

General Allegations

5. Plaintiff is a law firm what was induced to file a lawsuit against the State of Florida for early cutoff of FPUC payments by the Florida DEO.

6. Defendants induced the Plaintiff to file said lawsuit based upon a GoFundMe set up to fund the lawyers fees and costs. Instead of paying the GoFundMe monies to the lawyers such as Plaintiff, the Defendants placed the GoFundMe monies in their personal bank accounts and have used them for their own personal purposes.

7. Plaintiff has hired the undersigned law firm and has agreed to pay it a reasonable fee for its services.

8. All conditions precedent necessary to maintain this action have been performed, waived or excused.

Count I - Fraud in the Inducement

Plaintiff reavers and realleges paragraphs 1 through 8 as if fully set forth herein and further alleges:

9. Defendants made false statements of material fact to Plaintiff that GoFundMe monies would be paid to the lawyers for their fees and costs.

10. When making these representations, Brito knew the statements made were false.

11. Brito intended for the Plaintiff to rely upon her their false statements.

12. By virtue of the Defendants false representations, the Plaintiff has suffered damages in justifiable reliance thereon.

WHEREFORE, Plaintiff demands judgment against Defendants for damages of