

IN THE CIRCUIT COURT OF THE  
ELEVENTH JUDICIAL CIRCUIT IN AND  
FOR MIAMI-DADE COUNTY, FLORIDA

FELIX VULIS, an individual,

CASE NO.:

Plaintiff,

v.

IGOR FRUMAN, an individual; LEV  
PARNAS, an individual; DAVID CORREIA,  
an individual; and GLOBAL ENERGY  
PRODUCERS, LLC, a Delaware limited  
liability company,

Defendants.

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**COMPLAINT**

Plaintiff, FELIX VULIS (“Vulis”), by and through his undersigned counsel, hereby files this Complaint for damages against Defendants, IGOR FRUMAN (“Igor”), LEV PARNAS (“Lev”), DAVID CORREIA (“David”), and GLOBAL ENERGY PRODUCERS, LLC (“GEP”), and in support thereof state as follows:

**JURISDICTION, PARTIES, AND VENUE**

1. This is an Action for damages in excess of Fifteen Thousand Dollars (\$15,000.00), exclusive of pre-judgment interest, attorney’s fees, and costs and is thus within the exclusive plenary jurisdiction of Florida’s Circuit Courts.

2. Plaintiff, FELIX VULIS, is and was, at all material times, an individual that resides in Miami-Dade County, Florida, and is *sui juris*.

3. Defendant, IGOR FRUMAN, is and was, at all material times, an individual that resides in Miami-Dade County, Florida, and is *sui juris*. Defendant Igor is a member and officer of Defendant GLOBAL ENERGY PRODUCERS, LLC.

4. Defendant, LEV PARNAS, is and was, at all material times, an individual that resides in Palm Beach County, Florida, and is *sui juris*. Defendant Lev is a member and officer of Defendant GLOBAL ENERGY PRODUCERS, LLC.

5. Defendant, DAVID CORREIA, is and was, at all material times, an individual that resides in Palm Beach County, Florida, and is *sui juris*. Defendant David is a member and officer of Defendant GLOBAL ENERGY PRODUCERS, LLC.

6. Defendant GLOBAL ENERGY PRODUCERS, LLC, is and was, at all material times, a Delaware limited liability company with its principal place of business in New Castle County, Delaware.

7. Venue is proper in Miami-Dade County, Florida, the place where the contract sued upon was entered and breached and the place where the causes of action and the economic damages giving rise to this Complaint occurred. The Defendants have purposefully subjected themselves to the jurisdiction of the courts of Florida pursuant to Fla. Stat. § 48.193 by the following acts or omissions: (1) operating, conducting, engaging in, or carrying on business in Florida, including the subject business venture between the Parties described in this Complaint, (2) committing a tortious act within Florida, (3) owning real property within Florida, (4) causing injury to persons or property within Florida arising out of an act or omission by the Defendants outside Florida since, at or about the time of the injury, the Defendants were engaged in solicitation of business within Florida as more fully described herein, (5) breaching a contract in Florida by failing to perform acts required by the contract to be performed in this state including, but not limited to, making payment to the Plaintiff as more fully described herein, and (6) the Defendants are engaged in substantial and not isolated activity within Florida as more fully described herein.

8. All conditions precedent to the institution and maintenance of this Action have been performed, excused, or have otherwise occurred.

**GENERAL ALLEGATIONS**

9. In or around September of 2018, Defendants Igor, Lev, and David, on behalf of themselves and their company, Defendant GEP, contacted Plaintiff in order to solicit a loan.

10. At that time, Defendants represented to Plaintiff that Defendant GEP was an

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