

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

FENDI, S.R.L.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A",

Case No. 1:24-cv-05629

District Judge April M. Perry

Magistrate Judge Beth W. Jantz

DECLARATION OF PAUL KOSSOF

I, Paul Kossof, declare and state as follows:

1. This declaration is based on my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I would testify to the statements made herein.
2. I am employed as a Senior Vice President at DAC Management LLC where I oversee operations in China and lead the intellectual property group.
3. I am in charge of monitoring internet-based infringement and counterfeiting of the Fendi Trademarks through internet stores to sell counterfeit Fendi products from foreign countries such as China to consumers in the U.S. and elsewhere. I, or someone working under my direction, analyzed each of the e-commerce stores operating under the internet stores identified in Schedule A to the Complaint (the "Defendant Internet Stores"), which were offering for sale and/or selling unauthorized and unlicensed products in connection with infringing and counterfeit versions of the Fendi Trademarks (the "Counterfeit Fendi Products") to consumers in this judicial district and throughout the United States.
4. Our investigation shows that Defendants are using the Defendant Internet Stores to sell Counterfeit Fendi Products from foreign countries such as China to consumers in the U.S. and

elsewhere. The Defendant Internet Stores can be found on certain marketplace platforms such as AliExpress, eBay, Alibaba, Amazon, Wish.com and DHGate.

5. True and correct copies of screenshot printouts showing the active Defendant Internet Stores reviewed were filed as Exhibit 2 to the Declaration of Nicolas Lambert (Dkt. 12, ¶ 12.)
6. January 7, 2025, I emailed Amazon and requested the sales data for counterfeit Fendi goods sold by the Defendant Internet Stores. Amazon confirmed that as of October 22, 2024, the sales from counterfeit jewelry sold by three Defendant Internet Stores totals \$38,538.87. A true and correct copy of the email correspondence between Amazon and DAC Collections, including a spreadsheet containing the sales data is attached as Exhibit 1.
7. These three Defendant Internet Stores were selling one piece of counterfeit jewelry each on the Amazon platform, ranging in price from \$13.00 - \$21.65. True and correct copies of screenshot printouts showing the active e-commerce stores operating on the Amazon platform are contained within Exhibit 2 to the Declaration of Nicolas Lambert ((Dkt. 12, ¶ 12.))
8. On January 8, 2025 and January 10, 2025, I contacted DHGate and requested the sales data for counterfeit Fendi goods sold by the Defendant Internet Stores. DHGate confirmed that as of October 18, 2024, the sales from counterfeit Fendi purses and clothing sold by 41 Defendant Internet Stores totaled \$383,458.10 from merely 30 days of sales. A true and correct copy of the email correspondence between DHGate and DAC Collections, including a spreadsheet containing the sales data is attached as Exhibit 2.
9. These 41 Defendant Internet Stores were selling one piece of counterfeit Fendi merchandise each on the DHGate platform, ranging in price from slightly over \$20.00 to less than \$200.00. True and correct copies of screenshot printouts showing the active e-commerce stores operating on the Amazon platform are contained within Exhibit 2 to the Declaration of Nicolas Lambert ((Dkt. 12, ¶ 12.))
10. The sales data provided by Amazon and DHGate demonstrates that Defendants are selling thousands of counterfeit Fendi goods in a short period of time. As these sales figures are only

derived from Amazon and DHGate's U.S. platform, our experience in the infringement and counterfeit monitoring arena indicates that the volume of counterfeit Fendi goods sold by Defendant Internet Stores is much higher as the Defendants typically list multiple counterfeit products across various platforms and under numerous store names.

11. Failure to obtain a judgment against these Defendants will inevitably encourage continued sales and encourage Defendants and other counterfeiters to exploit the Fendi brand, causing additional harm to Fendi and the broader marketplace for luxury goods.
12. Fendi will suffer immediate and irreparable injury, loss, or damage if a statutory judgment is not entered against these infringing Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 17, 2025.

Paul Kossof

Paul Kossof

Signature: 

Email: pkossof@dacmllc.com

Decl. of Paul Kossof

Final Audit Report

2025-01-17

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"Decl. of Paul Kossof" History

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