

4.

Defendants have committed fraud upon petitioners and fraudulently induced petitioners to provide them funds through wire transfers overseas to Geneva, Switzerland and London, England, and are liable unto petitioners for attorney fees based upon their fraudulent acts.

5.

Petitioners discovered the fraudulent acts of Stefanos Kollakes and Martin A. Lewis on or about September 1, 1995 when funds were requested back from defendants, and none were forthcoming.

6.

Petitioners allege they have never received any value for the funds sent to defendants, and that defendants have absconded with their funds without any intent to invest said funds as promised petitioners.

7.

Pickwick Chatham and Company is directed by Stefanos Kollakis and Martin A. Lewis and conspired with these defendants to provide the sale of a fraudulent title for the sum of EIGHTEEN THOUSAND FIVE HUNDRED AND NO/100 (\$18,500.00) DOLLARS to the plaintiffs on December 20, 1994.

8.

At the time of the actions taken by Stefanos Kollakis and Martin A. Lewis, it is believed and on information and belief it is alleged that they were acting as directors, agents, and/or employees of Pickwick Chatham and Company, and Pickwick Chatham and Company are liable for all actions taken by Stefanos Kolladkis and Martin A. Lewis as described hereinabove by virtue of respondeat superior and responsibility for the acts of their directors, agents and employees.

9.

Most of the actions taken by the defendants herein and plaintiffs in relation to documents purchased and funds transferred were taken in Lafayette, Lafayette Parish, Louisiana, and contracts were signed in Lafayette, Lafayette Parish, Louisiana.

WHEREFORE, petitioners pray that after due delays that judgment be rendered herein in favor of petitioners, DR. CHARLES W. BOUSTANY, JR. and BRIDGET EDWARDS BOUSTANY, against defendants STEFANOS KOLLAKIS, MARTIN ALEXANDER LEWIS,