

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-20335-CIV-BLOOM**

RICHEMONT INTERNATIONAL 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 (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 have been an investigator since 2012.

3. Counsel for Plaintiff, Richemont International SA ("Plaintiff"), retained my firm to investigate and document the suspected sale of counterfeit and infringing versions of Plaintiff's products by Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" attached to Plaintiff's Application for Temporary Restraining Order

(collectively “Defendants”), and to obtain the available payment account data for receipt of funds paid to Defendants for the sale of counterfeit branded products.

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 bearing and/or using at least one of the Plaintiff’s trademarks at issue in this action, 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 for the purchase of various products – all bearing and/or using counterfeits and infringements of at least one of the Plaintiff’s trademarks at issue in this action and requested each product be shipped to an address in the Southern District of Florida.² Each order was processed entirely online, and following the submission of the orders, my firm received information for finalizing payment³ for the products ordered using Defendants’ respective financial account information, as identified on Schedule “A” hereto. At the conclusion of the process, the detailed web pages my firm captured and downloaded reflecting each product my firm ordered were sent to Plaintiff’s counsel. True and correct copies of the web pages captured and downloaded by my firm, showing the various items

¹ Certain Defendants operate their E-commerce Store Names in tandem with electronic communication via private messaging applications and/or services to complete their offer and sale of counterfeit and infringing versions of Plaintiff’s branded products. (See generally Comp. Ex. 1, hereto.) Additional means of contact provided by Defendants, including e-mail addresses and WhatsApp phone numbers are also identified on Schedule “A” hereto.

² During the checkout process from Defendant 13’s E-commerce Store Names, cnxscs.store and cysenwk.shop, my firm was automatically redirected to Defendant 13’s E-commerce Store Name, yewugu.store.

³ My firm did not transmit the funds to finalize the sale for orders from many of the Defendants so as to avoid adding additional funds to Defendants’ coffers.

bearing and/or using Plaintiff's trademarks ordered via Defendants' E-commerce Store Names, together with redacted copies of the order summary web pages, order confirmation, payment account data and any electronic 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 On: 2025-01-22 in 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	Payee Information	Merchant ID	PayPal E-mail	Additional Means of Contact
1	aaawatch.to	aaamontre@gmail.com	L4FVGTYDXH A2Y		aaa-watch@outlook.com
2	astonishing.top	南昌高新区知选贸易商行	MLJBSMP243W 6C		tingxicm@outlook.com
2	fashiones.top	南昌高新区知选贸易商行	MLJBSMP243W 6C		tingxicm@outlook.com iwcslife@outlook.com
3	bestwatches.to	13912343095@139.com	XVQTNF9LYL7 HS		ibestwatches2020@hotmail.com
4	betterlifego.com		6KYHVUP45RS W2		CustomerService@ashoesfactory.com
4	shoefactory.top	zi bo wei cai mao yi you xian gong si	HKGKQZ2CKW 3K2		CustomerService@ashoesfactory.com
5	blog.12h.to	潘浩		leonberenguer445@gmail.com	WhatsApp: +852 6703 0781 WhatsApp: +852 6403 5279
6	buyonbest.com a.k.a. bobjewelry.com	Tran Ha Giang		hatranha833@gmail.com	support@buyonbest.com sale@buyonbest.com
6	bobjewelry.com		FP37G4QXV8U EE		support@bobjewelry.com support@buyonbest.com
7	cashial.online	太原爱食客餐饮管理有限公司	27FL5UUAP33G J		interhz11@163.com
7	grgdger.online	太原爱食客餐饮管理有限公司	27FL5UUAP33G J		interhz11@163.com
8	cheercash.online	北京京西弘基商业有限公司	CCATQHZ7P44 ZS		
9	chicstime.com		F6C5GX2ULBS YC	byrondeems3138@gmail.com	byrondeems3138@gmail.com

10	chris-luxury.shop	陕西暖尧建闹网络科技有限公司		cbx19977@outlook.com	115070853475@gmail.com vipservicecenter@outlook.com Mailiuy@outlook.com swissmadeluxury.cai@gmail.com
11	clothes.nu			soonzai227@gmail.com	depursesbag@hotmail.com WhatsApp: +86 186 6602 1721
12	cloverjw.com	Changting County Lianzhongxin Department Store Operations Department Changting County Lianzhongxin Department Store Business Department		342212184@qq.com	support@cloverjw.com
13	cnxsces.store a.k.a. yewugu.store		7DATNYQ3NWMW4		Customer.service@henwinto.com order.service@henwinto.com
13	cysenwk.shop a.k.a. yewugu.store		8TQRCSTZA743J		Customer.service@henwinto.com order.service@henwinto.com
13	kwsdrfh.shop		QVH544T9VF3T4		Customer.service@henwinto.com
14	daxiewatch.shop	杭州磐辰贸易有限公司	ZK7RVBVX6B9QE		kezhzhouwei0514@gmail.com
15	emuobag.shop	文 智弘 @41y8	KF29JLWXMCQWA		support@emuobag.shop worldsroderickthiyiqph@gmail.com sales@emuobag.shop
15	wwcbag.shop	文 智弘 @41y8 智弘 文	KF29JLWXMCQWA	asd763881227@163.com	cntopshoes@gmail.com support@wwcbag.shop sales@wwcbag.shop

		文 智弘 @41y8	KF29JLWXMC QWA		support@wwcbag.shop cntopshoes@gmail.com sales@wwcbag.shop
15	zvldbag.shop	文 智弘 @41y8	KF29JLWXMC QWA		support@zvldbag.shop worldsroderickthyiqlph@ gmail.com sales@zvldbag.shop
16	ffluxury.top		ZRPT6GFWNH MH6		djtecknoservice@gmail.c om service@luxurydpt.com
17	getjewelrys.com	武欣欣		maryjohna@hotma il.com	kerytony88@gmail.com
18	gilltime.com	Gilltime	KSDAR3RJQLR Y8		vipwatchesreplica@hotm ail.com
19	goodv-jewellery.store	Zhang Jin @cyoushin	RQWCB59VNH MPA		support@goodv- jewelry.com info@roejewels.com business@goodv- jewelry.com WhatsApp: +852 5108 3462
19	goodv-jewellery.com			chenglizhu95@gm ail.com	info@roejewels.com info@rosetomorrow.com WhatsApp: + 852 6337 7012
20	iwcwatch.life	义乌市菊彭3贸易 商行	GL7G2VCVE25 RA		bookerdivollco@hotmail. com tingxicm@outlook.com
21	jeordwatch.co	Zhang Di @jeordwatch6	URHE6GQMLJ WS6		jeordwatch@gmail.com info@jeordwatch.co
22	kernelluxuy.com			dx18605886632 @163.com	Andrewchun69@gmail.c om PWP- 0633DA0F87C7D7C775 C46E2D5D2EFE5B@P RIVACYGUARDIAN.O RG WhatsApp: +86 190 1281 5052

22	supermanluxury.com			dx18605886632@163.com	Andrewchun69@gmail.com WhatsApp: +86 190 1281 5052
23	kohvjewelry.com		VQGKNHFJA4JXA		support@kohvjewelry.com
24	marielco.com		5SPGDZVCY8TB4		support@marielco.com
25	mqs.shop	PRODO CROWN SHOP	HL9H8UF8QJ7WJ		mqbee88@gmail.com
25	sdy.shop		HL9H8UF8QJ7WJ		mqbee88@gmail.com
26	primetickers.com		P3VJHHV6QP33N		contact@primetickers.com 3CF0EA2B6C524D4A9787E74AC513B837.PR OTECT@WITHHELDFORPRIVACY.COM
27	puhfyhj.online	洛阳灿佳商贸有限公司	UXP93MQVUA2DG		ieu9989@163.com
28	rariate.com	N&M Co. Ltd	W689E84A4SR9W		admin@elttes.com PW-50A9F0166DEF5832FC2841216DCBBCA9@PRIVACYGUARDIAN.ORG
29	replicabest.store		9WLP868VMUY6E		
30	repicaluxuryshop.com	RSL Online Platform	CNG2LHREQEYW8		contact@repicaluxuryshop.com
31	replicawatch.shop	Bartoletti-Lockman		PankratzCooner445@gmail.com	service@replicawatch.shop
32	replicawatchesworld.com	Tuán Lê @bonsaiworld	ZDUUH5QKZHKQC		replicawatchesworldus.com@gmail.com 5C2360736F934E32BDADBC7C2EAD6CE6.PR OTECT@WITHHELDFORPRIVACY.COM
33	repicawrist.com			moramlisa@gmail.com	support@repicawrist.com WhatsApp: +44 7532 820531

34	repwatchplug.com	Angelo Williams @Hrt50		wangelo655@gmail.com	info@repwatchplug.com repwatchplug@gmail.com Hypepay2021@gmail.com
35	royal-jewelry.shop	涛中 童		Tongtaozhong@gmail.com	info@royal-jewelrys.com support@charmaries.com WhatsApp: +852 4688 3784
36	shoppingservices.top	Yi Jie Trading Co., Ltd.	PE72TH3MCSZ 8G		support@shoppingservices.com
36	us.watchswiss.top	Yi Jie Trading Co., Ltd.	PE72TH3MCSZ 8G		support@shoppingservices.com
37	storeluxury.top		N9VRJDULAPS WL	linhuodan@yeah.net	us@onlineshoppingservices.com
38	superreplica.shop		CLQ752BLKTY 8A		support@superreplica.shop
39	swisswatchesf.com	guang zhou rui yu tu ke ji you xian gong si	RHW23KWUFN 988		info@sportsservir.com PW-5F897A95B33D888339F8C2484FCDC731@PRIVACYGUARDIAN.ORG
39	watchesdd.com		KTD6G262PAK C4		info@sportsservir.com PW-CCB114C5EA35472289F6CA71DE275D8D@PRIVACYGUARDIAN.ORG
40	tickunique.is	MeetCadeau Co., Ltd.	6QLHZ526VAB 74	vinking-wiio@outlook.com	cstickunique@gmail.com WhatsApp: +44 7355 236610
41	vincyrep.ru			ganyong2019@outlook.com	admin@liomui.com vincystore@hotmail.com
		福来 黄		fulai-2022@outlook.com	vincystore@hotmail.com admin@liomui.com WhatsApp: +86 187 5092 5283