

**IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT  
IN AND FOR POLK COUNTY, FLORIDA  
CIVIL DIVISION**

Comp360 LLC  
a Florida Limited Liability Company  
Plaintiff,

Case No.:

KT Enterprises, LLC  
a California Limited Liability Company

Kevin Taban,  
an individual

Eddie Bryant  
an individual

Defendants,

\_\_\_\_\_ /

**COMPLAINT FOR DAMAGES**

Plaintiff, Comp360 LLC ("Plaintiff" or "Comp360"), by and through its undersigned counsel, hereby files this Complaint for damages against KT Enterprises, LLC, Kevin Taban, and Eddie Bryant (collectively "Defendants") and alleges as follows:

**I. PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff, Comp360 LLC is a Florida limited liability company with a principal place of business in Polk County, Florida.

2. Defendant KT Enterprises, LLC, ("KT Enterprises") is a California limited liability company with a principal place of business in Los Angeles County, California.

3. Defendant Kevin Taban ("Taban") is a natural person and a resident of Los Angeles County, California.

4. Defendant Eddie Bryant ("Bryant") is a natural person and a resident of Los Angeles County, California.

5. This Court has personal jurisdiction over Defendants under the Florida Long Arm Statute, §48.193 (1)(a)(1),(2),(4),(6) and/or §48.193 (2).

6. This is an action damages which exceed \$30,000. Accordingly, this Court has

jurisdiction over this matter.

7. Venue is proper in this Court because one or more of the wrongful acts of the Defendant which are the subject of this action have taken place in Polk County, Florida and threaten to continue to take place in Polk County, Florida.

**II. General Allegations**

8. Plaintiff is a leading workers compensation insurance broker providing workers compensation insurance to companies across Florida and the United States.

9. Defendants operate a competing workers compensation brokerage for companies in Florida and the United States.

10. Plaintiff has a long-standing relationship with Summit insurance company.

11. Summit has products and services which Plaintiff provides to its customers.

12. Beginning in June 2021, Defendants began spreading falsehoods to Summit regarding Plaintiff and Plaintiff's principal in the hopes of destroying Plaintiff's relationship with Summit.

13. Due to the falsehoods spread by Defendants, Summit decided to terminate its relationship with Plaintiff.

14. As a result of the falsehoods, Plaintiff has been damaged.

**COUNT I**

**Tortious Interference**

Plaintiff Comp360 LLC sues Defendants KT Enterprises, LLC, Kevin Taban, and Eddie Bryant and alleges in addition or in the alternative:

15. Plaintiff realleges and incorporates paragraphs 1 through 14 as fully set forth herein.

16. Plaintiff maintains a business relationship with Summit Insurance ("Summit") where Plaintiff serves as a broker for Summit's insurance products and services.

17. Defendants have knowledge of Plaintiff's status as a broker and its relationship with Summit.

18. Defendants have interfered with Plaintiff's relationship with Summit by spreading falsehoods to Summit regarding Plaintiff and Plaintiff's principal's character.

19. Defendants' spread of falsehoods has caused Summit to drop Plaintiff as a broker.

20. Accordingly, Plaintiff has been damaged as a result of Defendants' intentional and unjustified interference.

WHEREFORE, Plaintiff Comp360 LLC demands judgment against Defendants KT Enterprises, LLC, Kevin Taban, and Eddie Bryant for damages, costs, and expenses of this action, and for such other and further relief that this Court deems necessary in the interests of justice.

**COUNT II**  
Unfair Competition  
Common Law

Plaintiff Comp360 LLC sues Defendants KT Enterprises, LLC, Kevin Taban, and Eddie Bryant and alleges in addition or in the alternative:

21. Plaintiff realleges and incorporates paragraphs 1 through 20 as fully set forth herein.

22. This is a claim by Plaintiff Comp360 LLC against Defendants KT Enterprises, LLC, Kevin Taban, and Eddie Bryant for money damages and for common law unfair competition.

23. The Defendants' business conduct described above shows they have continuously taken action contrary to honest practice in industrial or commercial matters as it relates to their efforts to compete with Plaintiff for a common pool of clients and vendors.

24. Defendants had actual knowledge of the wrongfulness of their conduct and the high probability of damage to Plaintiff that would result, and nevertheless pursued this course of conduct to the detriment of Routes for Sale.

25. In particular, Defendants have purposely engaged in conduct to remove a key

insurer from the Plaintiff's offering so the Defendants could obtain a larger market share and unfairly compete with Plaintiff by claiming to offer products Plaintiff could not (because Defendants improperly interfered with the relationship).

26. As a result of Defendants' misconduct described above, Plaintiff has suffered damages.

WHEREFORE, Plaintiff Comp360 LLC demands judgment against Defendants KT Enterprises, LLC, Kevin Taban, and Eddie Bryant for damages, costs, and expenses of this action, together with such other and further relief that this Court deems necessary in the interests of justice.

**PUNITIVE DAMAGES**

Plaintiff reserves the right to amend this complaint to assert claims for punitive damages after presenting record evidence that provides a reasonable basis for the recovery of punitive damages in accordance with the provisions of Section 768.72, Florida Statutes.

**JURY TRIAL DEMAND**

Plaintiff demands trial by jury as to all issues so triable.

**DESIGNATION OF E-MAIL ADDRESSES IN ACCORDANCE WITH FLORIDA RULES OF JUDICIAL ADMINISTRATION RULE 2.515**

The undersigned attorney hereby designates the following emails in the above-referenced matter in accordance with Florida Rules of *Judicial Administration Rule 2.515*:

*Adam Hersh, Esq.*

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Dated this 25<sup>th</sup> day of January 2022

**Respectfully Submitted,**

**/s/Adam Hersh /**

**ADAM HERSH, ESQUIRE**

Florida Bar Number 0098549

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*Counsel for Plaintiff*

**FORM 1.997. CIVIL COVER SHEET**

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

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**I. CASE STYLE**

IN THE CIRCUIT/COUNTY COURT OF THE TENTH JUDICIAL CIRCUIT,  
IN AND FOR POLK COUNTY, FLORIDA

Comp360 LLC  
Plaintiff

Case # \_\_\_\_\_  
Judge \_\_\_\_\_

vs.

KT Enterprises, LLC, Kevin Taban, Eddie Bryant  
Defendant

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**II. AMOUNT OF CLAIM**

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- \$8,000 or less
- \$8,001 - \$30,000
- \$30,001- \$50,000
- \$50,001- \$75,000
- \$75,001 - \$100,000
- over \$100,000.00

**III. TYPE OF CASE** (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

## **CIRCUIT CIVIL**

- Condominium
- Contracts and indebtedness
- Eminent domain
- Auto negligence
- Negligence—other
  - Business governance
  - Business torts
  - Environmental/Toxic tort
  - Third party indemnification
  - Construction defect
  - Mass tort
  - Negligent security
  - Nursing home negligence
  - Premises liability—commercial
  - Premises liability—residential
- Products liability
- Real Property/Mortgage foreclosure
  - Commercial foreclosure
  - Homestead residential foreclosure
  - Non-homestead residential foreclosure
  - Other real property actions
- Professional malpractice
  - Malpractice—business
  - Malpractice—medical
  - Malpractice—other professional
- Other
  - Antitrust/Trade regulation
  - Business transactions
  - Constitutional challenge—statute or ordinance
  - Constitutional challenge—proposed amendment
  - Corporate trusts
  - Discrimination—employment or other
  - Insurance claims
  - Intellectual property
  - Libel/Slander
  - Shareholder derivative action
  - Securities litigation
  - Trade secrets
  - Trust litigation

## **COUNTY CIVIL**

- Small Claims up to \$8,000
- Civil
- Real property/Mortgage foreclosure

- Replevins
- Evictions
  - Residential Evictions
  - Non-residential Evictions
- Other civil (non-monetary)

**COMPLEX BUSINESS COURT**

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes  No

**IV. REMEDIES SOUGHT (check all that apply):**

- Monetary;
- Nonmonetary declaratory or injunctive relief;
- Punitive

**V. NUMBER OF CAUSES OF ACTION: [ ]**

(Specify)

2

**VI. IS THIS CASE A CLASS ACTION LAWSUIT?**

- yes
- no

**VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?**

- no
- yes If “yes,” list all related cases by name, case number, and court.

**VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?**

- yes
- no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Adam Hersh  
Attorney or party

Fla. Bar # 98549  
(Bar # if attorney)

Adam Hersh  
(type or print name)

01/25/2022  
Date