

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 22-61082-CIV-SINGHAL/VALLE**

CHANEL, INC.,

Plaintiff,

vs.

GDLKBA;  
CHENSHIHONGWUJINCHANPINJINGYINGBU;  
HANGXIN-TECH;  
HEFEIDOU CANGSHANGMAOYOUXIANGONGSI;  
JINKEMEI;  
KAILAIDIANZISHANGWUYOUXIANGONGSI;  
HEFEINIEZHUANGSHANGMAOYOUXIANGONGSI aka  
合肥也状商贸有限公司; 552384610; 3293950449;  
8618867316965; HUILIU5656; LANLINGPIJU; \_CHNNNNN  
aka COMANKE.COM, FINEANDMORE.TOP, and  
KYLIMADE.COM; AAALLLLAAA.CHICC; AIHUACHN;  
ANA.DESIGNER.GOODINC aka GOODINC;  
ANHUANG0636; ANNA\_22566 aka CHENSMILE3;  
AQLUXEBAGS aka AUREALUXE9; CHANEI19;  
CHAOALEXLIAO; DAY\_MODA\_LUXURY\_BRAND aka  
DAY MODA BRAND and  
VANESSAOLIVEIRA.SILVA.3388; DIAMOND\_BAGSS2;  
ELEGANT.DIANNA aka LV\_CHEN5;  
FASHION\_BLOGGERS36; FASHION\_KEY; GEOFSK;  
GUOK18; HELJAMELIS; HELLODEESSE; HOTSNKR168  
aka BEST-KICKS.RU; JESSICABAI16 aka CC18 and  
FASHIONTOTAL-BAGS; JU\_NE7527; KARRY11280 aka  
KICKFAM.COM; LI.SHA9984; LIANGLAI25; LIDAO055  
aka MAGIC998822; LISA.LUXBRANDS; LUCKILY1619;  
LUCY\_SHOES\_CHINA aka CHANGQIRUI; LUFACTORY;  
LUXUS\_SHEO3; MAXKEXIE; MODA.FASHIONBAGS;  
PROBAGSELLER; ROWENANERISALOR;  
SNKRSITE\_FLAGSHIP\_STORE; SNKRSITE\_ICY;  
XIANGXIANGZHEN aka KONGKICKS.COM and  
YATFAANLAU; YAMMYSELLER aka  
PICKNAVY62.COM; ZBSTOCKSTILL5385EN;  
ZHAOCHEN891; DIOR868888 aka TOP-QUALITY-BAGS;  
HIGH QUALITY REPLICA LUXURY DESIGNER  
HANDBAGS/COLLECTIONS WHOLESALE&RETAIL;  
51BOUTIQUE.COM; ACAXRO.US; ALLBRANDE.COM;  
ANY-CASES.COM; AONSHOPBUY.SHOP;

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BELTACTIVEE.COM; BESTBUYCASE.COM;  
BRADALUXURY.COM; BRANDSTORE2020.COM;  
BVBAGCN.CHKAIFA.COM; CCHIOES.SHOP;  
CHANGUC.COM; CHARMINGELEGANT.COM;  
CHELLION.COM; CICISHOPS.COM; CICUKLU.COM;  
DAISYMARY.COM; DECLEON.COM;  
DESIGNER888.COM; DILACUNAGIFT.STORE;  
DIVLERY.COM; DR-LUXURY.COM; DUPBAG.COM;  
ESEROZFASHION.COM; FRIVIOS.COM; GENISAY.COM;  
GODDESSRING.COM; GULVBAGSHOP.COM;  
HIGHENDNO1.COM;  
INSPIREDFASHIONSBOUQUE.COM aka  
UNIVERSALFASHIONBOUQUE.COM;  
IOFFERSTAR.COM; JCLUXURY.STORE;  
JOINCUSTOMECASE.COM; LINUSTE.COM;  
LJCASE.COM; LOVVSTYLE.COM;  
LUXURYWOMENBAG.COM; LVGUCCISTORE.COM;  
MAGAZINESTORECASE.COM aka  
MINESTORECASES.COM; NEWNICECO.COM;  
NOVUCASE.COM; OFFSTREETGARAGE.COM;  
OMYKOKO.COM; PHOENET.TW;  
PRUDSNEAKERS.COM; REPBUY.RU; RPSHOP.SHOP;  
SANDLABAGS.COM; SLAYBAGS.COM;  
STARPROCASES.US; USKAAAA.COM;  
VELLYHOO.SHOP aka WELOTT.SHOP;  
VIVICOLLECT.COM; VVIBAGS.COM; YSLQUEEN.COM;  
ZIVDELU.COM aka ZIVDELUU; 23SLAMDUNK.COM;  
ALICEJS.COM; ALLEYACCESSORY.COM;  
BURGUNDY9.COM; ELEGANTBRAND.CO;  
FANCYBUYHUB.RU aka RAINIESHOP.RU;  
FANCYNICELY.COM; HAPPYLUXURYDAY.COM;  
KOLUDCVVD.COM; MYFAVBANDS.COM;  
PINKSICING.COM; PRETTYNICELY.COM;  
SALESCARTBD.COM; TUBEKO-SHOES.COM;  
UCLARIS.COM aka UCLARIS.CN; USTINIANMEN.SHOP;  
VEROZIELEGANT.COM; YIHJKD.COM; ZFLLB.COM aka  
MOLIYDRESS.COM; and ZLUZURI.COM, Each an  
Individual, Business Entity, and 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, common law unfair competition, and common law trademark infringement pursuant to 15 U.S.C. §§ 1114, 1116, and 1125(a), 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<sup>2</sup> commercial Internet websites accessible in

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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.

<sup>2</sup> At least one Defendant uses its Subject Domain Name to act as a supporting domain name to direct traffic to its fully-interactive, commercial website operating under another Subject Domain Name, from which consumers can complete purchases.

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.

#### **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 consumers as well as 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. Some 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 unlawful infringing and counterfeiting activities.

13. Defendants will likely continue to register or acquire new seller identification aliases, photo albums, usernames, private messaging accounts, and domain names, as well as related payment accounts, for the purpose of selling and/or offering for sale goods bearing and/or 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 bearing and/or using 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 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
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, many of 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, advertising, distributing, offering for sale, and/or selling 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 and/or services, 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 or through 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 online and 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 have 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. Given the visibility of Defendants' various e-commerce stores, photo albums, and websites and the similarity of their actions, it is clear Defendants are either affiliated, or at a minimum, cannot help but know of each other's existence and the unified harm likely to be caused to Chanel and the overall consumer market in which they operate because of Defendants' concurrent actions.

34. Although some Defendants may be physically acting independently, they may properly be deemed to be acting in concert because the combined force of their actions serves to multiply the harm caused to Chanel.

35. Defendants' payment and financial accounts, including but not limited to those specifically set forth on Schedule "A" hereto, 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 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.

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

37. Chanel has no adequate remedy at law.

38. 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, and unfairly competitive activities are not preliminarily and permanently enjoined by this Court, Chanel and the consuming public will continue to be harmed.

39. 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)**

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

41. 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.

42. 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.

43. 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.

44. 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.

45. 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.

46. 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))**

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

48. 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.

49. 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.

50. 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.

51. 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.

52. 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. Defendants are thereby jointly (i) depriving Chanel of valuable marketing and educational space online which would otherwise be available to Chanel, and (ii) reducing the visibility of Chanel's genuine goods on the World Wide Web and across social media platforms.

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

54. 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 - COMMON LAW UNFAIR COMPETITION**

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

56. 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 one or more of the Chanel Marks in violation of Florida's common law of unfair competition.

57. 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 (i) space in search engine and social media results across an array of search terms and (ii) visibility on the World Wide Web.

58. 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.

59. 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 IV - COMMON LAW TRADEMARK INFRINGEMENT**

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

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

62. 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.

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

64. 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.

65. 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**

66. 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 pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendants, their agent(s) or assign(s), to assign all rights, title, and interest, to their Subject Domain Name(s) and any other domain names used by Defendants 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 pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendants, their agent(s) or assign(s), to instruct all search engines to permanently delist or deindex the Subject Domain Name(s) and any other domain names used by Defendants, 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 type offered for sale or 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 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.

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

q. 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.

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



DATED: July 1, 2022.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez (Fla. Bar No. 103372)

401 East Las Olas Blvd., #130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: [stephen@smgpa.net](mailto:stephen@smgpa.net)

E-mail: [leo@smgpa.net](mailto:leo@smgpa.net)

E-mail: [Raquel@smgpa.net](mailto:Raquel@smgpa.net)

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 / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
1	GDLKBA	A5EOOBRU8KF1T		B09P144F1Q		
2	chenshihongwujinchanpinjinyingbu	A2GS73R6MX4DRP		B09Q1X95XN B09Q1ZY6MR		
3	hangxin-tech	ADERAQJ55FWE2		B09PMS1L88 B09PMHGBNX B09PMVX27V		
4	HeFeiDouCangShangMaoYoyuXianGongSi	A201C5EODRAC5Q		B09QZKNVT8 B09QZL5J8K B09QZM5M5Y		
5	jinkemei	A2RVZSL2NQO5K0		B09PMCSM3N B09PMW428D B09PMT4GFS		
6	kailaidianzishangwuyouxiangongsi	A1JDQL3LIOH8DF		B09PV84VVP B09PV964TJ		
7	hefeiniezhuangshangmaoyouxiangongsi aka 合肥也状商贸有限公司	A2L7F4XEMD73SY		B09NTFB4RM B09NTFJ82D		
8	552384610	ashan52@qq.com	环英 蔡 ASHAN52		WhatsApp: +86 152 6090 8256	
9	3293950449	leavebaby77@gmail.com	前向 LEAVEBABY77		WhatsApp: +86 131 2406 8558	
10	8618867316965	1374908324@qq.com 849880872@qq.com	丰昌 1374908324 龙飞 谢 谢龙飞 XIELONGFEI		WhatsApp: +86 133 3253 1169	
11	huiliu5656	50570574@qq.com	丽兵 严 50570574		WhatsApp: +86 180 3030 5888	
12	lanlingpiju	luhanfeimj@outlook.com	Li Yu LUHANFEIMJ		WhatsApp: +86 186 9777 7976	
13	_chnnnnn aka comanke.com aka fineandmore.top aka kylie-made.com	support@fineandmore.top	宝伟 吴 通化市拉默物资贸易有限公司 ENCORETRADI		WhatsApp: +86 139 4353 0509 support@comanke.com support@kylie-made.com	https://www.facebook.com/Comanke-107883638449515
14	aaallllaaa.chicc	ala.chic@hotmail.com	Marino Cortes ALACHIC		WhatsApp: +593 99 327 7759	
15	aihuachn	jiecu1403@163.com	爱华 陈 JIECU1403		DM WhatsApp: +86 186 5027 0899	
16	ana.designer.goodinc aka goodinc	waltpark4@verizon.net			DM WhatsApp: +86 131 3207 3533	
17	anhuang0636	wjias103@gmail.com	伟佳 黄		WhatsApp: +86	

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
			WJIAS103		188 5959 0636	
18	anna_22566 aka chensmile3	2820285847@qq.com	立锋 陈 2820285847		WhatsApp: +86 137 6067 3145 WhatsApp: +86 131 4885 2284	
19	aqluxebags aka aurealuxe9	aqstore9@163.com	丽霞 江 AQSTORE9 佳苑 邱 1241289433		DM WhatsApp: +86 136 7055 5823 1241289433@q q.com	
20	chaneii9	w31412@yeah.net	忠龙 陆 W31412		WhatsApp: +86 158 1334 5135	
21	chaoalexiao	liuyousheng815@gmail.com	友生 刘 LIUYOUSHENG		DM WhatsApp: +852 5177 7811	
22	day_moda_luxury_brand aka Day Moda Brand aka vanessaoliveira.silva.3388	desysoares@icloud.com			DM	<a href="https://www.facebook.com/vanessaoliveira.silva.3388">https://www.facebook.com/vanessaoliveira.silva.3388</a>
23	diamond_bagss2	ali.tvsn@hotmail.com			WhatsApp: +90 552 727 93 48	
24	elegant.dianna aka lv_chen5	la4203@icloud.com	腊松 陈 LA4203		WhatsApp: +86 188 1421 4890 WhatsApp: +86 172 6668 8676	
25	fashion_bloggers36	sunlight_safe@live.co.uk			DM	
26	fashion_kev	1509526634@qq.com	凯文 萧 1509526634		DM WhatsApp: +86 176 8969 5761	
27	geofstk	ywsys_dzswsh@163.com	二军 林 义乌市阳树电子商 务商行 TREE		DM WhatsApp: +852 9581 0373	
28	guok18	2535406970@qq.com	国军 李 2535406970		WhatsApp: +86 182 1849 2540	
29	heljamelis	nb6688h@outlook.com			DM WhatsApp: +852 5131 7473	
30	hellodeesse	qiuguoda@gmail.com	国达 邱 QIUGUODA		WhatsApp: +86 156 2233 5005	
31	hotsnkr168 aka best-kicks.ru	565244673@qq.com heuvelruglancel@gmail.com annabellsavasta94@gmail.com	娟 刘 569227693 仁坤 余 HEUVELRUGLA 秋凤 华 USKICKSERVI 政政 汪 ANNABELLSAV		WhatsApp: +86 133 3998 8537 rahulmumper7 @gmail.com uskick.service@ gmail.com Lessacsdiscoun t@gmail.com	
32	jessicabai16 aka cc18	tingtingyu18@163.com	婷婷 于 TINGTINGYU1		DM WhatsApp: +86	

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
	aka fashiontotal-bags				134 5866 8216 157078619@qq.com	
33	ju_ne7527	1608659236@qq.com	云俊 邓 1608659236		DM	
34	karry11280 aka kickfam.com	3421305819@qq.com 3433967835@qq.com	媛 丁 3421305819 建勋 陈 3433967835		DM jaquelynneel7@gmail.com gailudy1@gmail.com pw-c81fa51bfe599e39e354300b0c3f26e7@privacyguardian.org guanbing400@hotmail.com Reggie19990128@gmail.com	
35	li.sha9984	1024163694@qq.com	勤晴 张 1024163694		WhatsApp: +86 183 1933 3369	
36	lianglai25	3621155@qq.com			WhatsApp: +86 183 1851 8320	
37	lidaoo55 aka magic998822	wcx333qw@gmail.com	春霞 王 南平市建阳区达洛烟百货商行 JIAN YANG QUD		DM WhatsApp: +852 9587 3405	
38	lisa.luxbrands	987740494@qq.com	春燕 吴 987740494		DM	
39	luckily1619	shirlylin1502@yahoo.com			DM	
40	lucy_shoes_china aka changqirui	2469106166@qq.com	腾波 潘 2469106166		WhatsApp: +86 159 5998 9709	
41	lufactory	542888996@qq.com	远京 郭 542888996		DM WhatsApp: +86 132 6646 3322	
42	luxus_sheo3	liaofacai08@gmail.com	志文 廖 LIAOFACAI08 志龙 廖 528186882		WhatsApp: +86 186 0200 8229 528186882@qq.com	
43	maxkexie	629619995@qq.com	文溢 卢 629619995		WhatsApp: +86 186 5946 7632	
44	moda.fashionbags	temmuzdolas10@gmail.com			WhatsApp: +90 5383842231	
45	probagseller	dannydang99@hotmail.com			DM WhatsApp: +90 5070965215	
46	rowenanerisalar	akn6js@163.com	碰棕 林 永定区萤署植百货店 YONGDINGQUY		WhatsApp: +852 5178 0295	

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
47	snkrsite_flagship_store	hanzhixin66@outlook.com	志新 韩 HANZHIXIN66		DM WhatsApp: +86 185 7918 3465	
48	snkrsite_icy	nfg@800000.tk	付杰 李 NFG		WhatsApp: +86 130 2621 2531	
49	xiangxiangzhen aka kongkicks.com aka yatfaanlau	penniegrover76@hotmail.com farrahguzman88@outlook.com	明军 张 PENNIEGROVE 田 张 FARRAHGUZMA		WhatsApp: +852 5971 0801 WhatsApp: +852 5696 0943 DM WhatsApp: +852 9816 1958	
50	yammyseller aka picknavy62.com	picknavy62@outlook.com	粤妹 陈 PICKNAVY62		DM WhatsApp: +86 185 7906 1979 picknavy62@outlook.com pw-8fabdb719b61bcb3e8251aaba0208773@privacyguardian.org	
51	zbstockstilld5385en	2818358474@qq.com	振兴 丁 2818358474		DM	
52	zhaochen891	1069189001@qq.com	文召 陈 1069189001		WhatsApp: +86 166 2045 0951	
53	dior868888 aka top-quality-bags	173771431@qq.com	美红 罗 173771431 文昌 蓝 LANWENCHANG		lanwenchang808@gmail.com WhatsApp: 8613246885087	https://www.facebook.com/dior868888
54	High Quality Replica Luxury Designer Handbags/Collections Wholesale&Retail	abeauacc@vip.163.com	燕 余 ABEAUACC		WhatsApp: 8615856161515	https://www.facebook.com/groups/237171447532465
55	51boutique.com	kellylv2015@163.com	娟 吕 KELLYLV2015		missexyhk@163.com services@51microshop.com	
56	acaxro.us	support@acaxro.us	Nguyen Khoi Phan THAI DUY NGUYEN ACAUS		support@acaxro.net order@acaxro.net	
57	allbrande.com	service@allbrando.com 848787794@qq.com	莹佳 林 848787794 guanghui chen 广州捷客漫贸易有限公司 JIEKEMANMAO		gobrandthing@gmail.com WhatsApp: +86 186 6482 9544	
58	any-cases.com	support@any-cases.com			support@any-cases.com any-	

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
					cases.com@contactprivacy.com	
59	aonshopbuy.shop	ghbdfgbv174@outlook.com	九龙保 邹 亳州市谯城区玖翰 百货店 QIAOCHENGQU		support@kybsawshops.store kohltendpqiheb@gmail.com husthwaitebopiks@gmail.com	
60	beltactivee.com	bbactiveltd@gmail.com			beltstations@gmail.com	
61	bestbuycase.com	vandoralatissia45@gmail.com	Brenda HOMAN BRENDAHOMAN		info@bestbuycase.com	
62	bradaluxury.com	khuang_23@hotmail.com	lau kim huang Brada Luxury BRADALUXURY		bradaluxury@gmail.com notification+bradaluxury.com@unicartmy.co	
63	brandstore2020.com	ppalyidong2019@outlook.com	小平 任 广州市翼潇电子商务有限公司 YIXIAODIANZ		brandstore1900@hotmail.com brandstore1004@gmail.com WhatsApp: +8618942420396	
64	bvbagn.chkaifa.com	yxzzhu@hotmail.com	旋珠 姚 YXZZHU 坤杰 姚 VANCOSTYLE		vancostyle@hotmail.com WhatsApp: +1 (605) 315-8052	
65	cchioes.shop	ghjshop@outlook.com	建 陈 广州濠际贸易有限公司 HAOJITRADIN 文亮 郭 北京宏恒永光商贸有限公司 HONGHENGYON		Kempkayeeb04245@gmail.com ceirshop@gmail.com	
66	changuc.com	bertyy280@gmail.com	赛妮 秦 赣榆区柘汪镇宏友 百货经营部 HONGYOUSTOR		bertyy280@gmail.com 1f4759d05380490092ba5f2924e2ed7b.protect@withheldforprivacy.com	
67	charmingelegant.com	teboracharm@hotmail.com	Luan Cong Huynh Tebora Charm TEBORACHARM		contacts@charmingelegant.com charmingelegant.store@gmail.com a2c5bc60b50e4c0890da530dff9	

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
					7522e.protect@withheldforprivacy.com	
68	chellion.com	lm8668998888@163.com	斐 刘 河南海创商贸有限公司 HAICHUANGSH		pw-de2baa84593a9abaa9ad7ddd8c7b843b@privacyguardian.org	
69	cicishops.com	lillian2325@126.com	丽娇 廖 LILLIAN2325 Chen Yujie ITHANDBAG		ithandbag@gmail.com ithandbag7@gmail.com	
70	cicuklu.com	andac.kuzey@yandex.com				
71	daisymary.com	laizhenying0406@gmail.com	俞霖 賴 龍俊通貿易有限公司 LONGJUNTONG		support@daisymary.com daisymary010@gmail.com daisymary.com@contactprivacy.com	
72	decleon.com	support@carneyforia.com	Faris Wahyu Utama Carneyforia		support@decleon.com decleonstore@gmail.com decleon.com@contactprivacy.com	
73	designer888.com	fengxian8858@163.com	传民 任 FENGXIAN885		designer12345@163.com whatsapp: +8616679072320	
74	dilacunagift.store	julien.rerolle86@gmail.com			contact@dilacunagift.store	
75	divlery.com	zhangxinyue1979@163.com	馨月 张 青岛馨园昊盛装饰工程配套有限公司 XINYUANHAOS		divlery@126.com	
76	dr-luxury.com	payment06@dr-watch01.live	建辉 胡 PAYMENT06		customer-service@drluxury.com	
77	dupbag.com	lvguccis@163.com	小冰 张 LVGUCCIS		support@dupbag.com pw-67aa96f4be446ce9d516e195532db35a@privacyguardian.org	
78	eserozfashion.com	elmbairamov@yandex.com			emeliaakhmedova@gmail.com	
79	frivios.com	friviosofficial@gmail.com			frivios.com@co	

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
					ntactprivacy.com	
80	genisay.com	shiquanhua1984@163.com	全华 施 双牌县疾阅劳百货店 SHUANGPAICO		genisay@126.com	
81	goddessring.com	service@lukpop.com	晓东 朱 广州原丹互联网技术有限公司 YUANDANHULI		service@goddessring.com	
82	gulvbagshop.com	weiwei134141@gmail.com wei134141@163.com	翠霞 朱 深圳市美星新材料科技有限公司 MEIXINGXINC 效弟 艾 深圳鸿凯通信电子科技有限公司 HONGKAITONG 帅 邵 江苏基带电子商务有限公司 GSUJIDAIDIA		pearletheresa4287@gmail.com service@gulvbagshop.com	
83	highendno1.com	onexloset@gmail.com	Ali Ahmed Reda Hussein ONEXLOSET Cesar Danha High End No.1 FIRSTSMARTC		info@highendno1.com	
84	inspiredfashionsboutique.com aka universalfashionboutique.com	sl010472@hotmail.com designer.inspired.clothes@gmail.com	SUSANNE LITTLE SL010472		universal.fashions.are.us@gmail.com	
85	iofferstar.com	crystal7811@163.com	Yi Man CRYSTAL7811		WhatsApp: +86 131 7388 7616	
86	jcluxury.store	1351051682@qq.com m16571568840@163.com	岑莹 陆 M1657156884		WhatsApp: +86 166 2041 1881 WhatsApp: +86 199 1480 3104	
87	joincustomcase.com	juandahadpstore@gmail.com	ADI PUTRA JUANDAH ADIPUTRAJUA JOHAN LAHMUDDIN Joincustomcase JOHANLAHM84		info@joincustomcase.com johanlahm8471@gmail.com WhatsApp: +1 (916) 302-9249 joincustomcase.com@contactprivacy.com	
88	linuste.com	xuming1245@outlook.com	敏 徐 扬州市浩腾照明器材有限公司		linuste@126.com linuste@126.com	



Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
			HAOTENGZHAO		m	
89	ljcase.com	3238559778@qq.com	飞王 深圳市欣荣联合投资控股有限公司 BAODONGQIYE		service@ljcase.com	
90	lovvstyle.com	support@yasminlight.com	唐杰 李 陕西益永宏工贸有限公司 SHAANXIYIYO 唐杰 李 西安烁氮星动商贸有限公司 SHUOKEXINGD		service@keerite.com service@tiitwo.com service@ziue.com	
91	luxurywomenbag.com	229402861@qq.com	gang lin jinghaitongkejiyouxiangongsi JINGHAITONG		luxurywomenbag@gmail.com WhatsApp: +1(661) 308-0934 pw-247bda10d1daf6d4f6b0ff98a4a2f4b8@privacyguardian.org	
92	lvguccistore.com	xiaodongchen556@163.com kff993818@163.com	晓东 陈 XIAODONGCHE 爱群 周 余江区蓝之天电子商务有限公司 YUJIANGQULA		yumiko@lvguccistore.com	
93	magazinestorecase.com aka minestorecases.com	frassetyayuda@gmail.com	yuda frassetya magazinecase MAGAZINECAS		sales@magazinestorecase.com minestore011@gmail.com sales@minestorecases.com magazinestorecase.com@contactprivacy.com minestorecases.com@contactprivacy.com	
94	newniceco.com	newnicehaircompany@gmail.com	翠翠 高 NEWNICEHAIR		WhatsApp: +86 150 0648 7290	
95	novucase.com	contact@novucase.com				
96	offstreetgarage.com	offstreetgarage@gmail.com			Support@offstreetgarage.com offstreetgarage.com@contactprivacy.com	
97	omykoko.com	sarcaana4161@163.com	玉霞 王		service@chrnu.	

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
			SARCAANA416		com WhatsApp: +852 8191 0985	
98	phoenet.tw	sarose9924@hotmail.com			despurses@gmail.com WhatsApp: +60 16-542 5482 maqdoona@ape xscore.com	
99	prudsneakers.com	535985849@qq.com	秀英 林 535985849		prudsneaker@o utlook.com	
100	repbuy.ru	fantasticfan1993@outlook.com y90fan11011@126.com	Fan Yang FANTASTICFA 帆 杨 Y90FAN11011		y90fan@gmail.com	
101	rpshop.shop	540393689@qq.com	银琴 林 540393689		zadqin@163.com	
102	sandlabags.com	zengbin198913@gmail.com	斌 曾 ZENGBIN1989		t3153941877@outlook.com WhatsApp: +86 189 7319 3807	
103	slaybags.com	744984307@qq.com	Obed mensah 744984307		underdollarchina@gmail.com shopsobed143@gmail.com	
104	starprocases.us	flyboardworldpro@gmail.com			info@starprocases.us nicolacatello123456@gmail.com nicolacatello123456@gmail.com	
105	uskaaaa.com	lil4241@163.com	新意 李 李新意 LLIVEPREFER		service@corrcty.com	
106	vellyhoo.shop aka welott.shop	uoijliu8531@outlook.com	少鹏 李 泉州市玉生烟贸易有限公司 YUSHENGTOBA 佐 官 莱州凤浩商贸有限公司 FENGHAOTRAD		vvv01shop@gmail.com	
107	vivicollect.com	m18138789851@163.com	吉 罗 M1813878985		vivicollect88@gmail.com WhatsApp: +86 181 3878 9851	
108	vvibags.com	403520515@qq.com	春龙 马 403520515			

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
109	yslqueen.com	liminjian0810@hotmail.com	敏坚 李 LIMINJIAN08 duo chen chen duo 淑玲 严 YANSHULING6		yanshuling627@gmail.com chenduo0711@hotmail.com	
110	zivdelu.com aka zivdeluu	honeydove22@gmail.com			info@zivdelu.com faithoo4sure@yahoo.com	
111	23slamdunk.com	Stripe Order No.: 23L364353 Date: 2/18/2022 Credit Card: Visa Total: \$100.94 Description: ROCKETCHBRA.COM Product Title: CN Air Jordan 13 Sneaker- S17 x 1 Size: US6/ EU36 WOMEN			support@masakonishi.com admin@23slamdunk.com 2a09b78f71fb4722902a9d5c27026e47.protect@withheldforprivacy.com	
112	alicejs.com	yeelogin@outlook.com	小波 胡 Yeehong International Trade Co.,Limited YEEHONG INT		service@alicejs.com	
113	alleyaccessory.com	support@alleyaccessoriess.com	Minh Khai Nguyen The1960s 1890SSTORE		support@alleyaccessory.com 9a4c49c87f0045ea90dda2e551473988.protect@withheldforprivacy.com	
114	burgundy9.com	dangtuan.94@gmail.com	Tuấn Anh Đăng Solutions Service And Trade Limited Liability SOLUTIONSSE		burgundy.sp@gmail.com sp@burgundy9.com e5eb3d944b9446d890155a79416d30df.protect@withheldforprivacy.com	
115	elegantbrand.co	support@archeologo.shop	Le Xuan Truong TLVNX		support@elegantbrand.co support@shifio.co	
116	fancybuyhub.ru aka rainieshop.ru	rainielee0626@gmail.com	梦琪 李 RAINIELEE06		fancybuyhub@gmail.com	
117	fancynicely.com	leycharmffashion@gmail.com	Lê Ý LEY CHARM FASHION LEYCHARMFAS		contacts@fancynicely.com fancynicely.store@gmail.com 210ed7c4569d41f492ac9c87a93	

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
					03129.protect@withheldforprivacy.com	
118	happyluxuryday.com	kristinawaltonz@yahoo.com	萍 叶 广州市聪小电子商务有限公司 CONGXIAODIA		service@meugan.com	
119	koludcvvd.com	f4crtb@sina.com	文杰 廖 广东省昱晟贸易有限公司 YUSHENGTRAD		service@corrcty.com	
120	myfavbrands.com	unknownsocks1@gmail.com			info@myfavbrands.com	
121	pinksicing.com	kwen1328@163.com	开明 温 深圳市迈格易工贸有限公司 MAIGEYIGONG		pinksicing@outlook.com andrew-kan@163.com	
122	prettynicely.com	balacifashion1900@gmail.com	Danh Cong Nguyen Balaci Fashion 1900 BALACIFASHI		contacts@prettynicely.com prettynicely.store@gmail.com f2369ef9752a464ab20f724e9567e8ee.protect@withheldforprivacy.com	
123	salecartbd.com	gzyxdzsw202108@163.com	小艳 李 广州雅心电子商务有限公司 PETER		support@salecartbd.com	
124	tubeko-shoes.com	m18819375226@163.com	东东 金 金东东 JINDONGDONG 琼坤 赵 陕西宏美汇供应链管理有限公司 SHANXIHONGM		hnh17391722305@163.com	
125	uclaris.com aka uclaris.cn	1312151948@qq.com	meng wang 王蒙 WANGMENG		uclarisinfo@gmail.com 1312151948@qq.com	
126	ustinianmen.shop	whb29618@163.com	孝僮 汤 WHB29618		support@onom.shop	
127	verozielegant.com	jupiterluxury518@gmail.com	Tu Minh Le Lê Minh Tú LE MINH TU		contacts@verozielegant.com verozielegant.store@gmail.com 5fb90c47d0f04dfbbc3110132119ca05.protect@	

Def. No.	Defendant / Seller ID / Subject Domain Name	Financial Account / Payee / Store No. / Merchant ID	Additional Username / Business Name	ASIN	Additional Means of Contact	Social Media URL
					withheldforprivacy.com	
128	yihjikd.com	v9vbbs@sina.com	云华 陈 义乌市峰筱贸易有限公司 FENGXIAOTRA		service@corrcty.com	
129	zflb.com aka moliydress.com	PayPal Account: shenzhen@boutiqueshe.com PayPal Payee: Online Shopping Merchant ID: PUH8VA8CGPKS4  PayPal Payee: Boutique Shop Merchant ID: R8RKTFXMGLWAN  PayPal Account: henan@yourjolly.com PayPal Payee: Online Shopping Merchant ID: HFAEZGLAY4AB2  PayPal Account: gongyuanqian@beautypayment.com PayPal Payee: Online Shopping Merchant ID: WSJ89N6EJQENC	端斌 陈 深圳市优零科技有限公司 ONLINESHOPP 灿金 王 广州顺锐电子商务有限公司 SHUNRUIDIAN 福思 林 丰泽区依米服饰商行 BOUTIQUESHO 小兵 谢 深圳市南山区凡素希服饰商行 德雄 林 广州共赢供应链有限公司 ONLINESHOPP		service@zflb.com service@moliydress.com	
130	zluzuri.com	hphuoc3702@gmail.com	Anh Thi Ngoc Dang HPHUOC3702		support@californialuxury60.com	