

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 20-62474-CIV-SINGHAL**

CHANEL, INC.,

Plaintiff,

vs.

BRANDS\_SHOP555; CRAZY\_BRAND\_COLLECTION2 aka  
GIRLS\_COLLECTION\_POINTTT,  
LUXIMAL\_FASHION\_STORE, LUXURY\_NEW\_STORE202,  
and NEW\_FASHION\_BRAND2020; LAIKE8218;  
LISA.CHANEL.SUPPLIER; LUCKY\_WEBSITES;  
LUXURY.BAG.SHOES; SHOPPINGHUBPREMIUM;  
SUPPLIER8617665237415; TAN\_CLUB2015 aka  
EDGYWALKER-ZIDAN and YUPOO EDGYWALKER;  
ULTIMATE\_FASHION\_STORE660 aka  
ULTIMATE\_NEW\_COLLECTION2 and  
ULTIMATE\_X\_FASHION\_BRAND; WONIU\_CHANEL;  
1LUXURYBRANDFACTORY aka CRAZYRABBIT;  
QXLUXURIESOFFICIAL aka QXLUXURY; GINA SHOP aka  
GINA-SHOP-134940923348833; LT.STORE - AUTHENTIC &  
FACTORY OUTLET aka LTSTOREAUTHENTIC;  
FACAILUXURY.COM; UAI881Q; VDKVFFV;  
WANGYUEZHEN12345; WHUYGBHHBV; WOUBHGT;  
WUYUANFENG111; XENQEARX; XIGUAN TILAMEN  
PANSEN QAPP; XILIAOKONGWQ; XINCHAODIPXM;  
XUANDE LUOJIEMEN; XUEREN PICKGUEE; XXANDYB;  
XXLAURE; XXTRACY; YINXUE ROU FUWANGXI;  
YUEGUANGQWQ; YUELIANGHU; YUN AICEN  
MELIUTA; YUNMURENGJINGLPS; ZHANGQINGMEI;  
ZHANGXI6; ZHANWE28; ZHONGDUIBAOOBJ;  
ZHUOBENJIUOBC; ZILUQITT; 3OPI14E\_; 9P16\_CDT;  
22M\_XJV; 32E1G104W53H12HW; 39M3F\_OS;  
123FUFUFU; ADIMPLEINTHEMOUTHCE;  
AIRANDSMELLALTARVD; ALBERTO STORE;  
ALICELYNNGFMH; AMY STARNES PEARSON;  
ANASTASIA BOHALL; ANGELA\_841; ANGYETER;  
ARGUINGFRO; ASDAS4544; AUBREEY; AVRIL  
WALLACE; AYRTBG7J; BASHIRONGXLO; BEAN CURD  
FISH BEE BUTTERFLY; BEATTRICE; BEN TORRANCE;  
BFQEZ82T; BINJIAQIAOLEI; BIRKLING; BNYTJGH;

BRADLE; BROOKENICOLE SCULLY; BULLYRAG;  
CALZADO Y GORRAS; CAODAOKANGRV; CAPPEROD;  
CARSONY; CCSDHCJSDGF; CELLPHONE A1;  
CELULREACIELO; CESARPE; CFOIJIDJFCOCXC;  
CHOUWEITANBENOP; CJEFJC; CJUICYIUYDCISAC;  
COBI; COMEONDD; COMMUNISTPARTYCF;  
CORRYCANDE; COUDCJHIDYI; D5SHOPW4; DAPEI;  
DARBY REISS; DBKDCTSH; DDMICHAEL;  
DIAZSERVICES; DISCOUNT STORE ME;  
DISEASEDGUNUNLOADINGDB; DJSKFHDFCCX;  
DMJKQSIA; EBLIX; EGC543KG;  
EMBLEMJUDGMENTNH; EMELIALARSON; ENQUE;  
FADINGHAZEOA; FATREWARDZHAI XR;  
FCODJFDIUFCZ; FCSMEATASGGAL; FLOWER AND  
FRUIT MOUNTAIN; FREDERICKFD; GIICO89; GLADIS  
GOMEZ; GLORIA HERNANDEZ; GMZQME2P; GRACE  
TESTERMAN; GROWLIKEACOFFINIW; GRTYHGH;  
HANGBILAOCD; HCIUHISDCC; HEIMEGA7308;  
HEXAGRAMROOMCW; HFGDH; HONEYSHY;  
HUIJINGPIEQDK; HUANGPINGJINGMTB;  
HUANGZHANRANGUNU; HUIJIANZHI201;  
HURRYUPANDFIGHTRN; IFFASOCIAL;  
IMPERTINENCEPO; JACOB EDWARDS; JANL3DPZUTRN;  
JESSICA MORENOA; JKKMDJSUID; JJTSKIRT;  
JKSDHSIDUXZ; JOANNALENCERIAS; JOCELINE  
LORENZO; JOHSHKA; JOSGON; JOY CHAVIES; KALEO  
KOBE-YAMANE; KANSEA DUOTEMEND; KARA C  
DINKLA; KDIHIUFFDDC; KELLBAK77; KEVIN ROLE;  
KIMBERLY JOHNSON; KONRAD; LABRAIL WALKER;  
LAOWENGHELOUXE; LASISTE; LAURAZA;  
LAURKRAM; LEMENTEE; LGOUC; LIANGZIYIHUIFMI;  
LIBIN163; LIGHTSUCKINGANDBEATINGCJ; LIJINGSDF;  
LISA STEPHAN; LIUFUXING6698; LIUGUIYAN4537;  
LIUSHUFEN; LIYINGHUA1997; LOETSWEY CLOTHES;  
LORA RIMMER; LUOHAIMIN994821;  
MARGARETDOUGLASS; MARINER;  
MARITZA.LEANNON; MARK GRAY; MARLA KRIZ-  
ROLE; MCSASEAUGHR; MELANIEZAMICHIELI;  
MELISSADFE; MILBURN; MODASTEXTIL; MON GTZ;  
MONICA GUARDADO; MONICCP; MONIVY; MORGANIA;  
MOUNAJB4545; N2SJDNUH; NAL\_JC1X; NILIAN123;  
NOTESANDOMISSIONSVD; NROCHICHI2558; ODFLL;  
ORION M JONES; P2ZNQBT4; PATRICK MORNINGSTAR  
DAVEY; POLARSHOP; PUFUBOOUA; QEWQ123456;

QUEENANNJOVELLANOS; RAHCEL; RAWAST; REESHO;  
RHUBARB; ROBMARK; ROBREYNOLDS;  
ROCKANDGRAINGAPLB; RODNEYABSON SHOP;  
RONGGELI; ROSIO GONZALEZ; ROWLEZ;  
RUIRUIDEMUHOU; SADFSDFKSDASD; SAMUSH; SCOTT  
SM1ITH; SFDGG2; SHABILUNSUWYK;  
SHANCHAOHEIWKR; SHEILAPLUS; SHERRI GREGG;  
SHIHUOPSEUDOQINJZ; SHIMEICHAOSH; SHIPP;  
SHOPERSTEG; SHOUHUIJIASHOUODV; SILVINA  
FARMIN; SPASMODICGLANCEGQ; SUNNTORY;  
SWAMK; TERESLISO; TEXTILL;  
THETRACKWOMANSOUTHVC;  
THROWAWAYTHEFAKEUK; TIM SMITH; TIOMTHY;  
TNSDHYISUD; TOFORCEASERVANTTOIMITATEST;  
TOM TARCZON; TONER CLAS; TRIEU54; TRYTAN;  
TUOZHONGJIKENGTU; TUUNTY; TUYOUKAN  
DADIAOGE; UCIFER LOOK BATOMAN; UNITED  
STATES121; VALERIE STOLF; VENTRICULARSTEMIW;  
VFJFIDHDIGVV; VOX1CTLN; VTVC394;  
WANGHAIDONG; WANGJIANJUN163;  
WERNERSEBASTIANEQTMX; WOKAI09;  
WOLFGANG883; WOODROWS; WYYFF;  
XIEHUANLUCUO; XIXINGPINNHP;  
XUANPAIJINGYOUAEZ; XUESHIYINZHUANG;  
YINGBAOXIAODIAN; YOUWEIWEI XFHBBKKN;  
YUANPAJIUQR; YUDAOQINXKT; YUJDUSDSI;  
ZATANGGANTAMEGF; ZHONGDUICHENGJIATE;  
ZIERJUVER BAGS; ZXC123FUFU; ZYYFF; ENOCHHU;  
JAMERE ROBINSON; KAICHUANG107; KFGHFFH;  
KING\_WORK; LADYBAG168; LAN11; LFQ002; LH0011;  
LHWY888; LIAO99; LING3355; LIU-888; LIU18011902843;  
LJJ186; LOUISBAG\_18; LOUISBAG\_88; LOVEY689;  
LRJANDY; LUCKY\_DAY520;  
LUCKYBRANDHANDBAG222; LUCYPLUS;  
LUXURY\_SHOES001; LUXURY\_SHOPPING;  
LUXURYBAG\_SUPPLIER; LUXURYBAG168;  
LUXURYBAG222; LUXURYBRAND\_A;  
LUXURYHAIRACCESSORI; LUXURYPRODUCTS588;  
LUXURYSHOES2018; LUXURYSHOPS; LV5518016;  
LVMKBAG; LXA137; LXA567; LYGJT; LZ920123;  
MARKET888; MEIBUSHENGSHOU; MILLER777; MN1234;  
MOMO666; MOTORHOUSING; MXQX5678;  
NIANNIANFACAI003; NICE\_\_GOODS; NINEONE233;  
NYZPP789; OHMYGOD13; ORVIESCHINA009; OTAKU33;

OUIYISHANG168; PALM\_04; PALM\_07; PFRS888; PINK25;  
PIXIE166; POPO\_BAGS; PPC001; PQHSHOES01;  
PRESERVER; PU58; QIANG2018; QQ83635; QQ409906347;  
QQ2567083594; QQ13751589026; QTP123;  
REDBOTTOMS202002; RUGERLTD; SAND\_PROFIT;  
SARAHANDBAGS; SCARFMALLSHOPPING;  
SCNEUF2295; SELLING\_WATCHES; SHANBAOBAO;  
SHANGGUANGSHENG; SHANGLI1113; SHOE02; SHOE06;  
SHOE09; SHOE10; SHOES\_WHOLESALE118;  
SHOES2199; SHOES888999; SHOESLOVELY;  
SHUANGNIAN8; SHULINSHOESSHOP888; SHY2019;  
SMILE1989624; STORE\_3; STORE\_4; STORE\_5;  
STORE\_SHOES\_001; STORE1818; SUPPLIERWATCH;  
SX666; SZAK\_TIANQI3; TAMMY1985; TAO0006;  
TG147258; TOSZLL; TRADE\_BOUTIQUE3; WATCH158;  
WATCH1888; WATCH5858; WEBUY55;  
WEDDINGSHOES01; WHOLESALSHOES8;  
WHOLESALE-WATCHES-1; WHOSALEBRANDS; WIIW;  
WISE\_BOY; WORLDTRADE852;  
WORLDWILLBETTER2020; WRISTWATCH\_FACTORY;  
WSJ288; WUXUE9933; X250; XIAOMUBIAO2020;  
XIAOPINGLUXURY01; XIAOYATOU2290; XIAOZHOU11;  
XINGFURENSHENG111; XINGYUNXING2019;  
XINWANG8869; XIYONGXIE; XLLWATCH2016;  
XUN6698; XWOAINI; YBAGS; YILING999; YYY\_SHOES;  
YYYXGSSS; ZH15688C; ZHANG1888; ZHAOCHUAN2019;  
ZHENPAI8; ZHIQI896; ZHIXIANGBAG110119;  
ZHOUSONGSONG; ZHOUXINXIN002; ZHOUYUNHUI;  
ZHUZI868; ZUONIANZG3; ZUONIANZG6; ZX88887;  
ZYT666; ABBCCC123456; ANGELIA57; ASA112233;  
ATOAST0806; BAGDESIGNER; BAGS\_SHOESHOP;  
BAGSMONOPOLY1; BAGSMONOPOLY666;  
BAGSMONOPOLY888; BGGOO; BRANDBAG770;  
BRANDBAG20204; BRANDBAGGG; BUY1GET2;  
CARRY13168; CHANEL869968; CHENCHEN002;  
CHENCHEN003; CHENCHEN004; CHENCHEN005;  
CHENGXINYI1; CLASSIC020; COMEINU9;  
DELUXEJEWELRY; DESIGNER BRAND CLOTHING  
DISCOUNT STORE aka YAADF6; DESIGNER HANDBAGS;  
DESIGNER\_HANDBAG01; DESIGNER1; DESIGNER1998;  
DESIGNERBAG338 aka LUXURYHHH;  
DESIGNERHANDBAG168; DESIGNERSBAGS\_66;  
DESIGNSNEAKER2019; DH\_PHONECASE;  
DHGATEZUOYIFAN2; DIOO\_03; DUNHUANG2024;

DUNHUANG2025; EE2565; FANTASYJEWELRY888;  
FASHION\_SHOES963; FASHION67; FASHIONBAG168 aka  
FASHION\_BAG168; FASHIONBAGS727;  
FASHIONBRAND\_06; FASHIONBRAND\_08;  
FASHIONNEWSTORE; FUTURESTREET; FUXIN001;  
FUXIN0101; FZSSTY; GAOGAOYA; GOOD686;  
GUYIFEIXING; HAIYING2018; HANDBAG\_LUXURY;  
HAPPYSTORE789; HC\_SHOES; HIGH QUALITY aka  
NIUGEBEI; HNHAOMAIJIA; HONGYUN178BAG;  
HOTSHOESONLINE; HZYSHOES09; JC6578;  
JEWELRYCD888; JIANSHUO20030303; JOKERSON8;  
JUJUKVC2V4; JUSTSTOREGOD; K900; KID\_DRESS;  
KISSCASHOES; KNLTOPBAG; KOUZHAO2020; LAN66;  
LAN147; LCTFC9999; LFQ003; LFQ006; LIBO001; LIBO004;  
LINLIN1689; LIU09; LIUHONGTAI1; LOVEBUY 3C STORE  
aka SZSYTDZKJ; LRW001; LRW002; LULEI\_88;  
LUXURY88HAT; LUXURYA; LUXURYBAG\_STORE;  
LUXURYDESIGNERBAGS00; LV1988; LZJ1222;  
MASKFACTORY2 aka E1688888; MENG008008; MIMI2006;  
MMKKWW3256; MORE DESIGNER aka  
WOZHUANQIAN168; MR\_DESIGNER;  
NICEFASHIONSTORE; OPPO55; PALIPABI; PHONE CASE  
CLUB aka LUZHU1022; QP1733859QP; RAINBOWWORLD;  
RENZAIZHONGNIAN; RUYANG888; SANXUN8;  
SASAHANFENG; SELLBESTBAGS; SESE21;  
SHISHANG1214; SHIYANPING; SHOE07; SPORT0016;  
SSS816; STAR899; STORE\_8; STORE2014; SUNFAN666;  
TEEMO\_2; TOPBAG888 aka GUONEI; TRADE\_BOUTIQUE;  
TRADE\_BOUTIQUE2; TRADE\_BOUTIQUE4; TX002;  
TX003; W15290381875; WANZIQIANHONG5;  
WELCOME69818; WHOLESALEBAGSHOP; WW7410;  
XCY3592386; XIA8801; XIAOQING2020;  
XIAOSUXIANGYAN2020; XS6325; XXL2635726584;  
YCLXNB; YEFACORY; YIODOCXRII; YONGSTORE;  
YUANZHUANG; YUHAN11; YUJI6125;  
YUNYUNZHONGSHENG; ZELINGBABY; ZHANG8777;  
ZHAOCHUNPING; ZHAOFUHONG601; ZHAOQIUMU;  
ZWM123; HAOMAO; HAOYUNLAI588;  
HBELTSTYLEEZY; HHKOS596; HOTSALJEJERSEY;  
HUA16888; HUANBAOMA2018; HUDAO2; HUIFAFA8518;  
HYY0429; IDUZIF; IJHDNDN; J1862741; JACKYAO123;  
JERSEY\_SPORT201911 aka VANNOGG;  
JIANGCHAOQUN666; JIANMO123; JIE6689; JINBAO0110;  
JINBAO0126; JUJUKVC2V8; JUNWEI08; KANGLE6688;

KENVY; KIDNFHD; KINGBRANDSHOES; KISSING1988;  
KUAILUE66; LAI2012121; LAOWANG\_; LIAO0243420;  
LIMIEJIE8899; LINER005; LINER008; LIQIU11;  
LISAI20130313; LIU09; LIUEE; LIUJU10; LKDIUFFJ;  
LUCKFISH2017; LUXURY550122; LUXURYBAG012019;  
LX1862741; MARA33; MICHAEL\_STORE; MONDAY\_5;  
MORNING\_SUN08; MUNDS857;  
NEW\_FASHION\_JEWELRY; NEW\_GOODS; OFO998;  
OHMYGOD11; OMMYGOD14; PALM006; PEARL\_BAG;  
PINGGUOYA; QIANQIANLI3; QIUCAO01; QUALITY42;  
SCSCSFSFS; SHENZHEN\_11; SHIJING\_JEWELRY;  
SHITATA; SHOES\_FACTORY\_; SPORT16; STAR1006;  
STORE\_002; STORE\_005; STORE\_7;  
SUPER\_ATTRACTION; SYH1988; T19900825P;  
TANCHAO CAN; TB4561011; TIAN8K99; TINA920;  
TOP2020; UPUP520205; VIPS609; WANZHEN02;  
WENXIANG0815; WHAT698; WKAOSHINIBAOL2;  
WSHZX; WSJ788; XCOIDFKL; XHMZ0316; XHMZ0724;  
XIANGGUIBAGSOES2020; XIANGXIANG0001; XIE333;  
XIUHUA77; XM0202; XSGUOJI\_001; XUEGUOHAO;  
XX555; YAADF6; YANER98; YECQ9; YIDONMEI;  
YINGBAIAINI1314; YINHONG6; YIZHANCHEN;  
YUYAO153; YUYAO0808; YW8828; Z117102;  
Z18673378183; ZB7907; ZDS1974; ZDS1977; ZDS1978;  
ZH15688A; ZHANG3177429; ZHAOFUHONG601;  
ZHENGAIHONG; ZHENPAI3; ZHOUXINXIN0009;  
ZHUZI889; ZRM602; ZST20060914ZST; ZTY001; ZYJ808;  
and ZYP1971126, Each an Individual, Partnership, or  
Unincorporated Association,

Defendants.

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**AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF**

Plaintiff, Chanel, Inc. (“Plaintiff” or “Chanel”), hereby sues Defendants, the Individuals, Partnerships, and Unincorporated Associations identified in the caption, which are set forth on Schedule “A” hereto (collectively “Defendants”). Defendants are promoting, selling, offering for sale, and distributing goods bearing counterfeits and confusingly similar imitations of Chanel’s trademarks within this district through various Internet based e-commerce stores, interactive photo

albums, and a fully interactive commercial Internet website operating under the seller identities and domain name set forth on Schedule “A” hereto (the “Seller IDs and Subject Domain Name”).

In support of its claims, Chanel alleges as follows:

### **JURISDICTION AND VENUE**

1. This is an action for federal trademark counterfeiting and infringement, false designation of origin, common law unfair competition, and common law trademark infringement pursuant to 15 U.S.C. §§ 1114, 1116, and 1125(a), and The All Writs Act, 28 U.S.C. § 1651(a), and Florida’s common law. Accordingly, this Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Chanel’s state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

2. Defendants are subject to personal jurisdiction in this district, because they direct business activities toward and conduct business with consumers throughout the United States, including within the State of Florida and this district through, at least, the Internet based e-commerce stores, photo albums,<sup>1</sup> and fully interactive commercial Internet website accessible in Florida and operating under their Seller IDs and Subject Domain Name.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, aliens who are engaged in infringing activities and causing harm

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<sup>1</sup> Some Defendants use their Seller IDs in tandem with electronic communication via private messaging applications and/or services in order to complete their offer and sale of counterfeit Chanel branded products. Specifically, consumers are able to browse listings of Chanel branded products online via Defendants’ respective Seller IDs, ultimately directing customers to send inquiries, exchange data, and complete purchases via electronic communication with those Defendants.



within this district by advertising, offering to sell, selling, and/or shipping infringing products into this district.

#### **THE PLAINTIFF**

4. Chanel is a corporation organized under the laws of the State of New York with its principal place of business in the United States located at Nine West 57th Street, New York, New York 10019. Chanel operates boutiques throughout the world, including within this district. Chanel is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this district, a variety of high quality luxury goods under multiple world famous common law and federally registered trademarks, including those identified in Paragraph 16 below. Chanel offers for sale and sells its trademarked goods within the State of Florida, including this district. Defendants, through the sale and offer to sell counterfeit and infringing Chanel branded products, are directly, and unfairly, competing with Chanel's economic interests in the State of Florida and causing Chanel harm and damage within this jurisdiction.

5. Like many other famous trademark owners, Chanel suffers ongoing daily and sustained violations of its trademark rights at the hands of counterfeiters and infringers, such as Defendants herein, who wrongfully reproduce and counterfeit Chanel's trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits across their e-commerce stores and website. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill associated with the Chanel name and associated trademarks and the destruction of the legitimate market sector in which it operates.

6. In order to combat the indivisible harm caused by the combined actions of Defendants and others engaging in similar conduct, each year Chanel expends significant monetary resources in connection with trademark enforcement efforts, including legal fees, investigative



fees, and support mechanisms for law enforcement, such as field training guides and seminars. The exponential growth of counterfeiting over the Internet, including through online marketplace platforms and social media websites, has created an environment that requires companies, such as Chanel, to expend significant time and money across a wide spectrum of efforts in order to protect both consumers and itself from the ill effects of confusion and the erosion of the goodwill connected to Chanel's brand.

### **THE DEFENDANTS**

7. Defendants are individuals and/or business entities of unknown makeup, each of whom, upon information and belief, either reside and/or operate in foreign jurisdictions with lax trademark enforcement systems, redistribute products from the same or similar sources in those locations, and/or ship their goods from the same or similar sources in those locations to fulfillment centers within the United States to redistribute their products from that location. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants target their business activities toward consumers throughout the United States, including within this district, through the simultaneous operation of commercial Internet based e-commerce stores via Internet marketplace websites and/or interactive photo albums via Internet based social media or image hosting websites under the Seller IDs or as an interactive commercial Internet website under the Subject Domain Name.

8. Many Defendants operate under the Seller IDs via third-party social media or image hosting websites in tandem with electronic communication via private messaging applications and/or services, thereby creating an interconnected ecosystem which functions as an online marketplace operation.

9. Defendants use aliases in conjunction with the operation of their businesses, including but not limited to those identified by the same Defendant Number on Schedule "A."

10. Defendants are the past and present controlling forces behind the sale of products bearing counterfeits and infringements of Chanel's trademarks as described herein operating and using at least the Seller IDs and Subject Domain Name.

11. Defendants directly engage in unfair competition with Chanel by advertising, offering for sale, and selling goods bearing counterfeits and infringements of one or more of Chanel's trademarks to consumers within the United States and this district through Internet based e-commerce stores, interactive photo albums, or commercial Internet website using, at least, the Seller IDs and Subject Domain Name, as well as additional names, e-commerce stores, photo albums, seller identification aliases, domain names, or websites not yet known to Chanel. Defendants have purposefully directed some portion of their illegal activities towards consumers in the State of Florida through the advertisement, offer to sell, sale, and/or shipment of counterfeit and infringing Chanel-branded goods into the State.

12. Defendants have registered, established or purchased, and maintained their Seller IDs and Subject Domain Name. Defendants may have engaged in fraudulent conduct with respect to the registration of the Seller IDs and Subject Domain Name by providing false and/or misleading information to the Internet based e-commerce platforms, social media websites, or image hosting website where they offer to sell and/or sell, or to their domain registrar during the registration or maintenance process related to their respective Seller ID and Subject Domain Name. Upon information and belief, many Defendants have registered and/or maintained their Seller IDs and Subject Domain Name for the sole purpose of engaging in illegal counterfeiting activities.

13. Defendants will likely continue to register or acquire new seller identification aliases, photo albums, user names, private messaging accounts, and domain names for the purpose of selling and/or offering for sale goods bearing counterfeit and confusingly similar imitations of one or more of Chanel's trademarks unless preliminarily and permanently enjoined.






14. Defendants use their Internet-based businesses to infringe the intellectual property rights of Chanel and others.





15. Defendants' business names, i.e., the Seller IDs and Subject Domain Name, associated payment accounts, and any other alias e-commerce stores, seller identification names, photo albums, user names, private messaging accounts, and domain names used in connection with the sale of counterfeit and infringing goods bearing one or more of Chanel's trademarks, are essential components of Defendants' online activities and are one of the means by which Defendants further their counterfeiting and infringement scheme and cause harm to Chanel. Moreover, Defendants are using Chanel's famous brand name and trademarks to drive Internet consumer traffic to their e-commerce stores, photo albums, and website operating under the Seller IDs and Subject Domain Name, thereby increasing the value of the Seller IDs and Subject Domain Name and decreasing the size and value of Chanel's legitimate marketplace and intellectual property rights at Chanel's expense.

### **COMMON FACTUAL ALLEGATIONS**

#### **Plaintiff's Business and Trademark Rights**

16. Chanel is the owner of all rights in and to the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (collectively, the "Chanel Marks"):

Trademark	Registration Number	Registration Date	Classes/Goods
CHANEL	0,626,035	May 1, 1956	IC 018 - Women's Handbags
CHANEL	0,902,190	November 10, 1970	IC 014 - Bracelets, Pins, and Earrings
CHANEL	1,177,400	November 10, 1981	IC 025 - Hats, Shawls and Belts
	1,241,264	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Tee-Shirts, Coats, Raincoats, Scarves, Shoes and Boots
CHANEL	1,241,265	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Coats, Raincoats, Scarves, Shoes and Boots
	1,314,511	January 15, 1985	IC 018 - Leather Goods-Namely, Handbags
CHANEL	1,347,677	July 9, 1985	IC 018 - Leather Goods-Namely, Handbags
	1,501,898	August 30, 1988	IC 006 - Keychains IC 014 - Costume Jewelry IC 025 - Blouses, Shoes, Belts, Scarves, Jackets, Men's Ties IC 026 - Brooches and Buttons for Clothing
CHANEL	1,733,051	November 17, 1992	IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business and Credit Card Cases, Change Purses, Tote Bags, Cosmetic Bags Sold Empty, and Garment Bags for Travel
	1,734,822	November 24, 1992	IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business Card Cases, Change Purses, Tote Bags, and Cosmetic Bags Sold Empty
J12	2,559,772	April 9, 2002	IC 014 - Timepieces; namely, Watches, and Parts Thereof
RUE CAMBON	2,964,843	July 5, 2005	IC 018 - Handbags
	3,025,934	December 13, 2005	IC 018 - Handbags

	3,025,936	December 13, 2005	IC 009 - Eyeglass Frames, Sunglasses IC 025 - Gloves, Swimwear IC 026 - Hair Accessories, namely, Barrettes
CHANEL	3,133,139	August 22, 2006	IC 014 - Jewelry and Watches
CHANEL	3,134,695	August 29, 2006	IC 009 - Eyeglass Frames, Sunglasses, Sunglass Parts, Cases For Spectacles and Sunglasses IC 025 - Swimwear, Stockings IC 026 - Hair Accessories, Namely, Barrettes IC 028 - Bags Specially Adopted For Sports Equipment, Tennis Rackets, Tennis Balls, Tennis Racket Covers
CHANEL	3,890,159	December 14, 2010	IC 009 - Cases for Telephones IC 018 - Key Cases
	4,074,269	December 20, 2011	IC 009 - Protective Covers for Portable Electronic Devices, Handheld Digital Devices, Personal Computers and Cell Phones IC 018 - Key Cases
	4,241,822	November 13, 2012	IC 025 - For Clothing, namely, Coats, Jackets, Dresses, Tops, Blouses, Sweaters, Cardigans, Skirts, Vests, Pants, Jeans, Belts, Swim Wear, Pareos, Hats, Scarves, Ties, Gloves, Footwear, Hosiery
CHANEL	5,100,448	December 13, 2016	IC 020 - Pillows
	5,280,486	September 5, 2017	IC 020 - Pillows

The Chanel Marks are used in connection with the manufacture and distribution of high quality goods in the categories identified above. True and correct copies of the Certificates of Registration for the Chanel Marks are attached hereto as Composite Exhibit "1."

17. The Chanel Marks have been used in interstate commerce to identify and distinguish Chanel's high quality goods for an extended period of time.

18. The Chanel Marks have been used by Chanel long prior in time to Defendants' use of copies of those Marks. The Chanel Marks have never been assigned or licensed to any of the Defendants in this matter.

19. The Chanel Marks are symbols of Chanel's quality, reputation, and goodwill and have never been abandoned. Chanel has carefully monitored and policed the use of the Chanel Marks.

20. The Chanel Marks are well-known and famous and have been for many years. Chanel expends substantial resources developing, advertising, and otherwise promoting the Chanel Marks. The Chanel Marks qualify as famous marks as that term is used in 15 U.S.C. § 1125(c)(1).

21. Further, Chanel extensively uses, advertises, and promotes the Chanel Marks in the United States in association with the sale of high quality luxury goods. Chanel has spent millions of dollars promoting the Chanel Marks and products bearing the Chanel Marks. In recent years, annual sales of products bearing the Chanel Marks have totaled in the hundreds of millions of dollars within the United States.

22. As a result of Chanel's efforts, members of the consuming public readily identify merchandise bearing or sold under the Chanel Marks, as being high quality goods sponsored and approved by Chanel.

23. Accordingly, the Chanel Marks have achieved secondary meaning as identifiers of high quality goods.

24. Genuine goods bearing the Chanel Marks are widely legitimately advertised and promoted by Chanel, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Chanel's overall marketing and consumer education

efforts. Thus, Chanel expends significant monetary resources on Internet marketing and consumer education, including search engine optimization (“SEO”) strategies. Those strategies allow Chanel and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Chanel brand and the goods sold thereunder. Similarly, Defendants’ individual seller stores, photo albums, and website are indexed on search engines and compete directly with Chanel for space in the search results.

**Defendants’ Infringing Activities**

25. Defendants are promoting and advertising, distributing, selling, and/or offering for sale goods in interstate commerce bearing counterfeit and confusingly similar imitations of one or more of the Chanel Marks (the “Counterfeit Goods”) through at least the Internet based e-commerce stores, interactive photo albums in tandem with various private messaging applications, or an interactive, commercial Internet website operating under the Seller IDs and Subject Domain Name. Specifically, Defendants are using the Chanel Marks to initially attract online consumers and drive them to Defendants’ e-commerce stores, photo albums, and website operating under the Seller IDs and Subject Domain Name. Defendants are using identical copies of one or more of the Chanel Marks for different quality goods. Chanel has used the Chanel Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Chanel’s merchandise.

26. Defendants’ Counterfeit Goods are of a quality substantially different than that of Chanel’s genuine goods. Defendants are actively using, promoting and otherwise advertising, distributing, selling, and/or offering for sale substantial quantities of their Counterfeit Goods with the knowledge and intent that such goods will be mistaken for the genuine high quality goods offered for sale by Chanel despite Defendants’ knowledge that they are without authority to use



the Chanel Marks. The net effect of Defendants' actions is likely to cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe all of Defendants' goods offered for sale in Defendants' e-commerce stores, photo albums, and website are genuine goods originating from, associated with, and/or approved by Chanel.

27. Defendants advertise their e-commerce stores, photo albums, and website, including their Counterfeit Goods offered for sale, to the consuming public via e-commerce stores or interactive photo albums on, at least, one Internet e-commerce marketplace, social media, or image hosting website using at least the Seller IDs, and/or via, at least, one commercial Internet website operating under at least the Subject Domain Name. In so advertising their stores and goods, Defendants improperly and unlawfully use one or more of the Chanel Marks without Chanel's permission.

28. As part of their overall infringement and counterfeiting scheme, Defendants are, upon information and belief, concurrently employing and benefitting from substantially similar, advertising and marketing strategies based, in large measure, upon an illegal use of counterfeits and infringements of the Chanel Marks. Specifically, Defendants are using counterfeits and infringements of Chanel's famous name and the Chanel Marks in order to make their e-commerce stores, photo albums, and website selling illegal goods appear more relevant and attractive to consumers searching for both Chanel and non-Chanel goods and information online. By their actions, Defendants are contributing to the creation and maintenance of an illegal marketplace operating in parallel to the legitimate marketplace for Chanel's genuine goods. Defendants are causing, individual, concurrent and indivisible harm to Chanel and the consuming public by (i) depriving Chanel and other third parties of their right to fairly compete for space within search engine results and reducing the visibility of Chanel's genuine goods on the World Wide Web, (ii)

causing an overall degradation of the value of the goodwill associated with the Chanel Marks, and (iii) increasing Chanel's overall cost to market its goods and educate consumers about its brand via the Internet.

29. Defendants are concurrently conducting and targeting their counterfeiting and infringing activities toward consumers and likely causing unified harm within this district and elsewhere throughout the United States. As a result, Defendants are defrauding Chanel and the consuming public for Defendants' own benefit.

30. At all times relevant hereto, Defendants in this action had full knowledge of Chanel's ownership of the Chanel Marks, including its exclusive right to use and license such intellectual property and the goodwill associated therewith.

31. Defendants' use of the Chanel Marks, including the promotion and advertisement, reproduction, distribution, sale, and offering for sale of their Counterfeit Goods, is without Chanel's consent or authorization.

32. Defendants are engaging in the above-described illegal counterfeiting and infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Chanel's rights for the purpose of trading on Chanel's goodwill and reputation. If Defendants' intentional counterfeiting and infringing activities are not preliminarily and permanently enjoined by this Court, Chanel and the consuming public will continue to be harmed.

33. Defendants' above identified infringing activities are likely to cause confusion, deception, and mistake in the minds of consumers before, during, and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive customers, the public, and the trade into believing there is a connection or association between Chanel's genuine goods and Defendants' Counterfeit Goods, which there is not.

34. Defendants' payment and financial accounts, including but not limited to those specifically set forth on Schedule "A," are being used by Defendants to accept, receive, and deposit profits from Defendants' trademark counterfeiting and infringing, and unfairly competitive activities connected to their Seller IDs and Subject Domain Name and any other alias e-commerce stores, photo albums, seller identification names, user names, private messaging accounts, domain names, or websites being used and/or controlled by them.

35. Further, Defendants are likely to transfer or secret their assets to avoid payment of any monetary judgment awarded to Chanel.

36. Chanel has no adequate remedy at law.

37. Chanel is suffering irreparable injury and has suffered substantial damages as a result of Defendants' unauthorized and wrongful use of the Chanel Marks. If Defendants' counterfeiting and infringing, and unfairly competitive activities are not preliminarily and permanently enjoined by this Court, Chanel and the consuming public will continue to be harmed.

38. The harm and damages sustained by Chanel have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Counterfeit Goods.

**COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT**  
**PURSUANT TO § 32 OF THE LANHAM ACT (15 U.S.C. § 1114)**

39. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 38 above.

40. This is an action for trademark counterfeiting and infringement against Defendants based on their use of counterfeit and confusingly similar imitations of the Chanel Marks in commerce in connection with the promotion, advertisement, distribution, offering for sale, and sale of the Counterfeit Goods.

41. Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing goods bearing and/or using counterfeits and/or infringements of one or more of the Chanel Marks. Defendants are continuously infringing and inducing others to infringe the Chanel Marks by using one or more of them to advertise, promote, offer to sell, and sell counterfeit and infringing Chanel branded goods.

42. Defendants' concurrent counterfeiting and infringing activities are likely to cause and actually are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods.

43. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damages to Chanel and are unjustly enriching Defendants with profits at Chanel's expense.

44. Defendants' above-described illegal actions constitute counterfeiting and infringement of the Chanel Marks in violation of Chanel's rights under § 32 of the Lanham Act, 15 U.S.C. § 1114.

45. Chanel has suffered and will continue to suffer irreparable injury and damages due to Defendants' above described activities if Defendants are not preliminarily and permanently enjoined. Additionally, Defendants will continue to wrongfully profit from their illegal activities.

**COUNT II - FALSE DESIGNATION OF ORIGIN**  
**PURSUANT TO § 43(a) OF THE LANHAM ACT (15 U.S.C. § 1125(a))**

46. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 38 above.

47. Defendants' Counterfeit Goods bearing, offered for sale and sold using copies of one or more of the Chanel Marks have been widely advertised and offered for sale throughout the

United States via at least one Internet marketplace, social media, or image hosting website or interactive commercial Internet website.

48. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of at least one of the Chanel Marks are virtually identical in appearance to Chanel's genuine goods. However, Defendants' Counterfeit Goods are different in quality. Accordingly, Defendants' activities are likely to cause confusion in the trade and among the general public as to at least the origin or sponsorship of their Counterfeit Goods.

49. Defendants have used in connection with their advertisement, offer for sale, and sale of their Counterfeit Goods, false designations of origin and false descriptions and representations, including words or other symbols and trade dress, which tend to falsely describe or represent such goods and have caused such goods to enter into commerce with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Chanel's detriment.

50. Defendants have authorized infringing uses of one or more of the Chanel Marks in Defendants' advertisement and promotion of their counterfeit and infringing branded goods. Defendants have misrepresented to members of the consuming public that the Counterfeit Goods being advertised and sold by them are genuine, non-infringing goods.

51. Additionally, Defendants are using counterfeits and infringements of one or more of the Chanel Marks in order to unfairly compete with Chanel and others for space within organic search engine and social media results, thereby jointly depriving Chanel of a valuable marketing and educational tool which would otherwise be available to Chanel and reducing the visibility of Chanel's genuine goods on the World Wide Web and across social media platforms.

52. Defendants' above-described actions are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

53. Chanel has no adequate remedy at law and has sustained indivisible injury and damage caused by Defendants' concurrent conduct. Absent an entry of an injunction by this Court, Defendants will continue to wrongfully reap profits and Chanel will continue to suffer irreparable injury to its goodwill and business reputation, as well as monetary damages.

### **COUNT III - COMMON LAW UNFAIR COMPETITION**

54. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 38 above.

55. This is an action against Defendants based on their promotion, advertisement, distribution, sale and/or offering for sale, of goods using or bearing marks that are virtually identical to the Chanel Marks in violation of Florida's common law of unfair competition.

56. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing goods using or bearing counterfeits and infringements of one or more of the Chanel Marks. Defendants are also using counterfeits and infringements of one or more of the Chanel Marks to unfairly compete with Chanel and others for (1) space in search engine and social media results across an array of search terms and (2) visibility on the World Wide Web.

57. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' e-commerce stores, photo albums, and website as a whole and all products sold therein by their use of the Chanel Marks.

58. Chanel has no adequate remedy at law and is suffering irreparable injury and damages as a result of Defendants' actions.

**COUNT IV - COMMON LAW TRADEMARK INFRINGEMENT**

59. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 38 above.

60. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and sale of their Counterfeit Goods bearing one or more of the Chanel Marks. Chanel is the owner of all common law rights in and to the Chanel Marks.

61. Specifically, Defendants are promoting, and otherwise advertising, distributing, offering for sale, and selling goods using and bearing infringements of one or more of the Chanel Marks.

62. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods bearing the Chanel Marks.

63. Chanel has no adequate remedy at law and is suffering damages and irreparable injury as a result of Defendants' actions.

**PRAYER FOR RELIEF**

64. WHEREFORE, Chanel demands judgment on all Counts of this Amended Complaint and an award of equitable relief and monetary relief against Defendants as follows:

a. Entry of temporary, preliminary, and permanent injunctions pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or



diluting the Chanel Marks; from using the Chanel Marks, or any mark or trade dress similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name or trademark or trade dress that may be calculated to falsely advertise the services or goods of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Chanel; from falsely representing themselves as being connected with Chanel, through sponsorship or association, or engaging in any act that is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants, are in any way endorsed by, approved by, and/or associated with Chanel; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of the Chanel Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants; from affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent Defendants' goods as being those of Chanel, or in any way endorsed by Chanel and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of Chanel's name or trademarks; and from otherwise unfairly competing with Chanel.

b. Entry of a temporary restraining order, as well as preliminary and permanent injunctions pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, enjoining Defendants and all third parties with actual notice of an injunction issued by the Court from participating in, including providing financial services, technical services or other support to, Defendants in connection with the sale and distribution of non-genuine goods bearing and/or using counterfeits of the Chanel Marks.

c. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, that upon Chanel's request, the top level domain (TLD) Registry

for the Subject Domain Name, and any other domains used by Defendants, or their administrators, including backend registry operators or administrators, place the Subject Domain Name on Registry Hold status for the remainder of the registration period for any such domain name, thus removing them from the TLD zone files which link the Subject Domain Name, and any other domain names being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing counterfeits and infringements of the Chanel Marks, to the IP addresses where the associated websites are hosted.

d. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, canceling for the life of the current registration or, at Chanel's election, transferring the Subject Domain Name and any other domain names used by Defendants to engage in their counterfeiting of the Chanel Marks at issue to Chanel's control so they may no longer be used for illegal purposes.

e. Entry of an order requiring Defendants, their agent(s) or assign(s), to assign all rights, title, and interest, to their Subject Domain Name(s) to Chanel and, if within five (5) days of entry of such order Defendants fail to make such an assignment, the Court order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

f. Entry of an order requiring Defendants, their agent(s) or assign(s), to instruct all search engines to permanently delist or deindex the Subject Domain Name(s) and, if within five (5) days of entry of such order Defendants fail to make such a written instruction, the Court order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

g. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, authorizing Chanel to serve the injunction on any e-mail service provider with a request that the service provider permanently suspend the e-mail addresses which are used by Defendants in connection with Defendants' promotion, offering for sale, and/or sale of goods using counterfeits, and/or infringements of the Chanel Marks.

h. Entry of an order requiring, upon Chanel's request, Defendants to request in writing permanent termination of any messaging services, Seller IDs, user names, and social media accounts they own, operate, or control on any messaging service and social media platform.

i. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Chanel's request, the applicable governing messaging service and Internet marketplace, social media, and image hosting website operators and/or administrators for the Seller IDs who are provided with notice of an injunction issued by the Court, disable and/or cease facilitating access to the Seller IDs and any other alias e-commerce stores, seller identification names, photo albums, user names, and private messaging accounts, being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing counterfeits and infringements of the Chanel Marks.

j. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority that, upon Chanel's request, any messaging service and Internet marketplace, social media, and image hosting website operators and/or administrators, registrar and/or top level domain (TLD) Registry for the Seller IDs and Subject Domain Name who are provided with notice of an injunction issued by the Court, identify any e-mail address known to be associated with Defendants' respective Seller ID or Subject Domain Name.

k. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Chanel's request, any messaging service and Internet marketplace website operators and/or administrators who are provided with notice of the injunction issued by the Court, permanently remove any and all listings and associated images of goods bearing and/or using counterfeits and/or infringements of the Chanel Marks via the e-commerce stores operating under the Seller IDs, and upon Chanel's request, any other listings and images of goods bearing and/or using counterfeits and/or infringements of the Chanel Marks associated with or linked to the same sellers or linked to any other alias seller identification names being used and/or controlled by Defendants to promote, offer for sale and/or sell goods bearing counterfeits and/or infringements of the Chanel Marks.

l. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Chanel's request, Defendants and any Internet marketplace operators and/or administrators who are provided with notice of an injunction issued by the Court, immediately cease fulfillment of and sequester all goods of each Defendant bearing one or more of the Chanel Marks in its inventory, possession, custody, or control, and surrender those goods to Chanel.

m. Entry of an order requiring Defendants to account to and pay Chanel for all profits and damages resulting from Defendants' trademark counterfeiting and infringing and unfairly competitive activities and that the award to Chanel be trebled, as provided for under 15 U.S.C. § 1117, or, at Chanel's election with respect to Count I, that Chanel be awarded statutory damages from each Defendant in the amount of two million dollars (\$2,000,000.00) per each counterfeit trademark used and product sold, as provided by 15 U.S.C. § 1117(c)(2) of the Lanham Act.

n. Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b) of Chanel's costs and reasonable attorneys' fees and investigative fees associated with bringing this action.

o. Entry of an order that, upon Chanel's request, Defendants and any financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, and their related companies and affiliates, identify and restrain all funds, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the Seller IDs and Subject Domain Name or other alias e-commerce stores, social media accounts, photo albums, seller identification names, user names, private messaging accounts, domain names and/or websites used by Defendants presently or in the future, as well as any other related accounts of the same customer(s) and any other accounts which transfer funds into the same financial institution account(s), and remain restrained until such funds are surrendered to Chanel in partial satisfaction of the monetary judgment entered herein.

p. Entry of an award of pre-judgment interest on the judgment amount.

q. Entry of an order for any further relief as the Court may deem just and proper.

DATED: December 24, 2020.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

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**SCHEDULE "A"**  
**DEFENDANTS BY NUMBER, SELLER ID, SUBJECT DOMAIN NAME, RESPECTIVE  
FINANCIAL INFORMATION, AND ADDITIONAL MEANS OF CONTACT**

<b>Def. No.</b>	<b>Defendant / Seller ID / Subject Domain Name</b>	<b>Financial Account Information</b>	<b>Infringing Product Number</b>	<b>Additional Means of Contact</b>
1	brands_shop555	349629171@qq.com		WhatsApp +923056748554
2	crazy_brand_collection2	1141337727@qq.com		WhatsApp +923093560800
2	girls_collection_pointtt	1141337727@qq.com		WhatsApp +923074709330
2	luximal_fashion_store	1141337727@qq.com		WhatsApp +8613109082404
2	luxury_new_store202	1141337727@qq.com		Direct Message
2	new_fashion_brand2020	1141337727@qq.com		Direct Message
3	laike8218	835248890@qq.com		Direct Message
4	lisa.chanel.supplier	846861420@qq.com		Direct Message
5	lucky_websites	Najamsaher30@gmail.com		Direct Message
6	luxury.bag.shoes	nekrasovazoe60@gmail.com		Direct Message
7	shoppinghubpremium	Sanasheikh00@icloud.com		shoppinghubpk5@gmail.com WhatsApp +971582681632
8	supplier8617665237415	3603811399@qq.com		Direct Message
9	tan_club2015 aka Edgywalker-Zidan aka Yupoo Edgywalker	351797467@qq.com		WhatsApp +8613809775377
10	ultimate_fashion_store660	aagoodssupplier1@hotmail.com		Direct Message
10	ultimate_new_collection2	aagoodssupplier1@hotmail.com		Direct Message
10	ultimate_x_fashion_brand	aagoodssupplier1@hotmail.com		Direct Message
11	woniu_chanel	lingawai71@163.com		Direct Message WhatsApp +8617706944325
12	luxurybrandfactory aka CrazyRabbit	1983109104@qq.com		pepper27999@gmail.com WhatsApp +8618683809268
13	qxluxuriesofficial aka Qxluxury	qxluxuriesofficial@gmail.com		
14	Gina Shop aka Gina-shop- 134940923348833	Chauhaboutique@yahoo.com		Facebook Messenger
15	LT.Store - authentic & factory outlet aka ltstoreauthentic	Lethuynguyen.2506@gmail.com		Facebook Messenger
16	facailuxury.com	240760858@qq.com		zhangfandashu@gmail.com WhatsApp +8617520200371
17	uai881q	5e86f15fcdbbb8113a5505cd	5ef2e0f5df5f0531f7a3badc	
18	VDKVFV	5e9d27897000cbab50b8a5d1	5ee1f9f30bdf5632078787d5	
19	Wangyuezheng12345	5f28d450c5f742f45638fe04	5f3cac28b2688102f652140e	
20	whuygbhhbv	5f17b9abb4be94ec85a80b6d	5f2254ae88ef923ca0ac6995	
21	woubhgt	5edb131ac3067a0c033c34e3	5f239a61a18dd13126e96575	
22	wuyuanfeng111	5d9419fb3018ac075f707576	5ef74ca2e5ede8714502587b	

23	xenqearx	5e8d92dfddbbc6ff3da030dd	5ef825d4461f810049ea71dc
24	XIguan Tllamen Pansen QAPP	5e4a2b1201ba9d210034b111	5f3f666facfb41003ebf927e
25	XiliaokongwQ	5e6cbb2b6bab2076cdb64d1a	5f279afe3124f75d4fc96944
26	XinchaodipXm	5e6ddc3857af09030064180e	5f448351c457040042f14abc
27	Xuande Luojiemen	5f1e43460035a8453aaf36d0	5f39e6a89951ec004f7557ad
28	Xueren Pickguae	5f264c0f0ee7f73faa097eb6	5f30d1820b11b2e9b61a6c00
29	XxAndyB	5e8c4042311072354062d25b	5ee9b27a59915200f0a52b18
30	XxLaure	5e8c36e876310c9ab01367f0	5ee9aef9315b0900f273115b
31	XxTracy	5e8c3df0e02bc5d268aaf97a	5ee9afb68946c200f15cb5c5
32	Yinxue Rou Fuwangxi	5f1d8503fc4e84edba079420	5f3b3098ffc98d003a26e84c
33	yueguangqwq	5f163b4e86dc2cd1e780f440	5f20b858700f0508713c5910
34	yuelianghu	5f16487e6b491616d4713a33	5f28ef084c1633003bfacd59
35	Yun Aicen Meliuta	5f23ad845eb5f9455f570bc2	5f3b5fa0b916b600507217ec
36	YunmurengjinglPs	5e6dc9034f421006806a704b	5f34da253b5cf80045f1d4ca
37	zhangqingmei	5ef04753f2f85e037a1243c9	5f44a35aa76db5004add88c6
38	ZhangXi6	5d8b14649b72cc5ca6871cf7	5eeaf07fe6fe902e67e11bed
39	zhanwe28	5e8c266039b090e3416ebdad	5ef97d9caae17ad725dd07e
40	ZhongduibaooBj	5e6ded3eb274840b00c46e7b	5f3a14021abbc4004cb21f0c
41	ZhuobenjiuoBc	5e6d01371061cfa6da54e70d	5f11b8ac0d38c3266eaafc1a
42	ZiluqitT	5e6cce6229e786384fdd6d77	5f0dd1ddac67523f05a6a9fb
43	3opi14e	5f7dd490294a286d4a1723fc	5f965c71784073003dad3fa3
44	9p16_cdt	5f7eef405f080e9e06196b03	5f95d6137ed35c00496f6c18
45	22m_xjv	5f7ee2113843420ef98b0328	5f8e116614486d0041276f37
46	32e1g104w53h12hw	5f50d5cbe426bc2fbf23a6ce	5f602d05f4b617d8bf61707a
47	39m3f_os	5f7dc6f7cba7d52534c25d50	5f8e69aa9964e10041fefc5b
48	123FUFUFU	5f5074c85d87be67e7f773cc	5f560a5ca86c9ff3762baa97
49	AdimpleinthemouthcE	5f5029c59a089c004a32dfcc	5f8fcfebb793961362d9b5e2
50	AirandsmellaltarvD	5f502c5c7d2ef23f73f56ded	5f826e580f0776d4085e2dab
51	alberto store	5f456ecfee4f0ea829425a93	5f8289965564aa004c7bfba1
52	AliceLynnGfMh	5e9028eb9bbc2b1c3e8e460a	5f2e05514f9852332b2765e9
53	Amy Starnes Pearson	5f564f5f5118edf10e60aac4	5f64abd949caec6e38036538
54	Anastasia Bohall	5f27a096a2574315f36b413b	5f54ad246fd8be2521e8f858
55	Angela_841	5f406eca588cb9825b385232	5f93c7fe89857ed85898c3af
56	Angyeter	5f52fc01425539d4fb1f8c60	5f85430eb7c4f8027d7710c6
57	arguingfro	5f096cc0e6bcf3e0de6981e4	5f362a087e20ee003c214cc3
58	asdas4544	5f50e47be426bc8cb823a70f	5f6181703ce213744460c0be
59	Aubrey	5f7ac070119147ccc12954d4	5f9628c683470f004dcecc43
60	AVRIL WALLACE	5f59a792fcf0448979a38dae	5f76f2ea43e8e8c25a16a647
61	ayrtbg7j	5f76fa0c43e8e8cb2616a8dd	5f8bb568db0534e18159baf5
62	BashirongxLo	5e6cd29f1e198586e42352dc	5f8284d607414242980e2fcb
63	Bean curd fish bee butterfly	5f7f107e64e2f63d967b855e	5f89655b4bebae14da03f104



64	Beatrice	5f796947cd233d7e05f87829	5f950b56f40a351f6b29c7a5	
65	Ben Torrance	5f56f7ddd3b894a3a12cdf65	5f6a09d7744a0c5a4afaf57b	
66	bfqez82t	5f7dd3703c7c687332ac5bfc	5f965c71ec1a0c004b17c3b8	
67	binjiaqiaolei	5eea434429e78606dfdb4ed8	5f636f1bace6fc24ce7bf1a9	
68	BIRKLING	5f4b174e3b681b2dc1e45cdf	5f598f1375bd9e8d06ab9579	
69	bnytjgh	5efaa9eb8543384882d811f8	5f1f790edda8da0e13e55dee	
70	Bradlle	5f798f25a08853aa783f63a9	5f951148ba05314d3eba83cc	
71	BrookeNicole Scully	5f566f785a02ce3793a53f7a	5f6443b3e3bf2e003b795133	
72	Bullyrag	5f6795b452a5501e291da5dd	5f7d278a26b7a7191bf7b6d0	
73	Calzado y Gorras	5f6012f69f6759154b3e642d	5f72b496e9fe270c11426b46	
74	CaodaokangrV	5de7283223e74f00f1227733	5f62d65eace6fc0aab7bd995	
75	Capperod	5f63661204b67e854fbabcb3	5f8274550fe604ff4ce11f4d	
76	Carsony	5f7ac70b68d87a3666d1695d	5f8e66ba801e8c004a015bcf	
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78	Cellphone A1	5f5fcccfc39e94bba86eb146	5f7542eaece2480af6f1c6af	
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87	CommunistPartycF	5f5029593b97b9736103546e	5f8e73dc1aab560c2c820bc1	
88	CorryCande	5f55f6d64cd330cdc6f1c7bc	5f6593a2e3bf2e0cca7947cb	
89	coudcjhidyi	5f7fd8f079bc0f004b07f51e	5f90f6ce51e84c0a1d73b0b2	
90	d5shopw4	5f7f2120ca9e0363ea874824	5f8bcb6a1c8085e371f1656e	
91	dapei	5f559eac366fe0fda73805b6	5f604123d94e580d0c1542f4	
92	Darby Reiss	5f5703db83d43befc4ddc8d5	5f7172b242894c09181f4bc5	
93	dbkdctsh	5f59fdbdb68a9bfc6242a7ed	5f74753ff54e1c1da2c5d68c	
94	ddmichael	5f399a7129e7863fdfade792	5f545e9cf72abeb20709c566	
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96	Discount Store me	5f40d21336d382c6261a4115	5f6b163d1a4a0515cde230eb	
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99	dmjkqsia	5f7eede95f080e9e8019688d	5f948341fa6f5f003b81b941	
100	Ebllx	5f7af74fdff932c748df740b	5f910665529826003eecf584	
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102	EmblemjudgmentnH	5f5021fe0808b2b746655d4d	5f868d6c95e47b1561dacc6c	
103	emelialarson	5f659d2f2f66f30a0c952265	5f83db7b3aabf09a2c5b977d	
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105	FadinghazeoA	5f50212d54139dae700845e9	5f82899a1bb96907bb274e54	
106	FatrewardZhaixR	5f502225422d7aa9ec551040	5f87ebda980ad0004904de89	

107	fcodjfdiufcz	5f7bd4546bc4c12917c71652	5f8aab112f605d164f3065eb	
108	fcsmeatasggal	5f747e6070e984003eac604a	5f8697b4ccb8e5bc9026aaa2	
109	Flower and Fruit Mountain	5f7f2f735f080e1d1219685d	5f93f9d58542701a7539d6ee	
110	Frederickfd	5f7c6f07860b3c0044943265	5f911b19add82e0d7860fc2a	
111	giiko89	5ef2164d2fdc51adc0d92015	5f83cfd9ff2221327575c0ab	
112	Gladis Gomez	5f5672aab980b2e0a50887e6	5f648428becb5a12602d794b	
113	Gloria Hernandez	5f5628b02f70a6302d35cd13	5f6198aa54378967c810ac0d	
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115	Grace Testerman	5f562d8fa598867c5c049949	5f62bbbdc63d99ee28c7495	
116	GrowlikeacoffiniW	5f502e8c507cb9003fd35ef9	5f8372cca76c710050802d23	
117	grtyhgh	5f851deddadaf3084e992acf	5f91203aa9c5140b9dbd433c	
118	HangbilaocD	5e6cb73d29e7867b83dddcf4	5f6c05b3955811003a19d0bd	
119	hciuhisdcc	5f7c1a9a846909bbc73f62c0	5f8aab1114d6bc1679b816cd	
120	heimega7308	5f4a316729e78603b1ca165b	5f58a312d318a4a815a4a18a	
121	HexagramroomcW	5f502199bfc92c6a990e7865	5f85395e388df50d5ff044af	
122	hfgdh	5f83cc21784efd003ed18d14	5f87e903c1750110063dc581	
123	HoneyShy	5f6206ee8e1bcd254fed8388	5f73e4c9f172bf064d403aef	
124	HuajijingpieqDk	5e6ccdaa6bab208435b64cf9	5f72cedd280d320e1d502cf9	
125	HuangpingjingmTb	5e6cab6a1e1985070024d690	5f6847e97f1cbc2303d8e75a	
126	HuangzhanranguNu	5e6cc6f96bab207f39b64dd9	5f698e830a1d19fd099215c7	
127	huijianzhi201	5f4de877919e3209f50a37bb	5f62cb0afa059a003b54d374	
128	HurryupandfightrN	5f5031175d87bef769f76979	5f8c889f27bc426f944c4065	
129	IffaSocial	5f67b64ee3bf2efd1079482d	5f7fca5e7287f03cdcd62acf	
130	ImpertinencepO	5f5021bd0808b25503655fac	5f85409057e6650863944246	
131	Jacob Edwards	5f567139b980b2d9d708870f	5f6484d4da29633b2e469dee	
132	janl3dpzutrn	5e7c644794b34f1d488a6b1f	5f5dad232f100a7c7c49944d	
133	Jessica Morenoa	5f7b3fc6ec54dace22afba30	5f82f08194ffba26a48ea842	
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137	joannalencerias	5f615c389f6759d7c93e60b1	5f866d4611127a0d74867840	
138	Joceline Lorenzo	5f58a1a1bde18add57644c6e	5f6b8bfdd0b3fc11a63027e6	
139	JohshKa	5f4fe6e83b97b97795035440	5f602119137df476fb541993	
140	JosGon	5f432d34c1689e56f8b852f8	5f7b43c94146dcb07c9b8acd	
141	Joy Chavies	5f5701f85c4adc041043e70a	5f705eb0c3db6e5edf979ef6	
142	Kaleo Kobe-Yamane	5f55fb20f99ad0989ff60086	5f6608944712176e0852a967	
143	Kansea Duotemend	5f5351767e6d44fc2b11c529	5f697443fcd5921eace001d3	
144	Kara C Dinkla	5f56ff8a1dc7833d7ed8c849	5f6dff80b27f3caddcd35aaf	
145	kdihiuffdde	5f4cb4a15d456596423e3e24	5f61ac24094aa7003e419c43	
146	KellBak77	5f4ee205c4b59512f27c9d08	5f5e51fba2deaef6eea22f03	
147	Kevin Role	5f59ab6aef1cae7cb690be73	5f7993ff9c2cb0b2bd008f5e	
148	Kimberlly Johnson	5f589f7861ae2ca2943d4172	5f8982653cae7affaea29be8	
149	Konrad	5f795104ec54da6bd5afb76c	5f959508cb9a5369bd2604a4	

150	LaBrail Walker	5f58c5d4f9aabe10ead8eeea	5f6b3af84901e05ebcd97100
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159	LightsuckingandbeatingcJ	5f502eab573d15beddd724a3	5f8372cca37ba2a26aeb1708
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161	Lisa Stephan	5f562366de2080f1b095d78c	5f686e232f66f38b7e951fc1
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164	liushufen	5f4a3e1cb7a9a149abc1e591	5f62c094d90a6000500088bf
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166	Loetswey Clothes	5f680f74ab83be5d621b939e	5f72c8474058e90b32f57d92
167	Lora Rimmer	5f599aa75ab7cab195c866de	5f78442f795c608a4610d3fb
168	luohaimin994821	5f5ef9463eb0643291599a5b	5f62b68a3d3c10021b88f922
169	Margaretdouglass	5f312ff462947db92e6d39f5	5f4521a7e5486c1456b94bac
170	Mariner	5f7d67ee3c7c689530ac5cf5	5f94dbf2cf396045e8ee1661
171	maritza.leannon	5f548f5f9358d051838d8d4e	5f87b53c80d416003c581669
172	Mark Gray	5f5669cf5118edc38a60acd9	5f64a74506aeb547f1001853
173	Marla Kriz-Role	5f59aa176805e30683e39f6b	5f797487d359e0902469d5dd
174	mcsaseaughr	5e90f1fcbdbef40408041e23	5f5f248f7fe8ad693fbfd3f1
175	MelanieZamichieli	5f3cd2385a6fe0c5208b291d	5f5b3400887fefa6a074f39e
176	Melissadfe	5f38eb03d2f98833ebef74dd	5f51ca544a5be3b577c5a62a
177	Milburn	5f7d5c122b14a474a55efd7f	5f94d0df296ee5003b67e5cd
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179	Mon Gtz	5f5678805118ed66db60b06e	5f6b1f134402c1a72ea138c1
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182	monivy	5f4b9a8ab7a9a15eadc1e5ca	5f617862dec7895c1851480c
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184	Mounajb4545	5f42852cc8e8b054d677a7e5	5f77159e5edfb3ee3b460b74
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193	Patrick Morningstar Davey	5f2a37392c36c44f7846a488	5f5d8ed07ccfa1de98e849f3
194	polarshop	5f3de8a9a51e68004a40ab31	5f6a37e9ab83bed04b1b953c
195	PufubooUa	5e6caba6eb2b334bc0761d6e	5f698e83eaf6a8f380f50a21
196	qewq123456	5f507317ff3a21654b3118dc	5f55d3727617523925c5e728
197	QueenAnnJovellanos	5f326eafa1af8f12b5beb854	5f4891de981c398bf40880af
198	Rahcel	5f796b919c2cb08415009136	5f8a950380b34314259f3158
199	Rawast	5f6f52a6938a8618c727ef4b	5f84f3dc6c030405c27f82
200	REESHO	5f61f2b814d77d98924645cb	5f7535f01e08720044de6f6e
201	Rhubarb	5f5e33d36a356fb35c097698	5f6aada0b84a601db0a6cc85
202	ROBMARK	5f60bb211a97c00b967304cf	5f910667c21281066caa19c2
203	RobReynolds	5f55f9235a02cee7aca53e54	5f65b0a1ab83be54771b96c0
204	RockandgraingaplB	5f5020e2bfc92c0bc80e7acd	5f828999548f88095798252b
205	RodneyAbson Shop	5f2a34b0bcf852ee25b02488	5f55cafc2f70a6acb535cd23
206	ronggeli	5ddcae6239adf22bc76af12a	5f83bbd4f58d3ab50aff5c77
207	Rosio Gonzalez	5f55fd86357093530b42baaf	5f671a70d9e21e4378f367a3
208	Rowlez	5f7af27f1088ac7ca5c9a3c4	5f8bad4cb0177b4874da5f7b
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211	Samush	5f7d49081fc1b73112f2ac57	5f8bdf1e5a3aa751e4059bb6
212	Scott Sm1ith	5f55f4a3a94e3efc6a0eed1f	5f647b1a2f66f3447c951fcb
213	SFDGG2	5dc4eb5829e786302d43fbe2	5f62d7122dc170095d1da4c1
214	ShabilunswYk	5e82f4ad0023b18e3b4a0f74	5f8572f0fa86391d73a588b3
215	ShanchaoheiwKr	5e6cbb5a1e198574a12352eb	5f78d53938c40d33897a1a02
216	Sheilaplus	5f5582ef1dc783003dd8c4dd	5f791be2996f233c8150c292
217	Sherri Gregg	5f570c876cae3cae0d9806b5	5f795d229c2cb076cb008fdc
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221	shopersteg	5f405c470e227720d375d865	5f6b13abe5ef0a8e9ed65051
222	ShouhuijiashouDv	5e6cbd6229e78626b0dd6e58	5f6acbdd6695530602efb04e
223	Silvina Farmin	5f566dd05a02ce02f6a540b8	5f6210e3ef6a703133dcd57b
224	SpasmodicglancegQ	5f50306e9a089c11e132dfd1	5f87df06c32a50004f4e0611
225	SunNtory	5f61e90ddec78916b3514908	5f740e329d2c420041930f91
226	Swamk	5f7af55a9c2cb02c53009638	5f8d1181dc875221fd557b24
227	teresliso	5f453837725bfac7c3f719b4	5f816a0f94ffba475b8ead40
228	textill	5f610cc8c2eaf558f1931b11	5f83b88fd5ed04f8a9cd8144
229	ThetrackwomanSouthvC	5f5021735987a25895b6aaa6	5f83ed1349b13c969f464b15
230	ThrowawaythefakeuK	5f502a45d7e8d5004675c078	5f81f2ded5b006ecbe4c46c2
231	Tim Smith	5f566c1c5118edee8060ade4	5f61b0da543789bffb10ae6d
232	Tiomthy	5f7ac49eea3b0a62a5afafbd	5f8be266cbe1b85270527880
233	tnsdhyisud	5f4e12e5998efe8d64734f0c	5f6c251545c1490aabea0197
234	ToforceaservanttoimitatesT	5f5021dc422d7a5a675511e6	5f8676fa91e4de0bb5ccf71d
235	Tom Tarczon	5f56f690a8d7fd94df59fbd	5f6793f97cc0a0ee2ed40e05

236	toner clas	5f45f5dd780916004e91d1e2	5f579d1b1dc7834fe4d8c5c0	
237	TRIEU54	5f550598f72abe646009c41c	5f61905bc9337d3bb532cc4c	
238	Trytan	5f7b9bf905cecc1003cb90040	5f8e488d3b46500040b0f4cc	
239	TuozhongjikengtU	5e6cff8829e786693edd6db9	5f6bd91706c7d8003c459ff4	
240	tuunty	5f3f3b635fccff5e592a44ad	5f62c0941df6c5074cf45219	
241	Tuyoukan Dadiaoge	5f538aa97e6d44c77911c458	5f62c097c25be0003c413b54	
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244	valerie Stolf	5f59a4727d7ea692182d279c	5f76e7322fa3529a1338ceb7	
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253	Wolfgang883	5f3c12515409ff9f78f3f565	5f6994d1110e15b141eec9d3	
254	Woodrows	5f3ac5b2509812554101538e	5f546214f72abe108709c64c	
255	WYYFF	5f8d2cb35d62bc8327887e60	5f963231e6835288f1f7f371	
256	XiehuanlucUo	5e6ddf296bab204434b65002	5f5f0627dd8cf2bdf5e1f647	
257	XixingpinnHp	5e6cc52457af097cf460d370	5f72909d69e8020044ec488f	
258	XuanpaijingyoueAz	5e86d527333873ea687103b6	5f69acef8ab312fc157fdae6	
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267	Zieryjuver Bags	5f880bfcb862314534c1cfb5	5f8bd73b03e1c94c0d75e00f	
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274	king work	21227644	502589003	
275	ladybag168	21458755	527600403	
276	Lan11	21226125	557766860	
277	lfq002	21476254	528318448	
278	lh0011	21491386	544025880	



279	lhwy888	21426699	523056143	
280	liao99	21093740	532521343	
281	ling3355	21098147	518343674	
282	liu-888	13919128	505861276	
283	Liu18011902843	21038961	455348806	WhatsApp +8618011902843
284	ljj186	21550430	555185129	
285	Louisbag 18	21420404	552231616	
286	louisbag 88	21540013	551331076	
287	lovey689	21001967	411314859	
288	lrjandy	20077598	525247046	
289	Lucky_day520	21426000	513929362	
290	luckybrandhandbag222	21432264	529945174	
291	lucyplus	20924227	552783838	
292	luxury shoes001	21160493	528077433	
293	luxury shopping	21285343	492155905	
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295	luxurybag168	21329247	530312767	
296	luxurybag222	21419773	556603718	
297	luxurybrand_a	21434800	529111666	
298	luxuryhairaccessori	21546857	556302194	
299	luxuryproducts588	21281107	528269101	
300	luxuryshoes2018	21264452	550742568	
301	luxuryshops	21177513	551837318	
302	lv5518016	20994494	456934475	
303	Lvmkbag	20630975	515180736	
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305	Lxa567	21178075	512276677	
306	lygjt	20924396	527348643	
307	lz920123	21276661	536115937	
308	market888	20823849	416849665	
309	Meibushengshou	21427167	551929834	
310	miller777	21166501	497317165	
311	mn1234	21169686	556280960	
312	momo666	20766672	507618593	
313	motorhousing	21164943	517887647	
314	Mxqx5678	20971990	508408402	
315	niannianfacai003	21140307	530165132	
316	nice_goods	21330845	551473678	
317	nineone233	21472309	542111191	
318	nyzpp789	21565573	566672861	
319	ohmygod13	21433724	515850831	
320	Orvieschina009	21478218	547890590	
321	otaku33	21016360	505435638	

322	ouyishang168	21432507	556012403	
323	palm_04	21522882	544627917	
324	palm_07	21523092	542523636	
325	pfrs888	21471090	556012957	
326	pink25	21456898	553332994	
327	pixie166	21496951	548666417	
328	popo_bags	20747113	531664988	
329	Ppc001	21435366	526680145	
330	pqhshoes01	21433840	537732055	
331	preserver	21118185	504321012	
332	pu58	21434387	515833456	
333	qiang2018	21119788	556627656	
334	qq83635	21150822	527748924	
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337	qq13751589026	20522013	420810742	
338	Qtp123	21277510	528214058	
339	redbottoms202002	21402619	568336601	
340	rugerltd	21177118	539608043	
341	sand_profit	21332555	552159476	
342	sarahandbags	20747100	506131446	
343	scarfmallshopping	21537587	553473462	
344	sceneuf2295	21524616	550972096	
345	selling_watches	21181382	469724625	
346	shanbaobao	21534904	554078296	
347	shangguangsheng	20751785	508359648	
348	shangli1113	21285257	513591851	
349	shoe02	21100050	543299603	
350	shoe06	21182313	470678427	
351	Shoe09	21182024	464318569	
352	shoe10	21182321	466003593	
353	shoes_wholesaler118	21148835	528294405	
354	shoes2199	21178317	516918474	
355	shoes888999	21076183	531447441	
356	shoeslovely	21041292	550750963	
357	shuangnian8	21093731	459078005	
358	shulinshoesshop888	20819009	439560578	
359	shy2019	21366776	529167832	
360	smile1989624	21068142	422738590	
361	store_3	21544119	561009194	
362	store_4	21543861	557518017	
363	store_5	21543863	552901326	
364	store shoes_001	21513306	540135790	

365	store1818	20040429	507233247	
366	supplierwatch	21224483	518956078	
367	Sx666	21282729	527760207	
368	szak tianqi3	21225589	531755607	
369	tammy1985	21223592	517591979	
370	tao0006	21435337	526900077	
371	tg147258	21432703	516207189	
372	toszll	21260515	527406921	
373	trade boutique3	21556040	570754125	
374	watch158	21356865	512545839	
375	watch1888	21066184	463808747	
376	watch5858	21272362	505295730	
377	webuy55	21347137	509282870	
378	weddingshoes01	21297234	566749268	
379	wholesaleshoes8	21514984	543860159	
380	wholesale-watches-1	13862465	398470418	
381	whosalebrands	21375245	529296725	
382	Wiiw	21227921	551332323	
383	wise_boy	21090574	554865546	
384	worldtrade852	21242746	499844537	
385	worldwillbetter2020	21475997	543542388	
386	wristwatch_factory	21298033	521716803	
387	wsj288	21171084	550357822	
388	wuxue9933	20801459	507768349	
389	x250	21105479	458400825	
390	xiaomubiao2020	21416590	508855552	
391	xiaopingluxury01	21287709	484407570	WhatsApp +8618306056889
392	xiaoyatou2290	21455679	529355488	
393	xiaozhou11	21433933	515552149	
394	xingfurensheng111	21485207	533398566	
395	Xingyunxing2019	21110296	527858144	
396	xinwang8869	21180032	456983348	
397	Xiyongxie	20950916	547016332	
398	xllwatch2016	20516009	395852550	
399	xun6698	21433794	516254265	
400	xwoaini	20476294	480309894	
401	ybags	21453086	571398807	
402	Yiling999	21425707	518538925	
403	yyy shoes	20731605	481960583	
404	Yyyxgsss	21344147	526666118	
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406	zhang1888	21046915	509761999	
407	zhaochuan2019	21259975	509164925	



408	zhenpai8	21074941	528458231	
409	Zhiqi896	20619544	565208908	
410	zhixiangbag110119	21229497	470204272	
411	zhousongsong	21125288	503878212	
412	zhouxinxin002	21054442	527552615	
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414	Zhuzi868	21033323	514324954	
415	zuonianzg3	21086293	463029536	
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423	bagdesigner	21396291	585862702	
424	bags_shoeshop	21179867	569444619	
425	bagsmonopoly1	21553314	556904360	
426	bagsmonopoly666	21541493	550542411	
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428	bggoo	21227547	555179131	
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432	buy1get2	21507081	552452632	
433	carry13168	21533684	555565284	
434	chanel869968	21232771	574785423	
435	chenchen002	21570280	599678284	
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440	classic020	21401467	500900277	
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442	deluxejewelry	21381273	506342694	
443	Designer brand clothing discount store aka yaadf6	21211731	567481398	
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445	designer handbag01	21504287	561942528	
446	designer1	21164406	535592318	
447	designer1998	21506980	559897336	
448	designerbag338 aka luxuryhhh	21484049	584804518	

449	designerhandbag168	21562544	566742847	
450	designersbags 66	21577349	584091272	
451	designsneaker2019	21360055	550740352	
452	dh_phonecase	21503289	540903063	
453	dhgatezuoyifan2	20409157	583044231	
454	dioo 03	21568155	569184029	
455	dunhuang2024	21577624	581039923	
456	dunhuang2025	21577321	580995661	
457	ee2565	21555447	563727413	
458	fantasyjewelry888	21392902	572712159	
459	fashion shoes963	21410263	504422677	WhatsApp +8618820027907
460	fashion67	21208704	576081911	
461	fashionbag168 aka fashion bag168	21261852	481785428	
462	fashionbags727	21325199	482858766	
463	fashionbrand 06	21588260	592253342	
464	fashionbrand 08	21588118	599238173	
465	fashionnewstore	21403236	554189604	
466	futurestreet	20796296	491954282	
467	fluxin001	21561550	596588789	
468	fluxin0101	21594320	596577404	
469	fzssty	21531805	556254190	
470	gaogaoya	21052903	527264451	
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472	guyifeixing	20948467	544285757	
473	haiying2018	21121923	564614361	
474	handbag luxury	21149503	522926455	
475	happystore789	21253382	508589497	
476	hc shoes	21429885	570163334	
477	High quality aka niugebei	21067548	551091773	
478	hnhaomaijia	21439589	553783366	
479	hongyun178bag	21294903	580535075	
480	hotshoesonline	21292228	569071321	
481	hzysshoes09	21300312	519443199	
482	jc6578	21550664	563749860	
483	jewelrycd888	21561770	562967113	
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486	jujukvc2v4	21430667	539829466	
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488	k900	21153687	559919531	
489	kid dress	21072292	525940999	

490	kisscashoes	21514081	582155591	
491	knltopbag	21446369	550793846	
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494	lan147	21359573	520400743	
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502	liuhongtai1	21290275	499737093	
503	Lovebuy 3C Store <i>aka</i> szsytdzkj	21290797	549280317	
504	lrw001	21433435	568501718	
505	lrw002	21433298	568518229	
506	lulei 88	21570071	589939683	
507	luxury88hat	21535097	567493629	
508	luxurya	21422793	563720723	
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510	luxurydesignerbags00	21417453	508435820	
511	lv1988	21428793	536257616	
512	lzj1222	21136175	511652095	
513	maskfactory2 <i>aka</i> e1688888	21210507	569912308	
514	meng008008	21565788	587896067	
515	mimi2006	21148934	515551619	
516	mmkkww3256	21414368	529633500	
517	More Designer <i>aka</i> wozhuanqian168	21555583	559002235	
518	mr_designer	21558190	564146162	
519	nicefashionstore	21435636	531948702	
520	oppo55	21298861	553059545	
521	palipabi	21215061	517020832	
522	Phone Case Club <i>aka</i> Luzhu1022	21201860	527118757	
523	qp1733859qp	21223045	559869694	
524	rainbowworld	20794019	491983379	
525	renzaizhongnian	21265471	510714576	
526	ruyang888	21250231	554117270	
527	sanxun8	21094074	571625524	
528	sasahanfeng	21571393	602133099	
529	sellbestbags	20577655	561683754	

530	sese21	21550375	560255642	
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532	shiyanning	20986476	588818201	
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535	sss816	21296100	515867117	
536	star899	21470845	530657233	
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539	sunfan666	21071135	592506665	
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544	trade boutique4	21555905	569912442	
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546	tx003	21476349	568683124	
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553	xia8801	21174441	545282380	
554	xiaoqing2020	21583912	590313523	
555	xiaosuxiangyan2020	21472901	535096659	
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563	yuhan11	21391410	564772314	
564	yuji6125	21157497	469907656	
565	yunyunzhongsheng	21591215	598434164	
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567	zhang8777	21117258	574617734	
568	zhaochunping	20686095	572947547	
569	zhaofuhong601	21418099	511390690	
570	zhaociumu	20439973	548643511	WhatsApp +8618010895041
571	Zwm123	21470455	526935995	

572	Haomaoo	20931392	478253101	
573	Haoyunlai588	20826078	512062874	
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575	Hhkos596	21149291	535830425	
576	Hotsalejersey	20157777	509386101	
577	Hua16888	21047260	490900049	
578	Huanbaoma2018	20987284	489115074	
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580	Huifafa8518	21442135	559484165	
581	Hyy0429	21202716	554166515	
582	Iduzif	21137257	507393963	
583	Ijhdndn	21558823	566011745	
584	J1862741	21550666	555165719	
585	Jackyao123	20613157	525815370	
586	Jersey_sport201911 aka VANNOGG	21211728	541662202	
587	Jiangchaoqun666	21472781	529250346	
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589	Jie6689	21033321	441522656	
590	Jinbao0110	21266107	528262124	
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592	Jujujukvc2v8	21430674	530278764	
593	Junwei08	21470492	527804255	
594	Kangle6688	21226788	516432755	
595	Kenvy	16538951	504267760	
596	kidnfhd	21558411	565500016	
597	Kingbrandshoes	21303524	506406136	
598	Kissing1988	21434528	515846794	
599	Kuailue66	21150841	504253973	
600	Lai2012121	21219468	563754978	
601	Laowang	21408895	514327475	
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603	Limiejie8899	21180110	469555439	
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609	Liuee	21032067	476422819	
610	Liuju10	21155848	527228790	
611	lkdiuffj	21552775	565944560	
612	Luckfish2017	20796514	519420220	
613	Luxury550122	21201943	457857463	

614	Luxurybag012019	21381973	554008332	
615	Lx1862741	21550668	555155356	
616	Mara33	21259265	502389509	
617	Michael store	21548980	584819397	
618	Monday_5	21504733	536875537	
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620	munds857	21558412	565691753	
621	New_fashion_jewelry	21199796	510721592	
622	New_goods	21211252	490514192	
623	Ofo998	21138853	517116288	
624	Ohmygod11	21433715	516228572	
625	Ommygod14	21434631	515859236	
626	Palm006	21518438	542717770	
627	Pearl bag	21398060	529452501	
628	Pingguoya	20986251	469424700	
629	qianqianli3	21435203	571232223	
630	Qiucao01	21557333	570171033	
631	Quality42	21050063	514941682	
632	scscsfss	21558825	566208444	
633	Shenzhen_11	21437106	525651103	
634	Shijing_jewelry	21526886	551202173	
635	Shitata	21052788	527535886	
636	Shoes_factory	20789511	542158584	
637	Sport16	21439029	524826279	
638	Star1006	21525926	572012193	
639	store_002	21564742	568207252	
640	store_005	21565046	570831785	
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642	Super_attraction	20539401	507475178	
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647	Tian8k99	21169917	529016032	
648	Tina920	20732705	519416312	
649	Top2020	20664703	517822829	
650	Upup520205	21425603	522229863	
651	Vips609	21076425	512967498	
652	Wanzhen02	21553220	565885147	
653	wenxiang0815	21226050	552341369	
654	What698	21198027	499806455	
655	wkaoshinibaol2	21569452	576741918	
656	wshzx	21149694	551915746	

657	Wsj788	21171318	545373114	
658	xcoidfkl	21558849	566119892	
659	Xhmz0316	21163054	554505103	
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661	Xiangguibagsoes2020	21427206	516958723	
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663	Xie333	21265516	560987876	
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665	Xm0202	21459102	525520124	
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667	Xueguohao	21063394	548909479	
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670	Yaner98	21418055	508790293	
671	Yecq9	21226868	455915124	
672	Yidonmei	21458171	528078976	
673	Yingbaiaini1314	21162710	498668365	
674	Yinhong6	21432305	516415766	
675	Yizhanchen	21179654	529459419	
676	yuyao153	21311648	554195554	
677	Yuyao0808	21396687	554134716	
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679	Z117102	21095120	530440834	
680	Z18673378183	21405111	505021011	
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682	Zds1974	21409779	504057161	
683	Zds1977	21409786	507690555	
684	Zds1978	21409985	504366435	
685	Zh15688a	21296276	551931185	
686	Zhang3177429	21436055	524797690	
687	Zhaofuhong601	21418099	509020281	
688	zhengaihong	21557193	567685121	
689	Zhenpai3	21074407	565794079	
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691	Zhuzi889	21432516	529801365	
692	Zrm602	21204378	512045715	
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694	zty001	21137487	555136302	
695	Zyj808	21226182	525921120	
696	Zyp1971126	21204334	453570692	