

13. Plaintiff offered his experience, knowledge and business connections, to start a business with Defendant Giannuzzi involving the importation of precious metals, specifically gold, from South America to the United States.

14. Plaintiff and Defendant Giannuzzi began discussing this venture in 2019, when they both were introduced in person in New York to Defendant Garcia through Dunesca Becker.

15. It was agreed at this meeting in New York in 2019, that Plaintiff and Defendant Giannuzzi would raise \$500,000 each to purchase gold from South America.

16. Defendant Giannuzzi offered to rename a corporate entity he had previously used, MLBT Consulting Corp., and rename it Doromet Inc., which he did on or about February 26, 2020.

17. Plaintiff and Defendant Giannuzzi agreed to use the new corporate entity, Defendant Doromet, to conduct a business transporting gold from South America to the United States.

18. Plaintiff relied upon representations by Defendants Giannuzzi and Doromet that if the business was successful, Plaintiff was be compensated as an equal partner with Defendant Giannuzzi.

19. Plaintiff accepted this offer, and proceeded to work with Defendants Giannuzzi and Doromet to build the business.

20. Plaintiff used his extensive experience in managing commodity price risk and his personal business connections to start the business venture, which included, but is not limited to:

- a. Opening a hedge account INTL FC Stone Markets, LLC to hedge currency;
- b. Opening a bi-lateral derivative account with Western Union to hedge currency;