

**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.

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**DECLARATION OF KATHLEEN BURNS IN SUPPORT OF PLAINTIFF'S  
NOTICE OF IDENTIFICATION OF ADDITIONAL ALIASES FOR  
DEFENDANT NUMBERS 1, 6, 10, 14, 16, AND 31 AND ADDITIONAL FINANCIAL  
ACCOUNTS USED BY DEFENDANT NUMBERS 1, 4, 5, 6, 10, 14, 16, 22, 31, AND 34**

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 Plaintiff's Notice of Identification of Additional Aliases for Defendant Numbers 1, 6, 10, 14, 16, and 31 and Additional Financial Accounts Used by Defendant Numbers 1, 4, 5, 6, 10, 14, 16, 22, 31, and 34. 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 Plaintiff, Omega SA ("Plaintiff" or "Omega"), retained my firm to investigate the ongoing sale of counterfeit versions of Omega's 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 Omega's branded products.

4. On March 10, 2025, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for Temporary Restraining Order”) [ECF No 6]. I hereby incorporate by reference all factual allegations contained in my Declaration in Support of Plaintiff’s Application for Temporary Restraining Order [ECF No. 6-4].

5. 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 the e-commerce stores, 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 Defendants electronically.<sup>1</sup> 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. Each order was processed entirely online and following the submission of the orders, my firm received information for finalizing payment<sup>2</sup> for the products via Defendants’ respective newly identified financial information (the “Additional Financial Information”), identified on Schedule “A” hereto.<sup>3</sup> True and correct copies of the web pages my firm captured and downloaded showing Omega’s branded items my firm ordered via Defendants’ E-commerce Store Names, together with redacted copies of the order summary web page, order

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<sup>1</sup> Certain Defendants use their E-commerce Store Names in with tandem electronic communication via private messaging applications and/or services to complete their offer and sale of goods.

<sup>2</sup> My firm did not transmit the funds to finalize the sale for the orders from most of the Defendants so as to avoid funding Defendants’ coffers.

<sup>3</sup> Additional means of contact for Defendants, including customer service e-mail addresses and WhatsApp phone numbers, are also included on Schedule “A” hereto.

confirmation, payment account data, and e-mail correspondence exchanged, are attached hereto as Composite Exhibit “1.”

6. In connection with the investigation, my firm identified the additional alias e-commerce store names identified on Schedule “B” hereto (the “Additional E-commerce Store Names”), registered, operated, and/or maintained by Defendant Numbers 1, 6, 10, 14, 16, and 31, that offer for sale watches bearing Omega’s trademarks at issue in this action. My firm’s investigation of Defendant Numbers 1, 6, 10, 14, 16, and 31’s e-commerce stores identified multiple commonalities establishing the relationship with their respective Additional E-commerce Store Names, including the following:

- a. Defendant Number 1: Defendant coolsar.com (Defendant Number 1) redirects to the Additional E-commerce Store Name, authentictimehub.com. Specifically, upon accessing the website operating under E-commerce Store Name coolsar.com, my firm observed the website automatically redirected to the website operating under the Additional E-commerce Store Name, authentictimehub.com.
- b. Defendant Number 6: Defendant camillaluxury.shop (Defendant Number 6) identified the Additional E-commerce Store Name jadeluxury.shop as its website. My firm contacted Defendant camillaluxury.shop via its e-mail address, [wathcesvipcenter@hotmail.com](mailto:wathcesvipcenter@hotmail.com), requesting information on how to complete the purchase of an Omega branded watch and was provided with a link to the website operating under the Additional E-commerce Store Name, jadeluxury.shop. (See ECF No. 28-2, p. 95.)
- c. Defendant Number 10: Defendant kimmyis.com (Defendant Number 10) identified the Additional E-commerce Store Name watcx.com as its website. My firm contacted

- Defendant kimmyis.com via its WhatsApp number, 15109774882, requesting information on how to purchase an Omega branded watch and was provided with a link to the website operating under the Additional E-commerce Store Name, watcx.com. Additionally, Defendant kimmyis.com shares an identical WhatsApp contact number, 15109774882, with the Additional E-commerce Store Name watcx.com. (See ECF No. 28-2, p. 114.)
- d. Defendant Number 14: Defendant top-swisstime.com (Defendant Number 14) redirects to the Additional E-commerce Store Name clean-fac.shop. Specifically, upon accessing the website operating under E-commerce Store Name top-swisstime.com, my firm observed the website automatically redirected to the website operating under the Additional E-commerce Store Name, clean-fac.shop.
- e. Defendant Number 16: Defendant idc022.com (Defendant Number 16) identified the Additional E-commerce Store Name idc077.com as its website. My firm contacted Defendant idc022.com via its e-mail address, [hitea777@outlook.com](mailto:hitea777@outlook.com), requesting information on how to complete the purchase of an Omega branded watch and was provided with a link to the website operating under the Additional E-commerce Store Name, idc077.com. Additionally, Defendant idc022.com shares an identical e-mail address, [hitea777@outlook.com](mailto:hitea777@outlook.com), and WhatsApp contact number, 8613926757799, with the Additional E-commerce Store Name idc077.com. (See ECF No. 28-2, pp. 160, 163–164.)
- f. Defendant Number 31: Defendant trivorshop.com (Defendant Number 31) identified the Additional E-commerce Store Name woratime.com as its website. My firm contacted Defendant trivorshop.com via its WhatsApp number 8613229945610,

requesting information on how to complete the purchase of an Omega branded watch and was provided with a link to complete the purchase via the website operating under the Additional E-commerce Store Name, woratime.com. (See ECF No. 28-2, p. 210.)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed 2025-05-06, at Scottsdale, Arizona.

*Kathleen Burns*

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Kathleen Burns

**SCHDULE “A”**  
**DEFENDANT BY NUMBER, E-COMMERCE STORE NAME, AND**  
**ADDITIONAL 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	EFRY2T6ZAVQMW		support@elitetimepiecesusa.com
1	authentictimehub.com	EFRY2T6ZAVQMW		support@authentictimehub.com
1	doxsd.com	HGDZHJFMUKFEG		support@doxsd.com
1	atinowatch.com	3ELZJYM6QRGRQ		support@atinowatch.com
1	luxyswear.com	C22KW6RKNRK64		support@luxyswear.com WhatsApp: 14793852889
1	opulencewrist.com	EFRY2T6ZAVQMW		support@opulencewrist.com WhatsApp: 14793852889
4	relaxtee.com	2SQZMXRUERKG6		contact@relaxtee.com WhatsApp: 16313199432
5	jobuly.com	xmjihejihe@gmail.com	厦门几何几何跨境电商有限公司	jobulywatch@gmail.com WhatsApp: 18182575506
6	jadeluxury.shop	customer@sideroper.com		Wathcesvipcenter@hotmail.com WhatsApp: 12135691925
10	watcx.com	Y77R25GBVXVAA	Jinghe New Town Yufeisong Department Store	info@gregdy.com 1544593053@qq.com
		jhdepartmentstore@163.com		
		8E9CZSE24E4CC	Yongan Qianran Department Store	WhatsApp: 15109774882; 8619835272209; 8613459507866
		qianrandepartment@163.com		
14	clean-fac.shop	B5U67ALVXD9VA	Weijin	clean.factory.shop@gmail.com WhatsApp: 16505078730
16	idc077.com	FJDMD57VD95A4	IDC SHOP	hitea777@outlook.com WhatsApp: 8613926757799

22	luxyavia.com	HGDZHJFMUKFEG		support@luxyavia.com
		YVU84G3QQ5TGQ		
31	woratime.com	VLQPJU6SCLE7L	woratime	rtvipwatch@hotmail.com rtwatchservice@hotmail.com
		CE22USGMFQYK6	woratime	WhatsApp: 8613229945610; 8617765281845
34	watchwsr.com	JKVH9XVQKJ858	丹阳市丹北镇王斌电子贸易商行（个体工商户）	higherwatch@outlook.com WhatsApp: 8613587735699

**SCHDULE “B”**  
**DEFENDANT BY NUMBER, E-COMMERCE STORE NAME,**  
**AND ADDITIONAL E-COMMERCE STORE NAME**

<b>Def. No</b>	<b>Defendant / E-commerce Store Name</b>	<b>Additional E-commerce Store Name</b>
1	coolsar.com	authentictimehub.com
6	camillaluxury.shop	jadeluxury.shop
10	kimmyis.com	watcx.com
14	top-swisstime.com	clean-fac.shop
16	idc022.com	idc077.com
31	trivorshop.com	woratime.com