

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 21-62034-CIV-DIMITROULEAS

CHANEL, INC.,

Plaintiff,

vs.

A ACCESSORY STORE, *et al.*,

Defendants.

**DECLARATION OF ERIC ROSALER IN SUPPORT OF PLAINTIFF'S
NOTICE OF IDENTIFICATION OF ADDITIONAL ALIASES AND
ADDITIONAL PAYPAL ACCOUNT USED BY DEFENDANT NUMBER 68**

I, Eric Rosaler, 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 and Additional PayPal Account Used by Defendant Number 68. If called upon to do so, I could and would competently testify to the following facts set forth below.

2. I am an officer of AED Investigations, Inc., a licensed private investigative firm.

3. Counsel for Plaintiff, Chanel, Inc. ("Chanel" or "Plaintiff"), retained my firm to investigate the ongoing sale of counterfeit versions of Plaintiff's products by Defendant, the Individual, Business Entity, or Unincorporated Association identified on Schedule "A" hereto ("Defendant"), and to determine Defendant's payment account data for receipt of funds paid to Defendant for the sale of counterfeit Chanel-branded goods.

4. On September 30, 2021, 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”) [DE 6]. I hereby incorporate by reference all factual allegations contained in my Declaration in Support of Plaintiff’s Application for Temporary Restraining Order [DE 6-4].

5. During the course of investigation into Defendant, my firm communicated with Defendant via the private messaging application, WhatsApp, which was identified directly on Defendant’s Internet website operating under the Subject Domain Name vanco.ru. Through WhatsApp, Defendant provided my firm two Internet websites operating under the domain names identified on Schedule “A” hereto (the “Additional Subject Domain Names”), that offer for sale Chanel-branded items. My firm accessed Defendant’s fully interactive,¹ commercial Internet website operating under one of the Additional Subject Domain Names. Upon accessing the website, my firm was able to view products bearing Chanel’s trademarks, add a product to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data electronically with the website. My firm then placed an order from Defendant’s Additional Subject Domain Name for the purchase of a product bearing counterfeits of, at least, one of Chanel’s trademarks at issue in this action, and requested the product be shipped to the Southern District of Florida. Following the submission of the order, my firm communicated with Defendant, and, through WhatsApp, Defendant provided my firm information for finalizing payment to its newly identified PayPal, Inc. (“PayPal”) account (the “Additional PayPal

¹ Defendant uses its Additional Subject Domain Name epurse.cn to act as a supporting domain name to direct traffic to its originally identified fully interactive, commercial Internet website operating under the Subject Domain Name vanco.ru, from which consumers can complete purchases. The supporting domain name automatically redirects and forwards to the fully interactive, commercial website. (See generally Composite Exhibit “1” hereto.)

Account”), as set forth on Schedule “A” hereto. True and correct copies of the detailed web page captures of Defendant’s Additional Subject Domain Names, including the Chanel-branded product my firm ordered, together with redacted copies of the order summary web pages, newly identified payment information, and electronic communication with Defendant, 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 the 19 day of November, 2021, at Aventura, Florida.

Eric Rosaler

Eric Rosaler

SCHEDULE "A"
DEFENDANT BY NUMBER, ADDITIONAL SUBJECT DOMAIN NAMES,
AND ADDITIONAL PAYPAL ACCOUNT

Def. No.	Defendant / Additional Subject Domain Names	Additional PayPal Account	E-mail Address
68	frankbag.cn epurse.cn	pursev@hotmail.com	Purseaaa@Hotmail.Com