

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LOGARO LLC,

Plaintiff,

v.

ABBRACCIA, et al.,

Defendants.

SEALED

Civil Action No.

Declaration of Adam E. Urbanczyk

I, Adam E. Urbanczyk, of the City of Sarasota, in the State of Florida, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Georgia and the United States District Court for the Northern District of Georgia. I am the attorney for Plaintiff. Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the following:
2. According to a 2023 report by U.S. Customs and Border Protection entitled “FY 2022 Fact Sheet”, there were 23,009 seizures of shipments containing counterfeit goods suggested retail price (MSRP) of the seized goods, had they been genuine, of \$2.76B, 90% of these originating from China or Hong Kong. A true and correct copy of this report is attached hereto as **Exhibit 1**.

3. According to a 2018 report by U.S. Customs and Border Protection entitled “Intellectual Property Rights Fiscal Year 2017 Seizure Statistics,” intellectual property rights (IPR) seizures increased 8% over 2016 to a record 34,143 reflecting a total manufacturer’s suggested retail price (MSRP) of the seized goods, had they been genuine, of more than \$1.2B. A true and correct copy of this report is attached hereto as **Exhibit 2**.
4. According to a 2017 report entitled “The Report of the Commission on the Theft of American Intellectual Property (also known as the IP Commission Report),” eCommerce trademark infringement, particularly involving counterfeit goods, and piracy / copyright infringement cost merchants in the U.S. alone nearly \$41 billion. A true and correct copy of this report is attached hereto as **Exhibit 3**
5. According to a 2015 report by U.S. Customs and Border Protection entitled “Intellectual Property Rights Fiscal Year 2015 Seizure Statistics,” there were 28,865 seizures which, according to the IP Commission Report, represented less than 3% of the total infringing goods being sold. A true and correct copy of this report is attached hereto as **Exhibit 4**.
6. According to a 2015 report by the World Economic Forum entitled “State of the Illicit Economy,” the “cost to the global economy of counterfeiting alone could reach USD 1.77 Trillion.” A true and correct copy of this report is attached hereto as **Exhibit 5**.

7. In my experience with online counterfeiting and piracy over the last eight years, I have observed counterfeiters using a variety of tactics to evade enforcement efforts. Specifically, infringers like Defendants in the present case may often register new online marketplace accounts under new aliases once they receive notice of a lawsuit, or otherwise utilize a plethora of accounts to minimize the risk that the removal or deactivation of one storefront due to their counterfeiting activities will stall their entire operation.
8. In my experience, once notice of a lawsuit is received, counterfeiters like those Defendants in the present case may move funds, if at all possible, from their U.S.-based accounts (*e.g.*, Walmart merchant account) to off-shore bank accounts outside the jurisdiction of this Court. Resources exists online, such as sellerdefense.cn, which monitor PACER dockets and provide seller communities with advance notice of newly-pending intellectual property infringement claims so as to forewarn sellers of impending temporary restraining orders.
9. For these reasons, in the absence of an *ex parte* Order, Defendants in this case, in the interest of shielding their assets could and likely would modify payment account registration data and content and to shuffle any assets from accounts in U.S.-based financial institutions (*e.g.*, Walmart or PayPal), to offshore accounts.
10. Online marketplace account operators very often use pseudonymous or cryptic store names and omit any or true physical contact information (*e.g.*, an address)

from their marketplace listings and/or their “storefront” in the interest of concealing or obfuscating their identities. What’s more, they rely almost exclusively on electronic communication to correspond with third-parties, such as customers or service providers (e.g., payment processors). Online marketplace account operators, particularly in the business of offering counterfeit or pirated merchandise, will very often carry no inventory and only upon receiving an order from their unauthorized product listing will themselves place an order with a third-party, similarly-infringing supplier or reseller who will in fact ship the goods from a separate location. Email is by a substantial margin the most direct, fastest, and most reliable way to provide direct notice to the operators of the storefronts operating under the Seller Aliases.

11.In my experience, a party initially registering an account on a marketplace may transfer the account to a second party who operates the account without modifying the registration information, despite platform requirements that it do so.

12.I have reviewed the Hague Convention on the Service Abroad of Judicial and Extra-Judicial Documents in Civil and Commercial Matters (“Hague Convention”), to which at least China, Indonesia, and Israel are signatories. Article 1 of the Hague Convention, the “convention shall not apply where the address of the person to be served with the document is not known.”

13.A true and correct copy of the Hague Convention on the Service Abroad of Judicial and Extra- Judicial Documents in Civil and Commercial Matters, and a list of signatory members, are collectively attached hereto as **Exhibit 6**.

14.A true and correct copy of a chart displaying the physical addresses associated with each storefront and the corresponding results when searched in Google Maps is attached hereto as **Exhibit 7**.

15.A true and correct copy of the actual screenshots of the Google Maps search results for the address is attached hereto as **Exhibit 8**.

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

Executed on this June 15, 2026 at Sarasota, Florida.

/s/Adam E. Urbanczyk
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