

DECLARATION OF MARCO ANTONIO BRUNO DA SILVA

Pursuant to 28 U.S.C. § 1746

I, Marco Antonio Bruno Da Silva, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. Personal Background

My name is Marco Antonio Bruno Da Silva. I am over the age of 18, competent to testify, and make this declaration based on personal knowledge.

I reside at Rua Libaro Badaro, 293 floor 21, Sao Paulo, Brazil zip 01009-000 and I am the Plaintiff in the lawsuit against LOGOS AVIATION, INC., a Florida corporation; AEROVISION USA LLC, a Florida limited liability company.

MARK TODD DANIELS, an individual. NICHOLAS KYRIAKOPOULOS, an individual; ALEXANDER KYRIAKOPOULOS, an individual; and THE NICHOLAS KYRIAKOPOULOS FAMILY TRUST,

2. Summary of Events

On August 12, 2024, I entered into a contract to purchase a Gulfstream G-IV aircraft (Serial Number 1019; FAA Registration N945XC) from Logos Aviation LLC and Aerovision LLC for \$2.8 million.

The contract explicitly stated that the aircraft was in good condition, with all systems operational, and included two Rolls-Royce Tay turbo-fan engines.

I transferred \$700,000 as a deposit, relying on the Defendants' representatives that the aircraft was fully operational and required minimal maintenance.

3. Discovery of Fraud

After repeated delays and excuses by the Defendants, I conducted an independent investigation into locating the aircraft.

Upon inspection, I discovered the aircraft was:

Missing both engines;

Unairworthy, with broken windshields and multiple missing or damaged components.

This condition was completely contrary to the assurances made in the contract and by the Defendants.

4. Misrepresentations and Falsified Evidence

The Defendants sent me falsified video evidence via WhatsApp, purporting to show the aircraft in operational condition, when in reality the aircraft was in a state of disrepair.

They also transmitted the fraudulent contract via email and certified mail, further perpetuating their scheme to deceive me.

5. Damages, Intimidation, and False Accusations

Despite my repeated demands for a refund of the \$700,000 deposit, the Defendants have refused to return the funds or deliver the aircraft as promised.

Part of the deposit funds came from an investment made by my associate, Rogerio Scotton, who contributed \$180,000 toward the purchase.

From July 2024 until the present, we have consistently requested repayment from all parties, without success.

Instead of returning the funds, Mark Daniels sent me numerous WhatsApp messages, filed false reports against me with U.S. government agencies, and caused the U.S. Embassy in Rio de Janeiro to summon me for a second interview despite my having already entered the United States on prior occasions.

Mr. Scotton also received direct threats from both Nikolaos Kyriakopoulos and Mark Daniels. In particular, Daniels sent him messages stating that he would call U.S. Immigration and Customs Enforcement (ICE) to have Mr. Scotton deported, further warning that “we do not know him and what he is capable of doing.”

6. Legal Violations

Based on my knowledge, the Defendants violated multiple federal and state laws, including:

Wire Fraud (18 U.S.C. § 1343) and Mail Fraud (18 U.S.C. § 1341) by transmitting falsified contracts and evidence;

Civil Theft (Fla. Stat. § 772.11) by unlawfully retaining my deposit;

FAA Regulations (14 C.F.R. §§ 91.7, 43.12, 21.9) by misrepresenting an unairworthy aircraft as operational.

Their fraudulent actions have caused me significant financial loss, emotional distress, and reputational harm.

7. Related Federal Case

After consultation with Mr. Scotton, we brought these matters to the attention of federal court proceedings, including through an amicus motion filed under the case SWCAM Aircraft, LLC v. Logos Aviation, Inc., et al., seeking criminal indictment of Mark Daniels and Nikolaos Kyriakopoulos.

Despite being notified, both Daniels and Kyriakopoulos have failed to respond to WhatsApp messages, although they have visibly read them.

8. Criminal History

Subsequent research has confirmed that both Mark Daniels and Nikolaos Kyriakopoulos have a long history of criminal conduct and have been defendants in numerous lawsuits filed against them.

9. Request for Relief

I respectfully request that the court hold the Defendants accountable for their fraudulent actions, compel them to return my deposit (including Mr. Scotton's investment), and award damages for the harm caused.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this July day of 12, 2025.


Marco Antonio Bruno Da Silva