

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 24-23663-CIV-BLOOM**

GOYARD ST-HONORE,

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 *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've been an investigator since 2012.

3. Counsel for Plaintiff, Goyard St-Honore ("Plaintiff" or "Goyard"), 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" attached to Plaintiff's Application for Temporary Restraining Order

(collectively “Defendants”), and to document Defendants’ payment account data for receipt of funds paid for the sale of counterfeit Goyard 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”). Upon accessing each e-commerce store, my firm was able to view products using Goyard’s trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data with each Defendant.<sup>1</sup> My firm then placed an order from each Defendant via their E-commerce Store Names for the purchase of various products – all bearing and/or using counterfeits and infringements of one or more of Goyard’s trademarks at issue in this action – and requested each product 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<sup>2</sup> for finalizing payment<sup>3</sup> for the products ordered using Defendants’ respective financial account information, as identified on Schedule “A” hereto.<sup>4</sup> At the conclusion of the process, the detailed web pages my firm captured

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<sup>1</sup> Certain Defendants use their E-commerce Store Names in tandem with electronic communication via private messaging applications and/or services in order to complete their offer and sale of counterfeit and infringing Goyard-branded products. See generally Comp. Ex. 1, hereto.

<sup>2</sup> Defendants use money transfer and retention services with PayPal, Inc. (“PayPal”) as a method to receive monies generated through the sale of counterfeit products. Following the submission of some of the orders from Defendants, my firm obtained PayPal payees and/or corresponding PayPal Merchant Identification Numbers (“Merchant IDs”), instead of PayPal financial accounts in the form of e-mail addresses. However, I have personal knowledge from past investigations that the PayPal payee or Merchant ID can be used to identify the corresponding financial account at issue.

<sup>3</sup> My firm did not transmit the funds to finalize the sale for the orders to avoid adding money to Defendants’ coffers.

<sup>4</sup> Some Defendants provided additional contact information in connection with their respective E-commerce Store Name; accordingly, these additional forms of electronic contact are included in Schedule “A” hereto.

and downloaded reflecting each product ordered were sent to Goyard's counsel. True and correct copies of the web pages my firm captured and downloaded showing the various Goyard-branded items ordered via Defendants' E-commerce Store Names, together with 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."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed 2024-09-25 at Scottsdale, Arizona.

*Kathleen Burns*

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Kathleen Burns

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

Def. No.	Defendant/ E-commerce Store Name	Payee	Merchant ID	Financial Account	E-mail Addresses	Other Means of Contact
1	goyardbagus.com		G76ZM2HEH7VAG		admin@goyardbagus.com	
2	goyarduksale.com	EDDIE GRIGGS @EGRIGGS 408	3V9T945J55BL4		luxuryitemswholesale@gmail.com	
3	aaareplica.nu	齐齐哈尔市变晓商贸有限公司	7Y4W2X69U8JK8	maoxiaohupp@outlook.com	service@aaareplica.nu service@aaareplica.nu	
4	bagscoll.shop	Luybagq	J4F24FFE2DGV6		support@zngogo.com	
4	blissbags.shop	LUXURYBAGSALEssc	A8Y8GSFRHE72J		Support@zngogo.com <a href="mailto:help@luybagsonline.shop">help@luybagsonline.shop</a>	
4	luxesbag.shop	LUXBAGONLINE Luybagq	MLLCUQ5WLJB2N CPMHBE54LTRD6		Support@zngogo.com	
4	topbagsnew.shop	LUXURYBAGSALEs  LUXURYBAGSALEssd	H8WS8VQZYWJEW  5NQJRJ4QRZVYN		Support@zngogo.com 547602388@qq.com Support@zngogo.com <a href="mailto:help@luybagsonline.shop">help@luybagsonline.shop</a>	
5	buyqualitybags.com		2444YDDM2597J	79886689@qq.com	topbagshub@gmail.com contact@topqualitybags.com	
		Tabren Aubrey Smith	RQLTT8ZY2YWL6	keithgrainger90@outlook.com		
5	topqualitybags.com		KV5T4GV3KAKZJ	Usamamanzoorstripe@gmail.com	topbagshub@gmail.com contact@topqualitybags.com	

6	byaneity.com	Byaneity	GNJEDFUTP XESS		service@unigav e.com service@byaneit y.com	
7	casebig.com		TFSNLFL6A NVF6		favocase@gmail .com sales@Casebig. com	
8	casefeely.com	CASEFEEL Y	Y4HM7FMW 95PWW		support@casefe ely.com	
9	caseshunter.com		VAYBUU357 F444		admin@caseshu nter.com	
10	cinderellastores.com	Rokki Agbotsu	2357NLWTJ3 8GJ		info@cinderella stores.com cinderellastoren z@gmail.com	
11	crozus.com		NJU2X7GLD 5X86 CMGUNSJL VGA6		support@crozus .com	
12	designermusthave.com	Designer Must Have	THGZG4A39 BKW4			designermusthave.c om/index.php/conta ct-us-2
13	qkkbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@qkkba g.shop lagreen511@gm ail.com sales@qkkbag.s hop	
13	qnkbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@qnkba g.shop lagreen511@gm ail.com sales@qnkbag.s hop	
13	whwlbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@whwlb ag.shop cntopshoes@gm ail.com sales@whwlbag .shop	
13	wmtbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@wmtba g.shop alexissaveryprpe ws@gmail.com cntopshoes@gm	

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13	wshubag.shop	文 智弘 @41y8	KF29JLWXM CQWA	asd763881227 @163.com	support@wshub ag.shop worldsroderickt hyiqph@gmail.c om sales@wshubag. shop	
13	xknbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@xknba g.shop cntopshoes@gm ail.com sales@xknbag.s hop	
14	gorchic.com	Hefei Jiao Kun Trading Co., Ltd.	PT465C2FK4 F7S		service@gorchi c.com	
14	gorchic.us	Hefei Jiao Kun Trading Co., Ltd.	PT465C2FK4 F7S ZU5WRREP DXNK4		service@gorchi c.com	
				lindashuai1995 @gmail.com	service@gorchi c.com service@gorchi c.net	
15	high-endbags01.com		WHFLXXCT HQ2QY	cong_0617@q q.com	xxx@163.com	
16	jojokkrelicas.com	福根 伍	FZ3HYPANX XR5Q	wufugen1115 @163.com	support@jojokk replicas.net	
17	karanfrank.ru			2315162318@ qq.com	karanfrankk@o utlook.com	
18	luxeebag.com	LuxeeBag	CM4ECTF5E NA9Y		support@luxeeb ag.com	
19	luxuryoubag.com	FindingLuxur y	8SG3KGHCT C9BG		contact@luxury oubag.com	
20	mafoi.shop		ZQBVLPZ48 7SS4	segadiarra@ mail.com	customers@maf oi.shop clients@mafoi.s hop	
21	merchprintz.com	MerchPrintz	DXS6FASUE QG2Q		support@merch printz.com	
22	peesty.com		K9NVCKFEB T27W		sale@temafes.bi z	

					support@temafes.net	
22	temaap.com		K9NVCKFEB T27W		support@temaap.com support@fasbags.shop	
22	temafes.us		K9NVCKFEB T27W		sale@temafes.biz support@temafes.net	
23	racastudyo.com	Raca Studyo Pty Ltd	SFNPZT873B UCJ		hello@racastudyo.com	
24	tgey.top	Qiansheng TRADING Co.LTD	WE4RF8RW7 CUWG		Allison54321aa @outlook.com	
25	theluxhouse.net	Fashion Venue	LVN357P5CL TWC	davidruffinjr@yahoo.com	info@theluxhouse.net theluxhouse1@gmail.com	
26	thetotetrove.myshopify.com	LuxuryHub	V8A8PG45Z HLVQ		ameliaavaforyou@gmail.com store+79032254753@t.shopifyemail.com avasophiaforyou@gmail.com	
27	vincyrep.ru	林海 柳		liulinhai188@outlook.com	vincystore@hotmail.com admin@liomui.com	
				rongfeng-2022@outlook.com	vincystore@hotmail.com	
				huixiang-2022@outlook.com	vincystore@hotmail.com	
28	viokshop.com		KF44JSYPRD 6SC	wuwupei@outlook.com	besttopstores_service@outlook.com	
29	vittoriaparumbell.com	VittoriaParumbell	3HZNUQB8Y TJY6		vittoriaparumbell.com@gmail.com sales@vittoriapa	

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