

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 21-61332-CIV-RUIZ**

CHANEL, INC.,

Plaintiff,

vs.

ANALUXURYFASHION; BOLSOS\_L.V\_CHANEL;  
CHANEL.DIO.LV.GUCCI; CHENHUAYING8; CUIYEYE2;  
EVA.BRAND.GOODS; FURSHOES\_WHOLESALE;  
HUSHBEGS; KELLY\_SHOES1; LINA9869832 aka YISA09889;  
LOVE\_BRAND\_COLLECTION; LUXURY.STOREGLOBAL;  
LUXURYSHOESBAGS86; MEIZI\_2013168\_G; MERRYKICK;  
MOENGYUNXUN aka YIFEICHONG36241;  
NANCYHENRYBBBAG2020; WORLDS\_BRAND\_STORE76;  
YAOJIAN; YIYANBAGS; YOFASHIONVIP; BRENDA84819  
aka SHOP900250100 STORE; HANKYANG0117 aka  
SHOP911259040 STORE; 2589 STORE; A-KUEI;  
521BAGS.COM; AREAGLAM.COM; BLESSEDBEDDING.COM;  
BOLSOSLVCHANEL.COM; DEPURSES.RU aka  
PURSE\_INSPIRATION; DTCBAGS.COM; EXRAIN.COM;  
LEMAISONPARIS.COM; LUXURYBAG.XYZ;  
LUXURYBAGWEB.COM; OFFSTREETUNIT.COM;  
TODADIVAOFFICIAL.COM; WEREPLICA.COM;  
WOMYSHOP.COM; CORWIN.STORE aka BLUERD.SHOP,  
BUEBU.SHOP, FEIEAGLE.SHOP, ILUIVO.SHOP,  
INCCO.SHOP, OFORE.STORE, SEERLIN.SHOP,  
WENDCO.SHOP, BLUEDIEM.SHOP, FURTA.SHOP,  
GUULIY.SHOP, INSCON.SHOP, POTARK.SHOP,  
RONIO.SHOP, SOLOIC.SHOP, VIENNAIS.SHOP, and  
WESROLES.SHOP; RARETALL.COM aka  
DELIGHTFUTS.COM, FACTIONES.COM, IGNOREDS.COM,  
ONGOINGES.COM, PENDINGETS.COM, BELIEFAL.COM,  
AMOUNTES.COM, GLORIOUSION.COM, DAWNISE.COM,  
SHINEIAN.COM, YEANG.COM, BURLYTS.COM,  
SERIOUSES.COM, WELCOMEAL.COM, and  
GLOWINGSS.COM; JIYUANM.COM aka ESUNNILY.COM and  
TOUSIKEY.COM; VKRJEWELRY.COM aka VLCASE.COM;  
AILILADY.COM aka ALICEMINI.COM; GENILICAA.COM;  
LIFEFASHIONDAY.COM; LUXEKINGS.CO; SPITFICE.COM;  
THEBRANDROOM.SHOP; ARICOT; BRUZY& aka HGVVV&;

CDUYBBIUVIU; FWQVK8888;  
 GUANGZHOULIANJIANSHIYEYOUXIANGONGSI;  
 HUAJIAZHIYUEXIANHUAHUNQINGLIYIDIAN;  
 TAIYUANXIGUANIAOYUKEJIYOUXIANGONGSI; YIHAO  
 GIFT; AEXAI6Q; ANGELICOTORY; BELLEELAI;  
 BLUETRONICSTI; BRANDI B. MAKEUP ARTISTRY; DIVOT;  
 DOMINICPH; FANGHUIJUAN2312; FARZONBA; FORMIRT;  
 FRAGATA STORES; FREELANCE WARDROBE STYLIST;  
 FROM MERCURY; FUS2174SHOP; GYASJBUIAFG; H3T0JX;  
 HAROLDMON; HOBARTKER; HOURACE;  
 HRISTOPHERBERT; HUNDP; JAMES G HOPE; JANICE R  
 JACKSON; JIMMIE M SKINNER; JLDEEAS; JOLYOM;  
 JONATIVIDAD; JU5K45; KATE.SE; KEVINLALVAB;  
 LIHANSHANGMAOSS; LIUZHIGANG7230; LOISAIF5;  
 MEFRANJE1; MISSLUXURY;  
 NDSJAGVDILSFJKDNXBHFGXNGTNGF; NICE555;  
 OAKIE1TE; PEGGY MCMULLENE; POPULAR COLOR  
 COORDINATES; SA6ZI8E; SEMCA TIENDA ONLINE; SHERRI  
 M RANGEL; SPIDERADIOXY; STESOFT; SUNYANLI66085;  
 TASSELT; TINKEAUO; TOY FLOWER; UNIPAY; VCBA;  
 WANGHAI9181; WANGTING2650; WATSUBO; YUFENGX;  
 AKA-SHI; ANGELAZEBULONX aka AMY0515;  
 ANNESTEPHANIE; APOWEJIUFA; BAMBUNATURAL;  
 BEAUTIFUL METAMORPHOSIS; BEEBAER SHOES;  
 BETSYBRIDGETZPCPPV; BLUE PRINCESS; CAIYOHJ5SHA;  
 CANTSSED; CBARMEN; CBVBYG; CGUTTMA; CHENYIJIA  
 STORE; CHGFTE; CJEIHF; CLAUDIA TOUR; COLORINE;  
 COMPLETE TECH; DAVID D KETTLER;  
 DAZHANHONGTU123; DRUNK LABRADOR; ETPLAZA;  
 FAREAST STAR; FELICITAS A COLEMAN; FHUITJO;  
 FJDWIOAGERHFTGJHTHTRGFDXHTRF;  
 FUSHUAIKANG3889; GETGREENFAST; GOUTOUG2865;  
 GUILLERMOGLOVER; HECKOSHOO79MW3;  
 HIOVJHADKZFJHFGJNGHJGYHJK; HIRAMANNRANTFM;  
 HUCHAO1256; HUGOPHOEBESH; HUIRUSHANGMAOSS;  
 HUZHOUDAMAIGE; IVYPETENZN; KSOENFUYU;  
 LATONYATOLER; LDLRCYXNM; LGSASASUASBS; LIPTIM;  
 LLMORTGAGE; LOEIRHWORE; LQQKJDAKFASSG;  
 MANHDUNGTRUONG54101; MCSHALECVPEQ; MEAT  
 JERKY WORLD; MENGJIEJINGIXS; NATURAL COMPANION;  
 PACIFICCOASTHANS; PAIQIUGONGJIN; QDNJK;  
 QINGFANG123; ROGERS FOOD STORES; RUCHEY;  
 SDNJGHEOIRJTGfYKGEDGVSDFDW; SESAY2020;  
 SIHUABAO1077; SMALL WAIST; SMARTLIBRARY;

SQINZIA; TEJS; TIAN SJKEA; TOBEYURIAHKBHOH;  
 ULTREOS; USED CARS; VALENTINEBOBAPCH;  
 WANGYUJIA0951; WITARD; ZHANGHAO2416;  
 ZHANGLIU1395; ZHANGTIANQI STORE; ZUOZE;  
 AMERICANCLOTHER; BEBIDASRAPIDAS;  
 BETANCOURT COVALENT; BRYAN D REYNOLDS;  
 BYRONCHLOEACEBL; CHICREPUBLIQUE;  
 DERRICKGEORGIAQYKW; DON MIGUELON;  
 DORISHUNTERTLQL; ERNESTFAITHEVMPY; FARNCES;  
 FIFTH AREA; FLOWKROSTY; G&O SUPREME SPARKLE;  
 GARLLE; GYHLASKDJAI SF; HELEN J VARGAS;  
 HENRYZARARZLS; HOLYWRITINGS;  
 HSFJKASFBHSDH FJSEF; INGARG86HBA5LR;  
 INVERSIONES GUS; JASON C SANDIN; JERGRAPH; JOHN P  
 ROOKS; KIRSTEN M MANRIQUE; LA ESTANCIA VE;  
 LAWRENCE A JOHNSON; LUIS SPORTS; MAJINXIAN;  
 MARCEL FAST; MARIO K ESPINOSA; MICHELLE K  
 CROUCH; MIIR91GANG; MOZHIHAOA; PARZER; PATRICIA  
 L KRICK; PICINAS Y DIFRUTES; PRISHOULD;  
 QUINTINASANDYUQEN; REVEL WINDMILL; ROBINJIMMY;  
 ROYBALDWINRNHU; SHFDJAFGHSFJFHWS;  
 SHFJKWHWKFWHJFWF; SKILLED; SOFASIEURE;  
 SONGDAN4772; STATELINK; STEVENPETERS; TECNOX  
 INC; THE LAST PACERS; USSIOSSOP; WIFFISTANDES;  
 WSNBB WORLD; WUZHICHAO0201; YETHAT; YINWEIYOU;  
 A2019; AA1010612317; AZ2026; BAG0111; BAG613;  
 BESTOFFERSHOP; BIGBRAND001; BRAND\_BAGS666;  
 BRANDFACTORY333; BUQU; BUYCHEAPCOCOS;  
 CHANELDIOR; CHAYUAN99; DANNY\_LUXURY\_BAG;  
 DESIGNER & HANGBAGS aka DH\_BAG\_JKSHFKD; DUZHIY;  
 FACTORY8\_STORE; FASHIONBAGS AND JACKETS aka  
 UNIN188; FOCUSONJERSEY; GONGJIA; GUANGZHOU  
 FASHION T-BEAR CO.,LTD aka TRADINGBEAR;  
 GZLUXURYBAG; HANDBAGS618; HLWYGOOD; JIAYU22;  
 JIUYIYI; JSM\_SHOES; KANYESHOES350\_014; KING01234;  
 KINGREMIT02; LADYBAG100; LAOYUAN2;  
 LUXURY\_SHOPS; LUXURYBAGS80;  
 LUXURYJEWELRYWORLD1; LUXURYSBAG766;  
 LVVL\_BAG; MORE THAN BAGS aka GOODBEST\_8686;  
 MRLIZHENG; NEWBAG999; PAIKE2025; PAIKEKEJI;  
 PANGZI888; PUMASHOP; QBFASHIONBAG; RED BOTTOMS  
 HEEL aka FACTORY\_STORE01; ROSE\_KING; ROSE28;  
 ROSE288; RUNXIAO; SENIOR441; SHI9527;  
 SNEAKERSSTORE202009; SPORT0004 CROSSBODY BRAND

LUXURY BAG aka SPORT0004; STYLISHHANDBAGSSTORE;  
 SUP\_BAGS2020; SUPERMAIL\_1; TANGTANG2;  
 THERENOBAG; TOP\_BAG\_6868; TOPSHOES7836; URMoby;  
 VIVISHOESCITY aka JESSIE\_LUXURY4; XIAO985985;  
 XUANSHU33; XUJIN01; YIYU22; ACEOUTSIDE; BINGO44;  
 BOUTIQUE PACKAGE aka SHANG2021; BUGBAGS; CEESD;  
 CICIBAGS; DESIGNER\_SHOES668;  
 DESIGNERCASUALSHOES; EFFINI; FASHION08008;  
 HOTLINECHINA; JOHN SHOES AND BAGS FACTORY aka  
 PROMOTIONKING; JOO8277; JOOOBAG; LADYSBAG999;  
 LEOCHAN16; LUXURYBAGS06; LUXURYHANBAGS aka  
 DENNIS\_SUPPLIERS; LUXURYS\_SHOES989; LVXURYSHOP;  
 MYSHOESCITY; PENG\_350\_V2; PINGPING6; PINKSUGAO;  
 POIRUYIW; SGYJ; SHENIAN; SHENZTOP;  
 SHISHANGBAG698; SHOESFINDER; SHOESSUPPLIER2021;  
 TIANCHENNET; TOPDESIGNERSNEAKER; VIVIBOUTIQUE;  
 and XIANGDINGDANG, Each an Individual, Business Entity, 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, Business Entities, 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 fully interactive commercial Internet websites operating under the seller identities and domain names set forth on Schedule “A” hereto (the “Seller IDs and Subject Domain Names”). 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, cybersquatting, common law unfair competition, and common law

trademark infringement pursuant to 15 U.S.C. §§ 1114, 1116, 1125(a), and 1125(d), 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 websites accessible in Florida and operating under their Seller IDs and Subject Domain Names. Alternatively, Defendants are subject to personal jurisdiction in this district pursuant to Federal Rule of Civil Procedure 4(k)(2) because (i) Defendants are not subject to jurisdiction in any state's court of general jurisdiction; and (ii) exercising jurisdiction is consistent with the United States Constitution and laws.

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

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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.

**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 15 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 United States, including the State of Florida and causing Chanel irreparable 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 websites. The natural and intended byproduct of Defendants' combined 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. 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 resources across a wide spectrum of efforts in order to protect both consumers and itself from confusion and the erosion of the goodwill connected to Chanel's brand.

### **THE DEFENDANTS**

7. Defendants are individuals, business entities of unknown makeup, or unincorporated associations each of whom, upon information and belief, either reside and/or operate in foreign jurisdictions, 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 shipping and fulfillment centers within the United States to redistribute their products from those locations. 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 interactive commercial Internet websites under the Subject Domain Names.

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 Defendant Number on Schedule "A."

10. Defendants are the past and present controlling forces behind the sale of products using counterfeits and infringements of Chanel's trademarks as described.

11. Defendants directly engage in unfair competition with Chanel by advertising, offering for sale, and selling goods each using 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 websites using, at least, the Seller IDs and Subject Domain Names, 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 Names. Defendants may have engaged in fraudulent conduct with respect to the registration of the Seller IDs and Subject Domain Names 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 registrars during the registration or maintenance process related to their respective Seller ID and Subject Domain Name. Many Defendants have registered and/or maintained their Seller IDs and Subject Domain Names 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, usernames, private messaging accounts, and domain names for the purpose of selling and/or offering for sale goods using counterfeit and confusingly similar imitations of one or more of Chanel's trademarks unless preliminarily and permanently enjoined.








14. Defendants' Seller IDs and Subject Domain Names, 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 using one or more of Chanel's trademarks, are essential components of Defendants' online activities and are the means by which Defendants further their counterfeiting and infringement scheme and cause harm to Chanel. Moreover, Defendants are using Chanel's famous name and trademarks to drive Internet consumer traffic to their e-commerce stores, photo albums, and websites operating under the Seller IDs and Subject Domain Names, thereby increasing the value of the Seller IDs and Subject Domain Names 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**

15. 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"):

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Classes/Goods</b>
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
	3,025,936	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
CHANEL	5,166,441	March 21, 2017	IC 024 - Travelling blankets
	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.”

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

17. The Chanel Marks have been used in commerce 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.

18. 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.

19. 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).

20. 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 expended enormous resources 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 alone.

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

22. Accordingly, the Chanel Marks have achieved secondary meaning among consumers as identifiers of high-quality goods.

23. 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 is important to Chanel's overall marketing and consumer education efforts. Thus, Chanel expends significant monetary and other resources on Internet marketing and consumer education, including search engine optimization ("SEO") and search engine marketing ("SEM") strategies. Those strategies allow Chanel and its authorized retailers to educate consumers fairly and legitimately about the value associated with the Chanel brand and the goods sold thereunder. Similarly, Defendants' individual seller stores, photo albums, and websites are indexed on search engines and compete directly with Chanel for space and consumer attention in the search results.

**Defendants' Infringing Activities**

24. Defendants are each promoting and advertising, distributing, selling, and/or offering for sale goods in interstate commerce using counterfeit and confusingly similar imitations of one or more of the Chanel Marks (the "Counterfeit Goods") through at least the e-commerce stores, interactive photo albums in tandem with various private messaging applications, or interactive, commercial Internet websites operating under the Seller IDs and Subject Domain Names. At least one Defendant is also using the listing and associated image identified by the Amazon Standard Identification Number ("ASIN") on Schedule "A" annexed hereto. Specifically, Defendants are using the Chanel Marks to initially attract online consumers and drive them to Defendants' e-commerce stores, photo albums, and websites operating under the Seller IDs and Subject Domain Names. Defendants are each 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.

25. 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 websites are genuine goods originating from, associated with, and/or approved by Chanel.

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

27. As part of their overall unlawful 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 to make their e-commerce stores, photo albums, and websites 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.

28. 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.

29. 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.

30. 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.

31. 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.

32. 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.

33. Moreover, upon information and belief, at least Defendant bolsoslvchanel.com ("Defendant Number 29") has registered its respective Subject Domain Name using marks that are nearly identical and/or confusingly similar to at least one of the Chanel Marks (the "Cybersquatted Subject Domain Name").

34. Defendant Number 29 does not have, nor has it ever had, the right or authority to use the Chanel Marks. Further, the Chanel Marks have never been assigned or licensed to be used on any of the websites including the website operating under the Cybersquatted Subject Domain Name.

35. Defendant Number 29 has provided false and/or misleading contact information when applying for the registration of the Cybersquatted Subject Domain Name or has intentionally failed to maintain accurate contact information with respect to the registration of the Cybersquatted Subject Domain Name.

36. Defendant Number 29 has never used the Cybersquatted Subject Domain Name in connection with a bona fide offering of goods or services.

37. Defendant Number 29 has not made any bona fide non-commercial or fair use of the Chanel Marks on a website accessible under the Cybersquatted Subject Domain Name.

38. Defendant Number 29 has intentionally incorporated at least one of the Chanel Marks in its Cybersquatted Subject Domain Name to divert consumers looking for Chanel's Internet website to its own Internet website for commercial gain.

39. 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, cybersquatting, and unfairly competitive activities connected to their Seller IDs and Subject Domain Names 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.

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



41. Chanel has no adequate remedy at law.

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

43. 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)**

44. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 43 above.

45. 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.

46. 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.

47. Defendants' concurrent counterfeiting and infringing activities are likely to cause and 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.

48. 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.

49. Defendants' above-described unlawful 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.

50. 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))**

51. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 43 above.

52. 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.

53. 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 consumers as to at least the origin or sponsorship of their Counterfeit Goods.

54. 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 commerce in the United States with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Chanel's detriment.

55. Defendants have each 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.

56. Additionally, Defendants are using counterfeits and infringements of one or more of the Chanel Marks to unfairly compete with Chanel and others for space within organic and paid 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.

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

58. Chanel has no adequate remedy at law and has sustained both individual and 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 - CLAIM FOR RELIEF FOR CYBERSQUATTING**  
**PURSUANT TO § 43(d) OF THE LANHAM ACT (15 U.S.C. § 1125(d))**  
**(Against Defendant Number 29 only)**

59. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 43 above.

60. At all times relevant hereto, Chanel has been and still is the owner of the rights, title, and interest in and to the Chanel Marks.

61. Defendant Number 29 has acted with the bad faith intent to profit from the Chanel Marks and the goodwill associated with the Chanel Marks by registering and using the Cybersquatted Subject Domain Name.

62. The Chanel Marks were distinctive and famous at the time Defendant Number 29 registered the Cybersquatted Subject Domain Name.

63. Defendant Number 29 has no intellectual property rights in or to the Chanel Marks.

64. The Cybersquatted Subject Domain Name is identical to, confusingly similar to, or dilutive of at least one of the Chanel Marks.

65. Defendant Number 29's conduct is done with knowledge and constitutes a willful violation of Chanel's rights in the Marks. At a minimum, the conduct of this Defendant constitutes reckless disregard for and willful blindness to Chanel's rights.

66. Defendant Number 29's actions constitute cybersquatting in violation of §43(d) of the Lanham Act, 15 U.S.C. § 1125(d).

67. Chanel has no adequate remedy at law.

68. Chanel has suffered and will continue to suffer irreparable injury and damages due to the above-described activities of Defendant Number 29 if this Defendant is not preliminarily and permanently enjoined.

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

69. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 43 above.

70. 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.

71. 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 each 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.

72. Defendants' infringing activities are likely to cause and are causing confusion, mistake, and deception among the consumers as to the origin and quality of Defendants' e-commerce stores, photo albums, and websites as a whole and all products sold therein by their use of the Chanel Marks.

73. Chanel has no adequate remedy at law and is suffering irreparable injury and damages because of Defendants' actions. Moreover, Defendants are unjustly profiting from those actions.

#### **COUNT V - COMMON LAW TRADEMARK INFRINGEMENT**

74. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 43 above.

75. Chanel is the owner of all common law rights in and to the Chanel Marks.

76. 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 using one or more of the Chanel Marks.

77. Specifically, each Defendant is promoting, and otherwise advertising, distributing, offering for sale, and selling goods using and bearing infringements of one or more of the Chanel Marks.

78. Defendants' infringing activities are likely to cause and are causing confusion, mistake, and deception among consumers as to the origin and quality of Defendants' Counterfeit Goods using the Chanel Marks.

79. Chanel has no adequate remedy at law and is suffering damages and irreparable injury because of Defendants' actions. Moreover, Defendants are unjustly profiting from those actions.

#### **PRAYER FOR RELIEF**

80. 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, 28 U.S.C. § 1651(a), The All Writs Act, 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 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, that upon Chanel's request, Defendants and the top level domain (TLD) Registry for each of the Subject Domain Names, and any other domains used by Defendants, or their administrators, including backend registry operators or administrators, place the Subject Domain Names 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 Names, 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 Names 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 unlawful 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 or have been 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, usernames, 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 Names 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, social media, and image hosting website operators and/or administrators who are provided with notice of the injunction issued by the Court, permanently remove from the multiple platforms, which include, *inter alia*, a Direct platform, Group platform, Seller Product Management platform, Vendor Product Management platform, and Brand Registry platform, 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 and Internet based photo albums operating under the Seller IDs, including but not limited to the listings and associated images identified by the “parent” and/or “child” Amazon Standard Identification Numbers (“ASIN”) on Schedule “A,” 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 any ASIN linked to the same sellers or linked to 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 promote, offer for sale and/or sell goods bearing and/or using counterfeits and/or infringements of the Chanel Marks.

l. Entry of an order pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, Federal Rule of Civil Procedure 65, and this Court’s inherent authority that, upon Chanel’s request, Defendants and any Internet marketplace, social media, and image hosting website 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 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 order requiring Defendant Number 29 to account to and pay Chanel for all profits and damages resulting from that Defendant's cybersquatting activities and that the award to Chanel be trebled, as provided for under 15 U.S.C. § 1117, or that Chanel be awarded statutory damages from Defendant Number 29 in the amount of one hundred thousand dollars (\$100,000.00) per cybersquatted domain name used as provided by 15 U.S.C. § 1117(d) of the Lanham Act.

o. 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.

p. Entry of an order pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, Federal Rule of Civil Procedure 65, and the Court's inherent authority 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 Names 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.

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

r. Entry of an Order requiring Defendants to pay the cost necessary to correct any erroneous impression the consuming public may have received or derived concerning the

nature, characteristics, or qualities of Defendants' products, including without limitation, the placement of corrective advertising and providing written notice to the public.

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

DATED: July 26, 2021.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

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Attorneys for Plaintiff, Chanel, Inc.

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

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Store No. / Merchant ID	PayPal Payee	ASIN/ Infringing Product Number	Additional Means of Contact	Social Media URL
1	analuxuryfashion	bertonlea@hotmail.com			WhatsApp: +8617603061115	
2	bolsos l.v chanel	anabediva50@outock.pt			DM WhatsApp: +34 642 06 07 16	
3	chanel.dio.lv.gucci	hermesezzhermes@gmail.com			DM Wechat: 6240012	
4	chenhuaying8	2335817488@qq.com			DM WhatsApp: +86 157 7979 1355	
5	cuiyeye2	5175299@qq.com			WhatsApp: +8613178238800	
6	eva.brand.goods	evayu891201@gmail.com			WhatsApp: +0086-18149704790	
7	furshoes wholesale	1193752402@qq.com			WhatsApp: +8619142092599	
8	hushbega	apanhwar3@gmail.com			DM	
9	kelly shoes1	287821339@qq.com			DM	
10	lina9869832 aka yisa09889	986983287@qq.com			DM WhatsApp: +8617689451819 WhatsApp: +8613615998061	
11	love brand collection	2493486587@qq.com 376428493@qq.com			DM	
12	luxury.storeglobal	lareinagu77@gmail.com			DM	
13	luxuryshoesbags86	2583151893@qq.com			DM WhatsApp: 8617665237415	
14	meizi 2013168_g	1649366167@qq.com			WhatsApp: +8615813635980	
15	merrykick	ericsheng20@outlook.com			WhatsApp: +8618858408171	
16	Moengyunxun aka yifeichong36241	fashionchen1005@outlook.com 675319957@qq.com			WhatsApp: +8618100591850 WhatsApp: +8615080190129	
17	nancyhenrybbbag2020	13621488409@163.com			DM WhatsApp: +86 136 2148 8409	
18	worlds brand store76	mrsilent0tear@gmail.com			WhatsApp: +92 305 6748554	
19	yaojiany	cuiyuhui1@126.com			WhatsApp: +8613386924492	
20	yiyanbags	1814574538@qq.com			DM WhatsApp: +8613760843667	
21	yofashionvip	1161646254@qq.com			DM	
22	brenda84819 aka Shop900250100 Store	Store No. 900250100 AE- Alipay@service.alibaba.com			WhatsApp: 008613530531210	
23	hankyang0117 aka Shop911259040 Store	Store No. 911259040 AE- Alipay@service.alibaba.com				
24	2589 Store	Store No. 911603835 AE- Alipay@service.alibaba.com				
25	A-kuei	965553355@qq.com			WhatsApp: +86 159 9975	

					7613	
26	521bags.com	ligezhang0@gmail.com			WhatsApp: +1 2095651228 service@521bags.com support@tiktokhotpop.com pw-fcea6e16dc0a432c610c581efc46421c@privacyguardian.org	
27	areaglam.com	falcostore10@gmail.com			info@areaglam.com areaglam.com@contactprivacy.com	
28	blessedbedding.com	ntuan8438@gmail.com			support@blessedbedding.com 9028c8495a7f4d5faf28c016c0a6b593.protect@withheldforprivacy.com	
29	bolsoslvchanel.com	jhostyndiaz25@gmail.com				
30	depurses.ru aka purse inspiration	keanyongtan91@gmail.com			WhatsApp: 60165425482 WhatsApp: 8618666021721 desacpurse@gmail.com	
31	dtebags.com	pp869788680@jackwzm.cn			WhatsApp: +1 561-292-9603 service@dtebags.com	
32	exrain.com	lehuephuong46933@gmail.com			support@exrain.com	
33	lemaisonparis.com	jabouzasrendal@icloud.com			order@lemaisonparis.com 5c3b7666f422406eafef70ba1ba5df12.protect@whoisguard.com WhatsApp: +1 302 4401 725	
34	luxurybag.xyz	zhong1995ju0202@gmail.com			WhatsApp: 8618826227375	
35	luxurybagweb.com	paypal@tradinggogo.com			WhatsApp: +8618677773661 Mell.Billi@gmx.com	
36	offstreetunit.com	info@offstreetunit.com			offstreetunit.com@contactprivacy.com	
37	todadivaofficial.com	sales@todadivaofficial.com			info@todadivaofficial.com todadivaofficial.com@contactprivacy.com	
38	wereplica.com	ulisfyha@gmail.com			wereplica@gmail.com	
39	womyshop.com	kristinbazar99@gmail.com			WhatsApp: +1(579) 390-3848 womyshop21@gmail.com 8b5d341c44894bc781a944311307f9b7.protect@withheldforprivacy.com	
40	corwin.store bluerd.shop buebu.shop feieagle.shop iluiivo.shop incco.shop ofore.store seerlin.shop wendco.shop bluediem.shop furta.shop guuliy.shop inscon.shop potark.shop ronio.shop soloic.shop viennais.shop wesroles.shop	james745119@gmail.com hytc201509@126.com	Sihe Trading Co., Ltd. 淄博浩源陶瓷材料有限公司 (Zibo Haoyuan Ceramic Material Co., Ltd.)		hanli135790@gmail.com hello@nova.com YT@gmail.com prediselhou50@gmail.com lavilyon.shop@ace.com jannegravie@gmail.com wanlvuyuan502@gmail.com	

			Sunoutdoor Co., Ltd. Guili Liu Liandong Wu Wuhan Wangxinchao Electronic Commerce Co., Ltd. Haidong Ye Zhiwei Chen Dubaozhan Communication Co., Ltd. Ruimu Women's Shoes Store, Wuchang District, Wuhan Fun Pack Technology Co., Ltd. Yi Han Hao Clothing Co., Ltd Guangjian Intelligent Technology Co., Ltd. Jinxin Biwang Technology Co., Ltd. Tupaco Entertainment Co., Ltd. Anshiyou Co., Ltd. Yizeyan Co., Ltd. Jia Enjin Network Technology Co., Ltd. James Hannah Henan Ziliang Network Technology Co., Ltd. Fanao E-Commerce Co., Ltd. Xinnike Trading Co., Ltd. Wenlin Technology Co., Ltd. Yushun Trading Company Dan Ford Trading Company District Haiyu Non-staple Food Shop Chuangshicheng Network Technology Co., Ltd. Linwen Electronic Commerce Co., Ltd. Lancheng Fitness Management Co., Ltd. Laomipi Co., Ltd. Youdeka Technology Co., Ltd. Jingshi Co., Ltd. Aaron Sparks Linlinyu Hotel Management Co., Ltd. Xiangyun Hongyi Technology Co., Ltd. Zi'an Decoration Co., Ltd.			
	hotsstore@hotmail.com lacrosse.sop@aol.com heetodry@protonmail.com waxic996@hotmail.com recklessjiang@zohomail.com torquesong@yahoo.com polar.shirt@yahoo.com chair.yky@gmail.com attorney_float@zohomail.eu han85.yan@outlook.com complientnc@zohomail.eu pengyong.leaf@yahoo.com finch.flam@gmail.com corn.pheasant@gmail.com peoriasing@yahoo.com jiaenjinshop@outlook.com mercifuledop@aol.com suicideop@yahoo.com mallliul@hotmail.com qizhong.linden@yahoo.com hu.baoping@outlook.com astronomytong@zohomail.eu junqing.bark@hotmail.com cheng84.cosmos@outlook.com zhuchen.pea@outlook.com jianchun.78li@outlook.com li86.peng@outlook.com ants.eagle@yahoo.com yew_serw@yahoo.com parsley.eng@zohomail.eu fwierb@zohomail.com violentxiao@outlook.com cockedyu@aol.com giraffedeer@hotmail.com fujun.bitter@outlook.com routgfs@yahoo.com xiaomin.twig@outlook.com	raretail.com delightfuts.com factiones.com ignoreds.com ongoinges.com pendingets.com beliefal.com amountes.com gloriousion.com dawnise.com shineian.com yeaing.com burlyts.com seriouses.com welcomeal.com glowingss.com		service.acx@gmail.com customer01@shopify-service.com boss@delightfuts.com customer05@shopify-service.com boss@factiones.com dawn-fast@outlook.com institute.ad@gmail.com hotsstore@hotmail.com	www.facebook.com/Raretail-2-101674995209115 www.facebook.com/Delightfuts-1-100279455408951/ www.facebook.com/Factiones-1-103313698388160 www.facebook.com/Brandon-Simmons-1-111122707749554/ www.facebook.com/Naufal-Rafif-Fajar-Ilmi_1-103025901791990/ www.facebook.com/Pendingetscom-104578065141218	

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42	jiyuanm.com esunnily.com tousikey.com	foshanaoke001@163.com foshanak001@163.com	佛山市顺强建材有限公司 (Foshan Shunli Building Material Co., Ltd.) Foshan Jiyuanmei Electronic Commerce Co., Ltd.		info@jiyuanmei.com 2911800416@qq.com jiyuanm.com@contactprivacy.com info@esunnily.com esunnily.com@contactprivacy.com tousikey@126.com	
43	vkrjewelry.com vlcase.com	2738429873@qq.com	深圳市豪佳杰贸易有限公司 (Shenzhen Haojiajie Trading Co., Ltd.)		service@vkrjewelry.com pw-e3e30172429068a3e24c72e5edd81db6@privacyguardian.org service@vlcase.com	
44	aililady.com alicemini.com	362506843@qq.com kyosal@163.com	深圳市天隆资产管理有限公司 (Shenzhen Tianlong Asset Management Co., Ltd.) 聚优国际电子商务(深圳)有限公司 (Juyou International Electronic Commerce (Shenzhen) Co., Ltd.)		contact@Aililady.com contact@AILISISI.com aililady.com@contactprivacy.com contact@alicemini.com 403592758@qq.com	
45	genilicaa.com	wenhaotc2022@163.com	深圳市信速进出口有限公司 (Shenzhen Xinsu Import and Export Co., Ltd.)		contact@genilica.com genilicaa.com@contactprivacy.com	
46	lifefashionday.com	ppvt2020@gmail.com	Nguyen Nhat Vu		support@lifefashionday.com 96c63f7b84fa4f048187dfb24cc8d1a0.protect@whoisguard.com	
47	luxekings.co	tungchefpayment@gmail.com naman.paymentonline@gmail.com	Tran Thanh Tung Nguyễn Tân Nam An		customers.pod.contact@gmail.com customers.contact.luxekings@gmail.com	
48	spitfice.com	htang8859@gmail.com	rao ping xian shun tang jian cai dian		spitfice@126.com info@spitfice.com	
49	thebrandroom.shop	info@outletbrandy.com	Outlet Brandy LTD		info@wellones.com	www.facebook.com/thebrandroomshop/
50	Aricot	ATSPQRNXGR9TE		B094FJ29MB		
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90	loiSaif5	Merchant ID: 5f7c9704e314d8babc01b7de PayPal Account: 329483790@qq.com		606bc83a940b4d7a22d8f422	WhatsApp: +86 15294557196	
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114	AngelaZebulonx aka amy0515	5ea76c023f2e0c37f197452c		5fd74dcf723199ce3f36aff1	WhatsApp: +8617394977655	
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191	Bebidasrapidas	6096e47c30cddfb45cb6db0a	60b79a4fce56abc1e82d8ccb
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235	Skilled	5ff49361ad7e54e2b88b24c2	60b4b82d8f122ae5c4ad203f
236	sofasieure	60026ee68c1c0830419af894	60ab4955fc8667256759c016
237	songdan4772	603c84827ea46a8c7b2b97b7	609d5635035d84273521d6f6

238	StateLink	60988939ac59b904a3940ae7		60be5ac5014e50a9c891bf4d		
239	StevenPeters	5e78c36eba7ff1b23e4b4f50		60b46154cc4a77f188177d46		
240	Tecnox inc	609452e2996c9468b386ac82		60a5d8c93b59ff4b0d4d9895		
241	The Last Pacers	607f5b0941dbdd4e68450126		60ab2af78eccc8fa869c316c		
242	Ussiossop	60a0e5857dcbb143fe3dc4d2		60ba5391b51060ed3a5e87ef		
243	Wiffistandes	6002789381125242282094cb		60bdf644745de972e55e858e		
244	WSNBB world	60507bcd3d2d6a21822dedf0		60bdaa6703e2eac0e7b80331		
245	wuzhichao0201	60a9c7f48b8c79b8002cc5db		60b8e81c1edcc7a3074c792e		
246	Yethat	6092a7768fd4947b8c198f75		60b6075841a446cf49062b0e		
247	yinweiyou	607157d70e3b29802fd44035		60b871d09805a1858e97977d		
248	a2019	21027388		631653706		
249	aa1010612317	21039360		627313635		
250	az2026	21199647		631658498		
251	bag0111	21646709		687554413	WhatsApp: +8617613722221	
252	bag613	21384989		640678672		
253	bestoffershop	21452089		666889740		
254	bigbrand001	21639441		664845022		
255	brand_bags666	21646918		676499872		
256	brandfactory333	21128272		551402656		
257	buqu	20331369		597270084		
258	buycheapcocos	21622935		636668939		
259	chaneldior	21479673		684291303		
260	chayuan99	21132946		511894586		
261	danny_luxury_bag	21584604		615453601		
262	Designer & hangbags aka dh_bag_jkshfkd	21646906		678390551		
263	duzhiy	21657184		687162403		
264	factory8_store	21001267		410537656	387893884@qq.com	
265	fashionbags and jackets aka unin188	21549949		680015628		
266	focusonjersey	21296818		548914714		
267	gongjia	21204629		615247369		
268	Guangzhou Fashion T-Bear Co.,Ltd aka tradingbear	14772552		544761334		
269	gzluxurybag	21660260		672560204		
270	handbags618	21619014		626701132		
271	hlwygood	20609155		548819459		
272	jiayu22	21161324		628694241		
273	jiuyiyi	21651916		693035289		
274	jsm shoes	21601207		643869233		

275	Kanyeshoes350_014	Store No. 21563374 PayPal Account: c18059566122@163.com		567296408	WhatsApp: +8613977667766	
276	king01234	21229079		682589008		
277	kingremit02	21081488		631469833		
278	ladybag100	14385011		618578774		
279	laoyuan2	21672323		693024676		
280	luxury shops	21574426		603866846		
281	luxurybags80	21620909		625858641		
282	luxuryjewelryworld1	21357823		606864119		
283	luxurysbag766	21633957		635488974		
284	lvvl bag	21572012		632433529		
285	more than bags aka goodbest_8686	21657047		679055749		
286	mrlizheng	20290604		639638316		
287	newbag999	21605164		618453121		
288	paike2025	21195509		632079054		
289	paikekeji	21191576		630592415		
290	pangzi888	21465740		561741120	WhatsApp: +8618617325756	
291	pumashop	21068950		677593145		
292	qbfashionbag	21642414		684072952		
293	red bottoms heel aka factory_store01	19960409		480059689		
294	rose king	21228841		675853859		
295	rose28	21225871		679152191		
296	rose288	21226678		591536534		
297	runxiao	21221729		553646403		
298	senior441	21127143		638763788		
299	shi9527	21650318		691751697		
300	sneakersstore202009	21402612		589717416		
301	sport0004 crossbody Brand luxury bag aka sport0004	20642763		648770841	cosysunny@126.com	
302	stylishhandbagsstore	21604571		619075475		
303	sup_bags2020	Store No. 21612095 PayPal Account: lfr131124@gmail.com		617240583	WhatsApp: +8613861676165	
304	supermail_1	21415277		587092076		
305	tangtang2	21607063		616166428		
306	therenobag	21677412		691922197		
307	top_bag_6868	21657056		677360313		
308	topshoes7836	21605012		694037897		
309	urmoby	21463735		553493475		
310	vivishoescity aka Jessie_luxury4	Store No. 14774868 PayPal Account: yunjiwsecsy@hotmail.com		544159956	WhatsApp: +8618620261057	
311	xiao985985	21215551		630341941		
312	xuanshu33	21161093		615247657		



313	xujin01	21668032		684841618		
314	yiyu22	21161077		628694324		
315	aceoutside	21640112		667376282		
316	bingo44	21359953		628211830		
317	Boutique package aka shang2021	21654408		690232859		
318	bugbags	21652538		678320263		
319	ceessd	21227032		601963222		
320	cicibags	21619364		693408985		
321	designer shoes668	21649690		674355159		
322	designercasualshoes	21647249		657052524		
323	EFFINI	21309004		528515903		
324	fashion08008	21078998		662103112		
325	hotlinechina	21646084		688519267		
326	John shoes and bags factory aka promotionking	21552685		633303513		
327	joo8277	21581520		688753768		
328	jooobag	21663539		689961632		
329	ladysbag999	21586939		597859624		
330	leochan16	20216802		582041117		
331	luxurybags06	21657177		689950746		
332	Luxuryhanbags aka dennis suppliers	21646737		670003153		
333	luxurys shoes989	21649692		679032208		
334	lvxuryshop	21605627		622016013		
335	myshoescity	14277485		544154582		
336	peng 350_v2	20996711		688871267		
337	pingping6	20245860		405084826		
338	pinksugao	21155468		620063044		
339	poiruyiw	21644960		677780876		
340	sgyj	21646792		676166116		
341	shenian	21032931		424758135		
342	shenztop	20397273		603027894		
343	shishangbag698	21430968		698110529		
344	shoesfinder	21637787		688799713		
345	shoessupplier2021	21684810		700128371		
346	tianchennet	21665239		686332781		
347	topdesignersneaker	21647256		658152194		
348	viviboutique	21106803		532671791		
349	xiangdingdang	21611256		628885728		