

Date: November 21, 2024

VIA US CERTIFIED MAIL E-MAIL & WHATSAPP

TO:

Aerovision LLC Attention: Mark Daniels, CEO 1460 Park Lane S., Jupiter, Florida 33458 (561) 722-5561

Logos Aviation LLC Attention: Kyriakopoulos Nikolaos, CEO 5900 NW 24th Way, Hangar B Fort Lauderdale, FL 33309 (954) 295-8601

Dilson Prado (954) 218-2366

Re: Notice of Intent to Sue for Fraud, Breach of Contract, RICO Violations, and Related Violations

Dear Mr. Mark Daniels, Mr. Nikolaos Kyriakopoulos, and Mr. Dilson Prado,

This letter serves as a formal Notice of Intent to Sue regarding your collective roles in defrauding Mr. Marco Antonio Bruno da Silva, the CEO of Mavi USA Holding LLC, in connection with the purchase of a Gulfstream G-IV aircraft (Serial Number



**1019**; **FAA Registration N945**SXE). The agreed contract, dated August 12, 2024, outlines the terms of sale and required conditions for the aircraft and associated

services. Evidence clearly demonstrates your intentional and willful engagement in fraud, conspiracy, and deceptive practices, thereby violating federal and state laws, including the Racketeer Influenced and Corrupt Organizations Act (RICO), among other regulations.

## **Summary of Misconduct and Violations**

## **Fraud and Intentional Misrepresentation:**

Mr. Da Silva was fraudulently led to believe that the aircraft was operational and flight-ready, with alleged repairs (e.g., windshield replacement & Cabin) completed. Logos Aviation even provided misleading videos and false claims of readiness. Upon investigation, the aircraft was found to be missing engines and had multiple unresolved issues.

Mr. DaSilva wire \$700,000, paid by Mr. Da Silva, yet neither the contracted services nor a refund have been provided.

# **Breach of Contract:**

Aerovision LLC and Logos Aviation LLC failed to deliver the aircraft and associated documents in the condition agreed upon, violating the terms outlined in the August 12, 2024, contract.



The aircraft was not delivered to the specified location in accordance with the agreed condition, and Mr. Da Silva has been denied access to his funds despite his legitimate requests.

# Conspiracy and Violations of the RICO Act (18 U.S. Code § 1962):

Evidence shows a pattern of fraudulent enterprise involving Aerovision LLC, Logos Aviation LLC, and Mr. Prado. Communications, audio recordings, and prior lawsuits demonstrate a continued scheme to defraud clients like Mr. Da Silva.

The conduct described aligns with predicate acts under RICO, including wire fraud (18 U.S. Code § 1343), mail fraud (18 U.S. Code § 1341), and financial deception. Unlicensed Brokerage and Violations of State and Federal Aviation Regulations:

Mr. Prado acted as an aircraft broker without proper licensure, in violation of Florida and federal laws. Furthermore, his involvement in facilitating this fraudulent transaction constitutes accessory to fraud.

Violation of the Florida Deceptive and Unfair Trade Practices Act (FDUTPA) (Florida Statutes § 501.204):

Misleading statements and failure to deliver on contractual promises constitute unfair and deceptive trade practices.



#### **Legal Demands**

To resolve this matter without litigation, we demand the following:

Immediate refund of \$700,000 to Mr. Marco Antonio Bruno Da Silva, including interest, within 10 business days of this letter.

Compensation for damages, including legal fees, investigative costs, and emotional distress, totaling \$10,000.00

Written confirmation that Aerovision LLC, Logos Aviation LLC, and Dilson Prado will cease all fraudulent activities immediately.

### **Potential and currently Legal Actions**

Should you fail to comply with the demands outlined in this letter, we will proceed with the following:

Filing a civil lawsuit seeking full restitution and damages for fraud, breach of contract, and violations of RICO statutes on state and Federal Court.

As of today, a complaints to the Federal Aviation Administration (FAA), the Department of Justice, the Florida Attorney General's Office, and the Federal Trade Commission (FTC).

On Monday Mr. Da Silva will File a criminal complaint with the Broward Sheriff's Department and our office will file the complaint with the U.S. Attorney's Office to ensure all parties involved face the highest level of prosecution.



**Evidence and Continuing Investigation** 

We possess substantial evidence, including:

Copies of the signed contract. Audio recordings, video footage, and messages clearly

demonstrate fraudulent intent. Records of prior lawsuits and complaints filed against

Aerovision LLC, Logos Aviation LLC, and Mark Daniels for similar misconduct.

The investigation also confirms that this is part of a continuous fraudulent enterprise,

fitting the definition of a RICO violation. Any denial of these allegations will not hold

weight against the overwhelming evidence presented.

**Conclusion** 

This notice is your opportunity to resolve this matter without litigation. Be advised that our client, Mr. Marco Antonio Bruno Da Silva, is prepared to pursue justice aggressively, ensuring that all responsible parties face maximum penalties under the

law, including fines, imprisonment, and restitution.

We look forward to your prompt response and compliance. If we do not receive a

response within the stated time frame, legal action will commence immediately.

Sincerely,

Legal Help 4 You

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