

[Redacted text block]

5. Prior to [Redacted], [Redacted].

[Redacted text block]

6. [Redacted]

[Redacted text block]

7. [Redacted]

[Redacted text block]

8. [Redacted]

[Redacted text block]

[REDACTED]

1 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT I - FRAUD

10. Plaintiffs reallege the contents of paragraphs 1 through 9 above as if set forth herein.

11 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14. There is no adequate remedy wholly at law to remedy the situation, as Defendant

has [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

WHEREFORE, Plaintiff prays that this Court enter judgment in favor of Plaintiffs for amounts to be proven at trial or other hearing, and to impose a constructive trust upon the described real property of Defendant [REDACTED], and to award to Plaintiff attorney's fees and court costs, and any other relief the Court deems just.

COUNT II - CONVERSION

15. Plaintiffs reallege the contents of paragraphs 1 through 9 above as if set forth herein.

16. At all times material hereto, Plaintiffs were the rightful owners of certain funds that were the business assets of Plaintiff-companies.

17. [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

WHEREFORE, Plaintiff prays that this Court enter judgment in favor of Plaintiffs for amounts to be proven at trial or other hearing, and to impose a constructive trust upon the described real property of Defendant [REDACTED], and to award to Plaintiff attorney's fees and court costs, and any other relief the Court deems just.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues so triable.

Filed by:

Jonathan N. David, Esq.

Attorney for Plaintiff

[REDACTED]

[REDACTED]

Ph: [REDACTED]

Fax: [REDACTED]

Fla. Bar No. 906816

A constructive trust can be impressed on property where the property was financed with money directly traceable to embezzled funds and where there was no consideration for the receipt of those funds. See *In Re Mart*, [106 B.R. 309](#) (Bkrtcy.S.D.Fla.

1989) .