

VIRGINIA:

IN THE PRINCE WILLIAM COUNTY CIRCUIT COURT

ASSET MANAGEMENT
CONSULTANTS OF VIRGINIA, INC.

Plaintiff,

vs.

KUSHNER COMPANIES
666 Fifth Avenue
New York, New York 10103

SERVE:

Secretary of the Commonwealth
1111 E. Broad Street
Richmond, Virginia 23210

Defendant.

CASE NO: 17-754a

FILED
2017 SEP 20 PM 12:59
CIRCUIT COURT CLERK'S OFFICE
PRINCE WILLIAM COUNTY, VA
BY  DEPUTY

COMPLAINT

COMES NOW Plaintiff, by Counsel, and moves for judgment against Defendant for the following reasons:

**COUNT I
(Breach of Contract)**

1. Asset Management Consultants of Virginia, Inc. (hereinafter "AMC") is a Virginia corporation with its principal place of business located at 12841 Fitzwater Drive, Nokesville, Virginia 20181, in Prince William County.

2. Kushner Companies (hereafter "Kushner") is a national real estate organization headquartered in New York City doing business in Virginia.

3. The parties entered into a valid and binding contract on June 22, 2017, a copy of which is attached to this Complaint as Exhibit 1.

4. Pursuant to this contract, AMC was to be compensated for any financial assets it recovered for Kushner and affiliated entities.

5. AMC recovered \$487,947.46 from Colts Neck Township, NJ, which sent a check in that amount to Kushner on July 14, 2017. See Exhibit 2.

6. AMC requested its agreed fee of \$97,589.49, an amount equal to twenty percent (20%) of the funds recovered.

7. To date, Kushner has refused to pay AMC the fee for the Colts Neck Township recovery or fees for other bonds AMC has processed for Kushner without excuse or justification. These monies returned to Kushner were not listed as "Exempt Funds" by Kushner on the Memorandum of Agreement.

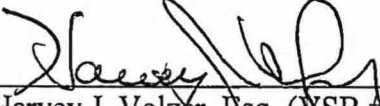
8. Kushner has breached its contract with AMC by refusing to honor its contractual obligations by timely paying AMC.

9. AMC has suffered damages in the principal amount of \$97,589.49 and interest of twelve percent (12%) per annum until the fee is paid; damages of twenty percent (20%) and twelve (12%) interest on other bonds AMC has processed for Kushner.

WHEREFORE, Plaintiff moves for judgment in the amounts and for the reasons stated above, and for such other and further relief as the Court deems proper.

A JURY TRIAL IS DEMANDED.

ASSET MANAGEMENT
CONSULTANTS OF VIRGINIA, INC.
Plaintiff
By Counsel



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