

IN THE CIRCUIT COURT FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

CASE NO.:

EDWARD TUDOR d/b/a
GROWTH CAPITAL PARTNERS,
a Sole Proprietorship,

50 2011 CA 01 4393XXXX

Plaintiff,

-vs-

SUSANNA ANDREA GONZALEZ A.,

Defendant.

FILED
11 SEP 20 PM 12:41
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 4

AH

COMPLAINT

The Plaintiff sues the Defendant and alleges:

1. This is an action for damages in an amount equal to \$75,000,000.00 and court costs.
2. On September 8, 2011 the Plaintiff and Defendant entered into a written contract in Boca Raton, Florida, a copy of which is attached hereto.
3. The contract called for the Defendant to purchase 41,000 ounces of Gold to be stored in a depository in Fort Lauderdale, Florida.
4. The Plaintiff fully performed under the terms of the contract.
5. The Defendant breached the contract by failing to make payment as agreed.
6. As a direct result of the breach, the Plaintiff suffered damages.

WHEREFORE, the Plaintiff prays that the Court enter judgment in favor of the Plaintiff and against the Defendant in an amount equal to \$75,000,000.00 plus courts costs.

DEMAND FOR JURY TRIAL

7. The Plaintiff demands a trial by jury.

Dated: September 12, 2011



Edward Tudor d/b/a Growth Capital Partners
902 Clint Moore Road, Suite 202
Boca Raton, FL 33487
561-910-5932 Telephone

From Article at GetOutOfDebt.org



GROWTH CAPITAL PARTNERS

Land Trusts : Cash and Gold Vaulting : Venture Capital

CONTRACT FOR PRECIOUS METALS CONTRACT NUMBER: 09102011

This Contract for Precious Metals (the "Contract") is entered into the 1st day of SEPTEMBER by and between SUSANNA A. GONZALEZ, Buyer, P F 11 and Growth Capital Partners, ("Broker").

Whereas, the Broker is in the business of Purchasing and Selling precious metals;
and

Whereas, Buyer desires to Purchase precious metal;

Whereas, Broker certifies, represents and warrants that it can fulfill the requirements of this Contract and provide product referred to herein in quantities, at times and for the term agreed upon; and

Therefore, for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, and pursuant to the mutual covenants, promises benefits and terms of this Contract and intending to be legally bound thereby do agree as follows:

1. **The Product:** Broker will obtain the following:

- a) Purity: .995 Fine
- b) Quantity: 41,000 Ounces
- c) Form: Bullion
- d) Delivery: Bullions to be stored in depository.
- e) Quoted Selling Price: \$75,000,000
- f) Transaction Price: \$7,500,000
- g) Payment: Broker shall enter into a Gold Futures Contract. Once spot price is secured, Buyer will confirm monies are available in a depository account.
- h) Once funds are confirmed, Broker will cause precious metals to be segregated and Purchaser will wire monies to Broker for payment to seller.



GROWTH CAPITAL PARTNERS

Land Trusts : Cash and Gold Vaulting : Venture Capital

2. Banking: The following is the banking information for Buyer and Broker:

Buyer:

Account Holder: Susana Andrea Gonzalez A.
Name of Bank: CitiBank Panama, SA
Address: calle 50 Edificio Plaza Panama PISO 11
Telephone: _____

ABA Routing #: 021000089
Swift Code: BACUPPA
Account #: [REDACTED]
Intermediary: _____

Broker:

Account Holder: Growth Capital Partners
Name of Bank: Bank of America Corporation
Address: 6101 Coral Ridge Drive
Coral Springs, FL 33076
Telephone: 954-227-6696

ABA Routing #: 026009593
Swift Code: BOFAUS3N
Account #: [REDACTED]
Intermediary: N/A

IN WITNESS WHEREOF, the parties have executed this Agreement this 1st day of September 2011.

Buyer:

By: Susana Andrea Gonzalez A.
10'305118 de Granada. M.

Print Name, Title

Seller:

By: [Signature]

Edward Cheng, VP

Print Name, Title

EDWARD TUPON d/b/a
GCP PARTNER

R E C E I P T

PALM BEACH CTY CIR CT JISPROD

Receipt Number: CAMB598865
Date: 20-SEP-2011
Cashier: CMMAY

Payor: GROWTH CAPITAL PARTNERS
Addr:

Vic ⁿ tion/Docket	Description	Amount
Case: 2011CA014393 - EDWARD TUDOR V SUSANNA ANDREA GONZA Party: EDWARD TUDOR CAFF		401.00
	CHECK RECEIVED GENERAL ACCT	-401.00
	Total Fees:	401.00
	Total Payment:	401.00

From Article at GetOutOfDebt.org