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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
PETER KRAVITZ, as Trustee of the)	Case No. _____	
Aegean Litigation Trust,)		
)		
Plaintiff,)	<u>JURY TRIAL DEMANDED</u>	
)		
-against-)		
)		
E. NIKOLAS TAVLARIOS,)		
PETER C. GEORGIPOLOUS,)		
JOHN P. TAVLARIOS, and)		
GEORGE KONOMOS,)		
)		
Defendants.)		
_____)	

ORIGINAL COMPLAINT

Plaintiff Peter Kravitz, as Trustee of the Aegean Litigation Trust (the “Trustee”), brings this action against E. Nikolas Tavlarios, Peter C. Georgiopoulos, John P. Tavlarios, and George Konomos (collectively, the “Defendants”), and respectfully alleges as follows:

39. Defendants knew the Fujairah project was tens of millions of dollars overbudget. Yet Defendants did nothing to protect Aegean. They turned a blind eye to Aegean's dealings with OilTank, allowing Melisanidis to use it to misappropriate tens of millions of Aegean's funds to what should have been flagged and monitored as a related party.

40. The use OilTank put to the money it received from Aegean confirms the improper nature of the payments. Aegean's payment of the Construction Consultant Fees coincided with substantial transfers from OilTank to other Melisanidis affiliates.

41. For example, in November 2013, a few months after Aegean revealed for the first time that the Fujairah Facility was purportedly overbudget, Melisanidis took control over AEK Athens, a Greek soccer club he previously ran in the mid-90s, to "rebuild" AEK after it dropped two divisions in the country's amateur league due to "huge debts." Melisanidis also helped "secure financing" for a new stadium estimated to cost approximately €60 million—financing that likely included substantial payments from OilTank directly to AEK. On top of financing the stadium, OilTank made direct payments to employees, players and coaches, and vendors on AEK's behalf.

42. OilTank also provided funds to other Melisanidis affiliates during this period, as well as Grady Properties Corporation SA ("**Grady Properties**"), a company controlled by Melisanidis's son, Georgios Melisanidis. For example, Aegean