

**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 NOTICE OF IDENTIFICATION OF ADDITIONAL ALIASES
FOR DEFENDANT NUMBERS 11-12 AND ADDITIONAL PAYMENT ACCOUNTS
USED BY DEFENDANT NUMBERS 5, 11-12, 18, 25, 33, 37 AND 41**

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 submit this Declaration in support of Plaintiff's Notice of Identification of Additional Aliases for Defendant Numbers 11-12 and Additional Payment Accounts Used by Defendant Numbers 5, 11-12, 18, 25, 33, 37 and 41. 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 versions of Plaintiff's products by Defendants, the Individuals, Business Entities, and Unincorporated Associations Identified on Schedule "A" to my Declaration in Support of Plaintiff's Application for Temporary Restraining

Order (collectively “Defendants”) and to determine Defendants’ payment account data for receipt of funds paid for the sale of the counterfeit branded goods.

4. On January 23, 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. [10]. I hereby incorporate by reference all factual allegations contained in my Declaration in Support of Plaintiff’s Application for Temporary Restraining Order, ECF No. [10-3].

5. Prior to filing this Declaration, my firm accessed Defendants’ Internet based e-commerce stores operating under their respective seller names set forth on Schedule “A” hereto (the “E-commerce Store Names”).¹ Upon accessing each e-commerce store, my firm was able to view products bearing and/or using Plaintiff’s trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data electronically with Defendants. My firm then placed an order from each Defendant for the purchase of a product – each bearing and/or using counterfeits and/or infringements of, at least, one of Plaintiff’s trademarks at issue in this action – and requested each product to be shipped to 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 for the products offered for sale and ordered from Defendants using their newly identified payment accounts (the “Additional Payment Accounts”), identified on Schedule “A” hereto. True and correct copies of the web page captures

¹ My firm identified the e-commerce store name, timesru.com, to be an alias e-commerce store name for Defendant Number 11 – clothes.nu, because my firm observed clothes.nu redirecting visitors to timesru.com. Additionally, my firm identified the e-commerce store name, fbonline.shop, to be an alias e-commerce store name for Defendant Number 12 – cloverjw.com, because the e-commerce stores share the same Merchant ID and certain contact e-mail addresses. As such, timesru.com and fbonline.shop are identified as Additional E-commerce Store Names in Schedule “A” hereto.

reflecting the Plaintiff's branded products offered for sale and ordered via Defendants' E-commerce Store Names, together with redacted copies of the order summary web pages, order confirmation, payment account data, and 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 On: 2025-03-12 in Scottsdale, Arizona.

Kathleen Burns

Kathleen Burns

SCHEDULE "A"
DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME,
ADDITIONAL E-COMMERCE STORE NAME, AND
ADDITIONAL PAYMENT ACCOUNT INFORMATION

Def. No.	Defendant / E-Commerce Store Name	Defendant / Additional E-Commerce Store Name	Additional Payee	Additional Merchant ID	Additional PayPal	Additional Contact Information
5	blog.12h.to		王锋		doernerzara@gmail.com	WhatsApp: +852 5263 8029
11	clothes.nu	timesru.com			kei227@outlook.com	pursesde@gmail.com
12	cloverjw.com			8U3Q3R26WZ GCQ		em15336681973@gmail.com shopify_jewelry@163.com
12		fbonline.shop		8U3Q3R26WZ GCQ		support@luxe-us.com shopify_jewelry@163.com em15336681973@gmail.com
18	gilltime.com		rotwa	SZFZBCZ73V AQ8		rtvipwatch@hotmail.com watchvipservice@hotmail.com
25	mqsiz.shop			HN5XTHUCQ LJGG UEPT2DD8GG QKG		
33	replicawrist.com				lisamoram9@gmail.com	
37	storeluxury.top			3ED2C6JTBVS J2		support2@wppay.online
41	vincyrep.ru		睿翰 曾		zusong-2024@outlook.com jiangzhou-2022@outlook.com Ruihan-2022@outlook.com	