

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
THE CITY OF NEW YORK,

Plaintiff,

-against-

SUMMONS

Index No. 450802/19

ATHANASIOS FOTINAKOPOULOS, HELEN
"ELENI" FOTINAKOPOULOS, TOMMY
DALAGEORGOS, MICHAEL A. VASIADIS,
ANTONIO TSATSAROS, DIMITRIOS TSIRKOS,
ACE ICE INC., ALFA TRIO INC., ANORIA ICE
INC., APPLA ICE CREAM INC., ASTROMAN
ICE INC., AVERY ICE INC., BALERIUS ICE
INC., BARRETTO SERVICES INC., BEST ICE
INC., BIRONIA ICE CREAM INC., BLACK ICE
INC., BOYZ OF MIDTOWN INC., BX
ICECREAM INC., CALVARY INC., CANDIE
LAND ICE CREAM INC., CARMINE ICE INC.,
CMC ICE INC., COLDE INC., COST ICE INC.,
CRYBAY INC., DEDE FOTI INC., D.L.T
SOFTEX CORP., DOMINGO ICE CORP.,
DRAKOS REALTY INC., EXPERT ICECREAM
INC., FEVGO ICE INC., FLATES ICE INC.,
FOUR GUYS ICE INC., FRAGO ICE CREAM
INC., GALAXY ICE INC., GAVROS SOFT
SERVE, LLC, GEEKICE INC., GOPEN ICE INC.,
GORTEN ICE INC. H AND M ICE INC., HAS
ICE INC., HENA ICE INC., HONGWAY
ICECREAM INC., HOS 214 INC, HULINA ICE
CREAM INC., ICE BOYZ INC., ICE MANIA
INC., ICY MAN INC., JURNE ICE INC., KALAS
SERVICES INC., KAMALI ICE CREAM INC.,
KAVENA ICE CREAM INC., KAVIN ICE
CREAM INC., KENWO ICE INC., KIKI
SERVICES INC. KINGSTONE ICE CREAM
INC., KIRMON ICE CREAM INC., KLAT ICE
CREAM INC., KONG ICE CREAM INC.,
KRENTAL ICE CREAM INC. KROKAT ICE
CREAM INC., LADIM ICE CREAM INC.,
LAROCO INC., LATTO ICE CREAM INC.,
LOTSAGA ICE CREAM INC., LYMOL ICE INC.,
M B H ICECREAM INC., MANANA
ENTERPRISE INC., MANIDA HILL DESERT

INC., MARITA ICE INC., MB ICE CREAM INC., MEATHEAD INC., MIA ICE INC., MIDTOWN ADVISORS INC., MINUS BELOW INC., MORGAN ICE INC., NUVARELUS INC. PAPIA I INC., PARKMAN ICE INC., PAVEMA ICE INC., PREPORIUM ICE INC, PRIVILEGE INC., ROBERT FUN ICE INC., SEKURTA ICE CREAM INC., SIDANO ICE INC., SOFTEE TASTE CORP., SUPER SOFTEE EXPRESS CORP., TAVAGA ICE INC., TENTRO INC., THTM INC., TRIA ICE INC., TWIRLY TWIRL ICE INC., TWIST ICECREAM INC., UMPA ICE CREAM INC., VERY BERRY ICE INC., VOULA ICE INC., VUKU SERVICES INC, X B SERVICE, INC., and "JOHN DOE" and "JANE DOE," numbers 1 through 76, fictitiously named parties, true names unknown, the parties intended being the owners, lessees, sublessees, and registrants of 76 mobile ice cream trucks, and any person claiming any right, title or interest in the real or personal property which is the subject of this action,

Defendants.

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED and required to serve upon plaintiff's attorney an answer to the complaint in this action within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

Plaintiff designates New York County as the place of trial in accordance with C.P.L.R. § 503(a).

Dated: New York, New York
May 30, 2019

ZACHARY W. CARTER
Corporation Counsel of the
City of New York
Attorney for Plaintiff The City of New York

100 Church Street, Rm. 20-99
New York, New York 10007
(212) 356-2032

By: 
Eric Proshansky
Anjan Mishra
Assistant Corporation Counsel

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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-against-

VERIFIED COMPLAINT

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Defendants.

-----x

Plaintiff, the City of New York (“City”), by its attorney, Zachary W. Carter, Corporation Counsel of the City of New York, alleges upon personal knowledge as to itself and upon information and belief as to all other matters:

INTRODUCTION

1. The City brings this action against the owners and/or registrants of 76 ice cream trucks that engage in a shell game of vehicle transfers by which, through 2017, these individuals and their shell corporations have thwarted the collection of \$4,471,754.58 in judgments on defaulted traffic summonses. The City seeks to undo the fraudulent transfers by which corporate assets were placed out of reach, recover the judgment amount, with interest, and damages, and enjoin the defendants’ continuing conspiracy to evade fines and judgments.

2. The defendants operate ice cream trucks in the most densely congested streets in New York City — midtown Manhattan — creating, for their own profit, unjustifiable risks to public safety by flouting traffic regulations while evading the financial consequences of doing business in that fashion by shuffling corporate assets. Between 2009 and 2017, the City issued in excess of 22,495 summonses to the defendants' trucks, all of which have gone into default.

3. Defendants routinely thwart enforcement measures and evade the imposed penalties by transferring the ticketed trucks to dummy corporate entities for less than fair value, in collusive transactions. Thus, defendants repeatedly transfer the registration of their trucks at the State of New York's Department of Motor Vehicles ("DMV") among a host of shell corporations, shielding the vehicles from levy and seizure when the numerous underlying summonses, on which defendants invariably default, go to judgment.

4. Defendants' sole purpose in forming the shell corporations is to intentionally avoid payment of the outstanding parking debt owed to the City. When the City issues parking violations and the resulting fines are unpaid a required default notice is sent to the debtor; within 90 to 105 days after issuance, the violations become judgments. The debtor's property is then subject to levy by the Sheriff of the City of New York.

5. Defendants, knowing of the process and its timeline, rapidly transfer the registrations of their trucks from the judgment-debtor corporation to other shell corporations; the ticketed vehicles are no longer owned by the corporation incurring the fine, and the Sheriff can no longer levy on the offending truck. In stripping the judgment-debtor corporations of their sole asset – the trucks – the defendants intentionally thwart the City's enforcement of the outstanding parking judgments.

6. Each of the transfers of ownership is also a fraudulent transfer as to the City as judgment creditor in violation of the Debtor-Creditor Law.

7. All of the individual and corporate defendants named herein conspire with one another to engage in ongoing, rapid transfers of ownership that are intended to and do interfere with, thwart, hinder and delay the City's collection of judgments.

8. By the above-described scheme, each of the Individual Defendants named herein misuses the corporations they own and/or control, fails to observe the corporate form and operates the corporations without attention to corporate formalities, and is accordingly liable for the corporations' debts.

Midtown Parking Violations Between Mid-2012 and 2017

9. Defendants' trucks create dangerous situations and disrupt City traffic flow by stopping, standing, or parking in crosswalks (846 violations) or adjacent to fire hydrants (1,192 violations); defendants' trucks ignore red lights (93 violations), and block access to pedestrian ramps (63 violations). The photograph below taken on or about July 20, 2018, for example, shows one of the defendants' trucks, emblazoned with the hashtag "#NewYorkIceCream," selling while illegally standing in the bus lane on Fifth Avenue at its intersection with East 79th Street, just south of the Metropolitan Museum of Art::



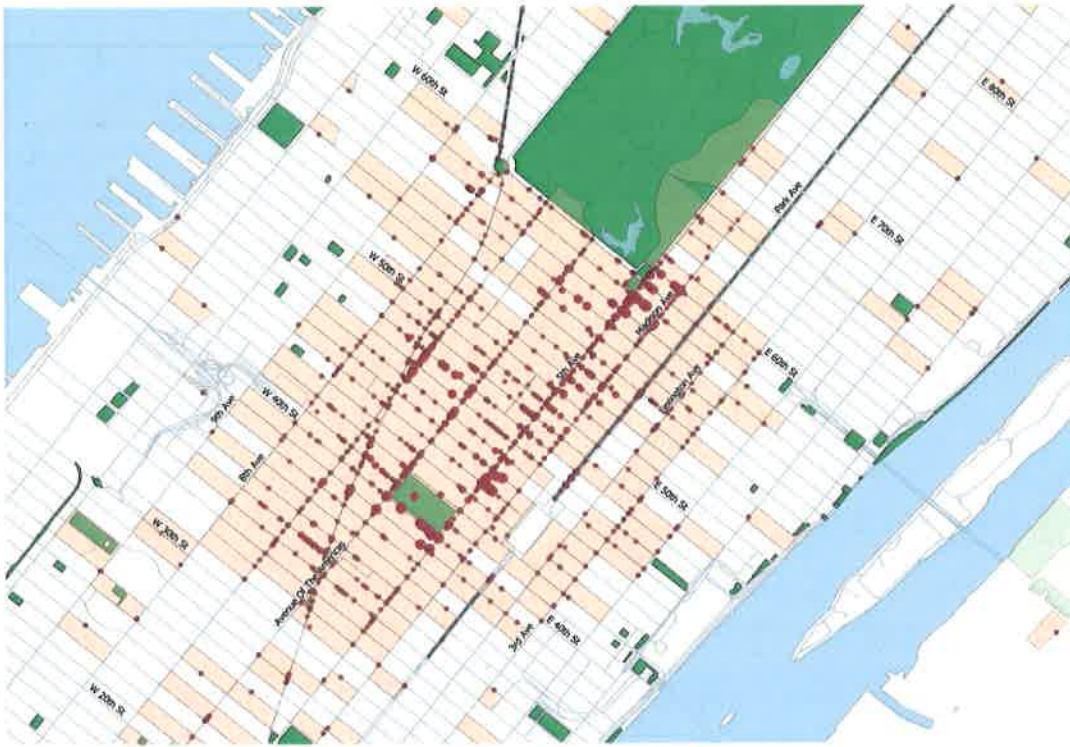
10. The photograph below depicts another of the defendants' trucks parked illegally across from Lincoln Center on Columbus Avenue, near its intersection with West 64th Street, as shown in this photograph taken on or about July 1, 2018.



11. Other examples illustrate defendants' trucks flouting the law by illegally parking in the crosswalk on Fifth Avenue and 50th Street, between Rockefeller Center and St. Patrick's Cathedral, as shown in these photographs taken on or about on or about July 5, 2017:



12. Defendants have between 2009 and 2017 accumulated hundreds of violations concentrated throughout mid-town Manhattan, 98.5% of which were violations between 34th and 59th Streets and between 3rd and 8th Avenues in Manhattan, as shown by the below map of the violations' location.



13. To halt the evasion of City judgments and the threat to public safety caused by defendants' flouting of City parking and traffic rules, the City seeks an order i) authorizing the prejudgment attachment of 46 of the 76 trucks repeatedly transferred as part of this scheme, and that have each accumulated in excess of \$10,000 in judgments and/or unpaid fines, accounting for more than 99% of defendants' \$4.47 million in parking debt through 2017; ii) voiding the fraudulent transfers of trucks on which fines are owed and, entering judgment against the transferor corporations in favor of the City; iii) entering judgments against all defendants named herein, jointly and severally, in an amount sufficient to pay the City damages for interfering with the City's collection of its judgments, including but not limited to the approximate amount of \$4.47 million owed on the unpaid summonses; and iv) enjoining the individual and corporate defendants from transferring vehicle ownership for vehicles on which parking summonses have been issued or will be issued in the future.

PARTIES

14. The individuals named as defendants herein are the principals, shareholders and/or officers of the corporate defendants. The individuals dominate and misuse the corporations they own, operate or control in order to place corporate assets beyond the reach of creditors, and to insulate the corporate defendants from the payment of millions of dollars in judgment debt to the City. The individual defendants divert to themselves and others for their personal use corporate assets that otherwise would be recoverable to pay the enormous fines and penalties owed to the City.

15. The City is a municipal corporation organized pursuant to the laws of the State of New York.

16. Defendant Athanasios Fotinakopoulos is an individual residing at 11 Hillside Avenue, Roslyn, New York 11577.

17. Defendant Helen "Eleni" Fotinakopoulos is an individual residing at 2576 31st Street, Astoria, New York 11102.

18. Defendant Tommy Dalageorgos is an individual residing at 3027 33rd Street, Apt. 1R, Astoria, NY 11102.

19. Defendant Michael A. Vasiadis is an individual residing at 14166 11th Avenue, Malba, New York 11357.

20. Defendant Antonio Tsatsaros is an individual residing at 15134 12th Road, Flushing, New York 11357.

21. Defendant Dimitrios Tsirkos is an individual residing at 12-10 148th Street, Whitestone, New York.

22. Hereafter, Athanasios Fotinakopoulos, Helen “Eleni” Fotinakopoulos, Tommy Dalageorgos, Michael A. Vasiadis, Antonio Tsatsaros and Dimitrios Tsirkos are referred to collectively as the “Individual Defendants.”

23. The corporate defendants in paragraphs 24 to 116 below are referred to collectively as the “Corporate Defendants.”

24. Defendant Ace Ice Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

25. Defendant Alfa Trio Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

26. Defendant Anoria Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

27. Defendant Applä Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about May 23, 2012 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

28. Defendant Astroman Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

29. Defendant Avery Ice Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

30. Defendant Balerius Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

31. Defendant Barretto Services Inc. was a New York corporation with a principal place of business located at 340 Barretto Street, Bronx, New York 10474 from its

incorporation on or about February 24, 2011 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

32. Defendant Best Ice Inc. was a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106 from its incorporation on or about January 10, 2008 until its dissolution by proclamation or annulment of authority on or about July 27, 2011.

33. Defendant Bironia Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about March 11, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

34. Defendant Black Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

35. Defendant Boyz of Midtown Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about September 11, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

36. Defendant Bx IceCream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 18, 2011 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

37. Defendant Calvary Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

38. Defendant Candie Land Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about April 8, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

39. Defendant Carmine Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

40. Defendant CMC Ice Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

41. Defendant Colde Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 11, 2008 until its dissolution by proclamation or annulment of authority on or about July 27, 2011.

42. Defendant Cost Ice Inc. is a New York corporation with a principal place of business located at 17-14 Parsons Boulevard, #2, Whitestone, New York 11357.

43. Defendant Crybay Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 24, 2012 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

44. Defendant Dede Foti Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 1, 2012 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

45. Defendant D.L.T Softex Corp. was a New York corporation with a principal place of business located at 31-42 44th Street, Long Island City, New York 11103 from its incorporation on or about December 29, 1998 until its dissolution by proclamation or annulment of authority on or about June 26, 2002.

46. Defendant Domingo Ice Corp. was a New York corporation with a principal place of business located at 221 East 168th Street, Suite 3D, Bronx, New York 10456 from its incorporation on or about February 22, 2006 until its dissolution by proclamation or annulment of authority on or about April 27, 2011.

47. Defendant Drakos Realty Inc. was a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106 from its incorporation on or about October 16, 1996 until its dissolution by proclamation or annulment of authority on or about December 27, 2000.

48. Defendant Expert Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 18, 2011 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

49. Defendant Fevgo Ice Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

50. Defendant Flates Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

51. Defendant Four Guys Ice Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

52. Defendant Frago Ice Cream Inc. was a New York corporation with a principal place of business located at 240 Barretto Street, Bronx, New York 10474 from its incorporation on or about May 3, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

53. Defendant Galaxy Ice Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 24, 2012 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

54. Defendant Gavros Soft Serve, LLC is a New York corporation with a principal place of business located at 19-24 76th Street, East Elmhurst, New York 11370.

55. Defendant GeekIce Inc. a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

56. Defendant Gopen Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

57. Defendant Gorten Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

58. Defendant H and M Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

59. Defendant Has Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

60. Defendant Hena Ice Inc. is a New York corporation with a principal place of business located at 519 Route 22, Purdys, New York 10579.

61. Defendant Hongway IceCream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 18, 2011 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

62. Defendant Hos 214 Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

63. Defendant Hulina Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about March 12, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

64. Defendant Ice Boyz Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about September 11, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

65. Defendant Ice Mania Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

66. Defendant Icy Man Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

67. Defendant Jurne Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

68. Defendant Kalas Services Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

69. Defendant Kamali Ice Cream Inc. was a New York corporation with a principal place of business located at 240 Barretto Drive, Bronx, New York 10474 from its incorporation on or about June 18, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

70. Defendant Kavena Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about March 11, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

71. Defendant Kavin Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 26, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

72. Defendant Kenwo Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

73. Defendant Kiki Services Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

74. Defendant Kingstone Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 20, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

75. Defendant Kirmon Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its

incorporation on or about March 12, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

76. Defendant Klat Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 26, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

77. Defendant Kong Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 19, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

78. Defendant Krental Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 27, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

79. Defendant Kroat Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 27, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

80. Defendant Ladim Ice Cream Inc. was a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106 from its incorporation on or about March 16, 2010 until its dissolution by proclamation or annulment of authority on or about June 29, 2016.

81. Defendant Laroco Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

82. Defendant Latto Ice Cream Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

83. Defendant Lotsaga Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about March 12, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

84. Defendant Lymol Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

85. Defendant Manana Enterprise Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about October 23, 2009 until its dissolution by proclamation or annulment of authority on or about June 29, 2016.

86. Defendant Manida Hill Desert Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about March 11, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

87. Defendant Marita Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

88. Defendant MB Ice Cream Inc. was a New York corporation with a principal place of business located at 245 Greene Street, Brooklyn, NY 11210 from its

incorporation on or about February 6, 2009 until its dissolution by proclamation or annulment of authority on or about October 26, 2011.

89. Defendant M B H IceCream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 18, 2011 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

90. Defendant Meathead Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

91. Defendant Mia Ice Inc. was a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106 from its incorporation on or about March 4, 2008 until its dissolution by proclamation or annulment of authority on or about July 27, 2011.

92. Defendant Midtown Advisors Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about May 8, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

93. Defendant Minus Below Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

94. Defendant Morgan Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

95. Defendant Nuvarelus Inc. was a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106 from its

incorporation on or about April 10, 2002 until its dissolution by proclamation or annulment of authority on or about April 25, 2012.

96. Defendant Papia I Inc. was a New York corporation with a principal place of business located at 47-30 46th Street, Woodside, New York 11377 from its incorporation on or about November 9, 2012 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

97. Defendant Parkman Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

98. Defendant Pavema Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

99. Defendant Preporium Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

100. Defendant Privilege Inc. was a New York corporation with a principal place of business located at 23-25 35th Street, Astoria, New York 11105 from its incorporation on or about February 22, 2012 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

101. Defendant Robert Fun Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

102. Defendant Sekurta Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about March 12, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

103. Defendant Sidano Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

104. Defendant Softee Taste Corp. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

105. Defendant Super Softee Express Corp. was a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106 from its incorporation on or about August 5, 1998 until its dissolution by proclamation or annulment of authority on or about June 26, 2002.

106. Defendant Tavaga Ice Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

107. Defendant Tentro Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

108. Defendant THTM Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

109. Defendant Tria Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

110. Defendant Twirly Twirl Ice Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

111. Defendant Twist IceCream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about February 1, 2012 until its dissolution by proclamation or annulment of authority on or about August 31, 2016.

112. Defendant Umpa Ice Cream Inc. was a New York corporation with a principal place of business located at 337 Manida Street, Bronx, New York 10474 from its incorporation on or about April 8, 2013 until its dissolution by proclamation or annulment of authority on or about October 26, 2016.

113. Defendant Very Berry Ice Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

114. Defendant Voula Ice Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

115. Defendant Vuku Services Inc. is a New York corporation with a principal place of business located at 34-37 11th Street, Long Island City, New York 11106.

116. Defendant X B Service Inc. is a New York corporation with a principal place of business located at 11-16 34th Avenue, Long Island City, New York 11106.

117. Defendants “John Doe” and “Jane Doe”, number 1 through 76, are fictitiously named parties, diligent investigation having failed to disclose their true names, the parties intended being any person or entity that is an owner, lessee, sublessee, transferor, transferee or operator of the 76 mobile ice trucks at issue, and any other person claiming any right, title or interest in the real or personal property which is the subject of this action. Defendants “John Doc” and “Jane Doc” are included in the terms “Corporate Defendants” and “Individual Defendants” as appropriate.

JURISDICTION

118. The Court has jurisdiction over the defendants pursuant to CPLR § 301.

119. Venue is appropriately laid in New York County as the City’s principal place of business.

FACTS

A. Defendants Transfer Judgment Debtors' Vehicles to Affiliated Shell Corporations for Less Than Fair Market Value

120. Pursuant to the scheme described above, between 2013 and 2017, defendants repeatedly transferred – and continue to transfer – the 76 trucks at issue here one Corporate Defendant to another at below-market sale prices, evading City judgments.

121. To register a corporate vehicle in New York, the registrant must complete and file a DMV vehicle registration/title application form, known as Form MV-82, requiring the registrant to state the vehicle's value, license plate number, name and address of the primary registrant, and vehicle identification number (VIN). Form MV-82 requires a representative of the registrant to certify that the information given in the application is true.

122. Between 2013 and 2017, the defendants conspired with one another to file hundreds of MV-82 forms for the 76 ice cream trucks at issue here, including the 46 ice cream trucks that the City seeks to attach. The defendants filed the MV-82 forms in order to transfer the trucks' ownership from a corporation saddled with pending or actual judgment debt to other shell corporations, thereby evading the City's enforcement of parking judgments. The MV-82 forms were signed by individuals claiming to be officers or other representatives of the corporations effecting the transfers.

123. The majority of the registrations appear to have been performed by (a) **Athanasios Fotinakopoulos**, also known as "A. Fotinakopoulos," "Tommy Fotinakopoulos," and "Tony Fotinakopoulos;" (b) **Tommy Dalageorgos**; (c) **Antonio Tsatsaros**; and (d) **Michael Vasiadis**, each of whom identified himself in DMV filings as an officer of multiple corporations. Each individual is identified in DMV filings as affiliated with one or more of the Corporate Defendants, and as a group, with all 93 Corporate Defendants.

124. The other two Individual Defendants, **Helen “Eleni” Fotinakopoulos** and **Dimitrios Tsirkos**, also have and have had roles in the defendants’ scheme, including the following:

- a. From 2013 through at least 2016, Helen “Eleni” Fotinakopoulos was listed on the lease agreements as a co-lessee for the ice cream truck with VIN # 5B4HP42W823340947, on which — as detailed below in paragraphs 179 and 180 — the defendants have incurred over \$128,000 in unpaid parking debt to the City. During this period, there were multiple transfers of registrations and ownership of this ice cream truck among the defendants, with the corporate registrants during this period including Kong Ice Cream Inc., Robert Fun Ice Inc., Twirly Twirl Ice Inc., Icy Man Inc., Vuku Services Inc. and Ace Ice Inc., and with the registered owners including Athanasios Fotinakopolous, Tommy Dalageorgos, and Michael Vasiadis.
- b. The defendants have also diverted to themselves, including to Helen “Eleni” Fotinakopoulos and Dimitrios Tsirkos, for their personal use corporate assets that otherwise would be recoverable to pay the fines and penalties owed to the City. Upon information and belief, both Ms. Fotinakopolous and Mr. Tsirkos — along with the other Individual Defendants — have diverted corporate monies to personal bank accounts and/or spent corporate monies on non-corporate purposes.
- c. In addition, Tsirkos operates one or more of the three depots where the defendants store their ice cream trucks and is the co-owner, through a limited liability company, of the depot at 11-16 34th Avenue, Long Island City, New York, which is the registered principal place of business of multiple Corporate Defendants, including ACE ICE, Inc., Avery Ice Inc., CMC Ice Inc., Fevgo Ice Inc, Four Guys Ice Inc., Meathead Inc., Tavaga Ice Inc., Twirly Twirl Ice Inc., Very Berry Ice Inc., and X B Service Inc. Together with the other Individual Defendants, Tsirkos controls these corporations and the other Corporate Defendants.

125. All or most of the 76 vehicles that are the subject of the scheme described above are located at three depots: (a) 34-37 11th Street, Long Island City, New York, since 1994 owned by non-party Double Eleven Realty Corp.; (b) 31-65 Vernon Boulevard, Long Island City, New York, owned by non-party JAD Partners LLC since June 2012; and (c) 11-16 34th

Avenue, Long Island City, New York, since 2005 owned by Livadi LLC, whose members are defendant Dimitrios Tsirkos and his wife, non-party Nektaria Otta.

126. In the DMV registrations, the defendants routinely list each truck's value at between \$100 and \$500, far below fair market value for vehicles of their type, age, and condition. As examples, MV-82 forms show below-market valuations in six registrations of the truck with VIN # 1GBHP32WXW3302540 between February 2015 and October 2016. The purported value ranged from (a) \$0 when Fotinakopoulos registered the truck in the name of Ice Mania Inc. in February 2015; (b) \$300 when Vasiadis registered the truck in the name of Umpa Ice Cream Inc. in July 2015; (c) \$199 when Fotinakopoulos registered the truck in the name of Pavema Ice Inc. in September 2015; (d) \$200 when Dalageorgos registered the truck in the name of Calvary Inc. in February 2016; (e) \$250 when Fotinakopoulos registered the truck in the name of Avery Ice Inc. in July 2016; and (f) \$200 when Fotinakopoulos registered the truck in the name of Frizus Ice Inc. in October 2016.

127. In addition to the DMV registration form (Form MV-82), New York vehicle sellers are required to provide vehicle buyers with damages disclosure statements on the back of the vehicle's New York State title certificates, printed on the two-sided DMV form identified as Form MV-999. In filing MV-82 forms with the DMV, prospective registrants demonstrate proof of vehicle ownership by providing certificates of title and damages disclosure statements.

128. These forms also illustrate that the defendants' scheme has no legitimate business purpose. Thus, for example, in the six above-described registrations between February 2015 and October 2016 of the truck with VIN # 1GBHP32WXW3302540 in paragraph 125, the sellers' damages disclosure statements show the truck was: (a) sold by Astralease Associates,

Inc. to Fotinakopoulos, purportedly as “president” of himself, on January 23, 2015; (b) sold by Fotinakopoulos, supposedly in his personal capacity,¹ to Michael Vasiadis, as vice president of Umpa Ice Cream Inc., on July 8, 2015; (c) sold by Antonio Kostas, as vice president of Umpa Ice Cream Inc., to Fotinakopoulos, as president of Pavema Ice Inc., on September 16, 2015; (d) sold by Tsatsaros, as vice president of Pavema Ice Inc., to Dalageorgos, as president of Calvary Inc. on February 22, 2016; (e) sold by Dalageorgos, as president of Calvary Inc., to Fotinakopoulos, as president of Avery Ice, Inc., on June 28, 2016; and (f) sold by Tsatsaros, as president of Avery Ice Inc., to Fotinakopoulos, as president of Frizus Ice Inc., on October 31, 2016, this despite Fotinakopolous supposedly having purchased the truck four months earlier in his capacity as president of Avery Ice Inc., with no documents filed with the DMV in the interim to report an intervening change in title or registration.

**B. 93 Judgment Debtors Have Incurred \$4.47 Million
in Parking Judgment Debt Across 76 Separate Ice
Cream Trucks, from 2009 to 2017**

129. The defendants owe \$4,471,754.58 in judgment debt, exclusive of interest, arising from parking violations on 76 ice cream trucks, each having a unique vehicle identification number (VIN), as required by federal law. The defendants’ scheme involved repeatedly transferring and re-registering the vehicles for less than fair market value to avoid payment of the judgment debt.

130. Table 1 below summarizes the debt incurred by each Corporate Defendant (“Judgment Amount”), the dates between which the underlying parking violations occurred, and the number of trucks (by VIN number) associated with each debtor.

¹ The MV-82 form for the preceding period listed Ice Mania Inc. as the prospective vehicle registrant and title applicant, with Fotinakopolous executing the form on behalf of Ice Mania Inc.

**Table 1. Amount of Debt Associated With Each Judgment Debtor for
Parking Violations Incurred Between 2009 and 2017**

#	Debtor-Registrant	Judgment Amount	Time Period When Parking Violations Occurred	# of VINs
1	Ace Ice Inc.	\$132,126.93	April – July 2016	9
2	Alfa Trio Inc.	\$36,309.80	April -- June 2016	3
3	Anoria Ice Inc.	\$40,961.96	May – July 2016	3
4	Appla Ice Cream Inc.	\$21,535.42	July – October 2012	2
5	Astroman Ice Inc.	\$90,252.95	July – October 2015	7
6	Avery Ice Inc.	\$187,927.16	April – July 2016	9
7	Balerius Ice Inc.	\$30,950.98	April – June 2014	1
8	Barretto Services Inc.	\$39,877.50	April – November 2011	6
9	Best Ice Inc.	\$10,406.21	July – September 2009	1
10	Bironia Ice Cream Inc.	\$33,910.73	April – September 2013	1
11	Black Ice Inc.	\$11,810.80	March -- August 2016	1
12	Boyz of Midtown Inc.	\$1,141.75	September -- October 2013	1
13	Bx IceCream Inc.	\$95,507.56	April 2011 – February 2012	10
14	Calvary Inc.	\$140,168.01	March – July 2016	8
15	Candie Land Ice Cream Inc	\$15,343.87	June – October 2013	1
16	Carmine Ice Inc.	\$870.55	April – June 2016	1
17	CMC Ice Inc.	\$2,913.82	May -- August 2015	1
18	Colde Inc.	\$19,967.67	July – November 2009	4
19	Cost Ice Inc.	\$18,177.49	July – October 2015	3
20	Crybay Inc.	\$31,252.64	March – October 2012	2
21	Dede Foti Inc.	\$18,841.87	April – October 2012	3
22	D.L.T Softex Corp.	\$17,872.29	March – July 2014	5
23	Domingo Ice Corp.	\$47,758.47	September – November 2013	4
24	Drakos Realty Inc.	\$23,074.38	April – July 2015	5
25	Expert IceCream Inc.	\$27,703.95	April – October 2011	3
26	Fevgo Ice Inc.	\$17,878.62	April – August 2016	5
27	Flates Ice Inc.	\$41,618.77	April – July 2014	2
28	Four Guys Ice Inc.	\$172,096.64	July – October 2016	7
29	Frago Ice Cream Inc.	\$68,518.49	June – October 2013	2
30	Galaxy Ice Inc.	\$63,442.60	June – October 2012	8
31	Gavros Soft Serve, LLC	\$13,279.98	June – November 2014	4
32	GeekIce Inc.	\$20,476.96	April – September 2015	2
33	Gopen Ice Inc.	\$52,463.65	March – July 2014	3
34	Gorten Ice Inc.	\$24,592.14	March – July 2014	1
35	H and M Ice Inc.	\$104,340.74	July – October 2014	6
36	Has Ice Inc.	\$28,208.51	April – September 2015	1
37	Hena Ice Inc.	\$53,163.70	April – September 2014	5
38	Hongway IceCream Inc.	\$57,994.37	April – October 2012	3
39	Hos 214 Inc.	\$21,897.51	March – June 2016	2
40	Hulina Ice Cream Inc.	\$14,471.28	May – August 2013	1

#	Debtor-Registrant	Judgment Amount	Time Period When Parking Violations Occurred	# of VINs
41	Ice Boyz Inc.	\$66,917.72	March -- July 2014	5
42	Ice Mania Inc.	\$128,086.75	March -- July 2015	8
43	Icy Man Inc.	\$176,726.84	April -- August 2015	8
44	Jurne Ice Inc.	\$65,953.03	April -- July 2014	4
45	Kalas Services Inc.	\$4,177.05	July -- October 2015	3
46	Kamali Ice Cream Inc.	\$11,273.68	July -- October 2013	1
47	Kavena Ice Cream Inc.	\$36,862.81	April -- August 2013	2
48	Kavin Ice Cream Inc.	\$37,560.37	March -- August 2013	1
49	Kenwo Ice Inc.	\$8,671.55	May -- September 2015	1
50	Kiki Services Inc.	\$77,614.64	March -- June 2016	7
51	Kingstone Ice Cream Inc.	\$58,639.75	March -- September 2013	2
52	Kirmon Ice Cream Inc.	\$29,599.55	May -- September 2013	2
53	Klat Ice Cream Inc.	\$18,786.59	April -- August 2013	1
54	Kong Ice Cream Inc.	\$24,219.97	May -- September 2013	1
55	Krental Ice Cream Inc.	\$38,235.64	March -- September 2013	1
56	Kroat Ice Cream Inc.	\$52,580.58	May -- October 2013	2
57	Ladim Ice Cream Inc.	\$10,252.47	May -- October 2013	2
58	Laroco Inc.	\$9,866.62	November -- December 2014	6
59	Latto Ice Cream Inc.	\$550.93	April 2017	2
60	Lotsaga Ice Cream Inc.	\$46,000.84	May -- October 2013	2
61	Lymol Ice Inc.	\$26,910.88	July -- October 2015	3
62	Manana Enterprise Inc.	\$95,183.92	June 2010 -- March 2012	12
63	Manida Hill Desert Inc.	\$31,030.53	May -- October 2013	1
64	Marita Ice Inc.	\$27,690.60	June -- October 2014	3
65	MB Ice Cream Inc.	\$6,481.94	November -- July 2010	1
66	M B H IceCream Inc.	\$33,269.96	June 2011 -- October 2013	7
67	Meathead Inc.	\$25,123.83	July -- October 2014	1
68	Mia Ice Inc.	\$5,596.43	July -- October 2009	1
69	Midtown Advisors Inc.	\$40,993.47	September -- October 2013	4
70	Minus Below Inc.	\$147,546.71	March -- July 2015	7
71	Morgan Ice Inc.	\$37,616.23	April -- July 2014	2
72	Nuvarelus Inc.	\$22,772.18	April -- October 2013	2
73	Papia I Inc.	\$137,831.68	April -- October 2013	9
74	Parkman Ice Inc.	\$45,517.40	April -- July 2015	3
75	Pavema Ice Inc.	\$61,363.50	September -- October 2015	9
76	Preporium Ice Inc.	\$5,117.16	June -- September 2016	2
77	Privilege Inc.	\$19,317.13	April -- October 2013	4
78	Robert Fun Ice Inc.	\$70,110.39	April -- July 2014	3
79	Sekurta Ice Cream Inc.	\$37,468.71	April -- October 2013	1
80	Sidano Ice Inc.	\$41,044.05	April -- September 2014	1
81	Softee Taste Corp.	\$9,838.54	April -- July 2014	4
82	Super Softee Express Corp.	\$5,567.19	April -- July 2014	5
83	Tavaga Ice Inc.	\$31,716.19	July -- October 2015	3

#	Debtor-Registrant	Judgment Amount	Time Period When Parking Violations Occurred	# of VINs
84	Tentro Inc.	\$1,838.09	July 2014 – March 2015	2
85	THTM Inc.	\$116,922.25	July – November 2014	9
86	Tria Ice Inc.	\$48,863.53	July – October 2014	3
87	Twirly Twirl Ice Inc.	\$82,906.09	July – October 2014	4
88	Twist IceCream Inc.	\$25,424.58	April – December 2012	2
89	Umpa Ice Cream Inc.	\$123,464.60	May – September 2015	8
90	Very Berry Ice Inc.	\$4,361.14	July – October 2014	3
91	Voula Ice Inc.	\$17,980.94	June – September 2014	2
92	Vuku Services Inc.	\$135,387.69	July – October 2015	8
93	X B Service Inc.	\$118,712.47	September 2016 – July 2017	7

131. In total, 76 unique VINs correspond to the 76 vehicles that have accumulated violations equaling \$4,471,754.58 in total judgments. Table 2 below summarizes the amount of the debt corresponding to each truck (by VIN number) (the “VIN Judgment Amount”), in decreasing amount of debt.

**Table 2. Debt Associated with Each Vehicle Identification Number (VIN) for
Parking Violations Incurred Between 2009 and 2017**

Debt Rank	VIN # of Vehicle	VIN Judgment Amounts	# of Debtor-Registrants Associated with VIN	Time Period When Parking Violations Occurred
1	1GBHP32WXW3302540	\$219,017.07	13	July 2010 – Feb. 2017
2	5T4GP41W923343386	\$225,493.25	11	June 2010 – Feb. 2017
3	1GBHP32R3W3304057	\$214,177.30	11	June 2010 – Oct. 2016
4	5B4HPD28693436751	\$202,292.00	12	July 2010 – Feb. 2017
5	1GBKP32RXW3307186	\$162,207.78	6	June 2014 – Oct. 2016
6	1GBHP32R9W3309750	\$160,393.37	11	June 2011 – Jan. 2017
7	1GBGP32Z1S3323776	\$157,068.06	10	April 2012 – Jan. 2017
8	1GDKP32Y1V3502266	\$155,477.95	10	June 2011 – Jan. 2017
9	5B4HP32W1Y3325175	\$155,375.36	9	June 2010 – June 2016
10	1GBHP32K5M3306425	\$151,883.81	11	July 2009 – Sept. 2016
11	1GBHP32K8J3308732	\$147,787.87	12	July 2010 – Feb. 2017
12	1GDHP32R4X3500193	\$147,539.09	7	June 2010 – July 2016
13	1GDKP32Y3S3503608	\$147,042.46	8	May 2011 – June 2016
14	1GBHP32KXR3303804	\$140,385.69	9	June 2011 – Jan. 2017
15	1GBHP32KXS3314968	\$132,553.31	7	Oct. 2012 – June 2016
16	5B4HP32W6X3312601	\$130,001.92	10	June 2010 – Sept. 2016
17	5B4HP42W823340947	\$128,173.91	9	June 2010 – June 2016
18	1GBGP32W4V3306755	\$125,050.10	8	July 2009 – Jan. 2017
19	5B4HPD28893436752	\$119,689.75	10	July 2009 – Feb. 2017
20	1GCJP32J1H3323412	\$117,237.37	9	April 2011 – June 2016
21	1GCJP32J0H3325636	\$103,315.93	11	July 2011 – Oct. 2016
22	1GDJP32J8L3502907	\$90,655.98	8	May 2011 – June 2016
23	5B4KP42Y553401506	\$90,511.97	6	Dec. 2014 – Feb. 2017
24	1FCHE2925YHB55936	\$86,897.59	6	April 2015 – Oct. 2016
25	1GCJP32J6J3333441	\$85,089.62	8	June 2011 – Jan. 2017
26	1GBGP32W7V3304868	\$83,551.83	8	June 2011 – Jan. 2017
27	5B4KP42Y753403208	\$74,699.93	4	May 2015 – Oct. 2016
28	1GBHP32R6T3304050	\$65,229.47	5	June 2014 – July 2016
29	1GDKP32YXV3502640	\$63,671.68	6	April 2013 – Aug. 2016
30	5B4HP32R4Y3317503	\$63,150.66	3	June 2015 – Feb. 2017
31	5T4HP41V953404400	\$58,127.49	6	May 2012 – Feb. 2017
32	5B4KP42Y253399259	\$55,119.24	2	April 2013 – Oct. 2013
33	1GBHP32MOD3331069	\$52,221.18	7	May 2011 – July 2016
34	5B4JP32R1Y3318870	\$43,188.26	2	April 2013 – Sept. 2014
35	1FCJE39H0KHB10289	\$37,393.00	5	July 2013 – Aug. 2016
36	1GBHP32M1E3328442	\$33,739.59	3	May 2012 – Sept. 2014
37	1GBHP32K9L3303994	\$23,971.27	5	May 2013 – June 2015
38	1GDJP32K9L3500625	\$22,092.12	5	July 2013 – Aug. 2016

Debt Rank	VIN # of Vehicle	VIN Judgment Amounts	# of Debtor-Registrants Associated with VIN	Time Period When Parking Violations Occurred
39	5B4HP42W523343384	\$21,241.69	3	April 2015 – June 2016
40	1GBHP32W6V3302436	\$19,118.42	1	April 2013 – Oct. 2013
41	5B4HP42W123340028	\$17,012.71	2	May 2015 – June 2016
42	1GDKP32Y0W3500235	\$13,219.02	2	Aug. 2015 – Aug. 2016
43	TPM32A3500384	\$12,232.45	1	April 2014 – Sept. 2014
44	1GDGP32Z2S3505669	\$12,024.86	2	July 2013 – June 2014
45	1GCJP32J4J3307078	\$11,619.94	2	April 2013 – Oct. 2013
46	1GBHP32RXV3304913	\$10,266.31	3	Nov. 2010 – June 2016
47	1GDP32J9J3501004	\$9,975.65	4	July 2009 – Aug. 2014
48	1GCJP32J4J3318761	\$8,385.71	1	May 2014 – Nov. 2014
49	1GDHP32J4H3501209	\$7,650.16	1	April 2011 – Aug. 2011
50	1GDKP32J1N3501041	\$6,698.45	1	Apr. 2014 – Sept. 2014
51	1GDKP32YXV3502895	\$5,541.02	2	May 2013 – Nov. 2014
52	1GCJP32K2N3314268	\$5,293.71	2	Apr. 2014 – July 2015
53	1GBHP32KXP3320325	\$4,922.78	1	April 2013 – Oct. 2013
54	1GTHP32M8C3501432	\$4,575.67	4	Nov. 2009 – Oct. 2012
55	1J4GW58S91C559461	\$3,918.05	2	Sept. 2014 – Oct. 2015
56	1G1JH52FX27344515	\$3,835.10	2	June 2015 – Sept. 2016
57	1GCDM19W91B117049	\$3,566.68	1	April 2013 – Oct. 2013
58	1HGCG6658XA116227	\$3,163.90	2	July 2015 – Sept. 2016
59	5B4KP42Y523339522	\$2,360.85	1	April 2013
60	1HGCG6671WA002831	\$2,295.21	1	June 2015 – Oct. 2015
61	1GCJP32J1H3336581	\$2,006.15	1	March 2015 – Oct. 2015
62	P35HJDH30716	\$1,947.03	1	Aug. 2010 – Sept. 2010
63	1GDKP32YXV3502816	\$1,638.88	1	March 2014 – July 2014
64	1GDHP32Z5L3500472	\$1,065.62	3	April 2014 – July 2017
65	1GCJP32J2H3320616	\$744.99	2	April 2014 – Oct. 2014
66	5B4KP32R5Y3322666	\$681.22	1	June 2014 – July 2014
67	5B4HP42W423340962	\$660.60	1	May 2014
68	3VWSK29M61M058372	\$495.50	1	April 2016 – Aug. 2016
69	1GCJP32J0E3337507	\$369.32	1	May 2014 – Nov. 2014
70	1FCHE29Y3PHB37714	\$315.95	1	May 2014 – June 2014
71	1GDKP32Y7V3502630	\$311.18	1	May 2014 – Nov. 2014
72	1GDHP32Z5L3500407	\$300.51	1	Apr. 2016 – July 2017
73	1GCJP32J9J3318593	\$276.48	1	April 2014 – July 2014
74	1GCJP32J3J3318735	\$220.03	1	May 2014
75	1LNHM87A81Y646826	\$215.25	1	Sept. 2014
76	1GCJP32J4J3307145	\$113.30	1	July 2011
	SUM OF VIN JUDGMENT AMOUNTS	\$4,471,754.58		

132. For the 46 ice cream trucks that the City seeks to attach, a table below summarizes the changes between 2009 and 2017 in the title owner and registrant names, with the corresponding VIN Judgment Amounts and date range listed for each new registrant, and with the “YEAR” column corresponding to the applicable registration date for the given truck.

133. Following each table is a summary of the purchase-and-sale transactions that the City alleges the defendants have conducted for each truck since 2013. The overwhelming majority of these transfers have been non-arm’s length transactions for less than fair market value.

VIN # 1: 1GBHP32WXW3302540

134. The ice cream truck with VIN # 1GBHP32WXW3302540 incurred parking violations between July 2010 and February 2017, in the amount of approximately \$219,017.07 in unpaid parking debt, excluding interest. During this period, there were thirteen different defendant-registrants, each of which is associated with \$1,302.66 or more in parking judgment debt arising from violations issued against this truck’s owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2010	33073KA	MANANA ENTERPRISE INC.	MANANA ENTERPRISE INC.	07/2010 - 03/2012	\$5,412.79
2011	21184MA	BX ICE CREAM INC	BX ICE CREAM INC	04/2011 - 02/2012	\$17,640.97
2012	18805MC	HONGWAY ICECREAM INC	HONGWAY ICECREAM INC	04/2012 - 10/2012	\$19,975.24
2013	24671MD	ASTRALEASE	KINGSTONS ICE CREAM	03/2013 - 09/2013	\$38,877.30
2013	94754MD	ASTRALEASE	DOMINGO ICE CORP	09/2013- 11/2013	\$15,495.60
2014	37256ME	ASTRALEASE	ROBERT FUN ICE INC	04/2014 - 07/2014	\$28,213.96
2014	69709ME	ASTRALEASE	TWIRLY TWIRL ICE INC	07/2014 - 10/2014	\$21,116.00

2014	71374ME	ASTRALEASE	LAROCO INC.	11/2014- 12/2014	\$1,302.66
2015	21832MG	FOTINAKOPOULOS, A	ICE MANIA INC	03/2015- 07/2015	\$17,629.72
2015	90853MG	UMPA ICE CREAM INC	UMPA ICE CREAM INC	07/2015 - 09/2015	\$9,085.83
2015	42238MH	PAVEMA ICE INC	PAVEMA ICE INC	09/2015 - 12/2015	\$7,262.24
2016	77121MH	CALVARY INC	CALVARY INC	03/2016 - 07/2016	\$17,406.29
2016	35987MJ	AVERY ICE INC	AVERY ICE INC	10/2016- 02/2017	\$19,598.47
TOTAL					\$219,017.07

135. The defendants transferred the truck with VIN # 1GBHP32WXW3302540 in non-arm's length transactions for less than fair market value no fewer than ten times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Hongway IceCream Inc., Kingstone Ice Cream, Domingo Ice Corp., Robert Fun Ice Inc., Twirly Twirl Ice Inc., Laroco Inc., Ice Mania Inc., Pavema Ice Inc., Calvary Inc., and Avery Ice Inc.

136. For the truck with VIN # 1GBHP32WXW3302540, four of these purchase-and-sale transactions occurred between July 2015 and June 2016, and were as follows:

- a. In or about July 2015, Fotinakopoulos sold the truck to Vasiadis for \$300.00, with title ownership transferring from Ice Mania Inc. or Athanasios Fotinakopoulos to Umpa Ice Cream Inc.;
- b. In or about September 2015, Antonio Kostas sold the truck to Fotinakopoulos for \$199.00, with title ownership transferring from Umpa Ice Cream Inc. to Pavema Ice Inc.;
- c. In or about February 2016, Tsatsaros sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Pavema Ice Inc. to Calvary Inc.: and

d. In or about June 2016, Dalageorgos sold the truck to Fotinakopoulos for \$250.00, with title ownership transferring from Calvary Inc. to Avery Ice Inc.

VIN # 2: 5T4GP41W923343386

137. The ice cream truck with VIN # 5T4GP41W923343386 incurred parking violations between June 2010 and February 2017, in the amount of approximately \$225,493.25 in unpaid parking debt, excluding interest. During this period, there were eleven different defendant-registrants, each of which is associated with \$2,116.00 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2010	80101KA	ASTRALEASE	MANANA ENTERPRISE INC	06/2010-09/2010	\$9,796.04
2011	59618MA	ASTRALEASE	BARRETTO SERVICES INC	04/2011-11/2011	\$9,574.25
2013	94522MD	FRAGO ICE CREAM INC	FRAGO ICE CREAM INC	06/2013-10/2013	\$34,955.76
2014	63329ME	ASTRALEASE	ICE BOYZ INC	03/2014-07/2014	\$22,772.39
2014	69708ME	ASTRALEASE	TWIRLY TWIRL ICE INC	07/2014-10/2014	\$22,016.41
2014	99585ME	ASTRALEASE	LAROCO INC	11/2014-12/2014	\$2,116.00
2015	52081MG	ASTRALEASE	ICE MANIA INC	04/2015-07/2015	\$32,362.25
2015	90846MG	ASTRALEASE	VUKU SERVICES INC	07/2015-10/2015	\$25,411.95
2015	42203MH	ASTRALEASE	PAVEMA ICE INC	09/2015-12/2015	\$6,786.64
2016	69412MH	ASTRALEASE	CALVARY INC	02/2016-07/2016	\$32,389.15
2016	33287MJ	ASTRALEASE	AVERY ICE INC	10/2016-02/2017	\$27,312.41
				TOTAL	\$225,493.25

138. The defendants transferred the truck with VIN # 5T4GP41W923343386 in non-arm's length transactions for less than fair market value no fewer than eight times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Frago Ice Cream Inc., Ice Boyz Inc., Twirly Twirl Ice Inc., Laroco Inc., Vuku Services Inc., Pavema Ice Inc., Calvary Ice Inc., and Avery Ice Inc.

VIN # 3: 1GBHP32R3W3304057

139. The ice cream truck with VIN # 1GBHP32R3W3304057 incurred parking violations between June 2010 and October 2016, in the amount of approximately \$214,177.30 in unpaid parking debt, excluding interest. During this period, there were eleven different defendant-registrants, each of which is associated with \$4,776.19 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2010	94652JZ	MANANA ENTERPRISE INC	MANANA ENTERPRISE INC	06/2010-09/2010	\$19,160.48
2011	21748MA	BX ICE CREAM INC	BX ICE CREAM INC	05/2011-08/2011	\$10,817.44
2012	99182MB	GALAXY ICE INC	GALAXY ICE INC	06/2012-10/2012	\$8,423.73
2013	26020MD	MANIDA HILL DESERT INC	MANIDA HILL DESERT INC	05/2013-10/2013	\$31,030.53
2014	32919ME	FLATES ICE INC	FLATES ICE INC	04/2014-07/2014	\$17,294.69
2014	69661ME	THTM INC	THTM INC	07/2014-10/2014	\$24,683.00
2015	45937MG	ICY MAN INC	ICY MAN INC	04/2015-07/2015	\$22,016.65
2015	90858MG	UMPA ICE CREAM INC	UMPA ICE CREAM INC	07/2015-09/2015	\$17,504.70
2015	42237MH	PAVEMA ICE INC	PAVEMA ICE INC	09/2015-10/2015	\$4,776.19
2016	77364MH	ACE ICE INC	ACE ICE INC	04/2016-06/2016	\$24,593.68
2016	35975MJ	FOUR GUYS ICE INC	FOUR GUYS ICE	07/2016-	\$33,876.21

			INC	10/2016	
				TOTAL	\$214,177.30

140. The defendants transferred the truck with VIN # 1GBHP32R3W3304057 in non-arm's length transactions for less than fair market value no fewer than eight times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Galaxy Ice Inc., Manida Hill Desert Inc., Flates Ice Inc., THTM Inc., Icy Man Inc., Umpa Ice Cream Inc., Pavema Ice Inc., Ace Ice Inc., and Four Guys Ice Inc.

141. For the truck with VIN # 1GBHP32R3W3304057, six of these purchase-and-sale transactions occurred between July 2014 and June 2016 and were as follows:

- a. In or about July 2014, Antonio Kostas sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Flates Ice Inc. to THTM Inc.;
- b. In or about March 2015, Tsatsaros sold the truck to Dalageorgos for \$300.00, with title ownership transferring from THTM Inc. to Icy Man Inc.;
- c. In or about July 2015, Dalageorgos sold the truck to Vasiadis for \$200.00, with title ownership transferring from Icy Man Inc. to Umpa Ice Cream Inc.;
- d. In or about September 2015, Antonio Kostas sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from Umpa Ice Cream Inc. to Pavema Ice Inc.;
- e. In or about March 2016, Vasiadis sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Pavema Ice Inc. to Ace Ice Inc.; and

- f. In or about June 2016, Tsatsaros sold the truck to Vasiadis for \$300.00, with title ownership transferring from Ace Ice Inc. to Four Guys Inc.

VIN # 4: 5B4HPD28693436751

142. The ice cream truck with VIN # 5B4HPD28693436751 incurred parking violations between July 2009 and February 2017, in the amount of approximately \$202,292.00 in unpaid parking debt, excluding interest. During this period, there were twelve different defendant-registrants, each of which is associated with \$2,942.52 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2009	54255JZ	AMANOLLAHI REZA M	COLDE INC	07/2009-10/2009	\$8,548.36
2010	29905KA	MANANA ENTERPRISE INC	MANANA ENTERPRISE INC	06/2010-10/2010	\$9,006.24
2011	21749MA	BX ICECREAM INC	BX ICE CREAM INC	04/2011-09/2011	\$21,156.87
2012	78941MB	HONGWAY ICECREAM INC	HONGWAY ICECREAM INC	04/2012-10/2012	\$21,469.51
2013	24710MD	KRENTAL ICE CREAM INC	KRENTAL ICE CREAM	03/2013-09/2013	\$38,235.64
2013	94752MD	DOMINGO ICE CORP	DOMINGO ICE CORP	09/2013-12/2013	\$10,086.59
2014	32177ME	ICE BOYZ INC	ICE BOYZ INC	03/2014-07/2014	\$20,057.65
2014	37279MG	LAROCO INC	LAROCO INC	11/2014-12/2014	\$2,942.52
2015	21833MG	FOTINAKOPOULOS A	ICE MANIA INC	06/2014-06/2015	\$18,678.87
2015	90829MG	VUKU SERVICES	VUKU SERVICES INC	07/2015-09/2015	\$12,823.18
2016	69458MH	ASTRALEASE	CALVARY INC	04/2016 - 07/2016	\$14,857.72
2016	33291MJ	ASTRALEASE	AVERY ICE INC	10/2016-02/2017	\$24,428.85
				TOTAL	\$202,292.00

143. The defendants transferred the truck with VIN # 5B4HPD28693436751 in non-arm's length transactions for less than fair market value no fewer than eight times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Hongway IceCream Inc., Krental Ice Cream, Domingo Ice Corp., Ice Boyz Inc., Laroco Inc., Ice Mania Inc., Vuku Services Inc., Calvary Inc., and Avery Ice Inc.

144. For the truck with VIN # 5B4HPD28693436751, the following four purchase-and-sale transactions occurred between April 2014 and February 2015:

- a. In or about April 2014, Fotinakopoulos sold the truck to Vasiadis for \$400.00, with title ownership transferring from Ice Boyz Inc. to Katra Ice Inc.;
- b. In or about November 2014, Nick Katros sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Katra Ice Inc. to Laroco Inc.
- c. In or about February 2015, Dalageorgos sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from Laroco Inc. to Ice Mania Inc.; and
- d. In or about July 2015, Fotinakopoulos sold the truck to Vasiadis for \$400.00, with title ownership transferring from Fotinakopoulos to Vuku Services Inc.

VIN # 5: 1GBKP32RXW3307186

145. The ice cream truck with VIN # 1GBKP32RXW3307186 incurred parking violations between June 2014 and October 2016, in the amount of approximately \$162,207.78 in unpaid parking debt, excluding interest. During this period, there were five different defendant-

registrants, each of which is associated with \$25,803.73 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2014	77321ME	ASTRALEASE	SIDANO ICE INC	06/2014-09/2014	\$41,044.05
2015	15240MH	ASTRALEASE	ICY MAN INC	04/2015-07/2015	\$28,041.32
2015	90901MG	ASTRALEASE	VUKU SERVICES INC	07/2015-10/2015	\$25,803.73
2016	77201MH	ACE ICE INC	ACE ICE INC	04/2016 - 07/2016	\$26,473.45
2016	35989MJ	FOUR GUYS ICE INC	FOUR GUYS ICE INC	07/2016 - 10/2016	\$32,562.97
				TOTAL	\$162,207.78

146. The defendants transferred the truck with VIN # 1GBKP32RXW3307186 in non-arm's length transactions for less than fair market value no fewer than four times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Sidano Ice Inc., Icy Man Inc., Vuku Services Inc., Ace Ice Inc., and Four Guys Ice Inc.

147. For the truck with VIN # 1GBKP32RXW3307186, the following three purchase-and-sale transactions occurred between November 2015 and June 2016:

- a. In or about November 2015, Vasiadis sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Vasiadis to Pavema Ice Inc.;
- b. In or about March 2016, Fotinakopoulos sold the truck to Vasiadis for \$300, with title ownership transferring from Pavema Ice Inc. to Ace Ice Inc.; and

- c. In or about June 2016, Tsatsaros sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from Ace Ice Inc. to Four Guys Ice Inc.

VIN #6: 1GBHP32R9W3309750

148. The ice cream truck with VIN # 1GBHP32R9W3309750 incurred parking violations between June 2011 and January 2017, in the amount of approximately \$160,393.37 in unpaid parking debt, excluding interest. During this period, there were eleven different defendant-registrants, each of which is associated with \$2,208.34 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	59531MA	MBH ICE CREAM INC	MBH ICE CREAM INC	06/2011-10/2011	\$3,416.55
2012	98711MB	ASTRALEASE	DEDE FOTI INC	04/2012-10/2012	\$2,699.00
2013	65412MD	ASTRALEASE	KIRMON ICE CREAM INC	05/2013-08/2013	\$13,725.65
2014	32921ME	ASTRALEASE	MORGAN ICE INC	03/2014-07/2014	\$24,844.44
2014	69619ME	ASTRALEASE	H AND M ICE INC	07/2014-10/2014	\$24,533.50
2014	37206MG	ASTRALEASE	LAROCO INC	11/2014-12/2014	\$2,208.34
2015	52091MG	ASTRALEASE	MINUS BELOW INC	03/2015-07/2015	\$24,890.10
2015	13737MH	ASTRALEASE	ASTROMAN ICE INC	07/2015-10/2015	\$18,546.08
2015	42236MH	ASTRALEASE	PAVEMA ICE INC	09/2015-12/2015	\$11,567.65
2016	46183MH	ASTRALEASE	KIKI SERVICES INC	03/2016-06/2016	\$12,621.70
2016	33277MJ	ASTRALEASE	X B SERVICE INC	09/2016-01/2017	\$21,340.36
TOTAL					\$160,393.37

149. The defendants transferred the truck with VIN # 1GBHP32R9W3309750 in non-arm's length transactions for less than fair market value no fewer than nine times between 2013 and 2017, during which time the vehicle's registrants included Corporate defendants Dede Foti Inc., Kirmon Ice Cream Inc., Morgan Ice Inc., H and M Ice Inc., Laroco Inc., Minus Below Inc., Astroman Ice Inc., Pavema Ice Inc., Kiki Services Inc., and X B Service Inc.

VIN # 7: 1GBGP32Z1S3323776

150. The ice cream truck with VIN # 1GBGP32Z1S3323776 incurred parking violations between April 2012 and January 2017, in the amount of approximately \$157,068.06 in unpaid parking debt, excluding interest. During this period, there were ten different defendant-registrants, each of which is associated with \$3,356.72 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2012	16831MC	MICHAEL A VASIADIS	TWIST ICE CREAM INC	04/2012-12/2012	\$14,284.60
2013	59619MA	ASTRALEASE	MBH ICE CREAM INC	06/2011-10/2013	\$3,356.72
2013	26032MD	KIRMON ICE CREAM INC	KIRMON ICE CREAM INC	05/2013-08/2013	\$15,873.90
2013	61385MD	MIDTOWN ADVISORS INC	MIDTOWN ADVISORS INC	09/2013-10/2013	\$10,247.06
2014	77134ME	JURNE ICE INC	JURNE ICE INC	04/2014-07/2014	\$28,976.41
2014	67045ME	H AND M ICE INC	H AND M ICE INC	07/2014-09/2014	\$23,619.48
2015	89182MD	MINUS BELOW INC	MINUS BELOW INC	04/2015-07/2015	\$22,380.50
2015	90994MG	ASTROMAN ICE INC	ASTROMAN ICE INC	07/2015-11/2015	\$14,694.28
2016	77368MH	KIKI SERVICES INC	KIKI SERVICES INC	04/2016-06/2016	\$10,839.60
2016	35853MJ	X B SERVICE INC	X B SERVICE INC	09/2016-01/2017	\$12,795.51
TOTAL					\$157,068.06

151. The defendants transferred the truck with VIN # 1GBGP32Z1S3323776 in non-arm's length transactions for less than fair market value no fewer than ten times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants MBH Ice Cream Inc., Kirmon Ice Cream Inc., Midtown Advisors Inc., Jurne Ice Inc., H and M Ice Inc., Minus Below Inc., Astroman Ice Inc., Kiki Services Inc., and X B Service Inc.

152. For the truck with VIN # 1GBGP32Z1S3323776, the following seven purchase-and-sale transactions occurred between June 2014 and June 2017:

- a. In or about June 2014, Dalageorgos sold the truck to Tsatsaros for \$200.00, with title ownership transferring from Jurne Ice Inc. to H and M Ice Inc.;
- b. In or about March 2015, Tsatsaros sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from H and M Ice Inc. to Minus Below Inc.;
- c. In or about July 2015, Dalageorgos sold the truck to Fotinakopoulos — who had apparently bought the same truck a few months earlier — for \$200.00, with title ownership transferring from Minus Below Inc. to Astroman Ice Inc.;
- d. In or about March 2016, Vasiadis sold the truck to Dalageorgos for \$300.00, with title ownership transferring from Astroman Ice Inc. to Kiki Services Inc.;
- e. In or about June 2016, Fotinakopoulos sold the truck to John Cicero for \$300.00, with title ownership transferring from Kiki Services Inc. to X B Service Inc.;

- f. In or about March 2017, an unknown transferor transferred the truck's title ownership from X B Service Inc. to Pony Services Inc.;
- g. In or about June 2017, an unknown seller sold the truck to an unknown buyer for \$500.00, with title ownership transferring from Pony Services Inc. to BDS Acquisitions Inc.

VIN # 8: 1GDKP32Y1V3502266

153. The ice cream truck with VIN # 1GDKP32Y1V3502266 incurred parking violations between June 2011 and January 2017, in the amount of approximately \$155,477.95 in unpaid parking debt, excluding interest. During this period, there were ten different defendant-registrants, each of which is associated with \$8,011.80 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	59643MA	ASTRALEASE	MBH ICE CREAM INC	06/2011-10/2011	\$10,458.08
2012	16804MC	TOMMY DALAGEORGOS	TWIST ICE CREAM INC	04/2012-12/2012	\$11,139.98
2013	26033MD	BIRONIA ICE CREAM INC	BIRONIA ICE CREAM INC	07/2013-12/2013	\$33,910.73
2013	61416MD	MIDTOWN ADVISORS INC	MIDTOWN ADVISORS INC	09/2013-10/2013	\$15,537.95
2014	32826ME	MORGAN ICE INC	MORGAN ICE INC	04/2014-07/2014	\$12,771.79
2014	67068ME	H AND M ICE INC	H AND M ICE INC	07/2014-10/2014	\$16,626.34
2015	46076MG	MINUS BELOW INC	MINUS BELOW INC	04/2015-07/2015	\$18,475.58
2015	90974MG	ASTROMAN ICE INC	ASTROMAN ICE INC	07/2015-09/2015	\$8,011.80
2016	77198MH	KIKI SERVICES INC	KIKI SERVICES INC	04/2016-06/2016	\$10,137.00
2016	35850MJ	X B SERVICE INC	X B SERVICE INC	09/2016-01/2017	\$18,408.70
TOTAL					\$155,477.95

154. The defendants transferred the truck with VIN # 1GDKP32Y1V3502266 in non-arm's length transactions for less than fair market value no fewer than nine times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Twist Ice Cream Inc., Bironia Ice Cream Inc., Midtown Advisors Inc., Morgan Ice Inc., H and M Ice Inc., Minus Below Inc., Astroman Ice Inc., Kiki Services Inc., and X B Service Inc.

155. For the truck with VIN # 1GDKP32Y1V3502266, the following five purchase-and-sale transactions occurred between June 2014 and June 2017:

- a. In or about June 2014, Fotinakopoulos sold the truck to Tsatsaros for \$200.00, with title ownership transferring from Morgan Ice Inc. to H and M Ice Inc.;
- b. In or about March 2015, Dalageorgos sold the truck to Fotinakopoulos for \$250.00, with title ownership transferring from H and M Ice Inc. to Minus Below Inc.;
- c. In or about July 2015, Dalageorgos again sold the truck to Fotinakopoulos for \$200.00 — despite these two being the same buyer and seller of the same truck three months earlier — with title ownership transferring from Minus Below Inc. to Astroman Ice Inc.;
- d. In or about March 2016, Fotinakopoulos sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Astroman Ice Inc. to Kiki Services Inc.; and
- e. In or about June 2016, Fotinakopoulos — who had apparently sold the same truck three months earlier — sold the truck to John Cicero for

\$300.00, with title ownership transferring from Kiki Services Inc. to X B Service Inc.

VIN # 9: 5B4HP32W1Y3325175

156. The ice cream truck with VIN # 5B4HP32W1Y3325175 incurred parking violations between June 2010 and June 2016, in the amount of approximately \$155,375.36 in unpaid parking debt, excluding interest. During this period, there were nine different defendant-registrants, each of which is associated with \$5,836.89 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2010	33079KA	AMANOLLAHI, REZA	MANANA ENTERPRISE INC	06/2010-10/2010	\$5,836.89
2011	59616MA	ASTRALEASE	BARRETTO SERVICES INC	04/2011-10/2011	\$12,957.32
2012	16830MC	ASTRALEASE	GALAXY ICE INC	04/2012-08/2012	\$19,012.94
2013	94521MD	ASTRALEASE	FRAGO ICE CREAM INC	09/2013-05/2013	\$33,562.73
2014	33014ME	ASTRALEASE	BALERIUS ICE INC	07/2014-11/2014	\$30,950.98
2015	99535ME	ASTRALEASE	THTM INC	04/2015-07/2015	\$13,765.52
2015	95586MG	ASTRALEASE	ICY MAN INC	09/2015-12/2015	\$17,939.51
2015	90848MG	ASTRALEASE	VUKU SERVICES INC	07/2015-09/2015	\$13,470.99
2016	94366MH	ASTRALEASE	ACE ICE INC	04/2016-06/2016	\$7,878.48
TOTAL					\$155,375.36

157. The defendants transferred the truck with VIN # 5B4HP32W1Y3325175 in non-arm's length transactions for less than fair market value no fewer than six times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants

Galaxy Ice Inc., Frago Ice Cream Inc., Balerius Ice Inc., THTM Inc., Icy Man Inc., Vuku Services Inc., and Ace Ice Inc.

VIN # 10: 1GBHP32K5M3306425

158. The ice cream truck with VIN # 1GBHP32K5M3306425 incurred parking violations between July 2009 and September 2016, in the amount of approximately \$151,883.81 in unpaid parking debt, excluding interest. During this period, there were eleven different defendant-registrants, each of which is associated with \$967.78 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2009	91136JX	N/A	MIA ICE INC	07/2009-10/2009	\$5,596.43
2012	18980MC	GALAXY ICE INC	GALAXY ICE INC	04/2012-08/2012	\$967.78
2013	44630MD	KAVENA ICE CREAM INC	KAVENA ICE CREAM INC	04/2013-08/2013	\$25,764.09
2013	94754MD	DOMINGO ICE CORP	DOMINGO ICE CORP	09/2013-11/2013	\$15,495.60
2014	32918ME	FLATES ICE INC	FLATES ICE INC	04/2014-06/2014	\$24,324.08
2014	6709ME	THTM INC	THTM INC	07/2014-10/2014	\$9,181.06
2015	42235MH	PAVEMA ICE INC	PAVEMA ICE INC	03/2015-10/2015	\$8,282.26
2015	46077MG	ICY MAN INC	ICY MAN INC	04/2015-07/2015	\$18,627.42
2015	90852MG	UMPA ICE CREAM INC	UMPA ICE CREAM INC	07/2015-09/2015	\$12,760.46
2016	77383MH	ACE ICE INC	ACE ICE INC	04/2016-07/2016	\$15,249.28
2016	35973MJ	FOUR GUYS ICE INC	FOUR GUYS ICE INC	07/2016-09/2016	\$15,635.35
				TOTAL	\$151,883.81

159. The defendants transferred the truck with VIN # 1GBHP32K5M3306425 in non-arm's length transactions for less than fair market value no fewer than nine times between

2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Galaxy Ice Inc., Kavena Ice Cream Inc., Domingo Ice Corp., Flates Ice Inc., THTM Inc., Pavema Ice Inc., Icy Man Inc., Umpa Ice Cream Inc., Ace Ice Inc., and Four Guys ICE Inc.

160. For the truck with VIN # 1GBHP32K5M3306425, the following six purchase-and-sale transactions occurred between June 2014 and March 2017:

- a. In or about June 2014, Fotinakopoulos sold the truck to Vasiadis for \$200.00, and with title ownership transferring from Flates Ice Inc. to THTM Inc.
- b. In or about March 2015, Fotinakopoulos again sold the truck to Vasiadis for \$200.00 — despite these two being the same buyer and seller of the same truck nine months earlier — and with title ownership transferring from THTM Inc. to Icy Man Inc.;
- c. In or about July 2015, Fotinakopoulos once again sold the truck to Vasiadis — despite these two being the same buyer and seller of the same truck three months earlier — for \$200.00, with title ownership transferring from Icy Man Inc. to Umpa Ice Cream Inc.;
- d. In or about September 2015, Antonio Kostas sold the truck to Fotinakopoulos for \$200.00, with title ownership transferring from Umpa Ice Cream Inc. to Pavema Ice Inc.;
- e. In or about June 2016, Tsatsaros sold the truck to Vasiadis for \$300.00, with title ownership transferring from Ace Ice Inc. to Four Guys Ice Inc.; and

f. In and about March 2017, Fotinakopoulos sold the truck to Tsatsaros for \$300.00, with title ownership transferring from Four Guys Ice Inc. to Tesera Services Inc.

VIN # 11: 1GBHP32K8J3308732

161. The ice cream truck with VIN # 1GBHP32K8J3308732 incurred parking violations between July 2010 and February 2017, in the amount of approximately \$147,787.87 in unpaid parking debt, excluding interest. During this period, there were twelve different defendant-registrants, each of which is associated with \$3,908.91 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2010	29896KA	MANANA ENTERPRISE INC	MANANA ENTERPRISE INC	07/2010-09/2010	\$9,245.27
2011	21186MA	BX ICECREAM INC	BX ICE CREAM INC	05/2011-09/2011	\$3,908.91
2012	16785MC	GALAXY ICE INC	GALAXY ICE INC	07/2012-10/2012	\$11,842.83
2013	24711MD	KROKAT ICE CREAM INC	KROKAT ICE CREAM INC	05/2013-09/2013	\$19,917.97
2013	94743MD	DOMINGO ICE CORP	DOMINGO ICE CORP	09/2013-10/2013	\$11,562.26
2014	31240MF	ICE BOYZ INC	ICE BOYZ INC	04/2014-06/2014	\$13,368.87
2014	67089ME	THTM INC	THTM INC	07/2014-10/2014	\$13,709.52
2015	21936MG	ICE MANIA INC	ICE MANIA INC	03/2015-07/2015	\$11,212.06
2015	90851MG	UMPA ICE CREAM INC	UMPA ICE CREAM INC	07/2015-09/2015	\$8,644.57
2015	42236MH	PAVEMA ICE INC	PAVEMA ICE INC	09/2015-12/2015	\$11,567.65
2016	77168MH	CALVARY INC	CALVARY INC	04/2016-06/2016	\$10,512.78
2016	35972MJ	AVERY ICE INC	AVERY ICE INC	10/2016-02/2017	\$22,295.18
TOTAL					\$147,787.87

162. The defendants transferred the truck with VIN # 1GBHP32K8J3308732 in non-arm's length transactions for less than fair market value no fewer than nine times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Galaxy Ice Inc., Kroat Ice Cream Inc., Domingo Ice Corp., Ice Boyz Inc., THTM Inc., Ice Mania Inc., Umpa Ice Cream Inc., Pavema Ice Inc., Calvary Inc., and Avery Ice Inc.

163. For the truck with VIN # 1GBHP32K8J3308732, the following six purchase-and-sale transactions occurred between June 2014 and June 2016:

- a. In or about June 2014, Dalageorgos sold the truck to Vasiadis for \$200.00, with title ownership transferring from Ice Boyz Inc. to THTM Ice Inc.;
- b. In or about March 2015, Vasiadis sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from THTM Inc. to Ice Mania Inc.;
- c. In or about July 2015, Fotinakopoulos sold the truck back to Vasiadis for \$200.00, with ownership transferring from Ice Mania Inc. to Umpa Ice Cream Inc.;
- d. In or about September 2015, Vasiadis sold the truck back to Fotinakopoulos for \$200.00, with title ownership transferring from Umpa Ice Cream Inc. to Pavema Ice Inc.;
- e. In or about March 2016, John Pavemas sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Pavema Ice Inc. to Calvary Inc.; and

f. In or about June 2016, Dalageorgos sold the truck to Fotinakopoulos for \$200.00, with title ownership transferring from Calvary Inc. to Avery Ice Inc.

VIN # 12: 1GDHP32R4X3500193

164. The ice cream truck with VIN # 1GDHP32R4X3500193 incurred parking violations between June 2010 and July 2016, in the amount of approximately \$147,539.09 in unpaid parking debt, excluding interest. During this period, there were seven different defendant-registrants, each of which is associated with \$9,596.75 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2010	94653JZ	MANANA ENTERPRISE	MANANA ENTERPRISE INC	06/2010-09/2010	\$9,596.75
2011	21189MA	BX ICECREAM INC	BX ICECREAM INC	04/2011-09/2011	\$12,247.40
2013	65415MD	ASTRALEASE	KROKAT ICE CREAM INC	04/2013-10/2013	\$32,662.61
2014	32932ME	ASTRALEASE	ROBERT FUN ICE INC	04/2014-07/2014	\$25,298.91
2014	69612ME	ASTRALEASE	TWIRLY TWIRL ICE INC	07/2014-10/2014	\$20,274.94
2015	95587MG	ASTRALEASE	ICY MAN INC	04/2015-09/2015	\$32,454.31
2016	79780MH	ANORIA ICE INC	ANORIA ICE INC	05/2016-07/2016	\$15,004.17
TOTAL					\$147,539.09

165. The defendants transferred the truck with VIN # 1GDHP32R4X3500193 in non-arm's length transactions for less than fair market value no fewer than four times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Kroat Ice Cream Inc., Robert Fun Ice Inc., Twirly Twirl Ice Inc., Icy Man Inc., and Anoria Ice Inc.

166. For the truck with VIN # 1GDHP32R4X3500193, the following two purchase-and-sale transactions occurred between April 2016 and July 2016:

- a. In or about April 2016, Tsatsaros sold the truck to Vasiadis for \$300.00, with title ownership transferring from Ace Ice Inc. to Anoria Ice Inc.; and
- b. In or about July 2016, Fotinakopoulos sold the truck to Vasiadis — who had apparently bought the same truck three months earlier — for \$300.00, with title ownership transferring from Anoria Ice Inc. to Fat Horse Service Inc.

VIN # 13: 1GDKP32Y3S3503608

167. The ice cream truck with VIN # 1GDKP32Y3S3503608 incurred parking violations between May 2011 and June 2016, in the amount of approximately \$147,042.46 in unpaid parking debt, excluding interest. During this period, there were eight different defendant-registrants, each of which is associated with \$1,141.75 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	21854MA	ASTRALEASE	EXPERT ICECREAM INC	05/2011-09/2011	\$9,511.08
2013	24856MD	SEKURTA ICE CREAM INC	SEKURTA ICE CREAM INC	04/2013-10/2013	\$37,468.71
2013	61449MD	BOYZ OF MIDTOWN INC	BOYZ OF MIDTOWN INC	09/2013-10/2013	\$1,141.75
2014	32857ME	GOPEN ICE INC	GOPEN ICE INC	04/2014-06/2014	\$20,767.59
2014	67046ME	TRIA ICE IN	TRIA ICE INC	07/2014-10/2014	\$23,905.26
2015	70342MG	PARKMAN ICE INC	PARKMAN ICE INC	04/2015-07/2015	\$22,652.93
2015	90925MG	LYMOL ICE INC	LYMOL ICE INC	07/2015-09/2015	\$11,486.06
2016	77122MH	ALFA TRIO INC	ALFA TRIO INC	04/2016-	\$20,109.08

				06/2016	
				TOTAL	\$147,042.46

168. The defendants transferred the truck with VIN # 1GDKP32Y3S3503608 in non-arm's length transactions for less than fair market value no fewer than six times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Sekurta Ice Cream Inc. Boyz of Midtown Inc., Gopen Ice Inc., Tria Ice Inc., Parkman Ice Inc., Lymol Ice Inc., and Alfa Trio Inc.

169. For the truck with VIN # 1GDKP32Y3S3503608, the following four purchase-and-sale transactions occurred between June 2014 and June 2016:

- a. In or about June 2014, Tsatsaros sold the truck to Vasiadis for \$200.00, with title ownership transferring Gopen Ice Inc. to Tria Ice Inc.;
- b. In or about March 2015, Tsatsaros sold the truck to Dalageorgos for \$300.00, with title ownership transferring from Tria Ice Inc. to Parkman Ice Inc.;
- c. In or about July 2015, Dalageorgos sold the truck to Fotinakopoulos for \$200.00, with title ownership transferring from to Parkman Ice Inc. to Lymol Ice Inc.; and
- d. In or about February 2016, Tsatsaros sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Lymol Ice Inc. to Alfa Trio Inc.

VIN # 14: 1GBHP32KXR3303804

170. The ice cream truck with VIN # 1GBHP32KXR3303804 incurred parking violations between June 2011 and January 2017, in the amount of approximately \$140,385.69 in unpaid parking debt, excluding interest. During this period, there were nine different defendant-

registrants, each of which is associated with \$3,297.65 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	61199MA	MBH ICE CREAM INC	MBH ICE CREAM INC	06/2011-10/2011	\$3,297.65
2013	24743MD	A FOTINAKOPOULOS	KLAT ICE CREAM INC	04/2013-08/2013	\$18,786.59
2013	61415MD	MIDTOWN ADVISORS INC	MIDTOWN ADVISORS INC	09/2013-10/2013	\$9,124.76
2014	32916ME	JURNE ICE INC	JURNE ICE INC	04/2014-07/2014	\$17,787.51
2014	69676ME	H AND M ICE INC	H AND M ICE INC	07/2014-10/2014	\$23,178.27
2015	89181MD	MINUS BELOW INC	MINUS BELOW INC	04/2015-07/2015	\$24,142.87
2015	90972MG	ASTROMAN ICE INC	ASTROMAN ICE INC	07/2015-10/2015	\$17,07.91
2016	77281MH	KIKI SERVICES INC	KIKI SERVICES INC	04/2016-07/2016	\$13,170.14
2016	35854MJ	X B SERVICE INC	X B SERVICE INC	09/2016-01/2017	\$13,889.99
				TOTAL	\$140,385.69

171. The defendants transferred the truck with VIN # 1GBHP32KXR3303804 in non-arm's length transactions for less than fair market value no fewer than ten times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Klat Ice Cream Inc., Midtown Advisors Inc., Jurne Ice Inc., H and M Ice Inc., Minus Below Inc., Astroman Ice Inc., Kiki Services Inc., and XB Service Inc.

172. For the truck with VIN # 1GBHP32KXR3303804, the following six purchase-and-sale transactions occurred between July 2014 and March 2017:

- a. In or about July 2014, Jurne Basil sold the truck to Tsatsaros for \$200.00, with title ownership transferring from Jurne Ice Inc. to H and M Ice Inc.;

- b. In or about March 2015, Tsatsaros sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from H and M Ice Inc. to Minus Below Inc.;
- c. In or about July 2015, Dalageorgos sold the truck to Fotinakopoulos — who had apparently bought the same truck four months earlier — for \$200.00, with title ownership transferring from Minus Below Inc. to Astroman Ice Inc.;
- d. In or about March 2016, Fotinakopoulos sold the truck back to Dalageorgos for \$200.00, with title ownership transferring from Astroman Ice Inc. to Kiki Services Inc.;
- e. In or about June 2016, Fotinakopoulos — who had apparently sold the same truck three months earlier — sold the truck to John Cicero for \$250.00, with title ownership transferring from Kiki Services Inc. to X B Service Inc.; and
- f. In or about March 2017, Vasiadis sold the truck to Tsatsaros for \$350.00, with title ownership transferring from Frizus Ice Inc. to Pony Services Inc.

VIN # 15: 1GBHP32KXS3314968

173. The ice cream truck with VIN # 1GBHP32KXS3314968 incurred parking violations between October 2012 and June 2016, in the amount of approximately \$132,553.31 in unpaid parking debt, excluding interest. During this period, there were seven different defendant-registrants, each of which is associated with \$302.54 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2012	64100MC	FOTINAKOPOULOS, A	APPLA ICE CREAM INC	10/2012-10/2012	\$3,209.57
2013	24661MD	KAVIN ICE CREAM INC	KAVIN ICE CREAM INC	3/2013-8/2013	\$37,560.37
2014	32847ME	GORTEN ICE INC	GORTEN ICE INC	3/2014-7/2014	\$24,592.14
2014	67066ME	MEATHEAD INC	MEATHEAD INC	7/2014-10/2014	\$25,123.83
2014	71373ME	LAROCO INC	LAROCO INC	10/2014-12/2014	\$302.54
2015	13284MH	LAROCO INC	HAS ICE INC	4/2015-9/2015	\$28,208.51
2016	77355MH	HOS 214; INC	HOS 214 INC	4/2016-6/2016	\$13,556.35
				TOTAL	\$132,553.31

174. The defendants transferred the truck with VIN # 1GBHP32KXS3314968 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Kavin Ice Cream Inc., Gorten Ice Inc., Meathead Inc., Has Ice Inc., and Hos 214 Inc.

175. For the truck with VIN # 1GBHP32KXS3314968, the following four purchase-and-sale transactions occurred between June 2014 and March 2016:

- a. In or about June 2014, Dalageorgos sold the truck to Vasiadis for \$200.00, with title ownership transferring from Gorten Ice Inc. to Meathead Inc.;
- b. In or about November 2014, Vasilios Pippis sold the truck to Dalageorgos for \$300.00, with title ownership transferring from Meathead Inc. to Laroco Inc.;
- c. In or about April 2015, an unknown seller sold the truck to Vasilios Pippis — who had apparently sold the same truck five months earlier — for \$500.00, with ownership transferring from Laroco Inc. to Has Ice Inc.; and

d. In or about March 2016, Tsatsaros sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Has Ice Inc. to Hos 214 Inc.

VIN # 16: 5B4HP32W6X3312601

176. The ice cream truck with VIN # 5B4HP32W6X3312601 incurred parking violations between June 2010 and September 2016, in the amount of approximately \$130,001.92 in unpaid parking debt, excluding interest. During this period, there were ten different defendant-registrants, each of which is associated with \$5,152.79 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2010	80102KA	ASTRALEASE	MANANA ENTERPRISE INC	06/2010-10/2010	\$5,152.79
2011	59617MA	N/A	BARRETTO SERVICES INC	04/2011-10/2011	\$5,823.13
2012	16829MC	GMPR SERVICES INC	GALAXY ICE INC	04/2012-08/2012	\$11,152.82
2013	65414MD	GMPR SERVICES INC	KINGSTONE ICE CREAM	09/2013-05/2013	\$19,762.45
2014	99533ME	ASTRALEASE	THTM INC	07/2014-11/2014	\$16,387.41
2015	13295MH	TOMMY DALAGEORGOS	MINUS BELOW INC	04/2015-07/2015	\$16,438.01
2015	42203MH	PAVEMA ICE INC	PAVEMA ICE INC	09/2015-12/2015	\$6,786.64
2015	90850MG	UMPA ICE CREAM INC	UMPA ICE CREAM INC	07/2015-09/2015	\$13,936.40
2016	77199MH	ACE ICE INC	ACE ICE INC	04/2016-06/2016	\$14,667.43
2016	35974MJ	FOUR GUYS ICE INC	FOUR GUYS ICE INC	07/2016-09/2016	\$19,894.84
TOTAL					\$130,001.92

177. The defendants transferred the truck with VIN # 5B4HP32W6X3312601 in non-arm's length transactions for less than fair market value no fewer than seven times between 2013 and 2017, during which time the vehicle's registrants included Corporate

Defendants Galaxy Ice Inc., Kingstone Ice Cream, THTM Inc., Minus Below Inc., Pavema Ice Inc., Umpa Ice Cream Inc., Ace Ice Inc., and Four Guys Ice Inc.

178. For the truck with VIN # 5B4HP32W6X3312601, the following six purchase-and-sale transactions occurred between July 2015 and June 2017:

- a. In or about July 2015, Dalageorgos sold the truck to Vasiadis for \$300.00, with title ownership transferring from Tommy Dalageorgos to Umpa Ice Cream Inc.;
- b. In or about September 2015, Antonio Kostas sold the truck to Fotinakopoulos for \$250.00, with title ownership transferring from Umpa Ice Cream Inc. to Pavema Ice Inc.;
- c. In or about March 2016, Fotinakopoulos sold the truck to Vasiadis for \$200.00, with title ownership transferring from Pavema Ice Inc. to Ace Ice Inc.;
- d. In or about June 2016, Tsatsaros sold the truck to Vasiadis — who had apparently bought the same truck a few months earlier — for \$250.00, with title ownership transferring from Ace Ice Inc. to Four Guys Ice Inc.;
- e. In or about February 2017, Tsatsaros again sold the truck to Vasiadis — despite these two being the same buyer and seller of the same truck eight months earlier — for \$300.00, with title ownership transferring from Four Guys Ice Inc. to Tesera Services Inc.; and
- f. In or about June 2017, Fotinakopoulos sold the truck to Dalageorgos for \$400.00, with title ownership transferring from Tesera Services Inc. to GMPR Services Inc.

VIN # 17: 5B4HP42W823340947

179. The ice cream truck with VIN # 5B4HP42W823340947 incurred parking violations between June 2010 and June 2016, in the amount of approximately \$128,173.91 in unpaid parking debt, excluding interest. During this period, there were nine different defendant-registrants, each of which is associated with \$8,910.49 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2010	94630JZ	MANANA ENTERPRISE INC	MANANA ENTERPRISE INC	06/2010-09/2010	\$9,798.41
2011	59523MA	BARRETTO SERVICES INC	BARRETTO SERVICES INC	06/2011-09/2011	\$10,08.76
2012	18982MC	ASTRALEASE	GALAXY ICE INC	04/2012-09/2012	\$8,910.49
2013	24603MD	ASTRALEASE	KONG ICE CREAM INC	05/2013-09/2013	\$24,219.97
2014	32931ME	ASTRALEASE	ROBERT FUN ICE INC	04/2014-07/2014	\$16,597.52
2014	69707ME	ASTRALEASE	TWIRLY TWIRL ICE INC	07/2014-10/2014	\$19,498.74
2015	15241MH	ASTRALEASE	ICY MAN INC	04/2015-07/2015	\$15,820.59
2015	90849MG	ASTRALEASE	VUKU SERVICES INC	07/2015-10/2015	\$10,756.46
2016	79709MH	ASTRALEASE	ACE ICE INC	04/2016 - 06/2016	\$12,562.97
				TOTAL	\$128,173.91

180. The defendants transferred the truck with VIN # 5B4HP42W823340947 in non-arm's length transactions for less than fair market value no fewer than six times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Galaxy Ice Inc., Kong Ice Cream Inc., Robert Fun Ice Inc., Twirly Twirly Ice Inc., Icy Man Inc., Vuku Services Inc., and Ace Ice Inc.

VIN # 18: 1GBGP32W4V3306755

181. The ice cream truck with VIN # 1GBGP32W4V3306755 incurred parking violations between July 2009 and January 2017, in the amount of approximately \$125,050.10 in unpaid parking debt, excluding interest. During this period, there were eight different defendant-registrants, each of which is associated with \$5,556.88 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2009	63050JZ	BEST ICE INC	BEST ICE INC	07/2009-10/2009	\$10,406.21
2011	61198MA	MBH ICE CREAM INC	MBH ICE CREAM INC	06/2011-10/2011	\$5,556.88
2013	56854MD	A FOTINAKOPOULOS	MIDTOWN ADVISORS INC	09/2013-10/2013	\$6,083.70
2014	35012ME	VOULA ICE INC	VOULA ICE INC	06/2014-09/2014	\$14,710.32
2015	21948MG	MINUS BELOW INC	MINUS BELOW INC	03/2015-07/2015	\$26,578.84
2015	90971MG	ASTROMAN ICE INC	ASTROMAN ICE INC	07/2015-09/2015	\$23,580.26
2016	77135MH	KIKI SERVICES INC	KIKI SERVICES INC	03/2016-06/2016	\$14,805.96
2016	35855MJ	X B SERVICE INC	X B SERVICE INC	09/2016-01/2017	\$23,327.91
				TOTAL	\$125,050.10

182. The defendants transferred the truck with VIN # 1GBGP32W4V3306755 in non-arm's length transactions for less than fair market value no fewer than six times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Midtown Advisors Inc., Voula Ice Inc., Minus Below Inc., Astroman Ice Inc., Kiki Services Inc., and X B Service Inc.

183. For the truck with VIN # 1GBGP32W4V3306755, the following six purchase-and-sale transactions occurred between April 2014 and February 2017:

- a. In or about April 2014, Fotinakopoulos sold the truck to Vasiadis for \$300.00, with title ownership transferring from Fotinakopoulos to Voula Ice Inc.;
- b. In or about March 2015, Tsatsaros sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from Voula Ice Inc. to Minus Below Inc.;
- c. In or about July 2015, Dalageorgos sold the truck to Fotinakopoulos — who had apparently bought the same truck four months earlier — for \$200.00, with title ownership transferring from Minus Below Inc. to Astroman Ice Inc.;
- d. In or about February 2016, Tsatsaros sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Astroman Ice Inc. to Kiki Services Inc.;
- e. In or about June 2016, Fotinakopoulos sold the truck to John Cicero for \$300.00, with title ownership transferring from Kiki Services Inc. to X B Service Inc.; and
- f. In or about February 2017, Fotinakopoulos — who had apparently sold the same truck ten months earlier — sold the truck to Dalageorgos for \$350.00, with title ownership transferring from X B Service Inc. to Pony Services Inc.

VIN # 19: 5B4HPD28893436752

184. The ice cream truck with VIN # 5B4HPD28893436752 incurred parking violations between July 2009 and February 2017, in the amount of approximately \$119,689.75 in unpaid parking debt, excluding interest. During this period, there were ten different defendant-

registrants, each of which is associated with \$316.47 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2009	93921JZ	AMANOLLAHI REZA M	COLDE INC	07/2009-10/2009	\$8,508.71
2010	29899KA	MANANA ENTERPRISE INC	MANANA ENTERPRISE INC	07/2010-10/2010	\$9,951.44
2011	21192MA	BX ICECREAM INC	BX ICE CREAM INC	04/2011-09/2011	\$12,874.69
2012	78942MB	HONGWAY ICECREAM INC	HONGWAY ICECREAM INC	04/2012-10/2012	\$16,549.62
2014	31278ME	ICE BOYZ INC	ICE BOYZ INC	03/2014-06/2014	\$316.47
2015	46075MG	ICY MAN INC	ICY MAN INC	04/2015-07/2015	\$20,087.16
2015	90857MG	UMPA ICE CREAM INC	UMPA ICE CREAM INC	07/2015-09/2015	\$14,462.07
2015	42239MH	PAVEMA ICE INC	PAVEMA ICE INC	09/2015-12/2015	\$7,959.66
2016	77123MH	CALVARY INC	CALVARY INC	04/2016-06/2016	\$12,426.56
2016	33290MJ	CALVARY INC	AVERY ICE INC	10/2016-02/2017	\$16,553.37
				TOTAL	\$119,689.75

185. The defendants transferred the truck with VIN # 5B4HPD28893436752 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Ice Boyz Inc., Icy Man Inc., Umpa Ice Cream Inc., Pavema Ice Inc., Calvary Inc., and Avery Ice Inc.

186. For the truck with VIN # 5B4HPD28893436752, the following three purchase-and-sale transactions occurred between March 2015 and February 2016:

- a. In or about March 2015, Fotinakopoulos sold the truck to Vasiadis for \$300.00, with title ownership transferring from Katra Ice Inc. to Icy Man Inc.;

- b. In or about July 2015, Dalageorgos sold the truck to Vasiadis — who had apparently bought the same truck a few months earlier — for \$400.00, with title ownership transferring from Icy Man Inc. to Umpa Ice Cream Inc.; and
- c. In or about February 2016, Tsatsaros sold the truck to Dalageorgos for \$300.00, with title ownership transferring from Pavema Ice Inc. to Calvary Inc.

VIN # 20: 1GCJP32J1H3323412

187. The ice cream truck with VIN # 1GCJP32J1H3323412 incurred parking violations between April 2011 and June 2016, in the amount of approximately \$117,237.37 in unpaid parking debt, excluding interest. During this period, there were nine different defendant-registrants, each of which is associated with \$1,302.66 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	21193MA	EXPERT ICECREAM INC	EXPERT ICECREAM INC	04/2011-09/2011	\$11,966.26
2012	16784MC	CRYBAY INC	CRYBAY INC	03/2012-09/2012	\$22,086.59
2013	24855MD	LOTSAGA ICE CREAM INC	LOTSAGA ICE CREAM INC	05/2013-10/2013	\$24,147.08
2014	32825ME	GOPEN ICE INC	GOPEN ICE INC	04/2014-07/2014	\$13,077.48
2014	67069ME	TRIA ICE INC	TRIA ICE INC	07/2014-10/2014	\$20,753.09
2014	71374ME	LAROCO INC	LAROCO INC	11/2014-12/2014	\$1,302.66
2015	21974MG	PARKMAN ICE INC	PARKMAN ICE INC	04/2015-07/2015	\$10,960.52
2015	90926MG	LYMOL ICE INC	LYMOL ICE INC	07/2015-09/2015	\$5,469.85
2016	77287MH	ALFA TRIO INC	ALFA TRIO INC	04/2016-	\$7,473.84

				06/2016	
				TOTAL	\$117,237.37

188. The defendants transferred the truck with VIN # 1GCJP32J1H3323412 in non-arm's length transactions for less than fair market value no fewer than six times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Lotsaga Ice Cream Inc., Gopen Ice Inc., Tria Ice Inc., Parkman Ice Inc., Lymol Ice Inc., and Alfa Trio Inc.

189. For the truck with VIN # 1GCJP32J1H3323412, the following six purchase-and-sale transactions occurred between June 2014 and June 2016:

- a. In or about June 2014, Tsatsaros sold the truck to Vasiadis for \$200.00, with title ownership transferring from Gopen Ice Inc. to Tria Ice Inc.;
- b. In or about October 2014, Tsatsaros — who had apparently sold the same truck four months earlier — sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Tria Ice Inc. to Laroco Inc.;
- c. In or about March 2015, Vasiadis sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from Laroco Inc. to Parkman Ice Inc.;
- d. In or about July 2015, Dalageorgos sold the truck to Fotinakopoulos — who had apparently bought the same truck four months earlier — for \$200.00, with title ownership transferring from Parkman Ice Inc. to Lymol Ice Inc.;
- e. In or about March 2016, Fotinakopoulos sold the truck to Tsatsaros for \$200.00, with title ownership transferring from Lymol Ice Inc. to Alfa Trio Inc.; and

f. In or about June 2016, Tsatsaros sold the truck to Fotinakopoulos for \$200.00, with title ownership transferring from Alfa Trio Inc. to Trakosa Inc.

VIN # 21: 1GCJP32J0H3325636

190. The ice cream truck with VIN # 1GCJP32J0H3325636 incurred parking violations between July 2011 and October 2016, in the amount of approximately \$103,315.93 in unpaid parking debt, excluding interest. During this period, there were eleven different defendant-registrants, each of which is associated with \$302.54 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	21187MA	BX ICE CREAM INC	BX ICE CREAM INC	07/2011-02/2012	\$729.40
2012	21937MC	APPLA ICE CREAM INC	APPLA ICE CREAM INC	07/2012-10/2012	\$18,325.85
2013	29072MD	KAVENA ICE CREAM INC	KAVENA ICE CREAM INC	04/2013-08/2013	\$11,098.72
2013	94744MD	DOMINGO ICE CORP	DOMINGO ICE CORP	09/2013-11/2013	\$10,614.02
2014	31313ME	ICE BOYZ INC	ICE BOYZ INC	03/2014-07/2014	\$10,402.34
2014	67076ME	THTM INC	THTM INC	07/2014-10/2014	\$10,975.62
2014	71373ME	LAROCO INC	LAROCO INC	12/27/2014	\$302.54
2015	21949MG	ICE MANIA INC	ICE MANIA INC	06/2014-07/2015	\$10,067.66
2015	90923MG	COST ICE INC	COST ICE INC	07/2015-10/2015	\$8,029.08
2016	77200MH	ACE ICE INC	ACE ICE INC	04/2016-06/2016	\$5,487.15
2016	35976MJ	FOUR GUYS ICE INC	FOUR GUYS ICE INC	07/2016-10/2016	\$17,283.55
				TOTAL	\$103,315.93

191. The defendants transferred the truck with VIN # 1GCJP32J0H3325636 in non-arm's length transactions for less than fair market value no fewer than eight times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Kavena Ice Cream Inc., Domingo Ice Corp., Ice Boyz Inc., THTM Inc., Laroco Inc., Ice Mania Inc., Cost Ice Inc., ACE Inc., and Four Guys Ice Inc.

192. For the truck with VIN # 1GCJP32J0H3325636, the following six purchase-and-sale transactions occurred between June 2014 and June 2016:

- a. In or about June 2014, Dalageorgos sold the truck to Vasiadis for \$200.00, with title ownership transferring from Ice Boyz Inc. to THTM Inc.;
- b. In or about October 2014, Vasiadis sold the truck back to Dalageorgos for \$300.00, with title ownership transferring from THTM Inc. to Laroco Inc.;
- c. In or about March 2015, Dalageorgos sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from Laroco Inc. to Ice Mania Inc.;
- d. In or about July 2015, Dalageorgos — who had apparently sold the same truck four months earlier — sold the truck to Vasiadis for \$200.00, with title transferring from Ice Mania Inc. to Cost Ice Inc.;
- e. In or about March 2016, Fotinakopoulos sold the truck to Vasiadis — who had apparently bought the same truck eight months earlier — for \$200.00, with title transferring from Cost Ice Inc. to Ace Ice Inc.; and
- f. In or about June 2016, Tsatsaros sold the truck to Vasiadis for \$250.00 — who had apparently bought the same truck three months earlier — with title ownership transferring from Ace Ice Inc. to Four Guys Ice Inc.

VIN # 22: 1GDJP32J8L3502907

193. The ice cream truck with VIN # 1GDJP32J8L3502907 incurred parking violations between May 2011 and June 2016, in the amount of approximately \$90,655.98 in unpaid parking debt, excluding interest. During this period, there were eight different defendant-registrants, each of which is associated with \$4,205.18 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	21855MA	ASTRALEASE	EXPERT ICECREAM INC	05/2011-09/2011	\$6,226.61
2012	30343MC	ASTRALEASE	CRYBAY INC	04/2012-10/2012	\$9,166.05
2013	65413MD	ASTRALEASE	LOTSAGA ICE CREAM INC	05/2013-05/2013	\$21,853.76
2014	37255ME	ASTRALEASE	GOPEN ICE INC	04/2014-07/2014	\$18,618.58
2014	17505MG	DALAGEORGOS TOMMY	TRIA ICE INC	08/2014-09/2014	\$4,205.18
2015	46017MG	PARKMAN ICE INC	PARKMAN ICE INC	04/2015-07/2015	\$11,903.95
2015	90927MG	LYMOL ICE INC	LYMOL ICE INC	07/2015-10/2015	\$9,954.97
2016	77367MH	ALFA TRIO INC	ALFA TRIO INC	04/2016-06/2016	\$8,726.88
				TOTAL	\$90,655.98

194. The defendants transferred the truck with VIN # 1GDJP32J8L3502907 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Lotsaga Ice Cream Inc., Gopen Ice Inc., Tria Ice Inc., Parkman Ice Inc., Lymol Ice Inc., and Alfa Trio Inc.

195. For the truck with VIN # 1GDJP32J8L3502907, the following four purchase-and-sale transactions occurred between March 2015 and June 2016:

- a. In or about March 2015, Dalageorgos sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from Dalageorgos to Parkman Ice Inc.;
- b. In or about July 2015, Dalageorgos again sold the truck to Fotinakopoulos — despite these two being the same buyer and seller of the same truck three months earlier — for \$200.00, with title ownership transferring from Parkman Ice Inc. to Lymol Ice Inc.;
- c. In or about March 2016, Vasiadis sold the truck to Tsatsaros for \$200.00, with title ownership transferring from Lymol Ice Inc. to Alfa Trio Inc.; and
- d. In or about June 2016, Vasiadis again sold the truck to Tsatsaros — despite these two being the same buyer and seller of the same truck three months earlier — for \$250.00, with title ownership transferring from Alfa Trio Inc. to Trakosa Inc.

VIN # 23: 5B4KP42Y553401506

196. The ice cream truck with VIN # 5B4KP42Y553401506 incurred parking violations between December 2014 and February 2017, in the amount of approximately \$90,511.97 in unpaid parking debt, excluding interest. During this period, there were six different defendant-registrants, each of which is associated with \$994.56 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2014	18662MG	ASTRALEASE	LAROCO INC	12/2014-12/2014	\$994.56
2015	52087MG	ASTRALEASE	ICE MANIA INC	04/2015-07/2015	\$13,142.93
2015	90847MG	ASTRALEASE	VUKU SERVICES INC	07/2015-10/2015	\$14,092.87

2015	42239MH	ASTRALEASE	PAVEMA ICE INC	09/2015-12/2015	\$7,959.66
2016	69408MH	ASTRALEASE	CALVARY INC	03/2016-06/2016	\$20,205.14
2016	33288MJ	ASTRALEASE	AVERY ICE INC	10/2016-02/2017	\$34,116.81
TOTAL					\$90,511.97

197. The defendants transferred the truck with VIN # 5B4KP42Y553401506 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Laroco Inc., Ice Mania Inc., Vuku Services Inc., Pavema Ice Inc., Calvary Inc., and Avery Ice Inc.

VIN # 24: 1FCHE2925YHB55936

198. The ice cream truck with VIN # 1FCHE2925YHB55936 incurred parking violations between April 2015 and October 2016 that have given rise to \$86,897.59 in unpaid parking debt, excluding interest. During this period, there were five different defendant-registrants, each of which is associated with \$551.40 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2015	46018MG	ICY MAN INC	ICY MAN INC	04/2015-07/2015	\$21,739.88
2015	95635MG	PAVEMA ICE INC	PAVEMA ICE INC	06/2015-07/2015	\$551.40
2015	90856MG	UMPA ICE CREAM INC	UMPA ICE CREAM INC	07/2015-09/2015	\$16,520.88
2015	93480MG	PAVEMA ICE INC	PAVEMA ICE INC	09/2015-10/2015	\$7,886.78
2016	77366MH	ACE ICE INC	ACE ICE INC	04/2016-07/2016	\$13,285.96
2016	35988MJ	FOUR GUYS ICE INC	FOUR GUYS ICE INC	07/2016-10/2016	\$26,912.69
TOTAL					\$86,897.59

199. The defendants transferred the truck with VIN # 1FCHE2925YHB55936 in non-arm's length transactions for less than fair market value no fewer than five times between

2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Icy Man Inc., Pavema Ice Inc., Umpa Ice Cream Inc., Ace Ice Inc., and Four Guys Ice Inc.

200. For the truck with VIN # 1FCHE2925YHB55936, the following five purchase-and-sale transactions occurred between March 2015 and June 2016:

- a. In or about March 2015, Fotinakopoulos sold the truck to Vasiadis for \$300.00, with title ownership transferring from Fotinakopoulos to Icy Man Inc.;
- b. In or about July 2015, Dalageorgos sold the truck to Vasiadis — who had apparently bought the same truck four months earlier — for \$300.00, with title ownership transferring from Icy Man Inc. Umpa Ice Cream Inc.;
- c. In or about September 2015, Antonio Kostas sold the truck to Fotinakopoulos for \$400.00, with title ownership transferring from Umpa Ice Cream Inc. to Pavema Ice Inc.;
- d. In or about March 2016, Vasiadis sold the truck to Dalageorgos for \$300.00, with title ownership transferring from Pavema Ice Inc. to Ace Ice Inc.; and
- e. In or about June 2016, Tsatsaros sold the truck to Vasiadis for \$350.00, with title ownership transferring from Ace Ice Inc. to Four Guys Ice Inc.

VIN # 25: 1GCJP32J6J3333441

201. The ice cream truck with VIN # 1GCJP32J6J3333441 incurred parking violations between June 2011 and January 2017, in the amount of approximately \$85.089.62 in unpaid parking debt, excluding interest. During this period, there were eight different defendant-registrants, each of which is associated with \$300.92 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	59533MA	MBH ICE CREAM INC	MBH ICE CREAM INC	06/2011-10/2011	\$300.92
2012	98672MB	DEDE FOTI INC	DEDE FOTI INC	04/2012-10/2012	\$6,533.66
2013	26011MD	HULINA ICE CREAM INC	HULINA ICE CREAM INC	05/2013-08/2013	\$14,471.28
2014	32920ME	JURNE ICE INC	JURNE ICE INC	04/2014-07/2014	\$10,477.04
2014	69677ME	H AND M ICE INC	H AND M ICE INC	07/2014-10/2014	\$462.36
2015	45900MG	GEEKICE INC	GEEKICE INC	04/2015-09/2015	\$20,389.35
2016	77173MH	KIKI SERVICES INC	KIKI SERVICES INC	03/2016-06/2016	\$7,507.86
2016	35851MJ	X B SERVICE INC	X B SERVICE INC	09/2016-01/2017	\$24,947.15
				TOTAL	\$85,089.62

202. The defendants transferred the truck with VIN # 1GCJP32J6J3333441 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Hulina Ice Cream Inc., Jurne Ice Inc., H and M Ice Inc., GeekIce Inc., Kiki Services Inc., and X B Service Inc.

203. For the truck with VIN # 1GCJP32J6J3333441, the following four purchase-and-sale transactions occurred between July 2014 and June 2016:

- a. In or about July 2014, Jurne Basil sold the truck to Tsatsaros for \$200.00, with title ownership transferring from Jurne Ice Inc. to H and M Ice Inc.
- b. In or about March 2015, Tsatsaros sold the truck to Fotinakopoulos for \$200.00, with title ownership transferring from H and M Ice Inc. to GeekIce Inc.

- c. In or about February 2016, Tsatsaros — who had apparently sold the same truck eleven months earlier — sold the truck to Dalageorgos for \$200.00, with title ownership transferring from GeekIce Inc. to Kiki Services Inc.; and
- d. In or about June 2016, Fotinakopoulos sold the truck to John Cicero for \$200.00, with title ownership transferring from Kiki Services Inc. to X B Service Inc.

VIN # 26: 1GBGP32W7V3304868

204. The ice cream truck with VIN # 1GBGP32W7V3304868 incurred parking violations between June 2011 and January 2017, in the amount of approximately \$83,551.83 in unpaid parking debt, excluding interest. During this period, there were nine different defendant-registrants, each of which is associated with \$4,002.85 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	59532MA	MBH ICE CREAM INC	MBH ICE CREAM INC	06/2011-10/2011	\$6,883.14
2012	98673MB	DEDE FOTI INC	DEDE FOTI INC	04/2012-10/2012	\$8,639.63
2013	57946MD	KAMALI ICE CREAM INC	KAMALI ICE CREAM INC	07/2013-10/2013	\$11,273.68
2014	32823ME	JURNE ICE INC	JURNE ICE INC	04/2014-07/2014	\$8,712.07
2014	67078ME	H AND M ICE INC	H AND M ICE INC	07/2014-10/2014	\$15,920.79
2015	21976MG	MINUS BELOW INC	MINUS BELOW INC	04/2014-07/2015	\$14,640.81
2015	90993MG	ASTROMAN ICE INC	ASTROMAN ICE INC	07/2015-10/2015	\$4,946.48
2016	16502MJ	KIKI SERVICES INC	KIKI SERVICES INC	04/2016-06/2016	\$8,532.38
2016	35852MJ	X B SERVICE	X B SERVICE INC	09/2016-	\$4,002.85

		INC		01/2017	
				TOTAL	\$83,551.83

205. The defendants transferred the truck with VIN # 1GBGP32W7V3304868 in non-arm's length transactions for less than fair market value no fewer than nine times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Kamali Ice Cream Inc., Jurne Ice Inc., H and M Ice Inc., Minus Below Inc., Astroman Ice Inc., Kiki Services Inc., and X B Service Inc.

206. For the truck with VIN # 1GBGP32W7V3304868, the following six purchase-and-sale transactions occurred between June 2014 and February 2017:

- a. In or about June 2014, Dalageorgos sold the truck to Tsatsaros for \$200.00, with title ownership transferring from Jurne Ice Inc. to H and M Ice Inc.;
- b. In or about March 2015, Tsatsaros sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from H and M Ice Inc. to Minus Below Inc.;
- c. In or about July 2015, Dalageorgos sold the truck to Fotinakopoulos for \$200.00, with title ownership transferring from Minus Below Inc. to Astroman Ice Inc.;
- d. In or about March 2016, Vasiadis sold the truck to Dalageorgos for \$300.00, with title ownership transferring from Astroman Ice Inc. to Kiki Services Inc.;
- e. In or about June 2016, Fotinakopoulos sold the truck to John Cicero for \$300.00, with title ownership transferring from Kiki Services Inc. to X B Service Inc.; and

f. In or about February 2017, Dalageorgos sold the truck to Fotinakopoulos for \$350.00, with title ownership transferring from X B Service Inc. to Pony Services Inc.

VIN # 27: 5B4KP42Y753403208

207. The ice cream truck with VIN # 5B4KP42Y753403208 incurred parking violations between May 2015 and October 2016, in the amount of approximately \$74,699.93 in unpaid parking debt, excluding interest. During this period, there were four different defendant-registrants, each of which is associated with \$6,290.68 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2015	13307MH	VASIADIS, MICHAEL A	UMPA ICE CREAM INC	05/2015-09/2015	\$30,549.69
2015	93481MG	PAVEMA ICE INC	PAVEMA ICE INC	09/2015-10/2015	\$6,290.68
2016	77365MH	ACE ICE	ACE ICE INC	04/2016-07/2016	\$11,928.53
2016	35990MJ	FOUR GUYS ICE INC	FOUR GUYS ICE INC	07/2016-10/2016	\$25,931.03
				TOTAL	\$74,699.93

208. The defendants transferred the truck with VIN # 5B4KP42Y753403208 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Umpa Ice Cream Inc., Pavema Ice Inc., ACE Guys Inc., and Four Guys Ice Inc.

209. For the truck with VIN # 5B4KP42Y753403208, the following five purchase-and-sale transactions occurred between April 2015 and November 2016:

- a. In or about April 2015, Vasiadis sold the truck, purportedly to himself, for \$200.00, with title ownership transferring from Vasiadis to Umpa Ice Cream Inc;
- b. In or about September 2015, Antonio Kostas sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from Umpa Ice Cream Inc. to Pavema Ice Inc.;
- c. In or about March 2016, Fotinakopoulos sold the truck to Dalageorgos for \$350.00, with title ownership transferring from Pavema ice Inc. to ACE Ice Inc.;
- d. In or about June 2016, Tsatsaros sold the truck to Athanasios Fotinakopoulos — who had apparently bought the same truck nine months earlier — for \$350.00, with title ownership transferring from Ace Ice Inc. to Four Guys Ice Inc.; and
- e. In or about November 2016, Tsatsaros again sold the truck to Fotinakopoulos — despite these two being the same buyer and seller of the same truck five months earlier — for \$400.00, with title ownership transferring from Four Guys Ice Inc. to LIC Wholesale Services Inc.

VIN # 28: 1GBHP32R6T3304050

210. The ice cream truck with VIN # 1GBHP32R6T3304050 incurred parking violations between June 2014 and July 2016, in the amount of approximately \$65,229.47 in unpaid parking debt, excluding interest. During this period, there were five different defendant-registrants, each of which is associated with \$3,270.62 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2014	34850ME	VOULA ICE INC	VOULA ICE INC	06/2014- 09/2014	\$3,270.62
2014	99534ME	TMTH SERVICES INC	TMTH SERVICES INC	07/2014- 10/2014	\$19,994.38
2015	70343MG	ICE MANIA INC	ICE MANIA INC	03/2015- 07/2015	\$16,895.54
2015	90900MG	VUKU SERVICES INC	VUKU SERVICES INC	07/2015- 09/2015	\$8,954.79
2016	79752MH	ANORIA ICE INC	ANORIA ICE INC	05/2016- 07/2016	\$16,114.14
				TOTAL	\$65,229.47

211. The defendants transferred the truck with VIN # 1GBHP32R6T3304050 in non-arm's length transactions for less than fair market value no fewer than four times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Voula Ice Inc., Ice Mania Inc., Vuku Services Inc., and Anoria Ice Inc.

VIN # 29: 1GDKP32YXV3502640

212. The ice cream truck with VIN # 1GDKP32YXV3502640 incurred parking violations between April 2013 and August 2016, in the amount of approximately \$63,571.68 in unpaid parking debt, excluding interest. During this period, there were six different defendant-registrants, each of which is associated with \$7,819.37 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2013	18880JZ	ASTRALEASE	NUVARELUS INC	04/2013- 10/2013	\$12,383.03
2013	90855MG	TAVAGA ICE INC	TAVAGA ICE INC	07/2013- 10/2013	\$12,927.76
2014	77221ME	ASTRALEASE	DLT SOFTEX CORP	03/2014- 07/2014	\$10,768.15
2014	67060ME	SUPER STORE EXPRESS CORP	MARITA ICE INC	06/2014- 10/2014	\$9,335.34

2015	70244MG	DRAKOS REALTY INC	DRAKOS REALTY INC	04/2015-07/2015	\$7,819.37
2016	77166MH	FEVGO ICE INC	FEVGO ICE INC	03/2016-08/2016	\$10,438.03
TOTAL					\$63,671.68

213. The defendants transferred the truck with VIN # 1GDKP32YXV3502640 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Nuvarelus Inc., Tavaga Ice Inc., DLT Softex Corp., Marita Ice Inc., Drakos Realty Inc., and Fevgo Ice Inc.

214. For the truck with VIN # 1GDKP32YXV3502640, the following three purchase-and-sale transactions occurred between July 2015 and August 2016.

- a. In or about July 2015, Neftavim Otta sold the truck to Dimitrios Tsirkos for \$200.00, with title ownership transferring from Drakos Realty Inc. to Tavaga Ice Inc;
- b. In or about March 2016, Nick Tavagas sold the truck to Nektaria Otta-Tsirkos for \$300.00, with title ownership transferring from Tavaga Ice Inc. to Fevgo Ice Inc; and
- c. In or about August 2016, Nick Fevgatos sold the truck to Dimitrios Tsirkos for \$400.00, with title ownership transferring from Fevgo Ice Inc. to Grammozi Corp.

VIN # 30: 5B4HP32R4Y3317503

215. The ice cream truck with VIN # 5B4HP32R4Y3317503 incurred parking violations between June 2015 and February 2017, in the amount of approximately \$63,150.66 in unpaid parking debt, excluding interest. During this period, there were three different defendant-

registrants, each of which is associated with \$18,468.31 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2015	48332MG	FOTINAKOPOULOS A	VUKU SERVICES INC	06/2015-10/2015	\$24,073.72
2016	94418MH	CALVARY INC	CALVARY INC	03/2016-06/2016	\$18,468.31
2016	35970MJ	AVERY ICE INC	AVERY ICE INC	10/2016-02/2017	\$20,608.63
				TOTAL	\$63,150.66

216. The defendants transferred the truck with VIN # 5B4HP32R4Y3317503 in non-arm's length transactions for less than fair market value no fewer than three times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Vuku Services Inc., Calvary Inc., Avery Ice Inc., and Frizus Ice Inc.

217. For the truck with VIN # 5B4HP32R4Y3317503, the following three purchase-and-sale transactions occurred between March 2016 and October 2016.

- a. In or about March 2016, Fotinakopoulos sold the truck to Dalageorgos for \$200.00, with title ownership transferring from Fotinakopoulos to Calvary Inc;
- b. In or about June 2016, Dalageorgos sold the truck back to Fotinakopoulos for \$300.00, with title ownership transferring from Calvary Inc. to Avery Ice Inc.; and
- c. In or about October 2016, Tsatsaros sold the truck to Fotinakopoulos — who had apparently bought the same truck four months earlier — for \$300.00, with title ownership transferring from Avery Ice Inc. to Frizus Ice Inc.

VIN # 31: 5T4HP41V953404400

218. The ice cream truck with VIN # 5T4HP41V953404400 incurred parking violations between May 2012 and February 2017, in the amount of approximately \$58,127.49 in unpaid parking debt, excluding interest. During this period, there were six different defendant-registrants, each of which is associated with \$1,300.55 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2012	16915MC	PRIVILEGE INC	PRIVILEGE INC	05/2012-10/2012	\$3,757.76
2013	24746MD	PAPIA I INC	PAPIA I INC	04/2013-10/2013	\$12,687.54
2014	33093ME	HENA ICE INC	HENA ICE INC	04/2014-09/2014	\$1,300.55
2015	31306MH	ASTROMAN ICE INC	ASTROMAN ICE INC	08/2015-09/2015	\$3,466.14
2016	77167MH	CALVARY INC	CALVARY INC	04/2016-06/2016	\$13,902.06
2016	359871MJ	AVERY ICE INC	AVERY ICE INC	10/2016-02/2017	\$23,013.44
				TOTAL	\$58,127.49

219. The defendants transferred the truck with VIN # 5T4HP41V953404400 in non-arm's length transactions for less than fair market value no fewer than four times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Papia I Inc., Hena Ice Inc., Astroman Ice Inc., Calvary Inc., and Avery Ice Inc.

220. For the truck with VIN # 5T4HP41V953404400, the following three purchase-and-sale transactions occurred between February 2016 and March 2017:

- a. In or about February 2016, Ted Markas sold the truck to Dalageorgos for \$400.00, with title ownership transferring from Astroman Ice Inc. to Calvary Inc.;

- b. In or about June 2016, Dalageorgos sold the truck to Fotinakopoulos for \$300.00, with title ownership transferring from Calvary Inc. to Avery Ice Inc.; and
- c. In our about March 2017, Tsatsaros sold the truck to Fotinakopoulos — who had apparently bought the same truck nine months earlier — for \$400.00, with title ownership transferring from Avery Ice Inc. to LIC Wholesale Service Inc.

VIN # 32: 5B4KP42Y253399259

221. The ice cream truck with VIN # 5B4KP42Y253399259 incurred parking violations between April 2013 and October 2013, in the amount of approximately \$55,119.24 in unpaid parking debt, excluding interest. During this period, there were two different defendant-registrants, each of which is associated with \$11,650.51 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2013	98761MB	PRIVILEGE INC	PRIVILEGE INC	04/2013- 10/2013	\$11,650.51
2013	24831MD	PAPIA I INC	PAPIA I INC	04/2013- 10/2013	\$43,468.73
				TOTAL	\$55,119.24

222. The defendants transferred the truck with VIN # 5B4KP42Y253399259 in non-arm's length transactions for less than fair market value at least once between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Privilege Inc. and Papia I Inc.

VIN # 33: 1GBHP32MOD3331069

223. The ice cream truck with VIN # 1GBHP32MOD3331069 incurred parking violations between May 2011 and July 2016, in the amount of approximately \$52,221.18 in unpaid parking debt, excluding interest. During this period, there were seven different defendant-registrants, each of which is associated with \$316.47 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2011	21750MA	BX ICE CREAM INC	BX ICE CREAM INC	05/2011- 08/2011	\$8,368.42
2013	56853MD	CANDIE LAND ICE CREAM INC	CANDIE LAND ICE CREAM INC	06/2013- 10/2013	\$15,343.87
2014	31278ME	ICE BOYZ INC	ICE BOYZ INC	03/2014- 07/2014	\$316.47
2014	67077ME	THTM INC	THTM INC	07/2014- 08/2014	\$1,510.86
2015	21784MG	ICE MANIA INC	ICE MANIA INC	05/2015- 06/2015	\$8,097.72
2015	90924MG	COST ICE INC	COST ICE INC	07/2015- 09/2015	\$8,740.19
2016	79779MH	ANORIA ICE INC	ANORIA ICE INC	05/2016- 07/2016	\$9,843.65
				TOTAL	\$52,221.18

224. The defendants transferred the truck with VIN # 1GBHP32MOD3331069 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Candie Land Ice Cream Inc., Ice Boyz Inc., THTM Inc., Ice Mania Inc., Cost Ice Inc. and Anoria Ice Inc.

225. For the truck with VIN # 1GBHP32MOD3331069, the following five purchase-and-sale transactions occurred between June 2014 and March 2017, with Vasiadis listed as the buyer on four of the five transactions:

- a. In or about June 2014, Fotinakopoulos sold the truck to Vasiadis for \$200.00, with title ownership transferring from Ice Boyz Inc. to THTM Inc.;
- b. In or about February 2015, Fotinakopoulos sold the truck to K. Dalageorgos for \$200.00, with title ownership transferring from THTM Inc. to Ice Mania Inc.;
- c. In or about July 2015, Dalageorgos sold the truck to Vasiadis for \$200.00, with title ownership transferring from Ice Mania Inc. to Cost Ice Inc.;
- d. In or about April 2016, Tsatsaros sold the truck to Vasiadis — who had apparently bought the same truck nine months earlier — for \$200.00, with title ownership transferring from Cost Ice Inc. to Anoria Ice Inc.; and
- e. In or about March 2017, Fotinakopoulos sold the truck to Vasiadis — who had apparently bought the same truck eleven months earlier — for \$300.00 with title ownership transferring from Fat Horse Service Inc. to TMTH Services Inc.

VIN # 34: 5B4JP32R1Y3318870

226. The ice cream truck with VIN # 5B4JP32R1Y3318870 incurred parking violations between April 2013 and September 2014, in the amount of approximately \$43,188.26 in unpaid parking debt, excluding interest. During this period, there were two different defendant-registrants, each of which is associated with \$19,790.36 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2013	24830MD	PAPIA INC	PAPIA INC	04/2013-10/2013	\$23,397.90
2014	75390ME	HENA ICE INC	HENA ICE INC	04/2014-09/2014	\$19,790.36
				TOTAL	\$43,188.26

227. The defendants transferred the truck with VIN # 5B4JP32R1Y3318870 in a non-arm's length transaction for less than fair market value at least once between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Papia Inc. and Hena Ice Inc. More specifically, in or about September 2014, an unknown seller sold the truck to an unknown buyer for \$300.00, with title ownership transferring from Hena Ice Inc. to Popcorn NY Inc.

VIN # 35: 1FCJE39H0KHB10289

185. The ice cream truck with VIN # 1FCJE39H0KHB10289 incurred parking violations between July 2013 and August 2016, in the amount of approximately \$1,966.22 in unpaid parking debt, excluding interest. During this period, there were five different defendant-registrants, each of which is associated with \$1,966.22 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2013	90873MG	TAVAGA ICE INC	TAVAGA ICE INC	07/2013- 10/2013	\$9,780.02
2014	84602JN	N/A	SOFTEE TASTE CORP	04/2014- 06/2014	\$8,180.77
2014	67067ME	MARITA ICE INC	MARITA ICE INC	07/2014- 10/2014	\$9,493.26
2015	4607MG	DRAKOS REALTY INC	DRAKOS REALTY INC	04/2015- 07/2015	\$7,972.73
2016	77456MH	FEVGO ICE INC	FEVGO ICE INC	03/2016- 08/2016	\$1,966.22
				TOTAL	\$37,393.00

228. The defendants transferred the truck with VIN # 1FCJE39H0KHB10289 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Tavaga Ice Inc., Nuvarelus Inc., Marita Ice Inc., Drakos Realty Inc., and Latto Ice Cream Inc.

229. For the truck with VIN # 1FCJE39H0KHB10289, the following five purchase-and-sale transactions occurred between June 2014 and August 2016, with Dimitrios Tsirkos listed as the buyer on all five transactions:

- a. In or about June 2014, an unknown seller sold the truck to Dimitrios Tsirkos for \$200.00, with title ownership transferring from Nuvarelus Inc. to Marita Ice Inc.
- b. In or about March 2015, Tsatsaros sold the truck to Dimitrios Tsirkos for \$200.00, with title ownership transferring from Marita Ice Inc. to Drakos Realty Inc.
- c. In or about July 2015, John Drakos sold the truck to Dimitrios Tsirkos for \$200.00, with title ownership transferring from Drakos Realty Inc. to Tavaga Ice Inc.
- d. In or about April 2016, Jose Tavagas sold the truck to Dimitrios Tsirkos for \$100.00, with title ownership transferring from Tavaga Ice Inc. to Fevgo Ice Inc.; and
- f. In or about August 2016, an unknown seller sold the truck to Dimitrios Tsirkos for \$300.00, with title ownership transferring from Fevgo Ice Inc. to Latto Ice Cream Inc.

VIN # 36: 1GBHP32M1E3328442

230. The ice cream truck with VIN # 1GBHP32M1E3328442 incurred parking violations between May 2012 and September 2014, in the amount of approximately \$33,739.59 in unpaid parking debt, excluding interest. During this period, there were three different defendant-registrants, each of which is associated with \$496.86 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2012	98799MB	PRIVILEGE INC	PRIVILEGE INC	05/2012-10/2012	\$496.86
2013	26120MD	PAPIA I INC	PAPIA I INC	04/2013-10/2013	\$20,100.84
2014	33067ME	HENA ICE INC	HENA ICE INC	04/2014-09/2014	\$13,141.89
				TOTAL	\$33,739.59

231. The defendants transferred the truck with VIN # 1GBHP32M1E3328442 in non-arm's length transactions for less than fair market value no fewer than three times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Privilege Inc., Papia I Inc., and Hena Ice Inc.

232. In or about May 2015, Subultepe Sinon sold the truck with VIN # 1GBHP32M1E3328442 to D. Mouzakitis for \$500.00, with title ownership transferring from Hena Ice Inc. to Vrasi Management Inc.

VIN # 37: 1GBHP32K9L3303994

233. The ice cream truck with VIN # 1GBHP32K9L3303994 incurred parking violations between May 2013 and June 2015, in the amount of approximately \$23,971.27 in unpaid parking debt, excluding interest. During this period, there were four different defendant-registrants, each of which is associated with \$348.86 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2013	31020MB	LADIM ICE CREAM INC	LADIM ICE CREAM INC	05/2013-10/2013	\$8,925.22
2013	63334ME	LADIM ICE CREAM INC	DLT SOFTEX CORP	07/2013-10/2013	\$1,635.71
2014	35056ME	DLT SOFTEX CORP	DLT SOFTEX CORP	03/2014-07/2014	\$4,199.48
2014	99532ME	DLT SOFTEX CORP	MARITA ICE INC	06/2014-10/2014	\$8,862.00
2015	45961MG	DRAKOS REALTY INC	DRAKOS REALTY INC	06/2015-06/2015	\$348.86
TOTAL					\$23,971.27

234. The defendants transferred the truck with VIN # 1GBHP32K9L3303994 in non-arm's length transactions for less than fair market value no fewer than three times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Ladim Ice Cream Inc., DLT Softex Corp., Marita Ice Inc., and Drakos Realty Inc.

235. For the truck with VIN # 1GBHP32K9L3303994, the following three purchase-and-sale transactions occurred between June 2014 and July 2015:

- a. In or about June 2014, Dimitrios Tsirkos sold the truck to Vasiadis for \$200.00, with title ownership transferring from DLT Softex Corp. to Marita Ice Inc.;
- b. In or about March 2015, Tsatsaros sold the truck to Dimitrios Tsirkos for \$200.00, with title ownership transferring from Marita Ice Inc. to Drakos Realty Inc.; and
- c. In or about July 2015, an unknown seller sold the truck to Simon Singerman for \$200.00, with title ownership transferring from Drakos Realty Inc. to Tsicon Ice Inc.

VIN # 38: 1GDJP32K9L3500625

236. The ice cream truck with VIN # 1GDJP32K9L3500625 incurred parking violations between July 2013 and August 2016, in the amount of approximately \$22,092.12 in unpaid parking debt, excluding interest. During this period, there were five different defendant-registrants, each of which is associated with \$119.82 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2013	90874MG	TAVAGA ICE INC	TAVAGA ICE INC	07/2013-10/2013	\$9,08.41
2014	30793KA	N/A	SUPER SOFTEE EXPRESS CORP	04/2014-04/2014	\$119.82
2014	69623ME	VERY BERRY ICE INC	VERY BERRY ICE INC	07/2014-09/2014	\$3,717.27
2015	45989MG	DRAKOS REALTY INC	DRAKOS REALTY INC	04/2015-07/2015	\$6,273.90
2016	77457MH	FEVGO ICE INC	FEVGO ICE INC	04/2016-08/2016	\$2,972.72
				TOTAL	\$22,092.12

237. The defendants transferred the truck with VIN # 1GDJP32K9L3500625 in non-arm's length transactions for less than fair market value no fewer than five times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Tavaga Ice Inc., Super Softee Express Corp., Very Berry Ice Inc., Drakos Realty Inc., and Fevgo Ice Inc.

238. For the truck with VIN # 1GDJP32K9L3500625, the following five purchase-and-sale transactions occurred between June 2014 and August 2016, with Dimitrios Tsirkos listed as the buyer on four of the five transactions:

- a. In or about June 2014, Dimitrios Tsirkos sold the truck to Dalageorgos for \$5,000.00, with title ownership transferring from Super Softee Express Corp. to Very Berry Ice Inc.;
- b. In or about March 2015, Tsatsaros sold the truck to Dimitrios Tsirkos for \$200.00, with title ownership transferring from Very Berry Ice Inc. to Drakos Realty Inc.;
- c. In or about July 2015, John Drakos sold the truck to Dimitrios Tsirkos for \$200.00, with title ownership transferring from Drakos Realty Inc. to Tavaga Ice Inc.;
- d. In or about April 2016, Jose Tavagas sold the truck to Dimitrios Tsirkos for \$100.00, with title ownership transferring from Tavaga Ice Inc. to Fevgo Ice Inc; and
- e. In or about August 2016, Nektaria Otta sold the truck to Dimitrios Tsirkos for \$200.00, with title ownership transferring from Fevgo Ice Inc. to Grammozi Corp.

VIN # 39: 5B4HP42W523343384

239. The ice cream truck with VIN # 5B4HP42W523343384 incurred parking violations between April 2015 and June 2016, in the amount of approximately \$21,241.69 in unpaid parking debt, excluding interest. During this period, there were two different defendant-registrants, each of which is associated with \$87.61 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2015	52090MG	ASTRALEASE	GEEKICE INC	04/2015-09/2015	\$87.61

2016	46183MH	ASTRALEASE	KIKI SERVICES INC	03/2016-06/2016	\$12,621.70
2016	16502MJ	ASTRALEASE	KIKI SERVICES INC	04/2016-06/2016	\$8,532.38
TOTAL					\$21,241.69

240. The defendants transferred the truck with VIN # 5B4HP42W523343384 in a non-arm's length transaction for less than fair market value at least once between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants GeekIce Inc. and Kiki Services Inc.

VIN # 40: 1GBHP32W6V3302436

241. The ice cream truck with VIN # 1GBHP32W6V3302436 was registered in the name of Defendant Papia I Inc. between April 2013 and October 2013, during which time it incurred parking violations in the amount of approximately \$19,118.42 in unpaid parking debt, excluding interest.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2013	24851MD	PAPIA I INC	PAPIA I INC	04/2013- 10/2013	\$19,118.42
TOTAL					\$19,118.42

242. The defendants transferred the truck with VIN # 1GBHP32W6V3302436 in non-arm's length transactions for less than fair market value at least once between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendant Papia I Inc.

VIN # 41: 5B4HP42W123340028

243. The ice cream truck with VIN # 5B4HP42W123340028 incurred parking violations between May 2015 and June 2016, in the amount of approximately \$17,012.71 in unpaid parking debt, excluding interest. During this period, there were two different defendant-registrants, each of which is associated with \$8,341.16 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2015	48129MG	KENWO ICE INC	KENWO ICE INC	05/2015-09/2015	\$8,671.55
2016	77118MH	HOS 214 INC	HOS 214 INC	04/2016-06/2016	\$8,341.16
				TOTAL	\$17,012.71

244. The defendants transferred the truck with VIN # 5B4HP42W123340028 in non-arm's length transactions for less than fair market value no fewer than three times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Kenwo Ice Inc. and Hos 214 Inc.

245. For the truck with VIN # 5B4HP42W123340028, the following three purchase-and-sale transactions occurred between April 2015 and June 2016.

- a. In or about April 2015, Tsatsaros sold the truck to Fotinakapolous for \$300.00, with title ownership transferring from THTM Inc. to Kenwo Ice Inc.;
- b. In or about February 2016, Tsatsaros — who had apparently sold the same truck ten months earlier — sold the truck to Dalageorgos for \$300.00, with title ownership transferring from Kenwo Ice Inc. to Hos 214 Inc.; and
- c. In or about June 2016, Fotinakopoulos sold the truck to Dalageorgos — who had apparently bought the same truck four months earlier — for \$300.00, with title ownership transferring from Hos 214 Inc. to Gunz Services Inc.

VIN # 42: 1GDKP32Y0W3500235

246. The ice cream truck with VIN # 1GDKP32Y0W3500235 incurred parking violations between August 2015 and August 2016, in the amount of approximately \$13,219.02 in

unpaid parking debt, excluding interest. During this period, there were two different defendant-registrants, each of which is associated with \$1,408.22 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2015	46125MG	COST ICE INC	COST ICE INC	08/2015-09/2015	\$1,408.22
2016	77112MH	BLACK ICE INC	BLACK ICE INC	03/2016-08/2016	\$11,810.80
				TOTAL	\$13,219.02

247. The defendants transferred the truck with VIN # 1GDKP32Y0W3500235 in non-arm's length transactions for less than fair market value no fewer than three times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Cost Ice Inc. and Black Ice Inc.

248. For the truck with VIN # 1GDKP32Y0W3500235, the following three purchase-and-sale transactions occurred between April 2015 and August 2016.

- a. In or about April 2015, Tsatsaros sold the truck to K. Dalageorgos for \$350.00, with title ownership transferring from G & G Softee Inc. to Cost Ice Inc;
- b. In or about February 2016, Dominick Delovenzo sold the truck to Dalageorgos for \$100.00, with title ownership transferring from Cost Ice Inc. to Black Ice Inc; and
- c. In or about August 2016, Fotinakopoulos sold the truck to Tsatsaros for \$300.00, with title ownership transferring from Black Ice Inc. to Fat Horse Service Inc.

VIN # 43: TPM32A3500384

249. The ice cream truck with VIN # TPM32A3500384 was registered in the name of Defendant Hena Ice Inc. between April 2014 and September 2014, during which time it incurred parking violations in the approximate amount of \$12,232.45 in unpaid parking debt, excluding interest.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2014	33098ME	HENA ICE INC	HENA ICE INC	04/2014- 09/2014	\$12,232.45
				TOTAL	\$12,232.45

250. The defendants transferred the truck with VIN # TPM32A3500384 in a non-arm's length transaction for less than fair market value at least once between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendant Hena Ice Inc.

251. In or about April 2015, Nick Henas sold the truck with VIN # TPM32A3500384 to an unknown buyer for \$300.00, with title ownership transferring from Hena Ice Inc. to Vrasi Management Inc.

VIN # 44: 1GDGP32Z2S3505669

252. The ice cream truck with VIN # 1GDGP32Z2S3505669 incurred parking violations between July 2013 and June 2014, in the amount of approximately \$12,024.86 in unpaid parking debt, excluding interest. During this period, there were two different defendant-registrants, each of which is associated with \$1,635.71 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2013	12366JU	NUVARELUS INC	NUVARELUS INC	07/2013-10/2013	\$10,389.15
2014	63334ME	DLT SOFTEX CORP	DLT SOFTEX CORP	04/2014-06/2014	\$1,635.71

TOTAL	\$12,024.86
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253. The defendants transferred the truck with VIN # 1GDGP32Z2S3505669 in a non-arm's length transaction for less than fair market value at least once between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Nuvarelus Inc. and DLT Softex Corp.

VIN # 45: 1GCJP32J4J3307078

254. The ice cream truck with VIN # 1GCJP32J4J3307078 incurred parking violations between April 2013 and October 2013, in the amount of approximately \$11,619.94 in unpaid parking debt, excluding interest. During this period, there were two different defendant-registrants, each of which is associated with \$3,412.00 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2013	16712MC	PRIVILEGE INC	PRIVILEGE INC	04/2013-10/2013	\$3,412.00
2013	26121MD	PAPIA I INC	PAPIA I INC	04/2013-10/2013	\$8,207.94
				TOTAL	\$11,619.94

255. The defendants transferred the truck with VIN # 1GCJP32J4J3307078 in a non-arm's length transaction for less than fair market value at least once between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants Privilege Inc. and Papia I Inc.

VIN # 46: 1GBHP32RXV3304913

256. The ice cream truck with VIN # 1GBHP32RXV3304913 incurred parking violations between November 2010 and June 2016, in the amount of approximately \$10,266.31 in unpaid parking debt, excluding interest. During this period, there were three different

defendant-registrants, each of which is associated with \$870.55 or more in parking judgment debt arising from violations issued against this truck's owners and/or registrants.

YEAR	PLATE	TITLE OWNER	REGISTERED NAME	VIOLATION DATE RANGE	VIN JUDGMENT AMOUNT
2014	18756JZ	MB ICE CREAM INC	MB ICE CREAM INC	11/2010-07/2014	\$6,481.94
2015	21889MG	CMC ICE INC	CMC ICE INC	05/2015-09/2015	\$2,913.82
2016	45947MH	CARMINE ICE INC	CARMINE ICE INC	04/2016-06/2016	\$870.55
				TOTAL	\$10,266.31

257. The defendants transferred the truck with VIN # 1GBHP32RXV3304913 in non-arm's length transactions for less than fair market value no fewer than three times between 2013 and 2017, during which time the vehicle's registrants included Corporate Defendants MB Ice Cream Inc., CMC Ice Inc., and Carmine Ice Trio.

258. For the truck with VIN # 1GBHP32RXV3304913, the following three purchase-and-sale transactions occurred between August 2014 and June 2016.

- a. In or about August 2014, an unknown seller sold the truck to Vasiadis for \$100.00, with title ownership transferring from MB Ice Cream Inc to Umpa Ice Cream Inc.
- b. In or about March 2015, Antonio Kostas sold the truck to Cretella Vasiadis for \$200.00, with title ownership transferring from Umpa Ice Cream Inc. to CMC Ice Inc. and
- c. In or about June 2016, Vasiadis sold the truck to Fotinakapolous for \$250.00, with title ownership transferring from Carmine Ice Inc to Mikey Ice Inc.

C. The Defendants' Efforts To Interfere With The Collection of City Judgments

259. Each Individual Defendant controlled one or more of the Corporate Defendants, and every Corporate Defendant was controlled by one or more Individual Defendants. The Individual Defendants and the Corporate Defendants repeatedly transferred title ownership and/or changed the New York DMV registration for trucks having accumulated parking violation fines, with the intent of frustrating the City's efforts to collect upon the judgments owed by the Corporate Defendants.

260. The Individual Defendants caused the Corporate Defendants to be undercapitalized. Knowing that the Corporate Defendants owe the City millions of dollars in parking judgments, the Individual Defendants stripped assets from the Corporate Defendants through the truck transfers.

261. Representative examples of post-judgment transfers by the Individual and Corporate Defendants that were intended to interfere with the City's ability to collect the judgments include, but are not limited to, the following:

- a. As the title owner and registrant for the ice cream truck with VIN # 1GBHP32WXW3302540 (Truck #1), defendant Hongway IceCream Inc. incurred \$19,975.24 in parking ticket violations between April 2012 and October 2012 — a roughly six-month period spanning over 100 days — during which time the earlier-issued tickets went into judgment status. Before the City could enforce those judgments, the defendants transferred the title ownership and registration for the truck so that by 2013 neither the ownership nor the registration remained in the name of Hongway IceCream Inc.
- b. As the registrant for the ice cream truck with VIN # 5T4GP41W923343386 (Truck #2), defendant Calvary Inc. incurred \$32,389.15 in parking ticket violations between February 2016 and July 2016 — a roughly five-month period spanning over 100 days — during which time the earlier-issued tickets went into judgment status. Before the City could enforce those judgments, the defendants transferred the registration for the truck so that by the fall of 2016, defendant Avery Ice Inc. was the registrant rather than Calvary Inc.

- c. As the registrant for the ice cream truck with VIN # 1GDHP32R4X3500193 (Truck #12), defendant Icy Man Inc. incurred \$32,454.31 in parking ticket violations between April 2015 and September 2015 — a roughly five-month period spanning over 100 days — during which time the earlier-issued tickets went into judgment status. Before the City could enforce those judgments, the defendants transferred the registration for the truck so that by 2016, defendant Anoria Ice Inc. was the registrant rather than Icy Man Inc.
- d. As the title owner and registrant for the ice cream truck with VIN # 1GBHP32KXS3314968 (Truck #15), defendant Kavin Ice Cream Inc. incurred \$37,560.37 in parking ticket violations between March 2013 and August 2013 — a roughly five-month period spanning over 100 days — during which time the earlier-issued tickets went into judgment status. Before the City could enforce those judgments, the defendants transferred the title ownership and registration for the truck to defendant Gorten Ice Inc. so that by 2014 neither the ownership nor the registration remained in the name of Kavin Ice Cream Inc.
- e. As, respectively, the title owner and registrant for the ice cream truck with VIN # 1GBHP32KXS3314968 (Truck #15), defendants Laroco Inc. and Has Ice Inc. incurred \$28,208.51 in parking ticket violations between April 2015 and September 2015 — a roughly five-month period spanning over 100 days — during which time the earlier-issued tickets went into judgment status. Before the City could enforce those judgments, the defendants transferred the title ownership and registration for the truck to defendant Hos 214 Inc. so that by 2016 neither the ownership nor the registration remained in the name of Laroco Inc. or Has Ice Inc.
- f. As the title owner and registrant for the ice cream truck with VIN # 1GCJP32J0H3325636 (Truck #21), defendant Ice Mania Inc. incurred \$10,067.66 in parking ticket violations between June 2014 and July 2015 — a roughly thirteen-month period spanning well over 100 days — during which time the earlier-issued tickets went into judgment status. Before the City could enforce those judgments, the defendants transferred the title ownership and registration for the truck to defendant Cost Ice Inc. so that by late July 2015 neither the ownership nor the registration remained in the name of Ice Mania Inc.
- g. As the title owner and registrant for the ice cream truck with VIN # 1GCJP32J6J3333441 (Truck #25), defendant GeekIce Inc. incurred \$20,389.35 in parking ticket violations between April 2015 and September 2015 — a roughly five-month period spanning over 100 days — during which time the earlier-issued tickets went into

judgment status. Before the City could enforce those judgments, the defendants transferred the title ownership and registration for the truck to defendant Kiki Services Inc. so that by 2016 neither the ownership nor the registration remained in the name of GeekIce Inc.

- h. As the title owner and registrant for the ice cream truck with VIN # 1GBHP32M1E3328442 (Truck #36), defendant Papia I Inc. incurred \$20,100.84 in parking ticket violations between April 2013 and October 2013 — a roughly six-month period spanning over 100 days — during which time the earlier-issued tickets went into judgment status. Before the City could enforce those judgments, the defendants transferred the title ownership and registration for the truck to defendant Hena Ice Inc. so that by 2014 neither the ownership nor the registration remained in the name of Papia I Inc.

D. The Individual Defendants' Liability For The Parking Summonses As Alter Egos of the Corporate Defendants

262. The Individual Defendants caused the Corporate Defendants to be incorporated and are their principals and shareholders.

263. The Corporate Defendants have no or very few employees. All actions of the Corporate Defendants are carried out by the Individual Defendants.

264. The Individual Defendants rarely or never observe corporate formalities with respect to the Corporate Defendants. The Individual Defendants rarely or never hold board meetings or shareholder meetings of the Corporate Defendants.

265. The Individual Defendants transfer assets between Corporate Defendants without observing purchase and sale formalities, in non-arms' length transactions and for inadequate consideration.

266. The Individual Defendants made no distinction between the Corporate Defendants' funds and the individuals' funds. The Individual Defendants make transfers of money or assets to themselves or their designees from the Corporate Defendants and/or spend corporate funds for non-corporate purposes.

267. The Individual Defendants so dominate the Corporate Defendants as to effectively eliminate any legal distinction between the Individual and the Corporate Defendants.

268. By misusing the Corporate Defendants in this fashion, the Individual Defendants obtain funds for their personal use by avoiding judgments that the Corporate Defendants would otherwise have had to pay.

269. The Corporate Defendants were and are alter egos of the Individual Defendants.

270. The Individual Defendants are liable for the Corporate Defendants' debts. The Individual Defendants are liable for their own bad acts and the bad acts of the Corporate Defendants, including tortious interference with the City's collection of parking judgments and for effecting fraudulent transfers under the New York Debtor and Creditor Law because, at all relevant times, the Individual Defendants dominated and controlled the Corporate Defendants.

E. Civil Conspiracy

271. The defendants conspired, on behalf of one another, to fraudulently and repeatedly transfer the Corporate Defendants' assets from defendant debtors to other shell corporations and thereby tortiously and intentionally interfere with the City's ability to collect judgments arising from the parking violations that the Corporate Defendants had incurred.

272. The Individual and Corporate Defendants, acting collectively by, through, and on behalf of one another, reached a common agreement or understanding to commit tortious acts, including, but not limited to:

- a. Manipulating the finances of the Corporate Defendants for the purpose of concealing from the City the assets of the Corporate Defendants, thereby impairing the City's ability to collect judgment debt;
- b. Rendering the Corporate Defendants insolvent and unable to pay judgment debt to the City by fraudulently transferring assets from the Corporate Defendants and otherwise divesting them of assets; and

- c. Deriving income for the personal use of the Individual Defendants that would otherwise have been paid by the Corporate Defendants as the outstanding parking and traffic penalties to the City.

273. The defendants' tortious collective activities were knowingly and purposefully designed and were performed in furtherance of the defendants' economic and pecuniary benefit.

274. As a result, the defendants are jointly and severally liable to the City for the damages resulting from the conspiracy.

F. Concert of Action

275. The defendants, for the benefit of their respective business interests and economic benefit in particular, had an understanding, explicit or tacit, to participate in a common plan or design to commit tortious acts, including, but not limited to:

- a. Manipulating the finances of the Corporate Defendants for the purpose of concealing from the City the assets of the Corporate Defendants, thereby impairing the City's ability to collect judgment debt;
- b. Rendering the Corporate Defendants insolvent and unable to pay judgment debt to the City by fraudulently transferring assets from the Corporate Defendants and otherwise divesting them of assets; and
- c. Deriving income for the personal use of the Individual Defendants that would otherwise have been paid by the Corporate Defendants as the outstanding parking and traffic penalties to the City.

276. Each defendant knew or should have known that this understanding to participate in a common plan or design to so manipulate the Corporate Defendants' finances, conceal the assets of the Individual and Corporate Defendants, insulate them from judgment enforcement, and derive income for the Individual Defendants constituted numerous breaches of legal duties, and the defendants gave substantial aid and encouragement, each to the other, to further such common plan or design.

277. The defendants assisted and encouraged one another in committing the aforementioned tortious activities and in breaching legal duties, including the duty to pay judgments to the City and impairing the City's rights as a judgment creditor. The conduct of the defendants subjects the City and the public to unreasonable threats to public safety as a consequence of the defendants' flagrant and repeated violations of parking and traffic rules and regulations.

278. As a result, the defendants are jointly and severally liable to the City for the damages resulting from their concerted acts.

FIRST CAUSE OF ACTION
(Tortious Interference With the Collection of Judgments)

279. The City repeats and realleges paragraphs 1 through 278 as if fully set forth herein.

280. The defendants willfully and tortiously transferred corporate assets and altered the registrations of corporate vehicles in non-arms' length transactions for less than fair value intending to evade the payment of judgments owed by the Corporate Defendants.

281. The City has suffered damages, including but not limited to the amount of the judgments, investigative costs, attorneys' fees as a result of the defendants' interference with the City's judgments, for which the Individual and Corporate Defendants are jointly and severally liable.

SECOND CAUSE OF ACTION
(New York Debtor and Creditor Law § 273)

282. The City repeats and realleges paragraphs 1 through 278, as if fully set forth herein.

283. The City is a creditor of the Corporate Defendants.

284. The repeated conveyances by the defendants of the 76 ice cream trucks that are the subject of this action for less than market value and without fair consideration rendered the Corporate Defendants insolvent.

285. Each of the defendants, including each Individual Defendant, was either a transferee or beneficiary of the conveyances, each of which hindered, delayed or defrauded the City as creditor, and for which defendants are jointly and severally liable to the City.

286. The City is entitled to judgment against the defendants, including each Individual Defendant, pursuant to Debtor and Creditor Law § 273, setting aside the transfers from any Corporate Defendant to any other defendant, together with incidental damages to be determined at trial.

THIRD CAUSE OF ACTION
(New York Debtor and Creditor Law § 274)

287. The City repeats and realleges paragraphs 1 through 278, as if fully set forth herein.

288. The City is a creditor of each of the 93 Corporate Defendants.

289. The interests of the Corporate Defendants in the 76 ice cream trucks that are the subject of this action were conveyed without fair consideration in the purchase-and-sale transactions that closed between 2013 and 2017.

290. The repeated conveyances by the defendants of those 76 ice cream trucks were made when the Corporate Defendants were or were about to engage in a business or transaction for which the property remaining in the hands of the corporations after the conveyance amounted to unreasonably small capital..

291. Any and all such conveyances occurring after any judgment owed to the City, are fraudulent as to the City.

292. Each of the defendants, including each Individual Defendant, was a transferee or beneficiary of the fraudulent conveyances, and is jointly and severally liable to the City. The City is entitled to judgment against the defendants, including each Individual Defendant, pursuant to Debtor and Creditor Law § 274, setting aside such transfers from any Corporate Defendant to any other defendant, together with incidental damages to be determined at trial.

**FOURTH CAUSE OF ACTION
(New York Debtor and Creditor Law § 275)**

293. The City repeats and realleges paragraphs 1 through 278, as if fully set forth herein.

294. The City is a creditor of the Corporate Defendants.

295. The interests of the Corporate Defendants in the 76 ice cream trucks that are the subject of this action were conveyed without fair consideration in the purchase-and-sale transactions that closed between 2013 and 2017.

296. At the time the defendants made these purchase-and-sale transactions, the defendants intended, knew, and/or believed, based on the abundant past history of the hundreds of parking and traffic judgments on the 76 ice cream trucks, that the Corporate Defendants would incur debts beyond their ability to pay as the judgments matured.

297. Any and all such conveyances occurring after any judgment owed to the City, are fraudulent as to the City.

298. Each of the defendants, including each Individual Defendant, was a transferee or beneficiary of the fraudulent conveyances, and is jointly and severally liable to the City.

299. The City is entitled to judgment against the defendants, including each Individual Defendant, pursuant to Debtor and Creditor Law § 275, setting aside such transfers from any Corporate Defendant to any other defendant, together with incidental damages to be determined at trial.

FIFTH CAUSE OF ACTION
(New York Debtor and Creditor Law § 276)

300. The City repeats and realleges paragraphs 1 through 278, as if fully set forth herein.

301. The City is a creditor of each of the 93 Corporate Defendants.

302. The repeated conveyances by the defendants of the 76 ice cream trucks that are the subject of this action for less than market value and without fair consideration were made with actual intent to hinder, delay or defraud the City as creditor.

303. The conveyances are replete with the following badges of fraud:

- (1) The lack or inadequacy of consideration;
- (2) The family, friendship or close associate relationship between the parties;
- (3) The retention of possession, benefit or use of the property in question;
- (4) The financial condition of the parties sought to be charged both before and after the transaction in question;
- (5) The existence or cumulative effect of a pattern or series of transactions or course of conduct after the incurring of debt, or pendency or threat of suits by creditors; and

(6) The general chronology of the events and transactions under inquiry.

304. Each of the defendants, including each Individual Defendant, was a transferee or beneficiary of the fraudulent conveyances, and is jointly and severally liable to the City.

305. The City is entitled to judgment against the defendants, including each Individual Defendant, pursuant to Debtor and Creditor Law § 276, setting aside the transfers from any Corporate Defendant to any other defendant together with incidental damages to be determined at trial.

SIXTH CAUSE OF ACTION
(New York Debtor and Creditor Law § 276-a)

306. The City repeats and realleges paragraphs 1 through 305, as if fully set forth herein.

307. The defendants' fraudulent conveyances of the 76 ice cream trucks that are the subject of this action were made with the actual intent of the defendants and their transferees to hinder, delay or defraud the City as creditor.

308. If the City recovers judgment in this action, the City shall be entitled to an award of attorneys' fees and disbursements incurred in this action pursuant to Debtor and Creditor Law § 276-a, and each of the defendants, including each Individual Defendant, shall be jointly and severally liable to the City for its attorneys' fees and disbursements, in an amount to be determined by the Court.

PRAYER FOR RELIEF

WHEREFORE, the City demands that judgment be entered as follows:

- (a) Ordering that the defendants, each of whom is jointly and severally liable, pay the City damages in an amount to be determined at trial for tortiously interfering with the City's right to collect judgments against the Corporate Defendants;
- (b) Ordering that all of the fraudulent transfers of vehicle ownership and title made in violation of New York Debtor and Creditor Law §§ 273, 274, 275, and 276 be deemed null and void and set aside, and entering judgment against the defendants, jointly and severally in the amount of \$4,471,754.58, plus interest, Sheriff's fees, and costs;
- (c) Directing, pursuant to New York Debtor and Creditor Law § 276-a, that the defendants pay the City's attorneys' fees and disbursements in connection with this action; and
- (d) Granting such other relief as this Court may deem just and proper.

Dated: New York, New York
May 29, 2019

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By: 
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Assistant Corporation Counsel

VERIFICATION

STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

MAUREEN KOKEAS, being duly sworn, says that she is the First Deputy Sheriff of the City of New York; that the City of New York is the plaintiff in the within action; that the allegations in the Complaint as to plaintiff are true to her knowledge; that the matters alleged therein upon information and belief, she believes to be true; and that the basis of her knowledge is the books and records of the plaintiff and/or statements made to her by officers or employees thereof. This verification is not made by the plaintiff because the plaintiff is a municipal corporation.

Maureen Kokeas
MAUREEN KOKEAS

Sworn to before me this
29 day of MAY, 2019

George Tsatsaronis
NOTARY PUBLIC

