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,

______________________________/

Reply to Defendants' Opposition and Exposure of Counsel's Improper Tactics

COMES NOW the proposed amici curiae, Rogerio Scotton and Marco Da Silva, appearing pro se, and respectfully submit this Reply to the Response filed by Defendant Logos Aviation, Inc., and its counsel of record. This Reply is necessary to correct multiple misstatements, ad hominem attacks, and legally deficient arguments aimed at deflecting the Court's attention from the very serious allegations of fraud, deception, and abuse of civil process underlying the Amicus Curiae filing.

1. Introduction

Defendants' opposition to our motion is a ***textbook*** example of deflection and ad hominem attack. Rather than address the substance of our allegations – that Defendants engaged in a brazen **$735,000 fraud** – opposing counsel spends pages smearing Mr. Rogerio Scotton's character and past. Nowhere do Defendants meaningfully deny the core facts of the fraud we described; instead, they attempt to distract the Court with irrelevant references to Mr. Scotton's decade-old conviction and unrelated litigation history. Such tactics violate basic *rules of professional conduct* and have no place in this proceeding at bottom, the reality remains *unrefuted*: Defendants' client took $735,000 of our money in an aircraft sale, delivered nothing but a junkyard husk of an airplane, and refused to return the funds. This is, in plain terms, outright fraud. Defendants' brief does not even attempt to justify or explain this conduct – it doesn't respond at all to these damning allegations. Instead, it tries to paint us as the "bad guys" to distract from the true wrongdoer. We will not allow these smoke-and-mirrors tactics to go unanswered. In this reply, we will: Expose how opposing counsel's personal attacks on Mr. Scotton are immaterial,

unethical, and ***sanctionable***, in violation of both court rules and Florida Bar standards.

Show that Defendants failed to rebut any of the fraud allegations on the merits, effectively conceding the factual substance by their silence.

Counter the legal arguments in Defendants' response and the cases they cite, demonstrating that our participation as amici curiae is proper and can aid the Court in seeing the full picture of Defendants' misconduct.

Urge the Court to focus on the unaddressed fraud and not ***be swayed by Defendants'*** attempt to shift blame, and to consider appropriate remedies (such as striking scandalous material and referring this matter for further investigation).

I. Opposing Counsel's Irrelevant Personal Attacks Violate Professional Standards Rather than grapple with the fraud at hand, Defendants devote the bulk of their opposition to attacking Mr. Scotton personally – highlighting his only old felony record and labeling him a "vexatious" litigant. These gratuitous attacks are wholly unrelated to the issue before the Court and serve only to prejudice and inflame. Courts have repeatedly condemned such tactics:

The U.S. Supreme Court has stated that *"inflammatory attacks* on the opposing advocate" have "no place in the administration of justice" Personal smears do not advance any legitimate argument and undermine the integrity of the process.

The Eleventh Circuit likewise holds that an attorney who submits ad hominem attacks in court filings is ***"subject to sanction"*** under the court's inherent powers Bombastic name-calling and character assaults are completely unprofessional and sanctionable.

Florida's own professionalism guidelines demand civility: "Whether orally or in writing, lawyers should avoid vulgar language, disparaging personal remarks, or acrimony toward other counsel, parties, or witnesses."

In a 2011 disciplinary case, the Florida Supreme Court suspended an attorney for, among other things, ***"unceasing efforts to denigrate and humiliate"*** his opponents. The Court made clear: "We do not tolerate unprofessional and discourteous behavior."

Opposing counsel's brief – which impugns Mr. Scotton with derogatory references that have nothing to do with the present dispute – violates these exact standards of conduct.

In short, counsel's smear campaign against Mr. Scotton is improper and should be given no weight. By dragging in Mr. Scotton's past unrelated felony conviction and a magistrate's report from 2014, counsel is effectively asking the Court to decide this matter on irrelevant personal bias rather than facts and law. Such material is the definition of "immaterial" and "scandalous" matter that Rule 12(f) of the Federal Rules of Civil Procedure allows to be stricken.

Indeed, federal courts will strike allegations or defenses that serve only to smear a party. For example, when a defendant averred that a plaintiff was a "professional plaintiff" who had filed dozens of lawsuits (an attempt to brand the plaintiff vexatious), the court struck that assertion as "not an affirmative defense" and legally insufficient.

Here, Defendants' portrayal of Mr. Scotton as a felon and vexatious litigant is similarly irrelevant to the merits and purely intended to sidetrack the Court. It should be disregarded or stricken. It bears emphasis that even a person with a criminal record has the full right to access the courts and be heard. Mr. Scotton's history does not somehow disqualify him from seeking justice. Our legal system does not impose a civil death penalty on convicted individuals. To the contrary, Florida's Constitution pointedly declares: "The courts shall be open to every person for redress of any injury, and justice shall be administered without sale, denial or delay."(Fla. Const. Art. I §21) (emphasis added). In other words, no one is to be denied their day in court because of who they are or what their past may be. Opposing counsel's suggestion that Mr. Scotton's felony background somehow nullifies our claims or bars our participation is not only legally baseless – it is an affront to fundamental principles of fairness. Moreover, even if this case were at a trial stage, evidence of prior bad acts would be inadmissible to prove conduct in conformity (Fed. R. Evid. 404), and a decade-old conviction (for which Mr. Scotton long since served his sentence) would at best have limited impeachment value if he were testifying (Fed. R. Evid. 609). But we are not at trial; we are simply asking the Court to consider an amicus brief providing relevant information. The gratuitous airing of Mr. Scotton's unrelated past serves only to poison the well. It has no probative value on the issues currently before the Court – which concern Defendants' fraudulent conduct in the present case – and it should be summarily ignored. In sum, counsel's personal attacks are an improper "sideshow" intended to divert attention from the actual issues. This Court should see these tactics for what they are: a sign that Defendants have no good defense on the merits. As one court observed in rebuking such behavior, "remarks [attacking opposing parties or counsel] certainly have the potential to be prejudicial or inflammatory," and trial judges should deal swiftly with any breach of this rule. We respectfully ask the Court to do so here – by striking or disregarding counsel's scandalous attacks, and if appropriate, admonishing counsel that such uncivil conduct will not be rewarded.

II. Defendants Fail to Address – Let Alone Rebut – the Fraud Allegations

Tellingly, what is missing from Defendants' opposition is any substantive response to the actual fraud we brought to light. Our proposed amicus brief detailed how Defendants (Logos Aviation and its principals, the Kyriakopoulos family) allegedly defrauded Mr. Rogerio Scotton, Marco Da Silva of $735,000 in a bogus aircraft sale. We described how Defendants lured us with an advertised Gulfstream jet, took the money, then delivered only a photo and video of an airplane that turned out to be scrap in a junkyard – and then refused to refund the money. We further pointed out indications of a pattern: similar misrepresentations, forged documents, even a retaliatory ***false "terrorism"*** report made by Defendants to federal authorities when we pressed for our funds. These are serious allegations of fraud and misconduct – essentially a "separate but nearly identical fraudulent aircraft transaction" to the one at issue in the SWCAM v. Logos case. What is Defendants' response to these explosive allegations? Silence and procedural posturing. Nowhere in their opposition do Defendants deny any of the facts we asserted about the $735,000 fraud. They do not claim, for example, that they didn't take the money, or that they actually delivered a functional aircraft, or that they returned the funds. They do not refute that the plane was essentially a derelict. They do not explain the bogus paperwork or the false report to authorities. No – instead of even attempting to defend or explain their client's conduct, Defendants argue only that our allegations are about a "different matter" and therefore should be ignored by the Court. In essence, they ask the Court to look away from their client's fraud because it involves a different victim. This speaks volumes. If Defendants had any factual rebuttal or innocent explanation for the $735,000 airplane scam, one would expect them to declare it loudly. Their Teflon silence suggests that they cannot deny what happened – because it is true. Instead, they hope the Court will refuse to even consider it on technical grounds. We urge the Court not to be distracted. Defendants' failure to address the fraud allegations on the merits is glaring. It underscores that our account of events is essentially undisputed (at least at this stage). All Defendants offer is the argument that even if they did defraud us, it's not relevant to the current plaintiff's case. But that is a merits argument for another day – and, as we address below, it is an incorrect one. For now, the key point is: Defendants have not contested the truth of our allegations. They have not responded to the substance, only tried to suppress it. In legal terms, they have not ***"met the allegations head-on,"*** and thus for purposes of this motion those facts stand unrebutted. It is well established that when a party fails to respond to an argument or allegation, it can be deemed conceded or accepted as true (especially in motion practice). Here, Defendants do not even attempt to defend the outrageous scenario we presented. Their silence is effectively a concession to those facts. And those facts are damning. They reveal a scheme that, if proven, amounts to fraud, theft, and possibly wire/mail fraud on a federal level. To recap briefly: Defendants took three-quarters of a million dollars from us for an aircraft, sent us a picture and a video of what was purported to be that aircraft, and delivered nothing of actual value. When pressed, they stonewalled and retaliated rather than refund the money. This is not a complicated dispute – it is a straightforward swindle. No amount of character assassination against Mr. Scotton can erase these facts. Even if we were the worst people in the world (we are not), it would not excuse Defendants' blatant fraud. The law does not allow ***a con artist*** to keep ill-gotten gains simply by pointing a finger at the victim's character. "***You can't trust him, he's a felon" is not a defense to fraud;*** it's a playground tactic. The merits – unaddressed by Defendants – remain clear and unchallenged. Furthermore, Defendants' contention that our allegations are wholly unrelated to the SWCAM v. Logos case is overstated. Both involve allegations of dishonest practices by the same Defendants in the niche context of aircraft transactions. Our experience suggests a pattern of similar conduct by these Defendants – a pattern that could be highly relevant. For instance, if SWCAM's case involves fraud or willful misconduct (as their complaint's cause of action suggests – "Diversity-Fraud"), evidence that Defendants have engaged in other, similar frauds may be admissible to show intent, knowledge, absence of mistake, or a modus operandi. Courts recognize that when it comes to punitive damages or assessing the reprehensibility of conduct, "evidence that a defendant has repeatedly engaged in prohibited conduct while knowing or suspecting that it was unlawful" is relevant to determining how blameworthy and willing the defendant was in flouting the law. In fact, the U.S. Supreme Court notes that a recidivist's repeated misconduct is more reprehensible than a first-time offense – i.e., a pattern of fraud can justify stronger punishment. Here, the information we seek to provide the Court is exactly that: evidence that Defendants' dealings with SWCAM were not an isolated blunder but part of a broader pattern of fraudulent business practices. This could inform the Court's understanding of Defendants' intent and the need for deterrence. Defendants protest that our allegations are about a "different transaction" and have "no effect" on the current case. But that is premature for them to argue. Whether or not our evidence ultimately is admissible or actionable in this case is for the Court to decide at the proper time. The immediate question is simply *whether the Court should allow our amicus brief* (or some form of our input) to be considered. Given that Defendants have no answer on the facts, it would be unjust to ignore the information merely because it reveals additional wrongdoing by them. If anything, their opposition confirms how valuable our perspective is ***we shine a light on aspects of Defendants' conduct that they would prefer to remain hidden.***

III. Our Participation as Amici Curiae Is Proper and Will Assist the Court

Defendants argue that our proposed amicus curiae brief should be rejected on procedural grounds, citing cases that say non-lawyers cannot represent others and that an amicus must be impartial. These arguments are misguided and based on outdated notions of the amicus role. We address each in turn: A. We are not "representing" another party's claims – we seek to appear as concerned citizens/victims. Defendants cite authority (e.g. 28 U.S.C. §1654; ***Palazzo v. Gulf Oil Corp., 764 F.2d 1381 (11th Cir. 1985)***; ***Johnson v. Brown, 581 F. App'x 777 (11th Cir. 2014))*** for the uncontroversial rule that a non-attorney cannot represent another person or a company in court. We do not disagree. Mr. Scotton is not attempting to act as Mr. da Silva's lawyer or to litigate MAVI LLC's claims as their attorney. Our filings were a motion for leave to file an amicus brief – meaning, we sought to appear as friends (both) of the court, not as formal parties or representatives. An amicus curia is not the same as legal counsel for a party. By definition, an amicus does not "represent" a client in the case; rather, an amicus offers information and perspective to assist the court. To be clear, if there was any confusion caused by listing Mr. Da Silva and MAVI alongside Mr. Scotton as the "proposed amici," we are amenable to simplifying that: Mr. Scotton can appear as an amicus in his individual capacity (as someone with personal knowledge of Defendants' fraud), and Mr. Da Silva/MAVI can remain in the background or later intervene formally if necessary. The key point is that Mr. Scotton has a direct interest and firsthand knowledge regarding Defendants' fraudulent conduct – he is not a stranger intermeddling for no reason. Pro se litigants can act on their own behalf, and here Mr. Scotton seeks to do just that: on his own behalf to alert the Court of relevant facts. He is not engaging in unauthorized law practice; he is engaging in citizen advocacy, which is entirely permissible. Defendants also argue that a company (MAVI LLC) cannot appear pro se. That is true; an LLC must generally be represented by licensed counsel in litigation. But again, we are not trying to make MAVI a litigating plaintiff or defendant at this juncture. We attempted to include MAVI as an amicus alongside Mr. Da Silva and Mr. Scotton because MAVI was the entity that lost the money. If the Court finds that improper, MAVI can withdraw from the motion, and the individuals (the real parties in interest behind MAVI) can proceed. There is no intent to flout the rule on corporate representation – this was a good-faith attempt to bring all interested parties' voices to the Court's attention in an amicus capacity. The remedy, if the form was imperfect, is not to throw out the concerns entirely, but to adjust the participation to a form the Court is comfortable with (for example, allowing Mr. Scotton's brief to be filed in his name only, or treating our filing as a letter of information to the Court). We trust the Court has the discretion to manage this situation pragmatically.

B. **An amicus curiae need not be "impartial"** or unrelated to the case – modern courts welcome input from interested (even aligned) non-parties when it aids the Court. Defendants lean on an old notion (citing ***United States v. Michigan, 940 F.2d 143 (6th Cir. 1991)*** and a Seventh Circuit opinion by Judge Posner in ***Ryan v. CFTC, 125 F.3d 1062 (7th Cir. 1997)***) that an amicus should be a neutral "friend of the court, not a friend of a party." They suggest our involvement is improper because we obviously support the Plaintiff's side and have our own axe to grind. This argument is outdated and has been largely rejected in modern jurisprudence. As Judge (now Justice) Alito explained in a leading case on amicus practice, "The implication of [the phrase friend of the court, not friend of a party] seems to be that a strong advocate cannot truly be the court's friend. But this suggestion is contrary to the fundamental assumption of our adversary system that strong (but fair) advocacy on behalf of opposing views promotes sound decision making."

Thus, "an amicus who makes a strong but responsible presentation in support of a party can truly serve as the court's friend."

(***Neonatology Assocs., P.A. v. Commissioner, 293 F.3d 128, 131 (3d Cir. 2002***) (Alito, J.)). In today's courts, amici are often aligned with one side – and that's not a bad thing. Courts routinely accept amicus briefs from entities and individuals who have a stake or viewpoint favoring one party (business associations, civil rights groups, etc.). The Third Circuit in Neonatology explicitly rejected the argument that an amicus must be "impartial" and disinterested. Rule 29 of the Federal Rules of Appellate Procedure, for instance, requires an amicus to state its "interest" in the case – which inherently means the amicus has some perspective or bias. In short, the mere fact that we are on the Plaintiff's side and have a pecuniary interest (trying to recover our money) does not bar our amicus participation. What matters is whether our contribution can assist the Court. Here, we bring a unique perspective and information that the Court would not otherwise have. We are exposing an alleged pattern of similar fraudulent behavior by Defendants. This is not information Plaintiff SWCAM would necessarily know or present. It is new factual context that could help the Court see the case in a fuller light – e.g. understanding the Defendants' modus operandi or evaluating their credibility. Courts have recognized that amici can provide value by offering background, expertise, or broader context beyond what the immediate parties can provide. That is exactly the situation here. SWCAM's counsel is focused on the specifics of their maintenance-overhaul dispute; we, as outsiders, are pointing out that there's a larger story here about these Defendants' fraudulent dealings. This broader context might inform the Court's decisions (for instance, on any request for injunctive relief, on discovery scope, on potential consolidation of actions, or on punitive damages considerations). It certainly will not "prejudice" Defendants in any legally cognizable way – other than by revealing inconvenient facts about them, which is not undue prejudice but rather justice. Defendants cite a Seventh Circuit view that amicus briefs often just repeat party arguments and are therefore an abuse (citing Ryan). Again, that is one judge's perspective, and even that court acknowledged that many amicus briefs do bring something additional. Here, we are not simply duplicating Plaintiff's arguments; we are adding new facts and legal points (e.g. RICO, mail fraud, pattern of fraud) that Plaintiff did not raise. Our brief would "expand the breadth of arguments" in a way helpful to the Court's understanding. Importantly, the Eleventh Circuit has no rule forbidding amicus briefs in the district courts – it is within this Court's discretion to allow one. The general trend in federal courts is to be liberal in permitting amici, unless the brief is obviously frivolous or unhelpful. As Justice Alito observed, it's often preferable to err on the side of allowing an amicus because if it's unhelpful the Court can simply ignore it, whereas rejecting a potentially useful brief could deprive the Court of insights. We submit that our brief is far from frivolous – it highlights potential fraud and even criminal conduct by the Defendants. Few things could be more relevant to a court's equitable and remedial considerations. In sum, there is no procedural or doctrinal barrier that compels the Court to reject our amicus participation. Yes, the Plaintiffs here have counsel, but that doesn't automatically bar amici – especially where, as here, the amici have personal interests that could be affected by the case's outcome or reasoning. We satisfy the basic criteria for amicus participation: we have a clearly articulated interest in the case's subject matter, and we offer information that is relevant and desirable for the Court to consider. Defendants' own brief concedes that we claim to be "victims of a nearly identical fraudulent transaction" by the same Defendants – thus, our perspective "relates" to Plaintiff's claims in that it suggests those claims are part of a larger pattern. And notably, allowing us to be heard will not "unduly delay" or complicate the proceedings in any significant way. We have already submitted our proposed brief; the Court can read it (or not) at its leisure. It's not as if we are seeking to intervene as new parties (which would indeed formally complicate the case). Amicus status is a relatively low-impact, information-sharing role. Finally, Defendants argue that if we have grievances, we should file our own lawsuit or seek to intervene as parties. As a practical matter, we are doing exactly that – we fully intend to file our own civil action against these Defendants imminently (in fact, a draft RICO complaint is prepared). However, that separate lawsuit will take time, and it will likely be assigned to a different judge and proceed on its own track. It will not necessarily help SWCAM's case here or alert this Court to Defendants' wider scheme in the near term. We filed the amicus brief in this case because justice delayed is justice denied – we wanted this Court to be aware, now, that the Defendants it's dealing with have a history of fraud that extends beyond SWCAM. It is ultimately within this Court's discretion to allow or deny amicus participation. But we respectfully submit that there is substantial benefit to hearing us out. By considering the information we provide, the Court can potentially coordinate or flag related issues, or at least not unwittingly limit its view to a single tree when there is a whole forest. Conversely, the prejudice to Defendants in allowing our brief is minimal – their only "prejudice" is that their misdeeds are exposed, which is not a legally cognizable harm. Indeed, preventing relevant evidence from coming to light simply to protect a party from embarrassment is the opposite of what courts should do.

Finally, it must be emphasized that from Day One, the amicus motion explicitly stated that Mr. Scotton and Mr. Da Silva appear jointly and independently, each in their own capacity. Nowhere did Mr. Scotton claim to represent Mr. Da Silva or any corporate entity. In fact, the very exhibit submitted by Defendants' counsel—a screenshot of Legal Help 4 You's website—clearly states: "We are not attorneys. We do not provide legal advice." To now weaponize this against us in an attempt to imply unauthorized practice is not only disingenuous but borders on a willful violation of the Florida Bar's Rules of Professional Conduct, including Rules 4-3.3 (Candor Toward the Tribunal) and 4-8.4(d) (Conduct prejudicial to the administration of justice). The only clear "misrepresentation" here is the one perpetrated by Defendant's counsel: a deliberate sideshow intended to draw this Court's focus away from the substantive allegations of fraud.

The public record demonstrates that Logos Aviation, Inc., and its principal Mr. Kyriakopoulos, are currently or have been defendants in dozens of lawsuits across the State of Florida, involving serious allegations of fraud, breach of contract, and deceit (see, Tango Financial Servs Inc v. Logos – Case No. CACE02021434

Ameriship Corp v. Nick Kyriakopoulos – Case No. CACE09049178

Lonestar Pilot Services v. Logos – Case No. COCE10008809

World Jet Inc v. Logos – Case No. CACE10035016

Wells Fargo Bank NA v. Logos – Case No. CACE11017363

Royce Air LLC v. Logos – Case No. CACE16020647

Aero Shade Tech. Inc v. Mark IV Aviation – Case No. CACE17011666

Unicorn Air Charter Servs Ltd v. Izy Air – Case No. CACE20011267

Lynx FBO Fort Lauderdale, LLC v. Logos – Case No. CACE20020099

SL Falcon LLC v. Logos Aviation – Case No. CACE22000328

Ameriship Corp v. Logos Aviation – Case No. CACE23020252

, among others). This is not normal business conduct. It is a pattern. A pattern of exploitation, of "rindo das leis"—laughing at the laws of the United States—while living luxuriously off funds fraudulently obtained from honest members of the public. In our case, $735,000 was sent for the purchase of an aircraft, which turned out to be a complete fraud. No aircraft was delivered. Yet nearly a year has passed—without refund, without explanation, without justice. The funds remain unaccounted for, raising serious questions not just of civil fraud but of potential tax evasion, as no real sale occurred. How were these funds declared to the IRS? Were they declared at all? These are questions that merit criminal investigation.

We therefore ask this Court not only to accept the Amicus Curiae brief and consider referral of this matter to the Department of Justice, but also to sanction Defendant's counsel under Rule 11(b)(1)–(3) for filing a response replete with irrelevant, inflammatory, and defamatory material—including references to a 14-year-old conviction Mr. Scotton is still lawfully contesting under Rule 60(b) and Writ of Error Coram Nobis. Mr. Scotton's constitutional right to access the courts does not expire with a conviction, and the suggestion that he should be barred or dismissed for continuing to seek justice is not only offensive, but dangerously close to legal malpractice. It is uncalled for—and professionally disgraceful—for a licensed attorney to bring frivolous exhibits whose only purpose is to deflect from the present-day fraud committed by his client. This tactic of character assassination cannot be allowed to substitute for a legitimate legal defense. The issue before the Court is not Mr. Scotton's past. The issue is what this Defendant has done, again and again, to innocent parties like ourselves.

Where there is this much smoke, there is fire—and this Court may be the last alarm able to stop Logos Aviation from burning another member of our community. The Constitution and the laws of this nation deserve to be held at the highest standard, and no party—no matter how wealthy or well-represented—should be allowed to mock our democracy and evade justice.

IV. Conclusion and Prayer for Relief

"Your Honor, the emperor has no clothes." Defendants and their counsel have spent their entire opposition brief constructing a sideshow to draw attention away from the naked facts of fraud. They have impugned Mr. Scotton's character, waved around his past in an attempt to muddy the waters, and harped on procedural technicalities – all in hopes that the Court will avert its eyes from the blatant wrongdoing of their client. This strategy is as transparent as it is reprehensible. It is the oldest trick in the book: when you can't defend the crime, attack the accuser. We urge this Court not to be misled by these tactics. At the end of the day, Defendants have not answered our allegations. Not in any meaningful way. They have not explained why they kept $735,000 of someone else's money and provided essentially nothing in return. They have not refuted that they showed us a junked airplane while promising a functional one. They have not refuted that they refused to give the money back. They have not refuted that they engaged in retaliatory conduct when confronted. These damning facts stand before the Court unopposed on the merits. Instead, Defendants try to put us on trial – as if painting Mr. Scotton as a "bad guy" somehow absolves the actual bad act at issue. This is a classic deflection, and courts see through it routinely. It's equivalent to a thief, caught red-handed, arguing that the victim once got a speeding ticket, so the victim is a "lawbreaker" too and shouldn't be heard. Such nonsense does not and should not fly in a court of law. We respectfully ask the Court to focus on the reality: The real wrongdoer here is Defendants' client. By all appearances, Mr. Nikolaos "Nick" Kyriakopoulos (through Logos Aviation and related entities) has made a practice of defrauding people – taking their money under false pretenses, and then using high-priced lawyers and loopholes to evade accountability. While his lawyer hurls personal attacks in this courtroom, Mr. Kyriakopoulos is likely laughing all the way to the bank. He portrays himself on social media as a man of luxury – driving exotic cars, riding yachts and private jets – a lifestyle seemingly built on the misery of those he's swindled. Enough is enough. It is time to hold this man to account, and that begins with not allowing his counsel to hijack these proceedings with smoke and mirrors. No more distractions. No more character assassination. We urge the Court to deny Defendants' request to strike our filings, and instead to consider the substance of what we have brought forth. At minimum, we ask that the Court strike or disregard the scandalous and impertinent portions of Defendants' opposition that serve only to smear Mr. Scotton, in line with Fed. R. Civ. P. 12(f) and the Court's inherent duty to keep proceedings focused on relevant issues. We further ask the Court to accept our amicus brief (Doc. 13) for what it is – an offer of pertinent information – or, in the alternative, allow Mr. Scotton to file a revised amicus brief in his own name alone addressing the fraud pattern. This will not prejudice any party; it will only assist the Court. Finally, given the gravity of the allegations (now essentially uncontested) that Defendants engaged in a large-scale fraud, we ask the Court to consider referring this matter to the appropriate authorities (e.g. U.S. Attorney's Office or State Attorney) ***for criminal investigation***. Fraud of this magnitude, involving deceitful use of interstate communications (emails, wire transfers), potentially constitutes federal wire fraud, mail fraud, and other crimes.

The pattern we have alleged – and which Defendants conspicuously do not deny – suggests that Mr. Kyriakopoulos and his cohorts may have victimized others as well. Stopping such conduct is not just in our interest, but in the public's interest. This Court has the power to be ***a gatekeeper of justice*** by not allowing its process to be used as a shield for wrongdoing. A referral for investigation would send a strong message that this Court will not turn a ***blind eye*** where evidence of fraud is presented. In addition, we put the Court on notice that we are filing a separate civil action this week to directly seek redress for the $735,000 taken from Mr. Scotton and Da Silva. That suit will proceed in due course, but it does not lessen the relevance of our information to the instant case, nor our right to alert this Court now. Your Honor, Defendants have tried to turn this motion into a referendum on Mr. Scotton's past, when it should be about Defendants' present conduct. We ask that the Court firmly reject this ***sideshow***. The facts of what Defendants did to us deserve to be heard, and Defendants' failure to rebut those facts speaks volumes. Don't let the truth be obscured by personal attacks. The truth is that a fraud has been committed, and the perpetrators are attempting to escape accountability by attacking the messenger. We trust that this Court, in the grand tradition of American justice, will see through that ruse. Accordingly, we urge the Court to grant whatever relief is necessary to realign this case with reality: allow the amicus brief (or at least incorporate its evidence into the case record), strike the irrelevant slurs from Defendants' filings, and proceed to adjudicate the actual issues of fraud on their merits. In doing so, the Court will not only be deciding this motion correctly – it will be taking a stand that justice in this courtroom will be decided on facts and law, not on character assassination or diversion. Respectfully submitted,

Dated: July 28, 2025

Respectfully submitted,

Rogerio Chaves Scotton

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Email: info@legalhelp4y.com

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 Reply to Defendants' Opposition and Exposure of Counsel's Improper Tactics 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 28 day of July, 2025.

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EXHIBIT A

LUXURY LIFE BY FRAUDE EVIDENCE

Nick Kyriakopoulos







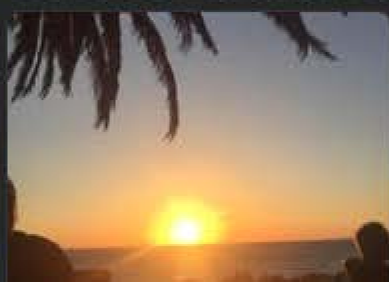
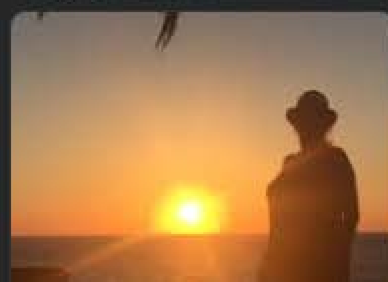


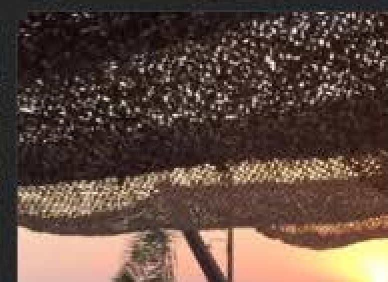










This photo is from a post. View post

Nick Kyriakopoulos
February 25, 2016 · Abuja, Nigeria ·

Alex Izynion II and **Nick Kyriakopoulos** onboard Hawker 800XP en route back from Lagos to Abuja.

— at **Abuja International Airport, Nigeria**.

5 1

Dyan Petroski
This is exactly why in moving in with U guys !! Cute n rich

9y


MALIBU
AFFLICTION
LIVE


Harley-Davidson

Nick Kyriakopoulos

538 friends

Add friend Message

Photos

Nick's Photos Albums

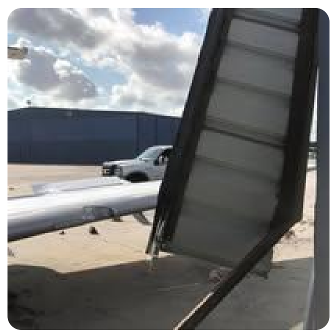




N253LA





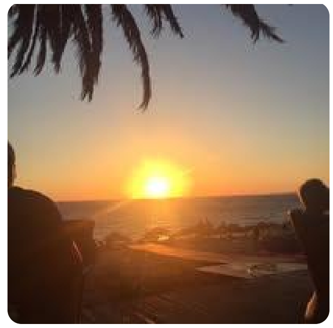

































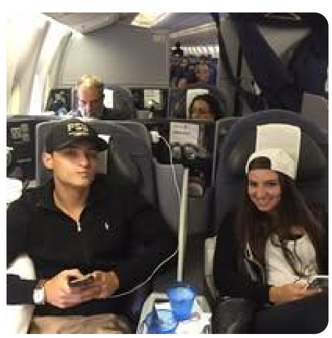
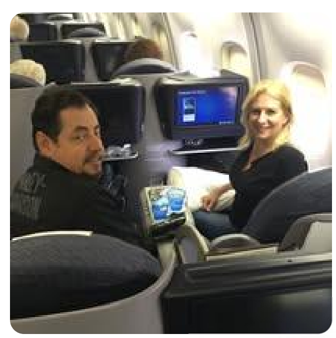








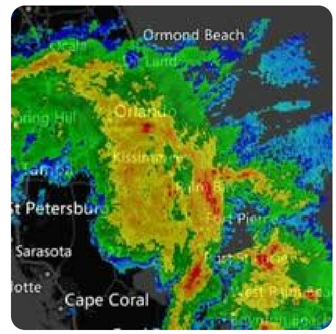










Ormond Beach
Sarasota
Cape Coral







MAKE AMERICA
75th Anniversary
2016
BIKE WEEK













RAMINATO
HEMI

RAMINAT
HEMI









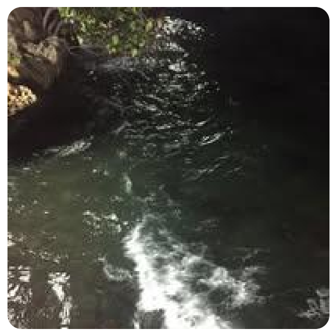




BERIA









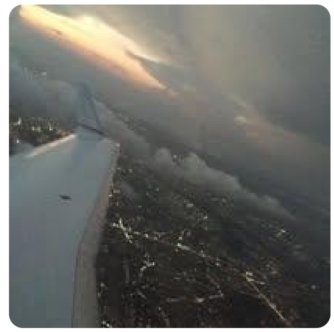




















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user card



















ROMA
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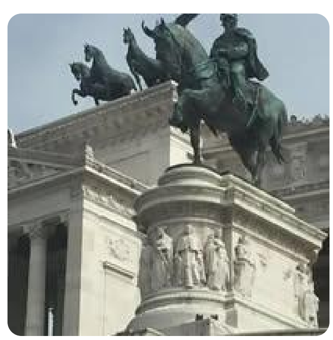












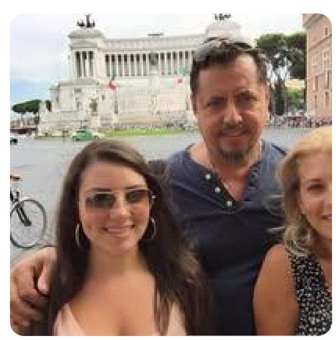


































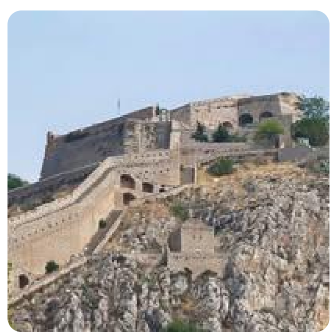

























The Greeks should vote 'no'


























1
























Happy
Birthday
Nick

BAR






Happy
Birthday
Nick








1





















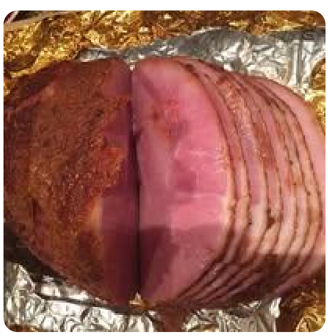
WINTERFEST






CHAMPIONS
PLAY
HERE








H A P P
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Corona
Extra


Nick Kyriakopoulos





































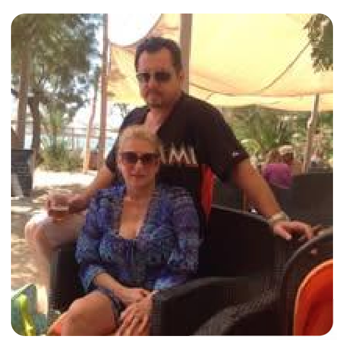


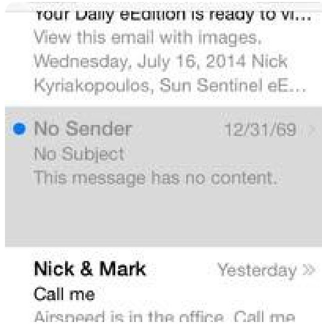
Your Daily eEdition is ready to vi...
View this email with images.
Wednesday, July 16, 2014 Nick
Kyriakopoulos, Sun Sentinel eE...
No Sender 12/31/69
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This message has no content.
Nick & Mark Yesterday
Call me






HAT HAPPENS ON A HARL
STAYS ON A HARLEY






or I am the Lord, you
God, who takes hold
our right hand and sa
to you, Do not fear;
I will help you





Love Bites

Love Bites





FINS TO THE RIGHT
NOT IN THE VILLAGES ANYMORE



ESPONSIBLY

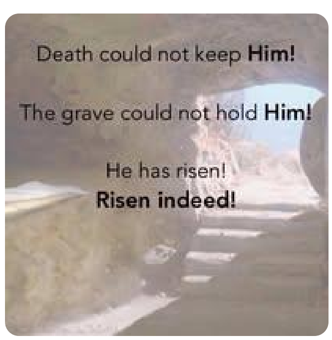
BIKEFEST




GRAB SOME BUDS






Death could not keep Him!
The grave could not hold Him!
He has risen!
Risen indeed!

HE
is
RISEN
LUKE 24:6



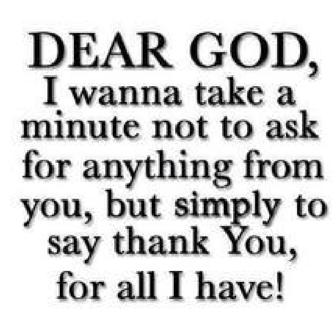




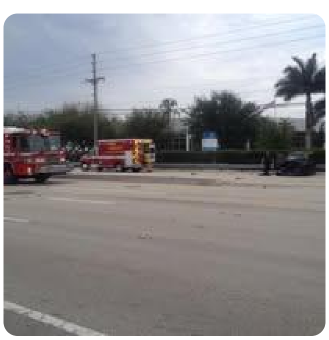
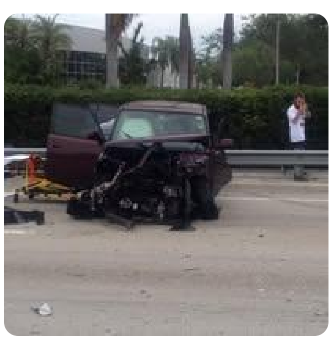



DEAR GOD,
I wanna take a
minute not to ask
for anything from
you, but simply to
say thank You,
for all I have!

past should be left in
it can steal your
Live life for what
can bring and not
yesterday has taken
Every day is a gift.


"Sometimes I Just Look Up,
Smile And Say,

DEAR GOD,
I wanna take a
minute not to ask
for anything from
you, but simply to
say thank You,
for all I have!




Good Night!


ITALIAN TOUR

EXHIBIT B

NOTIFICATION BEFORE AMICUS.

From:	Roger Scotton
To:	mohammad@aerolawoffices.com; attorneyfla@gmail.com
Cc:	jgrover@legalhelp.com; Maviusa; Info@logosaviation.com
Subject:	Notice of Filing: Amicus Curiae Motion and Memorandum in SWCAM Aircraft, LLC v. Logos Aviation Inc., et al. (Case No. 0:25-cv-61019)
Date:	Thursday, July 17, 2025 11:24:00 AM
Attachments:	AMICUS MOTION REQUEST.pdf MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF.pdf image003.png

Dear Counsel,

Pursuant to Rule 5(b) of the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern District of Florida, please be advised that I have today filed the following pleadings in the above-captioned matter:

Motion for Leave to File Amicus Curiae Brief in Support of Plaintiff SWCAM Aircraft, LLC,

Memorandum of Law in Support of Motion for Leave to File Amicus Curiae Brief.

These filings are submitted in accordance with the discretionary authority of the Court under Federal Rule of Appellate Procedure 29(a)(3), made applicable in this District by analogy, and in furtherance of the public interest and the interests of justice.

The accompanying Amicus Curiae materials set forth a detailed parallel account of predicate acts of fraud, wire fraud, and mail fraud allegedly perpetrated by Defendant Logos Aviation, Inc., and affiliated individuals. Said acts have materially harmed third parties beyond the named Plaintiff, including myself and associated corporate entities. These facts, along with the retaliatory conduct and interstate fraud schemes detailed in the brief, provide strong support for judicial notice and potentially broader investigation under 18 U.S.C. §§ 1961–1964.

Please consider this notice as formal service of said filings. Kindly confirm receipt at your earliest convenience.

Respectfully submitted,

Roger Scotton-Co Owner/Director
Legal Help 4 You
160 Camino real #102
Boca Raton, FL 33432
rs@legalhelp4y.com
+1 (786) 588-1202
+55 (21) 97249-3440

From:	Roger Scotton
To:	mohammad@aerolawoffices.com
Cc:	jgrover@legalhelp.com; Maviusa; Info@logosaviation.com
Subject:	ervice of Notice of Filing Exhibits in Support of Amicus Curiae Filing – SWCAM Aircraft, LLC v. Logos Aviation, Inc., et al., Case No. 0:25-cv-61019
Date:	Sunday, July 27, 2025 1:53:00 PM
Attachments:	NOTICE OF FILING EXHIBITS IN SUPPORT OF Amicus.pdf image004.png image005.png image002.png

Dear Counsel,

Please be advised that, pursuant to Rule 5 of the Federal Rules of Civil Procedure and the local rules of the United States District Court for the Southern District of Florida, I am serving upon you the attached Notice of Filing Exhibits in Support of Amicus Curiae Motion, along with the referenced supporting documentation and evidence.

This set includes over 250 pages of exhibits submitted in further support of my Motion for Leave to File Amicus Curiae Brief and the corresponding Memorandum of Law, both filed in the above-referenced case. These materials contain relevant and corroborating evidence—including communications, documentation of fraud, and records of alleged retaliation—intended to inform the Court of a pattern of deceptive and retaliatory conduct consistent with the ongoing litigation.

As a pro se litigant, I am fulfilling my obligations under applicable procedural rules with full transparency and integrity. I respectfully expect reciprocal compliance from all attorneys of record, particularly regarding prior omissions of service related to Defendants' opposition filing.

Should the Court require additional confirmation or filing documentation, I stand ready to provide it.

Sincerely,

LEGAL HELP 4 YOU LLC

Roger Scotton-Co Owner/Director
Legal Help 4 You
160 Camino real #102

Boca Raton, FL 33432
rs@legalhelp4y.com
+1 (561) 878-9001
+1 (561) 770-8909 Whatsapp
+55 (21) 97249-3440

From: Roger Scotton
Sent: Sunday, July 27, 2025 1:49 PM
To: mohammad@aerolawoffices.com
Cc: jgrover@legalhelp.com; Maviusa <maviusa19@gmail.com>; Info@logosaviation.com
Subject: RE: Formal Notice of Imminent Federal Action Against Logos Aviation Inc. – Fraud and RICO Violations

Dear Counsel,

In my capacity as a pro se litigant and interested party, I hereby serve upon you a complete copy of the following filings recently submitted to the United States District Court for the Southern District of Florida in the matter of SWCAM Aircraft, LLC v. Logos Aviation, Inc., et al, Case No. 0:25-cv-61019:

NOTICE TO THE COURT OF NONSERVICE AND MOTION FOR EXTENSION OF TIME.

This document are served in accordance with Federal Rules of Civil Procedure and Local Rule 5.1, governing notice and service. I am complying in full with my legal obligation—despite not holding a bar license—because I respect the integrity of this forum and the right of all parties to proper notice and response.

Unfortunately, I note with concern that Defendants' response in opposition to my motion was filed without serving me a copy, even though my email and address are known to you and were used in prior correspondence. This violates your own ethical and procedural obligations under Federal Rule of Civil Procedure 5(b), as well as the spirit of professional courtesy expected of licensed attorneys practicing before this Honorable Court.

Let this email serve as formal proof of service of the attached filings. I trust that going forward, all parties—particularly counsel of record—will observe the same compliance expected of pro se litigants and officers of the court.

Should the Court require additional confirmation of service or wish to address the Defendants' failure to serve their response, I will respectfully comply.

Sincerely,

Roger Scotton-Co Owner/Director
Legal Help 4 You
160 Camino real #102
Boca Raton, FL 33432
rs@legalhelp4y.com
+1 (561) 878-9001
+1 (561) 770-8909 Whatsapp
+55 (21) 97249-3440

From: Roger Scotton <rs@legalhelp4y.com>
Sent: Tuesday, July 15, 2025 1:37 PM
To: mohammad@aerolawoffices.com
Cc: jgrover@legalhelp.com; Legal Help LLC <info@legalhelp4y.com>; Maviusa <maviusa19@gmail.com>; Info@logosaviation.com
Subject: RE: Formal Notice of Imminent Federal Action Against Logos Aviation Inc. – Fraud and RICO Violations

Dear Mr. Faruqui,

I am reaching out to you in your capacity as counsel for Logos Aviation Inc., with utmost respect for your professional standing in the legal community.

After conferring with the legal counsel representing the plaintiff in SWCAM Aircraft, LLC v. Logos Aviation, Inc. et al., currently pending in federal court, I wish to inform you that I am preparing to initiate a separate federal civil action against your client in the coming days.

This forthcoming complaint is based on substantial and irrefutable evidence of fraudulent conduct perpetrated by your client, including but not limited to:

Audio and video recordings;

WhatsApp messages;

Signed contracts with falsified corporate information and seals;

Use of non-existent corporate entities (AeroVision LLC);

Fraudulent inducement in a $700,000+ aircraft transaction.

These actions constitute clear violations of federal statutes, including:

18 U.S.C. § 1343 – Wire Fraud

18 U.S.C. § 1341 – Mail Fraud

18 U.S.C. §§ 1961–1968 – Racketeer Influenced and Corrupt Organizations Act (RICO)

18 U.S.C. § 1001 – False Statements

15 U.S.C. § 45 – Deceptive Acts or Practices

Despite multiple opportunities extended to your client to resolve this matter amicably and avoid litigation, no restitution has been offered. In fact, your client has responded to our formal and good-faith efforts with disdain, mockery, and communications typical of an individual who acts with impunity and disregard for the law.

Moreover, I have already submitted the complaint and supporting evidence to the U.S. Attorney's Office for the Southern District of Florida, requesting formal investigation and potential criminal prosecution. The parallelism between the fraud alleged in the SWCAM case and our case is stark and undeniable, and will be of considerable relevance to any prosecutorial or judicial body evaluating a pattern of criminal conduct.

It is also worth noting that U.S. District Judge Dimitrouleas, who is presiding over the SWCAM case, may take judicial notice of a second and potentially third victim alleging identical misconduct by the same actors—an aggravating factor under both civil RICO and criminal sentencing guidelines.

Given the gravity of the allegations and the volume of corroborating evidence, I will be moving forward with filing the civil RICO complaint unless full restitution is made by end of day today. The damages suffered exceed $700,000, and the complaint will seek treble damages under 18 U.S.C. § 1964(c), along with attorney's fees, punitive damages, and injunctive relief.

I am notifying you directly as a professional courtesy, and in deference to your standing as an officer of the court. However, your continued representation of a client engaged in such conduct should be carefully weighed, especially in light of the evidentiary record and the exposure to civil and potentially criminal liability.

Should your client wish to resolve this matter privately and in good faith, the window of opportunity is rapidly closing. Absent restitution by close of business today, the complaint and exhibits will be filed in federal court and shared with media outlets already following the case.

You may consider this a final notice prior to the initiation of formal legal proceedings.

Respectfully,

LEGAL HELP4YOU LLC

Roger Scotton-Co Owner/Director
Legal Help 4 You

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+55 (21) 97249-3440