

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.**

OMEGA SA,
COMPAGNIE DES MONTRES LONGINES, FRANCILLON S.A.,
and MONTRES BREGUET S.A.,

Plaintiffs,

vs.

BESTREPLICAOMEGA.COM a/k/a CHEAPEST-WATCHES.COM
a/k/a LOVEOMEGA.NET a/k/a ZKANUP.COM a/k/a
COPYOMEGAWATCHES.COM a/k/a OMEGALOVER.COM a/k/a
SEAMASTEROMEGA.COM a/k/a SWISSOMEGA1848.COM a/k/a
OMEGAREPLICAWATCHES.COM a/k/a
OMEGAROLEXWATCHES.COM a/k/a OMEGAWATCHES.SALE
a/k/a OMEGAWATCHES1.COM a/k/a
OMEGAWATCHESOUTLET.COM a/k/a ROLEXOMEGA.COM
a/k/a SPEEDMASTEROMEGA.COM a/k/a TCUIRS.COM a/k/a
DEVILLEOMEGA.COM a/k/a LONGINESWATCH.NET a/k/a
OMEGAWATCHES.SITE a/k/a SEAMASTER.CC a/k/a
FAKELONGINES.COM a/k/a LONGINESONLINE.COM a/k/a
LONGINESREALTY.COM a/k/a LONGINESWATCHES.XYZ a/k/a
NEWOMEGAWATCHES.COM a/k/a OMEGA2010.COM a/k/a
OMEGADEVILLE.ORG a/k/a OMEGAROLEXREPLICA.COM a/k/a
REPLICALONGINES.COM a/k/a
REPLICALONGINESWATCHES.COM a/k/a
REPLICALONGINESWATCHES.ME a/k/a REPLICA-
OMEGA.COM a/k/a REPLICAOMEGA.NET a/k/a
REPLICAOMEGAWATCH.COM a/k/a SPEEDOMEGA.COM a/k/a
SPEEDSEAMASTER.COM a/k/a WATCHLONGINES.COM a/k/a
12GG.INFO a/k/a BCRE.CC a/k/a BESTREPLICAWATCHES.XYZ
a/k/a BESTSWISS.ME a/k/a CHOOSEREPLICAWATCHES.COM
a/k/a FINEREPLICAWATCHES.NET a/k/a
GETREPLICAWATCH.COM a/k/a
LOVEREPLICAWATCHES.COM a/k/a
ONSALEREPLICAWATCHES.NET a/k/a
ORDERREPLICAWATCH.COM a/k/a PROTEXUSNOW.COM a/k/a
REPLICASPECIAL.NET a/k/a REPLICAWATCHESBEST.COM
a/k/a REPLICAWATCHESBRAND.NET a/k/a
REPLICAWATCHESON.COM a/k/a SITECDESIGN.COM a/k/a
SWISSLOGINES.COM a/k/a WATCHESOUTLET.CC a/k/a
WATCHESREPLICA OEM.COM a/k/a
WATCHESSTORETIME.COM a/k/a ZGGJBB.COM,
BESTBREGUET.COM a/k/a TIPREPLICAS.COM a/k/a

PERFECTWATCHES.ME, CALLOMEGA.CC a/k/a PPFAKE.COM
 a/k/a CLEND.NET a/k/a FACTEB.ORG, COPYOMEGA.CO.UK a/k/a
 BESTWATCHUSE.COM a/k/a BESTWATCHES.IO a/k/a
 ABESTWATCHES.COM, IOMEGAREPLICA.COM a/k/a
 WATCHES.IS a/k/a PERPETUALOMEGAWATCH.CO.UK a/k/a
 RADOREPLICA.COM, MYSEAMASTERS.COM,
 OMEGADEVILLE.ONLINE a/k/a WATCHESREPLIC.XYZ a/k/a
 OMEDEVILLE.CO a/k/a OMEGASEAMASTER.CO a/k/a
 BESTWATCHESTOP.COM a/k/a SEAMASTERWATCH.ORG a/k/a
 AZEQUIPMENTNY.COM a/k/a B2IWATCH.ME a/k/a
 BESTMENWATCHES.ME a/k/a BESTWATCHREPLICA.ME a/k/a
 BUYWATCH.ME a/k/a CANDY-WATCHES.ORG a/k/a
 CLEMONTWATCHES.COM a/k/a COUPLEWATCHES.ME a/k/a
 EWATCHME.COM a/k/a FAKEOMEGEWATCHES.COM a/k/a
 FAKEWATCHESPRO.COM a/k/a FARMCOLD.COM a/k/a
 IMAGEWATCHES.ORG a/k/a IMAHNAHOME.COM a/k/a MY-
 WATCHES.PRO a/k/a PATEKWATCH.CC a/k/a
 SCARDCLUB.COM a/k/a WATCH2SHOP.COM a/k/a
 WATCHESLOVE.ORG a/k/a WATCHESREPLICATOP.ORG a/k/a
 WATCHESSIWSS.COM a/k/a WATCHES-WELL.COM a/k/a
 WEBUILDBC.COM a/k/a WINE2WATCH.ORG,
 OMEGAREPLICASALE.CO.UK a/k/a CIWATCHES.COM a/k/a
 GRWATCHES.CO.UK a/k/a BESTREPLICAUK.CO.UK a/k/a
 AGWATCH.CO.UK a/k/a AGWATCHES.CO.UK a/k/a
 AGWATCHES.UK, OMEGAWATCHESREPLICA.COM a/k/a
 REPLICAWATCHES.NU, ROMEGALEX.COM, 77MODEL.NET,
 AAAWATCHES.CO.UK, AHOTWATCH.COM, INCADINC.COM
 a/k/a ANYSWISSWATCH.COM a/k/a HELLOROLEX.IN a/k/a OK-
 REPLICAS.CO a/k/a PAYBESTWATCH01.ME a/k/a
 MOWATCHES.IN a/k/a AMAZING-CLOCK.ME a/k/a FINE-
 WATCHES.ME a/k/a JOINCLOCK.COM a/k/a TRUSTYTIME.ME
 a/k/a ANYCOPY.ORG a/k/a SWITZ-WATCH.COM a/k/a
 LESSGAUSS.COM a/k/a REPSWATCH.COM a/k/a
 SWISSTIMES.NET a/k/a USWISSSALE.COM a/k/a
 WATCHTHEWILD.NET a/k/a CHEAPMENSWATCHES.ME a/k/a
 MREPWATCH.COM a/k/a COSWATCH.ME a/k/a
 BESTSWISSREPLICA.COM a/k/a ESCREPLICA.COM a/k/a
 HELLOPANERAI.COM a/k/a TOPCLONEWATCH.COM,
 ANYREPLICAWATCHES.ORG, AWATCH.IO a/k/a FAKE-
 WATCHES.ME a/k/a PERFECTREPLICA.ME,
 BESTLUXURY.CO.UK, BIAO.CO.UK, BRANDWATCHESS.COM,
 BREITLINGWATCHES.ME, BUCIAM.COM,
 BUDGETREPLICAS.COM, BUYCOPYWATCH.COM,
 BUYLUXWATCHESLIFE.COM, CHEAPSALEWATCH.COM,
 CHINANOOBWATCH01.ME, CLOCKREPLICA.COM,
 CNWATCHSHOW.COM, EREDYSHOP.ME a/k/a

COASTOPTICS.ME, SEAMWATCHES.COM a/k/a
KAKAWATCHES.COM a/k/a FUMCTORR.ORG a/k/a
CRCONSTRUCTION.NET, FASHIONWATCHTIME.COM,
FJWATCHES.CO.UK a/k/a NOOBWRISTWATCHES.COM,
GZNOOBWATCH.COM a/k/a HOLLYWATCH.ME,
HONTWATCH.ME, HOTWATCHS.COM, IDOLWATCHES.LIVE,
IREPLICADEALER.COM, JOMAESTORE.CO.UK,
KEYCLONE.ME, LUXURYSWISS.CO.UK,
NOOBWATCH.ONLINE, NOOBWATCH01.IO, ONE-PRICES.ORG,
PERFECTHORLOGE.COM, PERFECTWATCHES.IO,
PFCDEALER.ME, REGALSTRAPS.COM, REPLICASOLD.COM,
REPLICAWATCH.VIP, REPLICAWATCHCHINA.SITE,
REPLICAWATCHESSTORE.CO.UK, REPLICAWATCHPRO.NET,
REPLICAWATCHSTORE.CO.UK,
ROLEXFAKEWATCHES.CO.UK, ROLEXGRADE.COM,
ROLEXREPLICA4US.COM, SANTAME.ORG,
SCRITTORINATI.COM, SKYTIME.ME, SWISSCLOCK.ME,
SWISSLUXURY.STORE a/k/a WATCHESFILE.COM,
SWISSTOP.ORG, TIME-GALLERY.S.ORG, TMWATCH.NET,
TTW-CLONE.COM, UKWATCHES.ME, WATCHCOPY.LIVE,
WATCHESCOPY.CO.UK, WATCHESPRO.CO.UK,
WATCHGETLUXURY.COM, and WATCHSBEST.COM, each an
Individual, Partnership, or Unincorporated Association,

Defendants.

COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

Plaintiffs, Omega SA, Compagnie des Montres Longines, Francillon S.A., and Montres Breguet S.A. (collectively “Plaintiffs”)¹ hereby sue Defendants the Individuals, Partnerships, or Unincorporated Associations identified in the caption, which are set forth on Schedule “A” hereto (collectively “Defendants”). Defendants are promoting, selling, offering for sale and/or distributing goods bearing counterfeits and confusingly similar imitations of Plaintiffs’ trademarks within this district through at least the fully interactive, commercial Internet websites

¹ Plaintiffs are subsidiaries of The Swatch Group Ltd., which is one of the world’s largest watch manufacturers.

operating under the domain names set forth on Schedule “A” hereto (the “Subject Domain Names”). In support of their claims, Plaintiffs allege 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), and The All Writs Act, 28 U.S.C. § 1651(a), and Florida’s common law. Accordingly, this Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. §1367 over Plaintiffs’ 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 operate commercial websites accessible in this district, conduct business by registering and maintaining commercial Subject Domain Names registered within the United States and/or direct business activities towards consumers throughout the United States, including within the State of Florida and this district through at least the fully interactive commercial Internet websites operating under the Subject Domain Names.²

² Some Defendants use their Subject Domain Names to act as supporting domain names to direct traffic to their fully-interactive, commercial websites operating under other Subject Domain Names, from which consumers can complete purchases. Some of the supporting domain names, when accessed directly, appear to be blog style or non-operating websites; however, when visited from a search engine such as Google, visitors are redirected to the fully-interactive websites operating under other Subject Domain Names. Other supporting domain names either automatically redirect and forward to a fully-interactive, commercial Internet website operating under one of the Subject Domain Names or redirect a consumer to a fully-interactive, commercial Internet website operating under one of the Subject Domain Names upon clicking a product or link on the website. Accordingly, the web pages for the Subject Domain Names which operate as redirecting websites are included with the web pages to which those sites redirect, as shown in Composite Exhibit “4” attached hereto.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, aliens engaged in infringing activities and causing harm within this district by advertising, offering to sell, and/or selling infringing products into this district.

THE PLAINTIFFS

4. Omega SA (“Omega”) is a corporation organized under the laws of Switzerland with its principal place of business located at Jakob-Stämpfli-Strasse 96, CH-2502 Biel/Bienne, Switzerland. Omega manufactures, markets, and sells goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified below.

5. Compagnie des Montres Longines, Francillon S.A. (“Longines”) is a corporation organized and existing under the laws of Switzerland with its principal place of business located at Rue des Noyettes 8, CH-2610 St-Imier, Switzerland. Longines manufactures, markets, and sells goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified below.

6. Montres Breguet S.A. (“Breguet”) is a corporation organized and existing under the laws of Switzerland with its principal place of business located at Place de la Tour 23, CH-1344 L’Abbaye, Switzerland. Breguet manufactures, markets, and sells goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified below.

7. Plaintiffs’ trademarked goods are sold within the State of Florida, including this district, through their boutiques and at high quality and prestigious retailers which are carefully selected and satisfy certain criteria. Defendants, through the sale and offer to sell counterfeit and infringing versions of Plaintiffs’ branded products, are directly, and unfairly, competing with

each Plaintiffs' economic interests in the State of Florida and causing each Plaintiff harm within this jurisdiction.

8. Like many other famous trademark owners, Plaintiffs suffer ongoing daily and sustained violations of their respective trademark rights at the hands of counterfeiters and infringers, such as Defendants herein, who wrongfully reproduce and counterfeit Plaintiffs' individual trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits.

9. In order to combat the indivisible harm caused by the combined actions of Defendants and others engaging in similar conduct, each year Plaintiffs expend significant 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 has created an environment that require companies, such as Plaintiffs, to expend significant time and money across a wide spectrum of efforts in order to protect both consumers and themselves from the ill effects of confusion and the erosion of the goodwill connected to Plaintiffs' brands.

THE DEFENDANTS

10. Defendants operate through domain names registered with registrars in multiple countries, including the United States, and are comprised of individuals, partnerships and/or business entities of unknown makeup, whom, upon information and belief, likely reside and/or operate in foreign jurisdictions, or redistribute products from the same or similar sources in those locations. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants direct their business activities towards consumers throughout the world,

including the United States and within this district through the simultaneous operation of at least the fully interactive commercial Internet websites existing under the Subject Domain Names.

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

12. Upon information and belief, Defendants are directly and personally contributing to, inducing and engaging in the sale of counterfeit branded products as alleged herein, often times as partners, co-conspirators and/or suppliers.

13. Defendants are part of an ongoing scheme to create and maintain an illegal marketplace enterprise on the World Wide Web, which (i) confuses consumers regarding the source of Defendants' goods for profit, and (ii) expands the marketplace for illegal, counterfeit versions of Plaintiffs' branded goods while shrinking the legitimate marketplace for Plaintiffs' genuine branded goods. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill associated with Plaintiffs' famous name and associated trademarks, as well as the destruction of the legitimate market sector in which Plaintiffs operate.

14. Defendants are the past and present controlling forces behind the operation of the Internet websites operating under at least the Subject Domain Names.

15. Upon information and belief, Defendants directly engage in unfair competition with Plaintiffs by (i) advertising, offering for sale, and/or selling goods bearing and/or using counterfeits and infringements of one or more of Plaintiffs' trademarks to consumers within the United States and this district through at least the commercial websites operating under the Subject Domain Names and additional domain names and websites not yet known to Plaintiffs and (ii) creating and maintaining an illegal marketplace enterprise for the purpose of diverting

business from Plaintiffs' legitimate marketplace for its genuine goods. Defendants have purposefully directed some portion of their illegal activities towards consumers in the State of Florida through the advertisement, offer to sell and/or sale of counterfeit branded versions Plaintiffs' goods into the State, and by operating an illegal marketplace enterprise which impacts and interferes with commerce throughout the United States, including within the State of Florida.

16. Upon information and belief, Defendants have registered, established or purchased, and maintained their respective Subject Domain Names and the websites operating thereunder. Upon information and belief, many Defendants may have engaged in fraudulent conduct with respect to the registration of the Subject Domain Names by providing false and/or misleading information to their various registrars during the registration or maintenance process. Upon information and belief, Defendants have registered and/or maintained their Subject Domain Names for the sole purpose of engaging in illegal counterfeiting activities.

17. Upon information and belief, Defendants will continue to register or acquire new domain names for the purpose of selling and/or offering for sale goods bearing counterfeit and confusingly similar imitations of one or more of Plaintiffs' trademarks unless preliminarily and permanently enjoined. Moreover, upon information and belief, Defendants will continue to maintain and grow their illegal marketplace enterprise at Plaintiffs' expense unless preliminarily and permanently enjoined.

18. Defendants' entire Internet-based website businesses amount to nothing more than illegal operations established and operated in order to infringe the intellectual property rights of Plaintiffs and others.




19. Defendants' business names, i.e., the Subject Domain Names, and any other domain names and aliases used in connection with the sale of counterfeits bearing one Plaintiffs'


trademarks are essential components of Defendants' counterfeiting and infringement activities and are one of the means by which Defendants further their counterfeiting and infringement scheme and cause harm to Plaintiffs. Moreover, Defendants are using one or more of Plaintiffs' famous names and trademarks to drive Internet consumer traffic to their websites operating under the Subject Domain Names, thereby creating and increasing the value of the Subject Domain Names and decreasing the size and value of Plaintiffs' legitimate consumer marketplace at Plaintiffs' expense.

COMMON FACTUAL ALLEGATIONS

Omega's Rights

20. Omega is the owner of the following trademarks which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Omega Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
SEAMASTER	556,602	March 25, 1952	IC 014. Watches, watch parts and watch movements.
OMEGA	566,370	November 4, 1952	IC 014. Watches and parts thereof.
	578,041	July 28, 1953	IC 014. watches (including pocket watches, wrist watches with or without straps, bands or bracelets, pendant watches, calendar watches, and stopwatches) either stem-wind or automatic; clocks; chronometers, chronographs, and parts for all of the foregoing.
SPEEDMASTER	672,487	January 13, 1959	IC 014. Watches and clocks.
	734,891	July 24, 1962	IC 014. Timepieces and Parts Thereof.
	1,290,661	August 21, 1984	IC 014. Watch Cases [, Watch Chains, and Watch Stands Sold as a Unit with Watches].
DE VILLE	1,309,929	December 18, 1984	IC 014. Watches, Wrist Watches, Portfolio Watches, Pendant Watches, and Miniature Clocks; and Parts Thereof.

	5,094,915	December 6, 2016	IC 014. Horological and chronometric instruments and parts for the aforesaid goods; accessories namely, watch chains, presentation cases for watches and cases for watches.
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The Omega Marks are used in connection with the manufacture and distribution of high-quality goods in the category identified above. True and correct copies of the Certificates of Registration for the Omega Marks are attached hereto as Composite Exhibit “1.”

21. Long before the Defendants began their infringing activities complained of herein, the Omega Marks have been used by Omega in interstate commerce to identify and distinguish Omega’s high-quality goods for an extended period of time and serves as symbols of Omega’s quality, reputation and goodwill.

22. Further, Omega has expended substantial time, money and other resources developing, advertising and otherwise promoting the Omega Marks. Omega and related companies have spent millions of dollars to extensively advertise and promote products under the Omega Marks in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Omega website, www.omegawatches.com. The Omega Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).





23. Omega has extensively used, advertised and promoted the Omega Marks in the United States in connection with the sale of high-quality goods. As a result, the Omega Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality goods.

24. Omega has carefully monitored and policed the use of the Omega Marks and has never assigned or licensed the Omega Marks to any of the Defendants in this matter.

25. Genuine goods bearing the Omega Marks are widely legitimately advertised and promoted by Omega and related companies, authorized distributors and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Omega's overall marketing and consumer education efforts. Thus, Omega and related companies expend significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Omega and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Omega Marks and the goods sold thereunder.

Longines' Rights

26. Longines is the owner of the following trademarks which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Longines Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
	065,109	September 10, 1907	IC 014. Watches, parts of watches, and watchcases
	668,956	October 28, 1958	IC 014. Watches and watch movements and parts thereof
	1,328,417	April 2, 1985	IC 014. Clocks, Watches and Parts Therefor, and Jewelry and Costume Jewelry
	1,377,147	January 7, 1986	IC 014. Watches and parts therefor, and jewelry and costume jewelry.

The Longines Marks are used in connection with the manufacture and distribution of high-quality goods in the category identified above. True and correct copies of the Certificates of Registration for the Longines Marks are attached hereto as Composite Exhibit "2."

27. Long before the Defendants began their infringing activities complained of herein, the Longines Marks have been used by Longines in interstate commerce to identify and distinguish Longines' high-quality goods for an extended period of time and serves as symbols of Longines' quality, reputation and goodwill.

28. Further, Longines has expended substantial time, money and other resources developing, advertising and otherwise promoting the Longines Marks. Longines and related companies have spent millions of dollars to extensively advertise and promote products under the Longines Marks in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Longines website, www.longines.com. The Longines Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

29. Longines has extensively used, advertised and promoted the Longines Marks in the United States in connection with the sale of high-quality goods. As a result, the Longines Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality goods.

30. Longines has carefully monitored and policed the use of the Longines Marks and has never assigned or licensed the Longines Marks to any of the Defendants in this matter.

31. Genuine goods bearing the Longines Marks are widely legitimately advertised and promoted by Longines and related companies, authorized distributors and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Longines' overall marketing and consumer education efforts. Thus, Longines and related companies expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Longines and its

authorized retailers to fairly and legitimately educate consumers about the value associated with the Longines Marks and the goods sold thereunder

Breguet's Rights

32. Breguet is the owner of the following trademark which is valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Breguet Mark"):

Trademark	Registration Number	Registration Date	Class / Goods
BREGUET	3,042,405	January 10, 2006	IC 014. Watches, watch straps, watch bracelets, and parts thereof, horological instruments, namely, chronometers and chronographs

The Breguet Mark is used in connection with the manufacture and distribution of high-quality goods in the category identified above. A true and correct copy of the Certificate of Registration for the Breguet Mark is attached hereto as Composite Exhibit "3."

33. Long before the Defendants began their infringing activities complained of herein, the Breguet Mark has been used by Breguet in interstate commerce to identify and distinguish Breguet's high-quality goods for an extended period of time and serves as a symbol of Breguet's quality, reputation and goodwill.

34. Further, Breguet has expended substantial time, money and other resources developing, advertising and otherwise promoting the Breguet Mark. Breguet and related companies have spent millions of dollars to extensively advertise and promote products under the Breguet Mark in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Breguet website, www.breguet.com. The Breguet Mark qualifies as a famous mark as that term is used in 15 U.S.C. §1125(c)(1).

35. Breguet has extensively used, advertised and promoted the Breguet Mark in the United States in connection with the sale of high-quality goods. As a result, the Breguet Mark is among the most widely recognized trademarks in the United States, and the trademark has achieved secondary meaning as an identifier of high-quality goods.

36. Breguet has carefully monitored and policed the use of the Breguet Mark and has never assigned or licensed the Breguet Mark to any of the Defendants in this matter.

37. Genuine goods bearing the Breguet Mark are widely legitimately advertised and promoted by Breguet and related companies, authorized distributors and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Breguet's overall marketing and consumer education efforts. Thus, Breguet and related companies expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Breguet and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Breguet Mark and the goods sold thereunder.

Defendants' Infringing Activities

38. Upon information and belief, Defendants are promoting and advertising, distributing, selling and/or offering for sale goods in interstate commerce bearing counterfeit and infringing trademarks that are exact copies of one or more of the Omega Marks, Longines Marks, and/or Breguet Mark (the "Counterfeit Goods") through the fully interactive commercial Internet websites operating under the Subject Domain Names. True and correct copies of the web pages reflecting samples of the Internet websites operating under the Subject Domain Names displaying Plaintiffs' branded items offered for sale are attached hereto as Composite

Exhibit “4.” Specifically, upon information and belief, Defendants are using identical copies of one or more of the Omega Marks, Longines Marks, and Breguet Mark (collectively, “Plaintiffs’ Marks”) for different quality goods. Plaintiffs have used their respective Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Plaintiffs’ goods.

39. Upon information and belief, Defendants’ Counterfeit Goods are of a quality substantially different than that of Plaintiffs’ genuine goods. Defendants, upon information and belief, 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 Plaintiffs despite Defendants’ knowledge that they are without authority to use Plaintiffs’ Marks. The net effect of Defendants’ actions will cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe Defendants’ Counterfeit Goods are genuine goods originating from, associated with, and approved by Plaintiffs.

40. Defendants advertise their Counterfeit Goods for sale to the consuming public via at least the websites operating under the Subject Domain Names. In so advertising these goods, Defendants improperly and unlawfully use one or more of Plaintiffs’ Marks without Plaintiffs’ permission. Upon information and belief, the misappropriation of Plaintiffs’ advertising ideas in the form of Plaintiffs’ Marks is, in part, the proximate cause of harm to Plaintiffs.

41. As part of their overall counterfeiting and infringement scheme, Defendants are, upon information and belief, concurrently employing and benefiting from substantially similar, and often times coordinated, advertising and SEO strategies based, in large measure, upon an illegal use of counterfeits and infringements of one or more of Plaintiffs’ Marks. Specifically,

Defendants are, upon information and belief, using counterfeits and infringements of one or more of Plaintiffs' Marks in order to make their websites selling illegal goods appear more relevant and attractive to consumers searching for Plaintiffs' related 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 Plaintiffs' genuine goods. Defendants are causing individual, concurrent and indivisible harm to Plaintiffs and the consuming public by (i) depriving Plaintiffs of their right to fairly compete for space online and within search engine results and reducing the visibility of Plaintiffs' genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with Plaintiffs' Marks, (iii) increasing Plaintiffs' overall cost to market their goods and educate consumers about their brands via the Internet, and/or (iv) maintaining an illegal marketplace enterprise which perpetuates the ability of Defendants and future entrants to that marketplace to confuse consumers and harm Plaintiffs with impunity.

42. Upon information and belief, Defendants are concurrently conducting and directing their counterfeiting and infringing activities toward consumers and causing harm within this district and elsewhere throughout the United States. As a result, Defendants are defrauding Plaintiffs and the consuming public for Defendants' own benefit.

43. Upon information and belief, at all times relevant hereto, Defendants in this action had full knowledge of Plaintiffs' ownership of Plaintiffs' Marks, including their exclusive rights to use and license such intellectual property and the goodwill associated therewith.

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

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

46. 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 into believing there is a connection or association between Plaintiffs' genuine goods and Defendants' Counterfeit Goods, which there is not.

47. Further, Defendants 1-10 have registered one or more of their respective Subject Domain Names, using a mark which is nearly identical and/or confusingly similar to at least one of Plaintiffs' Marks, (the "Cybersquatted Subject Domain Names").

48. Upon information and belief, Defendants 1-10 have registered and/or used their respective Cybersquatted Subject Domain Names with the bad faith intent to profit from Plaintiffs' Marks.

49. Defendants do not have, nor have they ever had, the right or authority to use Plaintiffs' Marks. Further, Plaintiffs' Marks have never been assigned or licensed to be used on any of the websites operating under the Cybersquatted Subject Domain Names.

50. Upon information and belief, Defendants 1-10 have provided false and/or misleading contact information when applying for the registration of the Cybersquatted Subject

Domain Names, or have intentionally failed to maintain accurate contact information with respect to the registration of the Cybersquatted Subject Domain Names.

51. Upon information and belief, Defendants 1-10 have never used any of the Cybersquatted Subject Domain Names in connection with a bona fide offering of goods or services.

52. Upon information and belief, Defendants 1-10 have not made any bona fide non-commercial or fair use of Plaintiffs' Marks on a website accessible under the Cybersquatted Subject Domain Names.

53. Upon information and belief, Defendants 1-10 have intentionally incorporated Plaintiffs' Marks in their respective Cybersquatted Subject Domain Names to divert consumers looking for Plaintiff's Internet website to their own Internet websites for commercial gain.

54. Given the visibility of Defendants' various websites and the similarity of their actions, it is clear Defendants are either related or, at a minimum, cannot help but know of each other's existence and the damage likely to be caused to Plaintiffs and the overall consumer market in which they operate as a result of Defendants' concurrent actions.

55. Although some Defendants may be 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 Plaintiffs.

56. Plaintiffs have no adequate remedy at law.

57. Plaintiffs are suffering irreparable injury and have suffered substantial damages as a result of Defendants' unauthorized and wrongful use of Plaintiffs' Marks. If Defendants' counterfeiting and infringing, cybersquatting, and unfairly competitive activities, and their illegal

marketplace enterprise are not preliminarily and permanently enjoined by this Court, Plaintiffs and the consuming public will continue to be harmed.

58. The harm and damages sustained by Plaintiffs have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Counterfeit Goods and by the creation, maintenance and very existence of Defendants' illegal marketplace enterprise.

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

59. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 58 above.

60. This is an action for trademark counterfeiting and infringement against Defendants based on their use of counterfeits, copies, and/or colorable imitations of Plaintiffs' Marks in commerce in connection with the promotion, advertisement, distribution, sale and/or offering for sale of the Counterfeit Goods.

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

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

63. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damage and irreparable harm to Plaintiffs and are unjustly enriching Defendants at Plaintiffs' expense.

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

65. Plaintiffs have suffered and will continue to suffer irreparable injury due to Defendants' above described activities if Defendants are not preliminarily and permanently enjoined.

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

66. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 58 above.

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

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

69. Defendants, upon information and belief, have used in connection with their advertisement, offer for sale, and sale of the Counterfeit Goods, false designations of origin and false descriptions and representations, including words or other symbols and trade dress which

tend to falsely describe or represent such goods and have caused such goods to enter into commerce with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Plaintiffs' detriment.

70. Defendants have authorized infringing uses of one or more of Plaintiffs' Marks in Defendants' advertisement and promotion of their counterfeit and infringing branded goods.

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

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

73. Plaintiffs have no adequate remedy at law, and have sustained indivisible injury and damage caused by Defendants' concurrent conduct. Absent an entry of an injunction by this Court, Plaintiffs will continue to suffer irreparable injury to their goodwill and business reputations, 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 Defendants 1-10 only)

74. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 58 above.

75. Upon information and belief, Defendants 1-10 acted with the bad faith intent to profit from Plaintiffs' Marks and the goodwill associated with Plaintiffs' Marks by registering and using the Cybersquatted Subject Domain Names.

76. Plaintiffs' Marks were distinctive and famous at the time Defendants 1-10 registered their respective Cybersquatted Subject Domain Names.

77. The Cybersquatted Subject Domain Names are identical to, confusingly similar to or dilutive of one or more of Plaintiffs' Marks.

78. Defendants 1-10's conduct is done with knowledge and constitutes a willful violation of Plaintiffs' rights in Plaintiffs' Marks. At a minimum, Defendants 1-10's conduct constitutes reckless disregard for and willful blindness to Plaintiffs' rights.

79. Defendants 1-10's actions constitute cybersquatting in violation of §43(d) of the Lanham Act, 15 U.S.C. §1125(d).

80. Plaintiffs have no adequate remedy at law and are suffering irreparable injury and damages as a result of Defendants' actions.

COUNT IV - COMMON LAW UNFAIR COMPETITION

81. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 58 above.

82. This is an action against Defendants based on their (i) promotion, advertisement, distribution, sale and/or offering for sale of goods bearing and/or using marks which are virtually identical, both visually and phonetically, to Plaintiffs' Marks and (ii) creation and maintenance of an illegal, ongoing marketplace enterprise operating in parallel to the legitimate marketplace in which Plaintiffs sells their genuine goods, in violation of Florida's common law of unfair competition.

83. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale, and/or distributing watches and related goods bearing counterfeits and infringements of one or more of Plaintiffs' Marks. Defendants are also using counterfeits and

infringements of one or more of Plaintiffs' Marks to unfairly compete with Plaintiffs for (i) space in search engine results across an array of search terms and/or (ii) visibility on the World Wide Web.

84. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake, and deception among members of the consuming public as to the origin and quality of Defendants' products by their use of Plaintiffs' Marks.

85. Plaintiffs have no adequate remedy at law and are suffering irreparable injury and damages as a result of Defendants' actions.

COUNT V - COMMON LAW TRADEMARK INFRINGEMENT

86. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 58 above.

87. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and/or sale of their Counterfeit Goods bearing one or more of Plaintiffs' Marks. Plaintiffs are the owners of all common law rights in and to Plaintiffs' Marks.

88. Specifically, Defendants, upon information and belief, are promoting and otherwise advertising, distributing, offering for sale, and selling goods bearing infringements of one or more of Plaintiffs' Marks.

89. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake and deception among members of the consuming public as to the origin and quality of Defendants' Counterfeit Goods bearing one or more of Plaintiffs' Marks.

90. Plaintiffs have no adequate remedy at law and are suffering irreparable injury and damages as a result of Defendants' actions

PRAYER FOR RELIEF

91. WHEREFORE, Plaintiffs demand judgment on all Counts of this Complaint and an award of equitable relief and monetary relief against Defendants as follows:

a. Entry of a temporary restraining order, as well as preliminary and permanent injunctions pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or diluting Plaintiffs' Marks; from using Plaintiffs' 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 design 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 Plaintiffs; from falsely representing themselves as being connected with Plaintiffs, 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 Plaintiffs; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of Plaintiffs' 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 Plaintiffs, or in any way endorsed by Plaintiffs and from offering such goods in commerce; from engaging in search engine optimization

strategies using colorable imitations of Plaintiffs' names or trademarks; and from otherwise unfairly competing with Plaintiffs.

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, enjoining Defendants and all third parties with actual notice of the injunction from participating in, including providing financial services, technical services or other support to, the Defendants in connection with the sale and distribution of non-genuine goods bearing counterfeits of Plaintiffs' Marks.

c. Entry of an order that, upon Plaintiff's request, those acting in concert or participation with Defendants who have notice of the injunction, as service providers cease hosting, facilitating access to, or providing any supporting service to any and all domain names, including but not limited to the Subject Domain Names, and websites through which Defendants engage in the promotion, offering for sale and/or sale of goods using counterfeits and/or infringements of Plaintiffs' Marks.

d. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, that upon Plaintiffs' request, 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 Plaintiffs' Marks, to the IP addresses where the associated websites are hosted.

e. 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 Plaintiffs' election, transferring the Subject Domain Names and any other domain names used by Defendants to engage in their counterfeiting of Plaintiffs' Marks at issue to Plaintiffs' control so they may no longer be used for illegal purposes.

f. Entry of an order, pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, authorizing Plaintiffs to request any Internet search engines which are provided with notice of the order, to permanently disable, de-index or delist all specific URLs of the Subject Domain Names identified by Plaintiffs which are being used by Defendants in connection with the offering for sale or sale of goods bearing counterfeits of Plaintiffs' Marks based upon Defendants' unlawful activities being conducted via the Subject Domain Names as a whole.

g. Entry of an order requiring each Defendant, its agent(s) or assign(s), to assign all rights, title, and interest, to its Subject Domain Name(s) to Plaintiffs and, if within five (5) days of entry of such order any Defendant fails to make such an assignment, the Court order the act to be done by another person appointed by the Court at any non-complying Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

h. Entry of an order requiring each Defendant, its 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 any Defendant fails to make such a written instruction, the Court order the act to be done by another person appointed by the Court at any non-complying Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

i. Entry of an order requiring each Defendant, its agent(s) or assign(s), to instruct all of its service providers in writing to permanently cease providing any services to the Defendant in connection with any and all domain names, including but not limited to the Subject Domain Names, and websites through which the Defendant engages in the promotion, offering for sale and/or sale of goods using counterfeits and/or infringements of Plaintiffs' Marks, and, if within five (5) days of entry of such order any Defendant fails to make such a written instruction, the Court order the act to be done by another person appointed by the Court at any non-complying Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a)

j. Entry of an order requiring Defendants to account to and pay Plaintiffs for all profits and damages resulting from Defendants' trademark counterfeiting and infringing activities and that the award to Plaintiffs be trebled, as provided for under 15 U.S.C. §1117, or, at Plaintiffs' election with respect to Count I, that Plaintiffs 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.

k. Entry of an order requiring Defendants 1-10 to account to and pay Plaintiffs for all profits and damages resulting from Defendants 1-10's cybersquatting activities and that the award to Plaintiffs be trebled, as provided for under 15 U.S.C. §1117, or, at Plaintiffs' election with respect to Count III, that Plaintiffs be awarded statutory damages from Defendants 1-10 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.

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

- m. Entry of an award of pre-judgment interest on the judgment amount.
- n. Entry of an order for any further relief as the Court may deem just and

proper.

DATED: October 31, 2019.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan/**

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SCHEDULE A
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME

Defendant Number	Defendant / Subject Domain Name
1	bestreplicaomega.com
1	cheapest-watches.com
1	loveomega.net
1	zkanup.com
1	copyomegawatches.com
1	omegalover.com
1	seamasteromega.com
1	swissomega1848.com
1	omegareplicawatches.com
1	omegarolexwatches.com
1	omegawatches.sale
1	omegawatches1.com
1	omegawatchesoutlet.com
1	rolexomega.com
1	speedmasteromega.com
1	tcuir.com
1	devilleomega.com
1	longineswatch.net
1	omegawatches.site
1	seamaster.cc
1	fakelongines.com
1	longinesonline.com
1	longinesrealty.com
1	longineswatches.xyz
1	newomegawatches.com
1	omega2010.com
1	omegadeville.org
1	omegarolexreplica.com
1	repicalongines.com
1	repicalongineswatches.com
1	repicalongineswatches.me
1	replica-omega.com
1	replicaomega.net
1	replicaomegawatch.com
1	speedomega.com
1	speedseamaster.com
1	watchlongines.com

1	12gg.info
1	bcre.cc
1	bestreplicawatches.xyz
1	bestswiss.me
1	choosereplicawatches.com
1	finereplicawatches.net
1	getreplicawatch.com
1	lovereplicawatches.com
1	onsalereplicawatches.net
1	orderreplicawatch.com
1	protexusnow.com
1	replicaspecial.net
1	replicawatchesbest.com
1	replicawatchesbrand.net
1	replicawatcheson.com
1	sitecdesign.com
1	swisslogines.com
1	watchesoutlet.cc
1	watchesreplicaoem.com
1	watchesstoretime.com
1	zggjbb.com
2	bestbreguet.com
2	tipreplicas.com
2	perfectwatches.me
3	callomega.cc
3	ppfake.com
3	clend.net
3	facteb.org
4	copyomega.co.uk
4	bestwatchuse.com
4	bestwatches.io
4	abestwatches.com
5	iomegareplica.com
5	watches.is
5	perpetualomegawatch.co.uk
5	radoreplica.com
6	myseamasters.com
7	omegadeville.online
7	watchesreplic.xyz
7	omedeville.co
7	omegaseamaster.co
7	bestwatchestop.com
7	seamasterwatch.org

7	azequipmentny.com
7	b2iwatch.me
7	bestmenwatches.me
7	bestwatchreplica.me
7	buywatch.me
7	candy-watches.org
7	clemontwatches.com
7	couplewatches.me
7	ewatchme.com
7	fakeomegawatches.com
7	fakewatchespro.com
7	farmcold.com
7	imagewatches.org
7	imahnahome.com
7	my-watches.pro
7	patekwatch.cc
7	scardclub.com
7	watch2shop.com
7	watcheslove.org
7	watchesreplicatop.org
7	watchessiuss.com
7	watches-well.com
7	webuildbc.com
7	wine2watch.org
8	omegareplicasale.co.uk
8	ciwatches.com
8	grwatches.co.uk
8	bestreplicauk.co.uk
8	agwatch.co.uk
8	agwatches.co.uk
8	agwatches.uk
9	omegawatchesreplica.com
9	replicawatches.nu
10	romegalex.com
11	77model.net
12	aaawatches.co.uk
13	ahotwatch.com
14	incadinc.com
14	anyswisswatch.com
14	hellorolex.in
14	ok-replicas.co
14	paybestwatch01.me
14	mowatches.in

14	amazing-clock.me
14	fine-watches.me
14	joinclock.com
14	trustytime.me
14	anycopy.org
14	switz-watch.com
14	lessgauss.com
14	repwatch.com
14	swisstimes.net
14	uswisssale.com
14	watchthewild.net
14	cheapmenswatches.me
14	mrepwatch.com
14	coswatch.me
14	bestswissreplica.com
14	escreplica.com
14	hellopanerai.com
14	topclonewatch.com
15	anyreplicawatches.org
16	awatch.io
16	fake-watches.me
16	perfectreplica.me
17	bestluxury.co.uk
18	biao.co.uk
19	brandwatchess.com
20	breitlingwatches.me
21	buciam.com
22	budgetreplicas.com
23	buycopywatch.com
24	buyluxwatcheslife.com
25	cheapsalewatch.com
26	chinanoobwatch01.me
27	clockreplica.com
28	cnwatchshow.com
29	eredyshop.me
29	coastoptics.me
30	seamwatches.com
30	kakawatches.com
30	functorr.org
30	crconstruction.net
31	fashionwatchtime.com
32	fjwatches.co.uk
32	noobwristwatches.com

33	gznobwatch.com
33	hollywatch.me
34	hontwatch.me
35	hotwatchs.com
36	idolwatches.live
37	ireplicadealer.com
38	jomaestore.co.uk
39	keyclone.me
40	luxuryswiss.co.uk
41	noobwatch.online
42	noobwatch01.io
43	one-prices.org
44	perfecthorloge.com
45	perfectwatches.io
46	pfcdealer.me
47	regalstraps.com
48	replicasold.com
49	replicawatch.vip
50	replicawatchchina.site
51	replicawatchesstore.co.uk
52	replicawatchpro.net
53	replicawatchstore.co.uk
54	rolexfakewatches.co.uk
55	rolexgrade.com
56	rolexreplica4us.com
57	santame.org
58	scrittorinati.com
59	skytime.me
60	swissclock.me
61	swissluxury.store
61	watchesfile.com
62	swisstop.org
63	time-gallerys.org
64	tmwatch.net
65	ttw-clone.com
66	ukwatches.me
67	watchcopy.live
68	watchescopy.co.uk
69	watchespro.co.uk
70	watchgetluxury.com
71	watchesbest.com