

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.**

TIFFANY (NJ) LLC,

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, Tiffany (NJ) LLC ("Plaintiff" or "Tiffany"), 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 determine Defendants’ payment account data for receipt of funds paid for the sale of counterfeit Tiffany-branded merchandise.

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”).¹ Upon accessing each e-commerce store, my firm was able to view products bearing and/or using, or suspected of bearing, at least one of Tiffany’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.² 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 Tiffany’s trademarks³ at issue in this action – and requested each product be shipped to an address in the Southern District of Florida. Each order was processed entirely online, and following the submission of the orders, my firm received information for

¹ Many 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 Tiffany 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 22’s E-commerce Store Name, lalsoft.com, my firm was automatically redirected to Defendant 22’s E-commerce Store Names, fspbo.shop and kegegegghh.shop. During the checkout process from Defendant 39’s E-commerce Store Name, zzmoonz.com, my firm was automatically redirected to Defendant 39’s E-commerce Store Name, zzmoonz.shop.

³ Certain Defendants blurred-out and/or concealed the images of Tiffany’s trademarks on products being offered for sale via Defendants’ respective e-commerce stores. Upon receipt of the products purchased from those Defendants, my firm visually inspected the products and verified that each product did, in fact, bear one or more of Tiffany’s trademarks in their entirety. True and correct photographs of the Tiffany-branded products my firm received from certain Defendants are included in Composite Exhibit “1” hereto.

finalizing payment⁴ for the products ordered from Defendants to their respective financial account 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, together with photographs of certain received products, were sent to Tiffany’s counsel. True and correct copies of the web pages captured and downloaded by my firm, showing the various Tiffany-branded items my firm 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: 2024-10-28 in Scottsdale, Arizona.

Kathleen Burns

Kathleen Burns

⁴ My firm did not transmit the funds to finalize the sale for the orders for many of the Defendants so as to avoid adding money to Defendants’ coffers.

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

Def. No.	Defendant / E-commerce Store Name	PayPal Payee	Merchant ID / Transaction Info	PayPal E-mail	Additional Means of Contact
1	ccfashionjewelry.com	深圳市朗克思照明有限公司	K9VDCP8BRGVC4	xyy412308@gmail.com	cc@ccfashionjewelry.com info@ccfashionjewelry.com
2	blingblings.es	Blingblings	LL9GLNQEU6QNE		oliva.sunny.song@gmail.com service@blingblings.es
3	classport.shop	海口龙华辉宏峻百货店	ZTSS2YX9SQSV8		service@classport.shop Jessport@ruralshoes.com
4	cocoshoes.top	南宁市君朗日用百货有限公司	F96QJFSQVMF2J	17689611506@163.com	cocoshoes2011@gmail.com WhatsApp: +852 6432 9578
5	correctkickz.com			76398812@qq.com	correctkickz.cc@gmail.com WhatsApp: +852 5614 0114
6	eleger.co		56P3F7YRER8Q8 T6XZ4CPL3PDH8		support@eleger.co
7	eukick.com	海口美兰崇泊姆电子商务工作室	5X9H6C3YAEBXJ		service@runningpro.shop WhatsApp: +86 173 2700 2347
8	evelynsneaker.com			1013573859@qq.com	evasneaker@gmail.com WhatsApp: +86 181 0058 6611
9	fcmg-sales.com	莆田市湄洲湾北岸经济开发区忠门湄里啪啦服饰店(个体工商户)	KY7YKZAYKJ9ZS		zzy925520@gmail.com
9	saleluxurycn.com	莆田市湄洲湾北岸经济开发区忠门湄里啪啦服饰店(个体工商户)	KY7YKZAYKJ9ZS		zzy925520@gmail.com r4c.lhikdl3t@gmail.com
10	fossilry.cc		QH4F7KX2378GW	yangbing19988dkh@163.com	fossilry@ontlook.net

11	getreadys.org			wzb5556688@163.com	cocosneakers@outlook.com WhatsApp: +86 180 5957 6801
12	greenutilityltd.online		XJMYYY3S4XM8N		support@greenutilityltd.online
13	jewelrybuild.com	CHAI TZU - CHUN @jewelrybuild	97BNUPBPH42EL		aaabbbccc330626@gmail.com
14	Jinyi Shoes retail wholesale a.k.a. +8619359440554 a.k.a. 俊弟aj LJR版 (本地 支持送货上门)			dgfsfaf@163.com zwypaypal@163.com	WhatsApp: +86 193 5944 0554
15	jwfancy.com		6CLPQVLVPRCKJ		support@jwfancy.com MANHSONLE@GMAIL.COM
16	kaideck.shop	Unlock your imagination	YW7CFDQUQRZ4L		SERVICE@KAIDECK.SHOP
17	kailin44088 a.k.a. luxury goods	苏 焯权 @6880887	T885RJF75US22	2687378995@qq.com	469011636@qq.com WhatsApp: +86 183 1280 1720
18	kickspk.com	Unlock your imagination	JU8DSXVDNNM96		SUPPORT@KICKSPK.COM support@kickssu.com
18	kickssu.org	Unlock your imagination	JU8DSXVDNNM96		SUPPORT@KICKSSU.ORG support@kickssu.com
19	kolobag.com	Online Shop	D74KA3BGHWNQE		info@spumall.com info@bxsale.com
20	koolmaker.com	Stripe Payment	SNOWTO.STO* KOOLMAKER Transaction Date: July 22, 2024 Posted Date: July 23, 2024 Category: Merchandise & inventory		support@koolmaker.com 6F7C571E6DC5414096967 A6AD47644EE.PROTECT @WITHHELDFORPRIVACY.COM
21	kw-store.top		8ERX395NJJ3GG	eryuedeqing@outlook.com	uuwa556@gmail.com WhatsApp: +85253194272

22	lalsoft.com a.k.a. fspbo.shop a.k.a. kegegegghh.shop		ZDW2EA7MN2YQ C		contacts@lalsoft.com BELKAABSOLUTLYMA N4@GMAIL.COM
			ZK22QSWY4NR4W		
23	luxere.top	BAGS LUXE @BAGSLUXE	GRWX9K4VBMGZ N		piyi2020@gmail.com info@luxere.top
24	maikesneakers111.com			ZhangJinYu202424@16 3.com	zhusen19780926@gmail.com Annareps2023@gmail.com zhusen780926@gmail.com WhatsApp: +86 138 6099 5961
25	matoyli.com		AVT9DA643UDUU		support@matoyli.com AB28F948E2C64911B30D B106DA340C57.PROTECT @WITHHELDFORPRIVA CY.COM
25	testegrila.com		AVT9DA643UDUU		support@testegrila.com Contact@sample.com Support@sample.com contact@yourstore.com
26	monicasneaker.im			choice409@126.com	monicasneaker@gmail.com WhatsApp: +86 183 9600 1806
27	niosneaker.com	Wear your personality, a new summer style	AJARX6JZSMYRN		niosneaker@gmail.com
28	obosneaker.com	盖州顺百商贸有 限公司	T7SE9R8HVVFQA	15659915689@163.com	onebyonemalls@gmail.com
29	oldsnkrs.shop	光远 赵		jjligimvgj92@hotmail.com	onlykickz0706@gmail.com Godky@163.com WhatsApp: +86 186 4960 5584
30	persting.live	GREEN E- 2FOUR PRIVATE LIMITED	LHL3Z7HRGBAGA		csservice@splendorx- live.com customer@visable- online.com
31	poposhoes.top	Guangzhou Share Clothing Co.,Ltd	XSEJ6A4ZWB4M8		liu31004@gmail.com info@poposhoes.top
32	sneakershop.ww	伟岚 钱 @WEILANQIAN	CSJWGLWPXJP2G	519097741@qq.com	WhatsApp: +86 159 8011 9208

33	sneakerssport789			qiuxia96@163.com	WhatsApp: +44 7473 486405
34	snkrsclub.cc		G475D5VGJX3U4		SUPPORT@SNKRSClub. CC support@snkrsclub.com snkrsclub- alan@outlook.com PWP- CE5127C33DCB144E78D8 0A5022CD7CC7@PRIVA CYGUARDIAN.ORG WhatsApp: +86 153 3001 0786
35	topfactory2166			topfactory2166@outlook.com	WhatsApp: +86 166 2166 1166
36	usasiha.shop	Unlock your imagination	662WL4LGHA7ME		SERVICE@USASIHA.SH OP
37	worlsoccer.com	上海斗彩信息科技有限公司	DLHY3FPQP3Q3N	aidfen@hotmail.com	hello@worlsoccer.com support@worlsoccer.com 8377557@gmail.com
38	xsir.product a.k.a. welcome to xsir			zhuchuanzheng203@outlook.com	WhatsApp: +86 181 5940 2993
39	zzmoonz.com a.k.a. zzmoonz.shop	zzmoonzshop@gmail.com	P72UBQDS26Y6U		zzmoonzshop@gmail.com