

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

SWCAM AIRCRAFT, LLC,

Plaintiff,

vs.

CASE NO: 0:25-cv-61019-WPD

LOGOS AVIATION, INC., et al,

Defendant,

_____/

**MOTION FOR LEAVE TO FILE AMICUS CURIAE
BRIEF IN SUPPORT OF PLAINTIFF**

COMES NOW, Rogerio Chaves Scotton, Marco Antonio Bruno Da Silva, and MAVI USA HOLDING LLC (“Amici”), and respectfully move this Honorable Court for leave to file the attached Amicus Curiae Brief in support of Plaintiff SWCAM Aircraft, LLC, pursuant to the Court’s inherent authority and the principles governing amicus participation in civil litigation. In support thereof, Amici states the following:

I. IDENTITY AND INTEREST OF AMICI CURIAE

Amici are direct victims of a nearly identical aircraft-related fraud perpetrated by the same individuals and entities named as Defendants in this action — specifically, Logos Aviation, Inc., Mark Daniels, Nicolas Kyriakopoulos, Alexander Kyriakopoulos, and their affiliated enterprises.

In 2024, Amici wired approximately \$735,000.00 USD toward the purchase of a Gulfstream aircraft, relying on fraudulent representations made by Defendants, including falsified corporate seals, fictitious entity documents (purporting to represent “AeroVision LLC”), and forged signatures. The aircraft was never delivered, and the funds were never returned. The transaction constitutes a textbook example of predicate racketeering acts, including mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), and civil RICO violations under 18 U.S.C. §§ 1961–1964.

II. PURPOSE OF AMICUS SUBMISSION

Amici seeks to provide factual context and evidentiary parallels that strongly corroborate the allegations raised by Plaintiff in this case. The submission is offered in the interests of justice, judicial economy, and public protection, without the intent to delay or complicate the litigation.

The proposed Amicus Curiae Brief includes factual declarations and relevant exhibits demonstrating that:

The same Defendants engaged in substantially similar fraudulent conduct;

The conduct constitutes a pattern of racketeering activity;

A broader scheme exists targeting multiple victims, which may warrant judicial notice under Fed. R. Evid. 201(b) or referral to federal authorities under 18 U.S.C. § 1964(c).

Amici respectfully assert that the Court's informed discretion in evaluating such systemic fraud would be materially aided by the submission.

III. LEGAL STANDARD

District courts have inherent discretion to permit the filing of amicus briefs “where they provide helpful analysis, insight, or factual background to the court.” *Jenkins v. United States*, 386 F.3d 415, 417 (2d Cir. 2004); *United States v. Michigan*, 940 F.2d 143, 165 (6th Cir. 1991).

Amici curiae need not have a direct pecuniary stake in the litigation but may be granted leave where they represent “interests that may otherwise be overlooked.” *Citizens Against Casino Gambling in Erie Cnty. v. Kempthorne*, 471 F. Supp. 2d 295, 311 (W.D.N.Y. 2007).

In the Matter of SWCAM AIRCRAFT LLC vs. LOGOS AVIAIONT INC ET AL
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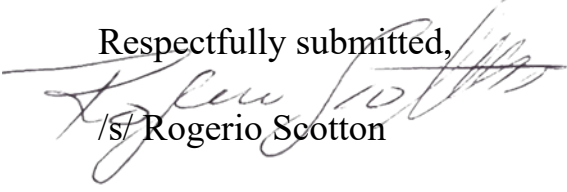
Given the substantial overlap between Plaintiff's claims and the parallel fraudulent scheme described by Amici, granting leave to file would promote judicial awareness of a broader fraudulent enterprise and prevent further harm to additional parties.

IV. CONCLUSION

For the foregoing reasons, Amici respectfully requests that this Honorable Court grant leave to file the attached Amicus Curiae Brief and enter it on the docket for consideration in this matter.

Dated: July 16, 2025

Respectfully submitted,




/s/ Rogerio Scotton

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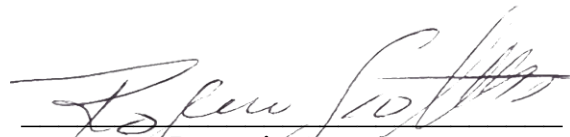
/s/ Marco Antonio Bruno Da Silva

Marco Antonio Bruno Da Silva

On behalf of MAVI USA HOLDING LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN SUPPORT OF PLAINTIFF was served on defendants, at his e-mail info@logosaviation.com and attorneys on record at they e-mail mohammad@aerolawoffice.com attorneyfla@gmail.com and provided in court by the amicus himself, on this 16 day of July, 2025.


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