

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT  
IN AND FOR BREVARD COUNTY FLORIDA

OLYMPIAN LED, INC

Case No.: 05-2018-CA-052408-XXXX-XX

Plaintiff,

vs.

TRANS-LUX CORPORATION  
D/B/A FAIR-PLAY, A TRANS-LUX  
COMPANY,

Defendant,  
\_\_\_\_\_ /

**COMPLAINT**

The Plaintiff, Olympian LED, Inc., by and through its undersigned counsel, sues the Defendant, Trans-Lux Corporation D/B/A Fair-Play, A Trans-Lux Company, and in support thereof alleges,

**JURISDICTION**

This Court has jurisdiction over this subject matter under Florida Statute § 47.051 as the Plaintiff, Olympian LED, Inc. is a Florida Corporation with a primary business address of 3620 S. Hopkins Avenue, Titusville, FL 32780. All business transactions occurred at this location or at the Plaintiff's prior business address of 3659 S. Hopkins, Titusville, FL 32780, and therefore the cause of action accrued therein.

The Defendant was registered with the State of Florida, Secretary of State, Department of Corporations, as a Foreign Corporation with a primary business address of 445 Park Avenue Suite 2001, New York, NY 10022. The Defendant's registration with the Florida Secretary of State was administratively revoked on September 22, 2017 due to its failure to submit the annual report.

This Court has jurisdiction over the Defendant as the Defendant has had significant contacts with the State of Florida, County of Brevard insofar as it made over 30 purchases of merchandise over a three year period from Olympian LED, Inc., knowing Olympian LED, Inc. was located in Titusville, Florida.

**COUNT I  
OPEN ACCOUNT**

1. This is an action for damages that exceed \$15,000.00 exclusive of interest and costs.
2. Defendant owes plaintiff \$38,990.00 that is due according to the attached account. See Exhibit A.

WHEREFORE plaintiff demands judgment for damages against defendant.

**COUNT II  
GOODS SOLD**

1. This is an action for damages that exceed \$15,000.00 exclusive of interest and costs.
2. Defendant owes plaintiff \$38,990.00. that is due for the following goods sold and delivered by plaintiff to defendant between May 4, 2015 and October 18, 2017:

Date	Invoice Number	Quantity	Items	Total
05-13-2015	1153	6	VDWall LVP603S Video Processor	\$6,600.00
		1	China DHL Shipping	\$500.00
08-28-2017	4084	8	VDWALL-LCP605S	\$6,560.00
10-18-2017	4185	30	NOVASTAR-MCTRL660	\$16,800.00
		35	NOVASTAR-CVT320	\$5,250.00
		4	VDWALL-LVP605S	\$3,280.00

WHEREFORE plaintiff demands judgment for damages against defendant.

/s/ James E. Orth, Jr.  
James E. Orth, Jr. FBN 75941  
/s/ George M. Gingo  
George M. Gingo, 08795  
400 Orange Street  
Titusville, FL 32796  
321-264-9624 Office  
jamesorthlaw@gmail.com  
gingo.george@gmail.com

# Olympian LED, Inc.

**Type: All transactions · Status: All statuses · Delivery method: Any · Name: Trans-Lux ·  
Date: All dates**

Date	Type	No.	Due date	Balance	Total	Status	PO#
04/12/2018	Payment	96153	04/12/2018	\$0.00	\$-2,400.00	Closed	
01/16/2018	Invoice	4711	01/16/2018	\$0.00	\$0.00	Paid	63843-00
11/03/2017	Payment	95522	11/03/2017	\$0.00	\$-1,640.00	Closed	
10/31/2017	Invoice	4283	10/31/2017	\$0.00	\$2,400.00	Paid	
10/24/2017	Invoice	4227	10/24/2017	\$0.00	\$0.00	Voided	
10/18/2017	Invoice	4185	10/18/2017	\$25,330.00	\$25,330.00	Overdue (Sent)	
09/28/2017	Invoice	4084	09/28/2017	\$6,560.00	\$6,560.00	Overdue (Sent)	
09/05/2017	Payment		09/05/2017	\$0.00	\$-840.00	Closed	
08/03/2017	Invoice	3706	08/03/2017	\$0.00	\$1,640.00	Paid	
07/18/2017	Invoice	3602	07/18/2017	\$0.00	\$840.00	Paid	
05/31/2017	Payment	94745	05/31/2017	\$0.00	\$-1,120.00	Closed	
03/20/2017	Invoice	3016	03/20/2017	\$0.00	\$1,120.00	Paid	
12/01/2016	Invoice	1586	12/01/2016	\$0.00	\$720.00	Paid	
12/01/2016	Payment		12/01/2016	\$0.00	\$-720.00	Closed	
11/03/2016	Payment	93509	11/03/2016	\$0.00	\$-5,230.00	Closed	
10/11/2016	Payment	93360	10/11/2016	\$0.00	\$-5,600.00	Closed	
09/19/2016	Invoice	1521	09/19/2016	\$0.00	\$5,230.00	Paid	
08/30/2016	Invoice	1495	08/30/2016	\$0.00	\$5,600.00	Paid	61895-00
08/22/2016	Payment	93121	08/22/2016	\$0.00	\$-2,310.00	Closed	
08/16/2016	Invoice	1486	08/16/2016	\$0.00	\$2,310.00	Paid	
08/02/2016	Payment	93016	08/02/2016	\$0.00	\$-95.00	Closed	
07/27/2016	Invoice	1469	07/27/2016	\$0.00	\$95.00	Paid	
07/25/2016	Payment	92915	07/25/2016	\$0.00	\$-1,120.00	Closed	
07/25/2016	Payment	92973	07/25/2016	\$0.00	\$-760.00	Closed	
07/18/2016	Invoice	1456	07/23/2016	\$0.00	\$760.00	Paid	
07/18/2016	Payment	92880	07/18/2016	\$0.00	\$-15,860.00	Closed	
06/09/2016	Invoice	1418	06/09/2016	\$0.00	\$15,860.00	Paid	
06/09/2016	Invoice	1419	06/09/2016	\$0.00	\$1,120.00	Paid	
03/30/2016	Payment	P391883504	03/30/2016	\$0.00	\$-8,736.00	Closed	
03/28/2016	Invoice	1378	03/28/2016	\$0.00	\$8,736.00	Paid	
02/29/2016	Payment	P391883504	02/29/2016	\$0.00	\$-3,310.00	Closed	
02/25/2016	Invoice	1346	03/26/2016	\$0.00	\$3,310.00	Paid	
02/01/2016	Payment	91790	02/01/2016	\$0.00	\$-3,424.00	Closed	
01/15/2016	Invoice	1317	01/15/2016	\$0.00	\$3,424.00	Paid	60921-00
12/17/2015	Payment	91457	12/17/2015	\$0.00	\$-1,782.00	Closed	
11/30/2015	Invoice	1287	11/30/2015	\$0.00	\$1,782.00	Paid	60818-00
10/19/2015	Payment	P391883504	10/19/2015	\$0.00	\$-19,532.40	Closed	
09/28/2015	Invoice	1255	09/28/2015	\$0.00	\$19,532.40	Paid	
09/14/2015	Payment	P391883504	09/14/2015	\$0.00	\$-14,975.00	Closed	

<b>Date</b>	<b>Type</b>	<b>No.</b>	<b>Due date</b>	<b>Balance</b>	<b>Total</b>	<b>Status</b>	<b>PO#</b>
09/04/2015	Invoice	1232	09/04/2015	\$0.00	\$14,975.00	Paid	
05/13/2015	Invoice	1153	05/13/2015	\$7,100.00	\$7,100.00	Overdue (Sent)	
05/04/2015	Payment		05/04/2015	\$0.00	\$-2,249.95	Closed	
04/16/2015	Invoice	1139	04/16/2015	\$0.00	\$2,249.95	Paid	
02/13/2015	Payment		02/13/2015	\$0.00	\$-999.98	Closed	
02/03/2015	Invoice	1104	02/03/2015	\$0.00	\$999.98	Paid	59529-00
01/15/2015	Invoice	1094	01/15/2015	\$0.00	\$1,599.00	Paid	
01/15/2015	Payment		01/15/2015	\$0.00	\$-1,599.00	Closed	
11/25/2014	Payment		11/25/2014	\$0.00	\$-4,488.98	Closed	
11/19/2014	Invoice	1071	11/19/2014	\$0.00	\$4,488.98	Paid	
11/06/2014	Payment	89011	11/06/2014	\$0.00	\$-3,536.96	Closed	
10/31/2014	Invoice	1061	10/31/2014	\$0.00	\$3,536.96	Paid	59169-00
09/12/2014	Payment		09/12/2014	\$0.00	\$-1,499.00	Closed	
09/12/2014	Payment		09/12/2014	\$0.00	\$-1,499.00	Closed	
09/11/2014	Invoice	1023	09/11/2014	\$0.00	\$1,499.00	Paid	
09/11/2014	Invoice	1024	09/11/2014	\$0.00	\$1,499.00	Paid	
09/10/2014	Invoice	1019	09/10/2014	\$0.00	\$1,499.00	Paid	
09/10/2014	Payment		09/10/2014	\$0.00	\$-1,499.00	Closed	

Olympian LED, Inc.  
3620 S HOPKINS AVE  
TITUSVILLE, FL 32780  
(321) 747-3220  
Brady@OlympianLED.com



## INVOICE

### BILL TO

Trans-Lux  
Trans-Lux  
1700 Delaware Ave  
Des Moines, Iowa 50317

INVOICE # 1153

DATE 05/13/2015

DUE DATE 05/13/2015

TERMS Due on receipt

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QTY	ACTIVITY	RATE	AMOUNT
6	<b>LVP603S</b> VDWall LVP603S Video Processor	1,100.00	6,600.00
1	<b>Shipping</b> China DHL Shipping	500.00	500.00

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BALANCE DUE

**USD 7,100.00**

Olympian LED, Inc.  
3620 S HOPKINS AVE  
TITUSVILLE, FL 32780  
(321) 747-3220  
Brady@OlympianLED.com



## INVOICE

### BILL TO

Trans-Lux  
Trans-Lux  
1700 Delaware Ave  
Des Moines, Iowa 50317

INVOICE # 4084  
DATE 09/28/2017  
DUE DATE 09/28/2017  
TERMS Due on receipt

QTY	ACTIVITY	RATE	AMOUNT
8	VDWALL-LVP605S VDWall LVP605S	820.00	6,560.00

Although inventory might be available when this invoice is sent, we are not able to hold any inventory until invoice is paid. Please pay ASAP to ensure we can ship your order in full.

BALANCE DUE

**USD 6,560.00**

Olympian LED, Inc.  
3620 S HOPKINS AVE  
TITUSVILLE, FL 32780  
(321) 747-3220  
Brady@OlympianLED.com



## INVOICE

### BILL TO

Trans-Lux  
Trans-Lux  
1700 Delaware Ave  
Des Moines, Iowa 50317

### SHIP TO

Trans-Lux  
Trans-Lux  
1700 Delaware Ave  
Des Moines, Iowa 50317

INVOICE # 4185

DATE 10/18/2017

DUE DATE 10/18/2017

TERMS Due on receipt

QTY	ACTIVITY	RATE	AMOUNT
30	<b>NOVASTAR-MCTRL660</b> Novastar MCTRL660 10 x DHL: 3705632991 (Delivered 10/30) 20x DHL: 4598102482 (Delivered 11/6)	560.00	16,800.00
35	<b>NOVASTAR-CVT320</b> Novastar CVT320 Fiber Converter 32 Shipped from OLED 1Z2E93860371551662 (Delivered 10/25) 1Z2E93860372101253 (Delivered 10/25) 1Z2E93860372118049 (Delivered 10/25) 3 shipped from Amazon 9361289680090383853775 (Delivered 11/23)	150.00	5,250.00
4	<b>VDWALL-LVP605S</b> VDWall LVP605S 4 shipped from OLED 1Z2E93860372773279 (Delivered 10/25)	820.00	3,280.00

Although inventory might be available when this invoice is sent, we are not able to hold any inventory until invoice is paid. Please pay ASAP to ensure we can ship your order in full.

BALANCE DUE

**USD 25,330.00**

# Fair-Play

A TRANS-LUX COMPANY

1700 Delaware Avenue  
Des Moines, Iowa 50317  
515.265.6240 Fax 515.265.3364

## PURCHASE ORDER

P/O NUMBER	PAGE
59991-00	01
P/O DATE	
5/11/2015	

VENDOR NO. ORDERED FROM  
OLYMPIAN LED  
BRADEN O'KEEFE  
3659 S. HOPKINS AVE.  
SUITE C  
TITUSVILLE, FL 32780

SHIP TO  
Trans-Lux Midwest/Fair-Play  
1700 Delaware Avenue  
Des Moines, IA 50317

ORDER TYPE	BUYER	ACKNOWLEDGE	CONFIRM	TERMS	FOB	SHIP VIA	COL'PPD
NORMAL	Zachary Pajunen	YES	YES	DUE UPON R	ORIGIN	BEST WAY	PPD
LINE SEQ	QUANTITY ORDERED	U/M	OUR ITEM NUMBER	YOUR ITEM NUMBER	PRICE UNIT	REQUIRED DATE	CHG/CNL
001	6	EA	<p>This PO is subject to Trans-Lux Standard Terms and Conditions of Purchase P 02.1.15 rev 1</p> <p>Please direct any questions on this PO to Zach Pajunen at 800-247-0265 ext 1017 or zpajunen@fair-play.com.</p> <p>TLV-LVP603S TLV-LED VIDEO PROCESSOR WITH S-VIDEO INPUT, (SDI INPUT)</p> <p>TOTAL P/O Dollars ---&gt; \$ 6,600.00</p>		1100.0000	5/21/2015	

ORDERED BY: 