

ARREST / NOTICE TO APPEAR

1 Arrest  
2 N.T.A.  
3 Request for Warrant  
4 Request for Capias  
5 Juvenile Referral

3 JUVENILE

OBTS Number	Agency ORI Number <b>0500200</b>		Agency Name <b>Boca Raton Police Department</b>	Agency Report Number (N.T.A.'s only) <b>3   2   2019-015800</b>
Charge Type: Check as many as apply	<input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony	<input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor	<input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other	If Weapon Seized Enter Type: <b>None/not Applicable</b>
Location of Arrest (Including Name of Business)			Location of Offense (Business Name, Address) <b>6000 GLADES RD, BOCA RATON, FL</b>	
Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date

Name (Last, First, Middle) <b>BENAYON, TALI</b>		Alias: <b>TALIA BENAYON, 9/1/69</b>		
Race W - White B - Black O - Oriental/Asian	Sex <b>F</b>	Date of Birth <b>09/01/1969</b>	Height <b>5'02</b>	Weight <b>130</b>
Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)		Marital Status <b>S</b>	Religion	Complexion <b>BROWN</b>
Local Address (Street, Apt. Number) <b>12770 HYLAND CIR, BOCA RATON, FL 33428</b>		(City)	(State)	(Zip)
Permanent Address (Street, Apt. Number) <b>12770 HYLAND CIR, BOCA RATON, FL 33428</b>		(City)	(State)	(Zip)
Business Address (Name, Street) <b>HAMSA SHOES, 6000 W GLADES RD</b>		(City)	(State)	(Zip)
D/L Number, State <b>B550800698211 / FL</b>	Soc. Sec. Number	INS Number	Place of Birth (City, State)	Citizenship <b>IS</b>

Co-Defendant Name (Last, First, Middle)	Race <b>W</b>	Sex <b>F</b>	Date of Birth <b>11/11/86</b>	<input type="checkbox"/> 1. Arrested <input type="checkbox"/> 2. At Large <input type="checkbox"/> 3. Felony <input type="checkbox"/> 4. Misdemeanor <input type="checkbox"/> 5. Juvenile
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<input type="checkbox"/> Parent <input checked="" type="checkbox"/> Legal Custodian	Name (Last, First, Middle)	Residence Phone
Address (Street, Apt. Number)		Business Phone
Notified by (Name)	Date	Time
Released To (Name)	Relationship	Date
The above address was provided by <input type="checkbox"/> defendant and/or <input type="checkbox"/> defendant's parents. The child and/or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address.		School Attended
<input type="checkbox"/> Yes, by <input type="checkbox"/> No	Property Crime? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Description of Property

Drug Activity N. No P. Possess	S. Sell B. Buy T. Traffic	R. Smuggle D. Deliver E. Use	K. Disperses/ Distribute	M. Manufacture/ Produce/ Cultivate	Z. Other	Drug Type N. N/A A. Amphetamine	B. Barbiturate C. Cocaine E. Heroin	H. Hallucinogen M. Marijuana O. Opium/Deriv.	P. Paraphernalia/ Equipment S. Synthetic	U. Unknown Z. Other
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Charge Description <b>SELLING OR OFFERING FOR SALE COUNTERFEIT GOODS</b>	Statute Violation Number <b>831.032(3A1)</b>	Violation of ORD #
Drug Activity	Drug Type <b>N</b>	Amount / Unit
Offense # <b>2019015800</b>	Counts <b>1</b>	Domestic Violence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N

Charge Description	Statute Violation Number	Violation of ORD #
Drug Activity	Drug Type	Amount / Unit
Offense #	Counts	Domestic Violence <input type="checkbox"/> Y <input type="checkbox"/> N

Charge Description	Statute Violation Number	Violation of ORD #
Drug Activity	Drug Type	Amount / Unit
Offense #	Counts	Domestic Violence <input type="checkbox"/> Y <input type="checkbox"/> N

Health / Apparent Physical Condition of Defendant	Any knowledge of the following: <input type="checkbox"/> Mental <input type="checkbox"/> Escape Risk <input type="checkbox"/> Medication <input type="checkbox"/> Deformities <input type="checkbox"/> Injuries Explain.
Check which applies: <input type="checkbox"/> Released O.R. <input type="checkbox"/> Posted Bond	<input type="checkbox"/> Released to Parent/Guardian <input type="checkbox"/> P.O.F. County Jail <input type="checkbox"/> South County Mental Health
Transported By	Date Transported / Time Transported / Other

<input type="checkbox"/> INSTRUCTION NO. 1 - Mandatory appearance in court	Location (Court, Room) <b>South County 200 W Atlantic Ave Delray Beach, FL 33444</b>
<input checked="" type="checkbox"/> INSTRUCTION NO. 2 - You need not appear in Court but must comply with instructions on Page 2.	Court Date and Time
I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS NOTICE TO APPEAR, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.	
Signature of Defendant (for Juvenile and Parent/Custodian)	Date Signed

HOLD for Other Agency	Signature of Arresting Officer 	Name Verification (Printed by Arrestee)
<input type="checkbox"/> Dangerous <input type="checkbox"/> Suicidal	Name of Arresting Officer (Print) <b>PAYNE, T. M.</b>	(PRINT)
Intake Deputy I.D. #	Pouch #	Transferring Officer I.D. #
Witness here if subject signed with an "X"		PAGE <b>1 OF 1</b>

COURT  STATE ATTORNEY  AGENCY  CENTRAL RECORDS  JAIL  CRIME ANALYSIS  P. I. O.  DEFENDANT

20CF5540A

PROBABLE CAUSE AFFIDAVIT

1. Arrest  
2. N.T.A.  
3. Request for Warrant  
4. Request for Capias

**1** JUVENILE

OBTs Number		Agency ORI Number <b>FL 0500200</b>		Agency Name <b>BOCA RATON POLICE DEPARTMENT</b>		Agency Report Number <b>3   2   2019-015800</b>	
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Charge Type: Check as many as apply.	<input checked="" type="checkbox"/> 1. Felony	<input type="checkbox"/> 3. Misdemeanor	<input type="checkbox"/> 5. Ordinance	Special Notes:
	<input type="checkbox"/> 2. Traffic Felony	<input type="checkbox"/> 4. Traffic Misdemeanor	<input type="checkbox"/> 6. Other	

Name (Last, First, Middle) <b>BENAYON, TALIA</b>	Alias	Race <b>W</b>	Sex <b>F</b>	Date of Birth <b>09/01/1969</b>
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Charge Description <b>831.032(2) COUNTERFEITING PRIVATE LABELS</b>	Charge Description
Charge Description	Charge Description


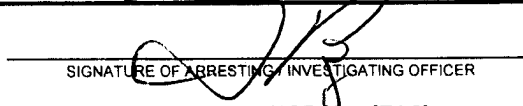
Victim's Name (Last, First, Middle) <b>LVMH,</b>	Race	Sex	Date of Birth
Local Address (Street, Apt. Number) <b>19 E 57TH ST, NEW YORK, NY</b>	(City)	(State)	(Zip)
Business Address (Name, Street) <b>CORPORATE US HEADQUARTERS</b>	(City)	(State)	(Zip)

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.  
 The Person taken into custody ...  
 committed the below acts in my presence.  was observed by \_\_\_\_\_ who told \_\_\_\_\_ that he/she saw the arrested person commit the below acts.  
 confessed to \_\_\_\_\_ admitting to the below facts.  was found to have committed the below acts, resulting from my (described) investigation.  
 On the **10** day of **March**, **2020** at **14:48** (Specifically include facts constituting cause for arrest.)

On 09/30/19, I received an anonymous tip in reference to a store in the Town Center Mall that appeared to be selling counterfeit merchandise. The complaint alleged that two women were conducting high pressure sales of "tons of fake Louis Vuitton's and lots of brands," at a store called Hamsa Boutique. I reached out via email to Heather McDonald from Baker Law in New York. Their firm represents several major trademarked corporations to include Louis Vuitton. Upon a return phone call from McDonald, she referred me to A Action Investigations, Justin and Eric Berger. She explained that they were contracted investigators who specialized in counterfeit merchandise investigations. They represented LVMH, which is the world's largest luxury goods conglomerate. They own over 70 brands to include Louis Vuitton, Dior, Fendi, Marc Jacobs, Tiffany&Co, Givenchy, and many others.

On 11/19/19, Det. Sgt. Shifflett and I met with Eric and Justin Berger at their office in Hollywood. We discussed Hamsa Boutique. The Bergers explained they were very familiar with Hamsa Boutique and had several issues with them in the past. Most recently, on 7/13/18, they served (via hand delivery) the owners/staff of the store a cease and desist demand letter on behalf of Louis Vuitton and Chanel to stop all sales of items that infringed on their trademarks and copyrights. The staff/owners refused to sign the letters. Berger provided me with copies of the letters. We researched the store at the Town Center Mall and learned that they had moved the store to a different location in the mall and had changed the name to Hamsa Shoes. It was still being run by the same owner, Talia Benayon (via Sunbiz), and had at least one of the same employees, \_\_\_\_\_

On 11/20/19, Ofc. Campo, while patrolling the Town Center Mall, was approached by an anonymous sales associate of a store who complained that he had personal knowledge of Hamsa Shoes (suite # 1088) selling counterfeit merchandise marked Gucci, Fendi, Louis Vuitton, etc. He showed Ofc. Campo photos he had taken of the rear stock room where he

SWORN AND SUBSCRIBED BEFORE ME  <b>SHIFFLETT, KELLY D.</b> NOTARY PUBLIC / CLERK OF COURT / OFFICER (F.S.S. 117.10) <b>03/24/2020</b> DATE	SIGNATURE OF ARRESTING / INVESTIGATING OFFICER  <b>PAYNE, TERRENCE M. (716)</b> NAME OF OFFICER (PLEASE PRINT) <b>03/24/2020</b> DATE
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PROBABLE CAUSE AFFIDAVIT SUPPLEMENT		1. Arrest 2. N.T.A.	3. Request for Warrant 4. Request for Capias	<b>1</b>	JUVENILE
OBTS Number	Agency ORI Number <b>FL 0500200</b>		Agency Name <b>BOCA RATON POLICE DEPARTMENT</b>		Agency Report Number <b>3   2   2019-015800</b>
Charge Type: Check as many as apply. <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 6. Other				Special Notes:	
Name (Last, First, Middle) <b>BENAYON, TALIA</b>			Alias	Race <b>W</b>	Sex <b>F</b>
			Date of Birth <b>09/01/1969</b>		
P R O B A B L E  C A U S E  S T A T E M E N T	<p>had accompanied a Hamsa Shoes employees on breaks multiple times. He said the employees are aware the products are counterfeit and are instructed never to bring the merchandise to the sales floor, only to show the merchandise in the stock room upon request of a customer. Based on the two independent accounts, I contacted A Action Investigations and we discussed doing a controlled buy of products from Hamsa Shoes to determine if they were selling counterfeit merchandise.</p> <p>On 12/17/19, Eric Berger, Aileen Berger, and Sarina Caskill from A Action Investigations met with Det. Sgt. Shifflett and me at the Town Center Mall. We entered the Mall together and Aileen and Sarina went to Hamsa Shoes to conduct a buy of possible counterfeit clothing. A counterfeit Louis Vuitton jacket was purchased for \$280.00 (plus tax). Aileen explained that she had over 20 years investigating counterfeit items and she was positive the jacket was not an authentic Louis Vuitton. Eric took photos of the jacket and sent them to the Criminal Enforcement Manager for Louis Vuitton, Eric Lacoma for verification. I took possession of the jacket and placed it into BRPD evidence. It should be noted that the tag on the jacket had Chinese markings and writing. Eric texted me the receipt from the transaction.</p> <p>On 12/18/19, I received a call from Justin Berger and he informed me that the photos of the jacket from the controlled buy had been verified as counterfeit by Louis Vuitton Criminal Enforcement Manager Eric Lacoma from the photos that were sent to him. Justin emailed me the affidavit of authenticity explaining the inconsistencies, quality, packaging, and other factors that showed the jacket was not a real Louis Vuitton. The jacket had a retail value of \$2,550.00. The letter was added to BRPD Evidence.</p> <p>On 12/31/19, a search warrant was drafted and signed by the Honorable Judge Rosemarie Scher for Hamsa Shoes, 6000 W Glades Rd, suite #1088. The warrant was executed at approximately 1300 hrs. by myself, Det. Randa White, Det. Amanda Alvarez, Det. Sgt. Kelly Shifflett and CSI Colleen Cassandra. I initially met with an employee, Daniela Mauquer. I read her the search warrant and explained why we were there. Before the business was searched, I sat down with Mauquer and she gave me a taped sworn statement to her employment at the store. She was read her Miranda Rights from a pre-printed card, she stated she understood, and was willing to speak to me. The interview was audio recorded.</p> <p>Mauquer explained that she was at the store "helping out" and didn't feel like she was working. She had only been working at the store a few weeks, explaining that she felt like she had been working there for around 2 weeks. She said Talia, [REDACTED], and Jesica were working there besides herself. Mauquer wanted to clarify the difference that she was not "working there" but "helping out." I asked her who was in charge and she said that both [REDACTED] and Talia were in charge, but "more Talia than [REDACTED]" was in charge. She explained that many of the items in the store didn't have prices and in order to sell those unpriced items, she has to send a picture (via cellphone) to [REDACTED] or Talia to ask</p>				
A D M I N I S T R A T I V E	SWORN AND SUBSCRIBED BEFORE ME  <b>SHIFFLETT, KELLY D</b> NOTARY PUBLIC / CLERK OF COURT / OFFICER (F.S.S. 117.10)		SIGNATURE OF ARRESTING / INVESTIGATING OFFICER  <b>PAYNE, TERENCE M (716)</b> NAME OF OFFICER (PLEASE PRINT)		
03/24/2020 DATE		03/24/2020 DATE			
PAGE 2 OF 8					

OBTIS Number		PROBABLE CAUSE AFFIDAVIT SUPPLEMENT		1. Arrest	3. Request for Warrant	<b>1</b>	JUVENILE
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<b>FL 0500200</b>		<b>BOCA RATON POLICE DEPARTMENT</b>		Agency Report Number			
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<b>BENAYON, TALIA</b>				<b>W</b>	<b>F</b>	<b>09/01/1969</b>	


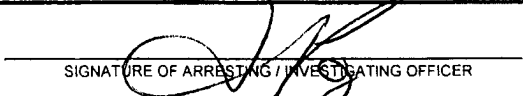
for a price. She said that [REDACTED] or Talia would text her back a price that she could sell the item for. She would text them both in case one didn't respond.

I then talked about the purpose of the warrant again and said we were there for Fendi products. I asked if she knew what Fendi products were and she said yes. I asked where the Fendi products were and she said "in the back." I then asked specifically, "To your knowledge, are those real Fendi products?" which she replied, "No... I don't know." I asked if there was any Fendi clothing in the main showroom and she said no. I asked if she knew why there were no Fendi products on the showroom floor and she didn't know why. I asked her if a customer comes in the store, how they would know to ask for Fendi or other name brands if they weren't on display and she said she didn't know. I asked how [REDACTED] or Talia would sell any of the items in the back and Mauquer said that a customer would ask for that type of product and they would get it from the back. I asked if it was a kind of "secret code word like understanding" and she shook her head yes. I asked if she thought it was strange for people/customers to ask for things from the back and she said "uh huh (yes indication)." I asked her what she did when someone came in and asked to "see something from the back" and she said she would then call [REDACTED]. She said [REDACTED] would ask who the person was and what they wanted. Mauquer explained that she had done a few of the back room sales but wanted to clarify that it was something that she "didn't want to be involved in." She said that if her cellphone conversations (with respect to the back room sales/conversations with [REDACTED] or Talia) were recorded, we would see that she was not comfortable with any of it. I asked if she thought the Fendi, Gucci, and products in the back were real or fake and she preferred not to answer. I asked how many times she had sold any items from the back and she said she sold one that morning and one the day before. I asked if Talia and/or [REDACTED] were there, if she was allowed to do any backroom sales and she said no. I asked if she had ever sold anything from the back without checking with Talia and [REDACTED] and she said "no no no." She had to call for pricing. She reconfirmed that Talia and [REDACTED] were in charge of the business. She said that when Talia or [REDACTED] were there, they did the backroom sales. Please see the recorded statement for full details.

The search warrant was conducted and in total there were items from Fendi, Gucci, Chanel, Burberry, Yves St. Laurent, Apple, Christian Dior, Louis Vuitton, Cartier, Warner Brothers, Versace, Rolex, Ajrmes, Hermes, Michael Kors, Kate Spade, Nike, Balenciaga, Tommy Hilfiger, Kenzo, Givenchy, Calvin Klein, Van Cleef, Prada, Dolce&Gabana, and Ray Ban taken from the business. There were over 1,800 items seized from the store. Every item collected was deemed counterfeit by A Action Investigations.

On 01/16/20, Det. Sgt. Shifflett and I met with [REDACTED] Tony, and their attorney, Jared Bassola at his office in Coral Springs to obtain a full statement from her. This is a summary of the meeting:

[REDACTED] was read her Miranda Rights via a pre-written card which she stated she understood,

ADMINISTRATIVE	SWORN AND SUBSCRIBED BEFORE ME .		
		<b>SHIFFLETT, KELLIE</b>	SIGNATURE OF ARRESTING / INVESTIGATING OFFICER
		NOTARY PUBLIC / CLERK OF COURT / OFFICER (F.S.S. 117.10)	<b>PAYNE, TERENCE M (716)</b>
		<b>03/24/2020</b>	NAME OF OFFICER (PLEASE PRINT)
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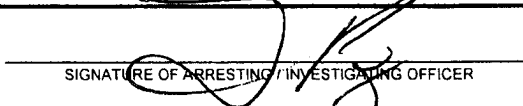
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signed, and was willing to speak to me. Her Attorney, Basola, was present the entire time. [REDACTED], Tony, was present as well as he was going to assist in any language/comprehension issues as [REDACTED] spoke English but her native language was Turkish.

[REDACTED] explained that she worked for Hamsa Shoes and/or Hamsa Boutique for over a year. She had worked at a Kiosk at the mall when Talia approached her and offered her a job. They didn't know each other prior. Talia told her that she wanted to hire her as she was a good sales person. I asked if Talia was in charge of Hamsa and [REDACTED] replied, "Yes, of course...she is the owner." I asked if it was just her and she said, "I think her only...and her brother, maybe, I'm not sure about it. I don't know exactly but Talia should be the owner." [REDACTED] reaffirmed that she believed Talia was the owner as she was hired by her and most everyone else was too. Talia did all of the "hiring and firing" per [REDACTED]. Talia trained [REDACTED] on the job and processes. I asked [REDACTED] about the counterfeit items and how she became aware and she explained that Talia put some counterfeit items in the display window and [REDACTED] said in her country (Turkey) that was normal, "not a big deal." [REDACTED] started selling the counterfeit items. At some point, two guys came into the store and told [REDACTED] that they were not allowed to put the items outside and gave [REDACTED] a paper. She called Talia and Talia told [REDACTED] to remove the items from the front. [REDACTED] said the two guys told her to take the items and hide them and not to put them on display. [REDACTED] didn't know who the guys were but she said they represented Louis Vuitton or Chanel, she wasn't sure. [REDACTED] explained that after Hamsa Boutique moved and became Hamsa Shoes, they started selling the items again after consolidating the two stores into one (Hamsa Shoes). [REDACTED] didn't know the process of how Talia got the items. She said she never organized the items (17:26). She explained that most of their sales were from prior customers or people who they knew or sold fake items or who bought other products from them. I asked who made the decision on what to sell the item for (20:37) and she said "the store owner." [REDACTED] explained that she was shown/trained by Talia on how to price the items and what the minimums were for each type of product. She said she could negotiate the price as long as the minimum price was met. I then showed [REDACTED] the cease and desist orders from Chanel and Louis Vuitton (29:06) from the two guys (the Bergers) and [REDACTED] said she didn't read or sign for the letters, she just gave them to Talia who told her it was "ok." I explained the letters and their meaning. I then asked how other employees sold the counterfeit items and she said "same as me." I asked if the other employees got to pick the prices (30:05) and she said they "probably asked Talia." She said the employees knew the "set" price of the items but may have or "probably checked with Talia."

We discussed ordering of products again. She told me that she knew of a shipment that was ordered by UPS (1:02:20) and "they got caught...US Customs...and I don't know how they handled that one but they said don't worry about it." She knew the items were fake and I told her she was not allowed to sell fake stuff and she acknowledged it. [REDACTED] said Talia sets the price and she was the one who trained all of the employees. I asked if Daniela was allowed to make a sale without checking with Talia and [REDACTED] said she did

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need to check with Talia first. [REDACTED] said if Talia didn't answer the phone when someone needed a price, they would ask her because she had been there the longest. But, [REDACTED] explained, the new people had to check with her or Talia on the prices of all the items, "not just the fake stuff."

When training new employees, [REDACTED] said she and Talia were the ones who explained how the sales worked and how to ask for prices and/or how to sell the fake items. They told the new employees it was not a big deal. I then asked about designer logos that we found in the search warrant and asked if she ever saw anyone glue on the logos onto clothing or create the fake items. She said they do "custom everything in the store." I specifically spoke about the several cloth appliques with the "C" Chanel logo on them (which she remembered) and I asked if they glue them on shirts or jackets and she said "Yes, is that a problem?" I asked if she made custom jackets that "looked like Louis Vuitton" and she said "Yes, looks like it...not me...someone she has it...they just...glue it on." [REDACTED] didn't know who did it and said Talia gave (them) the logos and they didn't do it in the store. I told [REDACTED] we found emblems, appliques, patches, and other material to make fake items and she knew it was being done, but said to ask Talia who was actually doing it. [REDACTED] saw Talia glue and or make/create the fake items at the store (at first) "one or two times." But then said she saw Talia "one time." (17:45) [REDACTED] described a black ball type purse that Talia made (EVIDENCE PHOTO #279).

We then discussed the day after the search warrant. [REDACTED] said that she felt Talia was scared to come to the store right after (the warrant) and Talia eventually came three days later. Talia told everyone to calm down, don't worry. [REDACTED] said Talia said, "As a store owner, anything that is going to happen is going to happen to me, you guys are just working here. Until we get a letter from the Detective or someone, we do not talk about this." [REDACTED] said she and Jessica were there for that conversation. We discussed what happened the day of the search warrant. [REDACTED] said she was scared to go to the store when she saw cops there. [REDACTED] said Talia called her (as Talia was watching on her remote camera system) and told [REDACTED] to go into the store and say that "all of the stuff was yours ([REDACTED]) and the owner of the store has nothing to do with this." [REDACTED] was told to tell the police that she was selling the fake stuff on the side without Talia's knowledge. [REDACTED] contemplated the lie and was going to help Talia. [REDACTED] knew Talia had this kind of problem before with fake stuff. [REDACTED] called her husband and told him what Talia wanted. Tony called Talia and asked her what was going on at the store. Talia told Tony that this had happened to her before and she just got an attorney and nothing happened and nothing's going to happen to her ([REDACTED]). "That way we can keep the doors open to the store and she can have a job." Tony called [REDACTED] and told her not to take the blame. After [REDACTED] left the store (while police were serving the search warrant), [REDACTED] spoke to Talia who told her not to worry, that they (police) won't do anything to you or anyone else, just lock the store up. Tony called Talia later and Talia asked Tony again for [REDACTED] to take the blame and not to talk. Tony said that Talia told [REDACTED] that if [REDACTED] didn't take the blame, then Talia could find someone who needed money and she would pay

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<p>PAGE <b>5 OF 8</b></p>	

Agency ORI Number: **FL 0500200** Agency Name: **BOCA RATON POLICE DEPARTMENT** Agency Report Number: **3 | 2 | 2019-015800**

Charge Type:  1. Felony  3. Misdemeanor  5. Ordinance  
 2. Traffic Felony  4. Traffic Misdemeanor  6. Other  
 Special Notes: \_\_\_\_\_

Name (Last, First, Middle): **BENAYON, TALIA** Alias: \_\_\_\_\_ Race: **W** Sex: **F** Date of Birth: **09/01/1969**

them to take the blame for her. (13:00)

As we went back and forth over things she forgot, or previously omitted, she mentioned that on one occasion, Talia had UPS ship a box full of fake purses to [REDACTED]'s house as Talia had a shipment seized by customs and was afraid to ship products to her usual addresses (22:00). Talia gave [REDACTED] a money order and told her to put it by her door so the UPS guy could deliver the shipment and take the payment. [REDACTED] said Talia asked her to do that because Talia didn't want to use her personal address after being caught. [REDACTED] took the box to the store where it was opened and organized to be sold. [REDACTED] said it was all fake stuff.

Sgt. Shifflett asked if [REDACTED] had any text messages or photos of fake products in communications between [REDACTED] and Talia (51:30). [REDACTED] explained that she had gone back and forth with Talia giving advice on what to buy, if the item looked good, would sell, and things of that nature. Talia would send pictures and messages on products asking [REDACTED] if it looked good. [REDACTED] did tell Talia if the fake items looked good enough to sell or not. [REDACTED] said Talia buys the items that she ([REDACTED]) recommends.

On 01/28/20, I spoke to Special Agent Joan Montoto who informed me that Talia's business kiosk in Miami was the target of counterfeit jewelry sales a few years ago. She explained that the employee was arrested and Talia refused to cooperate.

On 02/19/20, I met with Basola at his office and he gave me a flash drive with texts and communication from Talia's Whats App account that showed the ordering, organizing, photos, name brands, names and locations of suppliers, and communications between Talia and [REDACTED] and Talia and her suppliers. [REDACTED] acquired the information at her own accord and supplied the drive to me via her Attorney with no police direction or request for such. The flash drive was organized into sub folders-China Midtown, Michael NYC, Sharon Bags, Talia-[REDACTED], and White Van. The drive was organized by [REDACTED]'s husband, Tony.

The China Midtown folder contained 14 images from Talia's iPad Whats App program. Each screenshot was a communication between Talia (in Green textbox) and a contact named "China Midtown." Upon further inspection based on shots of the computer screen receipts from China Midtown to Talia, China Midtown appears to be a Mambo Fashion Wholesalers, 2525 NW 5th Ave, Miami, FL. The sales receipts are addressed to Talia Benayon, 12801 W. Sunrise Blvd (Sawgrass Mills Mall), with an email address of luckycharms18@yahoo.com (it should be noted Talia owns a kiosk in the Town Center Mall called Lucky Charms). The conversation was basically the negotiation and purchase of quantity, color, and price of several clothing items that appeared to be counterfeit Gucci and Disney. The screenshots of receipts are \$702.67, \$951.97, and \$1,775.85.

The Michael NYC folder contained 11 screenshots between Talia and username Michael NYC. It should be noted that Talia's profile picture on the app is her face. The conversation

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*Sgt. K. Shifflett*  
**SHIFFLETT, KELLY D**  
 NOTARY PUBLIC / CLERK OF COURT / OFFICER (F.S.S. 117.10)  
**03/24/2020**  
 DATE

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 SIGNATURE OF ARRESTING INVESTIGATING OFFICER  
**PAYNE, TERENCE M (716)**  
 NAME OF OFFICER (PLEASE PRINT)  
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 DATE

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Agency ORI Number <b>FL 0500200</b>	Agency Name <b>BOCA RATON POLICE DEPARTMENT</b>	Agency Report Number <b>3   2   2019-015800</b>
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Charge Type: Check as many as apply. <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 6. Other	Special Notes:
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Name (Last, First, Middle) <b>BENAYON, TALIA</b>	Race <b>W</b>	Sex <b>F</b>	Date of Birth <b>09/01/1969</b>
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between Talia and Michael NYC discuss the purchase of a fake ladies Rolex (and several other watches). Talia texted on 07/29/19 under a picture of several watches that she would buy "2 each." Another screenshot, Talia texted, "What did I get" and the reply was, "12 pc flip flop, 3 watch, 4 cheap Gucci" and a screenshot of the UPS shipping label. On 08/01/19, Talia texted, "Hi, got the package today, thank you (with a thumbs up emoji)." Several of the other screenshots are negotiations for more Rolexes and other watches, shoes, and clothing and accessories.


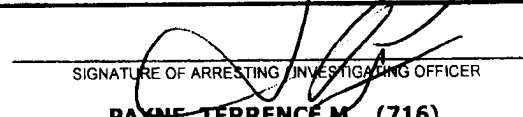
The Sharon Bags folder contained 3 screenshots. The conversations are between Talia (face shot profile pic) and Sharon Beckman (username Sharon Bags). The screenshots are negotiations for YSL, Chanel, and other purses.

The White Van folder contained 24 screenshots. The conversation was between Talia and username Margarita Gucci Bags. Again, all of the screenshots are photos of suspected fake purses and products and the negotiation for the models, quantity, colors, styles, and pricing.

The Talia- folder contained 36 screenshots. The conversation was between and Talia. The conversations were about Talia sending photos of items that she wanted to either approve of as good/bad to sell in the store, or conversations of Talia asking how many of an item were sold, on hand, or needed in order to make purchases to restock the store based on what sold well. Several times Talia asks to send pictures of what is selling or sold so Talia can order more of that product. All of the photos appeared to be fake items and Talia referenced the brand names of the items in several conversations.

During the course of the investigation, over 1800 items were collected and the retail value was estimated to be over \$20,000 (per A Action Investigations). I received verification letters from Apple, Kate Spade, Hermes, Louis Vuitton, Versace, Michael Kors, Chanel, Rolex, Warner Brothers, and Givenchy all stating that the items that were sent to them (via photos) were verified as counterfeit.

Based upon the statement from employee Mauquer saying that Talia was the owner and in charge of the business, based on statements about Talia and her being in charge of the store, ordering, pricing, and all major management decisions (hiring, firing, and salaries), based on Talia Benayon being listed by Suzbiz.org as the owner of Hamsa Boutique (aka Hamsa Shoes), based on several shipping receipts that list Talia as the recipient, based upon US customs having prior incidents with stores in Miami that Talia had been connected to and/or involved in, based on the Whats App text messages/photos/screenshots and conversations between user "Talia" (which has Talia's face picture included as the user) and several merchants who sold Talia items that match the counterfeit items that were seized in the search warrant (including referencing amounts, costs, names of trademarked brands), and based on screenshots in those texts

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PROBABLE CAUSE AFFIDAVIT  
SUPPLEMENT

1. Arrest  
2. N.T.A.  
3. Request for Warrant  
4. Request for Capias

1

JUVENILE


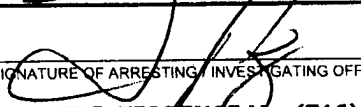
OBTs Number		Agency ORI Number <b>FL 0500200</b>		Agency Name <b>BOCA RATON POLICE DEPARTMENT</b>		Agency Report Number <b>3   2   2019-015800</b>	
Charge Type: Check as many as apply.		<input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony		<input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor		<input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other	

Name (Last, First, Middle) <b>BENAYON, TALIA</b>			Alias	Race <b>W</b>	Sex <b>F</b>	Date of Birth <b>09/01/1969</b>
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that show Talia Benayon's name, address, and other identifiers as the shipping/billing recipient, and based on Talia being served cease and desist orders in the past for selling counterfeit items, probable cause exists for the arrest of Talia Benayon, w/f, DOB 09-01/69, for violation of FSS 831.032(2)-Counterfeiting private labels-which states: Whoever knowingly sells or offers for sale, or knowingly purchases and keeps or has in his or her possession, with intent that the same shall be sold or disposed, or vends any goods having thereon a forged or counterfeit trademark, or who knowingly sells or offers for sale any service which is sold in conjunction with a forged or counterfeit service mark, of any person, entity, or association, knowing the same to be forged or counterfeited, commits the crime of selling or offering for sale counterfeit goods or services. A violation of subsection (1) or subsection (2) is a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084, if the offense involves 1,000 or more items bearing one or more counterfeit marks or if the goods involved in the offense have a total retail value of \$20,000 or more.

I am requesting a warrant for her arrest.

NOT A CERTIFIED COPY

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