

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.:

ANDREWS PLAZA, LLC,
A Florida limited liability company,

Plaintiff,

v.

BLACKZILIANS LLC, a Florida limited liability Company, a/k/a **BLACKZILLIANS PERFORMANCE INSTITUTE,** **JASON GOCHEZ,** an individual, and **JEAN MONGEOIS,** an individual,

Defendants.

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VERIFIED COMPLAINT

Plaintiff, ANDREWS PLAZA, LLC (“AP” or “Landlord”), sues BLACKZILIANS LLC, a/k/a BLACKZILLIANS PERFORMANCE INSTITUTE (“Tenant”), JASON GOCHEZ (“Gochez”) and JEAN MONGEOIS (“Mongeois”),¹ and alleges as follows:

NATURE OF THE ACTION

1. Plaintiff asserts claims against the Defendants for commercial eviction pursuant to Fla. Stat. § 83.001, *et. seq.*, damages for breach of the Lease Agreement, and damages for breach of the personal Guaranty.

THE PARTIES, JURISDICTION AND VENUE

2. This is an action for eviction, as well as for damages in an amount greater than Fifty Thousand Dollars (\$50,000.00), exclusive of interest, costs, and attorneys’ fees.

¹ Gochez and Mongeois shall collectively be referred to as the “Guarantors,” while Tenant and Guarantors shall collectively be referred to as the “Defendants.”