

IN THE COUNTY COURT OF THE
11TH JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

CASE NO.:

SUPERIOR MIAMI, LLC,
Plaintiff,
vs.

JORDAN BELFORT,
Defendant,

_____ /

COMPLAINT – FAILURE TO PAY FOR SERVICES RENDERED

Plaintiff, SUPERIOR MIAMI, LLC, by and through undersigned counsel, sues
Defendant, JORDAN BELFORT, and alleges:

***At least as a rich man, when I have to face my problems, I show up in
the back of a limo wearing a \$2000 suit and \$40,000 gold watch!***

Jordan Belfort¹

Defendant JORDAN BELFORT, better known as the Wolf of Wall Street in Leonardo DiCaprio's 2013 movie based on BELFORT's memoir of the same name, pled guilty in 1999 to multiple counts of conspiracy to defraud, money laundering, and manipulative and deceptive devices.²

BELFORT was sentenced to 42 months in prison, and ordered to pay restitution of \$110,362,993 to his victims, but has repaid only a tiny fraction of that amount to date.³

¹ *The Wolf of Wall Street* by Jordan Belfort, Bantam Books 2007 at page 97.

² *United States v. Belfort*, 340 F. Supp. 3d 265, 266 (E.D.N.Y. 2018).

³ *Id.* at 267

Despite still owing his victims over \$100 Million, BELFORT lives a opulent lifestyle, and recently moved into a \$35,000 per month rental home⁴ on Hibiscus Island in Miami Beach.⁵ As outlined in the Miami Herald about BELFORT's recent move to Miami, *"You'll spot the Bronx native doing what many Miami people do, taking selfies, eating at hot spots like Carbone and cruising Biscayne Bay near his waterfront mansion."*

Unfortunately, as outlined herein, BELFORT's luxurious habits continue to be fueled by taking advantage of others.

JURISDICTIONAL AND FACTUAL ALLEGATIONS

1. This is an action for damages within the jurisdictional limits of this Court.
2. Plaintiff SUPERIOR MIAMI, LLC is a Florida limited liability company that provides limousine services in Miami-Dade County.
3. Plaintiff provided limousine services to Defendant BELFORT at his request.
4. Plaintiff performed the services for Defendant.
5. Plaintiff performed all conditions precedent to be performed by Plaintiff or the conditions have occurred.
6. Plaintiff has been forced to retain undersigned counsel for representation in this action and Defendant is responsible for said attorney's fees and costs.

⁴ http://miabeachrentals.com/accommodation/429-n-hibiscus-dr/?adults=1&kids=0&rooms=1&date_from&date_to

⁵ <https://www.miamiherald.com/entertainment/celebrities/article256890517.html>

COUNT I- OPEN ACCOUNT

7. Plaintiff readopts and realleges paragraphs 1-6 herein.
8. This Count is pursuant to F.R.C.P. Form 1.932 approved by the Florida Supreme Court.
9. Defendant, JORDAN BELFORT, owes Plaintiff \$23,583 that is due with interest, according to the account attached as Exhibit A.

WHEREFORE, Plaintiff demands judgment for damages against Defendant, JORDAN BELFORT, including court costs, interest, and attorneys fees and costs.

COUNT II - SERVICES RENDERED

10. Plaintiff readopts and realleges paragraphs 1-6 herein.
11. Defendant, JORDAN BELFORT, owes Plaintiff \$23,583 that is due with interest, for services rendered by Plaintiff to Defendant, as evidenced by the invoices attached hereto as Exhibit A and incorporated herein.

WHEREFORE, Plaintiff demands judgment for damages against Defendant, JORDAN BELFORT, including court costs, interest, and attorneys fees and costs.

COUNT III - ACCOUNT STATED

12. Plaintiff readopts and realleges paragraphs 1-6 herein.
13. This Count is pursuant to F.R.C.P. Form 1.933 approved by the Florida Supreme Court.

14. Before the institution of this action, the Plaintiff and Defendant, JORDAN BELFORT, had business transactions between them and they agreed to the resulting balance.

15. Plaintiff rendered statements of it to Defendant, JORDAN BELFORT, copies being attached as Exhibit A, and the Defendant did not object to the statement.

16. Defendant, JORDAN BELFORT, owes Plaintiff \$23,583 that is due with interest, on the account.

WHEREFORE, Plaintiff demands judgment for damages against Defendant, JORDAN BELFORT, for damages, including court costs, interest, and attorneys fees and costs.

COUNT IV- UNJUST ENRICHMENT

17. This is an action for equitable relief.

18. Plaintiff has performed all conditions precedent to be performed by Plaintiff or the conditions have occurred.

19. Plaintiff has rendered valuable services to Defendant BELFORT, and is entitled to be compensated for same.

20. If Defendant BELFORT, does not compensate Plaintiff, then said Defendant will be unjustly enriched at the expense of Plaintiff.

21. Because of the facts and circumstances occurring between the parties, the Defendant BELFORT, has been unjustly enriched at the expense and detriment of the Plaintiff in the sum of \$23,583, no part of which has been paid, although duly demanded.

22. Plaintiff has no adequate remedy at law.

WHEREFORE, the Plaintiff demands judgment for damages against Defendant, JORDAN BELFORT, including court costs, interest, attorneys fees and costs, and such other relief as this Court deems reasonable.

Respectfully submitted,

s/davidwinker

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This communication is from a debt collector. This is an attempt to collect a debt, and any information obtained will be used for that purpose.

EXHIBIT A

SUPERIOR MIAMI, LLC

7601 East Treasure Drive # 2105
North Bay Village, FL 33141

FED EIN # 81-4243529

Bill To

Invoice #

1232

G M I

Invoice Date

12/26/2021

Global Motivation

Incorporated

Mister Jordan Belfort

Description	Amount
09/10/2021: Transfer from Opa-Locka Airport to Miami Beach with Mister Belfort	140.00
09/11/2021: Transfer from Miami Airport to Miami Beach with Cristina	140.00
09/15/2021: Transfer from Miami Beach to Miami Airport with Mister Belfort	140.00
09/16/2021: Transfer from Miami Beach to Miami Airport with Cristina	140.00
09/18/2021: Transfer from Miami Airport to Miami Beach with Cristina's Family	140.00
09/18/2021: Transfer from Miami Airport to Miami Beach with Cristina	140.00
09/18/2021: Transfer from Miami Airport to Miami Beach with Mister Belfort	140.00
09/22/2021: Hourly Service as Directed Miami Beach to Carbone Restaurant and back 8:15 pm until 11:10 pm	255.00

3 Hours at \$ 85 per Hour	
09/23/2021: Hourly Service as Directed Miami Beach to Palm Beach to Miami Beach to Opa-Locka Airport 9:00 am until 1:35 pm, 4.5 Hours	382.50
09/23/2021: Transfer from Miami Beach to Opa-Locka Airport with Cristina's Family	140.00
09/28/2021: Transfer from Opa-Locka Airport to Miami Beach with Mister Belfort and Cristina	140.00
09/29/2021: Hourly Service as Directed Miami Beach to Immigration and back to Miami Beach 7:20 am until 9:25 am, 2 Hours	170.00
09/29/2021: Hourly Service as Directed South Beach to Miami Beach to Opa-Locka Airport 1:00 pm until 2:45 pm, 2 Hours	170.00
09/29/2021: Pick up Medication for Mister Belfort at Walgreens	20.00
20 % Gratuity	451.50

Total

\$2,709.00

Terms & Conditions

THANK YOU VERY MUCH FOR YOUR BUSINESS !!

SUPERIOR MIAMI, LLC

7601 East Treasure Drive # 2105
North Bay Village, FL 33141

FED EIN # 81-4243529

Bill To

G M I

Global Motivation

Incorporated

Mister Jordan Belfort

Invoice #

1233

Invoice Date

12/27/2021

Description	Amount
10/01/2021: Transfer from Miami Airport to Miami Beach with Cristina.	140.00
10/05/2021: Hourly Service as Directed Miami Beach to Palm Beach to Wynwood to Miami Beach 11:30 am until 3:20 pm 4 Hours at \$ 85 per Hour	340.00
10/05/2021: Hourly Service as Directed Miami Airport to Miami Beach to South Beach back to Miami Beach 6:40 pm until 8:55 pm, 2 Hours	170.00
10/07/2021: Miami Beach to Mila Restaurant + wait	100.00
10/14/2021: Hourly Service as Directed Miami Beach to Downtown Miami to Wynwood to Miami Beach 7:00 pm until 11:40 pm, 5 Hours	425.00
10/20/2021: Hourly Service as Directed Miami Beach to Wynwood to South Beach to Miami Beach 6:45 pm until 12:30 am, 6 Hours	510.00
10/21/2021: Hourly Service as Directed Miami Beach to Bal Harbour to Delray Beach to Miami Beach	510.00

5:00 pm until 10:40 pm, 6 Hours	
10/27/2021: Hourly Service as Directed Miami Beach to the Fort Lauderdale Boat Show to Miami Beach 12:00 noon until 4:20 pm, 4.5 Hours	382.50
10/28/2021: Hourly Service as Directed Miami Beach to South Beach (Faena Hotel) to Miami Beach 6:30 pm until 11:50 pm, 5.5 Hours	467.50
10/29/2021: Transfer from Miami Airport to Miami Beach with Ilya	140.00
10/29/2021: Hourly Service as Directed Miami Beach to South Beach (Carbone Restaurant) to Miami Beach 8:45 pm until 12:55 am, 4 Hours	340.00
10/30/2021: Hourly Service as Directed Miami Beach to Star Island to Miami Beach 9:30 pm until 2:40 am, 5 Hours	425.00
10/31/2021: Transfer from Miami Beach to Miami Airport with Ilya	140.00
20 % Gratuity	818.00

Total

\$4,908.00

Terms & Conditions

THANK YOU VERY MUCH FOR YOUR BUSINESS !!

SUPERIOR MIAMI, LLC

7601 East Treasure Drive # 2105
North Bay Village, FL 33141

FED EIN # 81-4243529

Bill To Invoice # 1257
G M I Invoice Date 06/10/2022
Global Motivation
Incorporated
Mister Jordan Belfort

Description	Amount
11/02/2021: Transfer from Miami Beach to Opa-Locka Airport with Mister Belfort and Cristina	140.00
11/11/2021: Transfer from Opa-Locka Airport to Miami Beach with Mister Belfort and Ilya Pozin	140.00
11/11/2021: Hourly Service as Directed Miami Beach to Downtown Miami to Club E11Even to Miami Beach to Wynwood to Miami Beach 7:30 pm until 3:40 am 8 Hours at \$85 per Hour	680.00
11/12/2021: Hourly Service as Directed Miami Beach to Surfside to Miami Beach to Downtown Miami to Miami Beach 5:30 pm until 1:40 am 8 Hours at \$85 per Hour	680.00
11/13/2021: Transfer from Miami Beach to Opa-Locka Airport with Ilya Pozin	140.00
11/14/2021: Transfer from Miami Airport to Miami Beach with Cristina	140.00

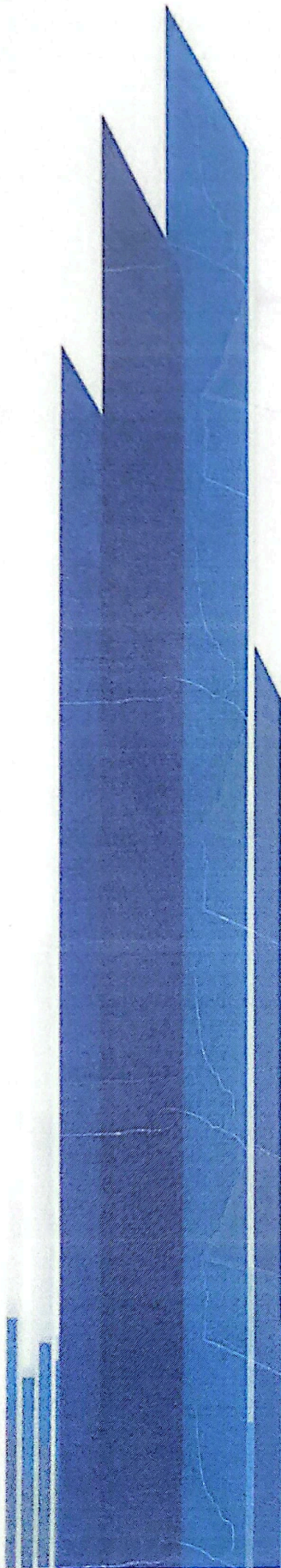
11/19/2021: Hourly Service as Directed Miami Beach to Loews Hotel to Miami Beach to Mila Restaurant to Miami Beach 5:00 pm until 12:20 am, 7 Hours	595.00
11/20/2021: Hourly Service as Directed Miami Beach to Downtown Miami to North Miami Beach to Bal Harbour to Miami Beach 12:40 pm until 4:45 pm, 4 Hours	340.00
11/25/2021: Hourly Service as Directed Miami Beach to Delray Beach to Miami Beach 3:00 pm until 9:50 pm, 7 Hours	595.00
11/26/2021: Transfer from Fort Lauderdale Airport to Miami Beach with Chandler Belfort	160.00
11/26/2021: Transfer from Boca Raton to Miami Beach with Carter Belfort	180.00
11/26/2021: Hourly Service as Directed Miami Beach to South Miami to Miami Beach to Design District to Miami Beach to South Miami to Miami Beach to South Beach to Miami Beach 7:15 am until 11:30 pm, 16 Hours	1,360.00
11/27/2021: Hourly Service as Directed Miami Beach to Cipriani Restaurant to Miami Beach to Club Socialista to Miami Beach 8:30 pm until 1:45 am, 5 Hours	425.00
11/28/2021: Transfer from Miami Beach to Boca Raton with Carter Belfort	180.00
11/29/2021: Transfer from Miami Beach to Boca Raton with Chandler Belfort	180.00
11/30/2021: Hourly Service as Directed Miami Beach to South Beach to Medley to Miami Beach to Downtown Miami to Design District to Miami Beach 11:00 am until 10:55 pm, 12 Hours	1,020.00
20 % Gratuity	1,391.00

Total

\$8,346.00

Terms & Conditions

THANK YOU VERY MUCH FOR YOUR BUSINESS !!



SUPERIOR MIAMI, LLC

7601 East Treasure Drive # 2105
North Bay Village, FL 33141

FED EIN # 81-4243529

Bill To Invoice # 1258
G M I Invoice Date 06/11/2022
Global Motivation
Incorporated
Mister Jordan Belfort

Description	Amount
12/01/2021: Hourly Service as Directed Miami Beach to South Miami to Miami Beach to Midtown to Miami Beach to Downtown Miami to South Beach to Miami Beach 2:00 pm until 1:45 am 12 Hours at \$85 per Hour	1,020.00
12/02/2021: Hourly Service as Directed Miami Beach to Wynwood to Star Island to South Beach to Miami Beach 5:00 pm until 1:55 am 9 Hours at \$85 per Hour	765.00
12/03/2021: Hourly Service as Directed Miami Beach to Design District to Miami Beach to South Beach to Miami Beach 3:45 pm until 1:50 am, 10 Hours	850.00
12/04/2021: Hourly Service as Directed Miami Beach to Downtown Miami to Miami Beach to South Beach to Miami Beach 1:00 pm until 12:55 am, 12 Hours	1,020.00
12/05/2021: Hourly Service as Directed	340.00

Miami Beach to South Beach to Miami Beach 12:30 pm until 4:15 pm, 4 Hours	
12/05/2021: Hourly Service as Directed Miami Beach to the Faena Hotel to Miami Beach 8:30 pm until 12:25 am, 4 Hours	340.00
12/07/2021: Hourly Service as Directed Miami Beach to Mid Beach to Miami Beach 5:30 pm until 7:50 pm, 2 Hours	170.00
12/13/2021: Hourly Service as Directed Miami Beach to Downtown Miami to Design District to Miami Beach 9:30 am until 2:40 pm, 5 Hours	425.00
12/13/2021: Transfer from Miami Beach to the Miami Airport with Mister Belfort and Cristina	140.00
12/16/2021: Transfer from the Miami Airport to Miami Beach with Mister Belfort	140.00
12/16/2021: Hourly Service as Directed Miami Beach to Mid Beach to Design District to Miami Beach 2:00 pm until 6:45 pm, 5 Hours	425.00
12/18/2021: Hourly Service as Directed Miami Beach to South Beach to Miami Beach 10:30 am until 11:40 am, 1 Hour	85.00
12/18/2021: Hourly Service as Directed Miami Beach to Mid Beach to the Miami Airport 5:00 pm until 6:45 pm, 2 Hours	170.00
12/26/2021: Transfer from Boca Raton to the Miami Airport with Chandler Belfort	180.00
01/13/2022: Transfer from the Miami Airport to Miami Beach with Mister Belfort and Cristina	140.00
01/14/2022: Transfer from the Miami Airport to Miami Beach with Chandler Belfort	140.00
20 % Gratuity	1,270.00

Total

\$7,620.00

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