T5HRLFFR326 | | support@atinolux.com WhatsApp: (+1469) 587-0120 |
| 4 | relaxtee.com | JPBUGW5YVU24A | | contact@relaxtee.com WhatsApp: +1 (979)-279-8357 |
| 5 | jobuly.com | 9QDAADBVFHM8A | 山东超众阀门管件有限公司 | jobulywatch@gmail.com WhatsApp: 18182575506 |
| 5 | bedliy.com | 9QDAADBVFHM8A | 山东超众阀门管件有限公司 | bedliyrole@outlook.com WhatsApp: 13462818224 |
| 6 | camillaluxury.shop | VBMDKUL3KEA3C | 广州狎集网络科技有限公司 | Wathcesvipcenter@hotmail.com WhatsApp: 12135565295 |
| 7 | chrono26.com | QDACM53V63EEA | Unlock your imagination | support@chrono26.com suppoprt@chrono26.com support@nuewatch.com |
| 8 | clonewatches.com | QPG9CFKC3EZY | Master | support@clonewatches.com WhatsApp: 447410208835 |
| 9 | dennistoystore.com | QRS8SS2M3JMKA | | 473613@qq.com |
| 10 | dunekhing.com | WZTXG85P3BVBJ | Moon Halo Limited | support@roseliay.com |
| | | XXCGH5AV26SF8 | 厦门玩物上治品牌设计有限公司 | WhatsApp: 8613652381765 |
| 10 | weistwatch.com | K6K9K7VZM923W | | support@roseliay.com WhatsApp: 12137919605 |
| 10 | kimmyis.com | EFSMSNLZY84N6 | | support@roseliay.com WhatsApp: 15109774882 |
| 10 | sunfdht.com | TDTCRQZXBYP2 | Hong Kong Weixiaoyun Technology Co., Limited | |
| 11 | gccista.shop | 7PLZRLUFWNN72 | Anhui Ningteng Trading Co., Ltd | gccista@outlook.com |
| 12 | gclvg.com | SLMPEN3CAFCZ4 | Shaanxi Benxin Chaojia Trading Co.,Ltd. | support@gclvg.com WhatsApp: 447856199796 |

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|----|-----------------------------|---------------------|--|---|
| 13 | getwatchpro.com | G9G82PVAFA6SA | Fashion is unlimited, beauty is unlimited | watcesgot@gmail.com WhatsApp: 12812360778 |
| 13 | rallx.store | G9G82PVAFA6SA | Fashion is unlimited, beauty is unlimited | watcesgot@gmail.com CortinasHanss@gmail.com WhatsApp: 12812360778 |
| 14 | high-w.store | ASN8376P57HMS | OMG | nartofortest@gmail.com WhatsApp: 14152258725 |
| 14 | top-swisstime.com | DPRD9DF7Z7CYE | fanjin | support@top-swisstime.com WhatsApp: 14152258725; 15042363820 |
| 15 | hy-premium-watch.com | JT4N64HXEG6W4 | | huangmangman@outlook.com support@hy-premium-watch.com |
| | | 2732188342@qq.com | | WhatsApp: 18153295760 |
| 16 | idc022.com | 96FCHQ4WMZG2G | IDC022 | hitea777@outlook.com WhatsApp: 8613926757799; 8618675426777 |
| 17 | luxnob.com | 2LRHW98MQKWT4 | 武平县梓靖日用品店 | support@luxnob.com riversky@luxnob.com |
| | | 15505970418@163.com | | WhatsApp: 447477483455; 447443756893 |
| 18 | luxtick.com | UT4MLXBV65NFQ | Timelesstunes records | support@luxtick.com WhatsApp: 16232020012 |
| 19 | luxuriousluxurywardrobe.com | 7QWGQQ6X83MZG | | llwardrobe999@gmail.com WhatsApp: 8613178848887 |
| 20 | luxurywatchessthlm.com | DNZ7JJB4Q2PXG | YoungSong (HongKong) Co., Limited | support@rrolxwatch.com support@luxurywatchessthlm.com WhatsApp: 46(0)86121088; 13213063327 |
| 21 | luxuwatchs.com | X9FA8RZRLWF4S | 旺达（广州）传媒科 技有限公司 | sswisswatchesafter@gmail.com |
| 22 | luxyavia.com | 7Y4U6FNY7H2HG | | support@luxyavia.com |
| 23 | menymoon.shop | 3K8FZNUZWDWXE | Waiyian Shop | |
| 24 | nic-watch.com | PJ3UVFT94E6MN | | nicwatch01@gmail.com WhatsApp: 8618285839977 |

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|----|------------------------|---------------|--|--|
| 25 | ocga.store | YFWP5ZCRAB4DW | Hong Kong Changzhifeng Trading Co.,Limited | nicechicbuy@gmail.com chicsgo@zohomail.com WhatsApp: 18323325572; 4082078438; 12817772895 |
| 26 | panda188.store | HRH24FFTPLLXS | 嘉兴乾源贸易有限公司 | pandaluxurywatch@gmail.com WhatsApp: 12132654084; 15107174505 |
| 27 | pdkicks.com | MU8VNGD7EMUMS | PD.Kicks.Co.Ltd | ceryslin2424@gmail.com support@pdkicks.com WhatsApp: 8615759912623 |
| 28 | premiumwatchs.com | 87UHSVH32337Q | Hevision Enterprises Pte. Ltd | service@luxurywatchs.com Support@premiumwatchs.com |
| 29 | sayhiyy.com | YG7C3GQBDSQ36 | 深圳市麦尔富电子商务有限公司 | sayhiyy01@outlook.com anglebabemia@gmail.com |
| 30 | treasurk.com | NPLSBT6RD7QAA | 海伦市慕薇诗美甲店 | gennapawelek@gmail.com 123456@gmail.com WhatsApp: 85253381445 |
| 31 | trivorshop.com | GJY3SNFSSSWQ4 | randtime | watchvipservice@hotmail.com WhatsApp: 8614739706838 |
| 32 | vernaculars.shop | 9M47DCTGZK6N2 | Huzhou Ningdajia Trading Co., Ltd | enuertiom@outlook.com |
| 33 | warringtac.shop | 6EJK56MM5HWT4 | Busby Louise | jsjasmine04@gmail.com service@billuxury.com |
| 34 | watchwsr.com | PAPSD5P32WKBL | | higherwatch@outlook.com WhatsApp: 8613587735699 |
| 35 | willy001.willyweb.shop | KU2S9PVJZSMQG | EMAYA—wcc | wzt952541276@gmail.com WhatsApp: 8615170471004 |