

**IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA**

CASE NO.: _____

LAW OFFICE OF ELIAS R. HILAL, P.A.,
A Florida Corporation and
Elias R. Hilal, Individually

Plaintiffs,

v.

A&S ENTERTAINMENT, LLC, a Florida Limited
Liability Company, DEPARTMENT OF REVENUE,
NOIR SEVEN LLC, a Florida limited liability company,
and EBONY SWEETING,

Defendants.

_____ /

COMPLAINT FOR DECLARATORY JUDGMENT

COME NOW, the Plaintiffs, Law Office of Elias R. Hilal, P.A. (hereinafter referred to as the "Law Office") and Elias R. Hilal ("Hilal") by and through the undersigned counsel, and hereby files this action for Declaratory Judgment against the Defendants, A&S Entertainment, LLC., Department of Revenue, Noir Seven, LLC., and Ebony Sweeting and seeks a court order declaring the rights of the parties and states the following:

JURISDICTION AND VENUE

1. This is an action for declaratory relief pursuant to Chapter 86, Florida Statutes, and the amount in controversy exceeds \$50,000.00, exclusive of interest, costs, and attorney's fees.

2. Venue is proper in Broward County, Florida, as the cause of action accrued in Broward County and the funds at issue were held and disbursed from the the Law Office's attorney trust account (the "Hilal Trust Account") maintained in Broward County.

3. Plaintiff, Law Office of Elias R. Hilal, P.A., is a Florida professional association engaged in the practice of law with its principal place of business in Broward County, Florida.

4. Plaintiff, Elias R. Hilal, is an individual who is over the age of 18 years old and resides in Broward County, Florida.

5. Defendant, Noir Seven LLC, is a Florida limited liability company.

6. Defendant, Ebony Sweeting, is a natural person and is believed to be a principal, member, or agent of Noir Seven LLC.

7. Defendant, A&S Entertainment, LLC, is a Florida limited liability company with which Plaintiffs have had a longstanding professional relationship.

8. Defendant, Department of Revenue, is an agency of the State of Florida and was the recipient of certain funds disbursed by the Plaintiff as described herein.

GENERAL ALLEGATIONS

9. On or about September 3, 2024, Defendant Noir Seven LLC transferred \$99,960.00 into the Hilal Trust Account.

10. A&S Entertainment, LLC verbally informed Hilal that the funds were to be used to pay down a tax delinquency owed to the Department of Revenue and to pay attorney's fees to the the Law Office based upon an agreement between A&S Entertainment, Noir Seven, LLC, and Sweeting.

11. Plaintiffs have served as counsel to A&S Entertainment, LLC for over ten years, and given the long-standing history between the parties, where verbal authorizations were customary.

12. In reliance on the instructions provided, the Law Office disbursed a total of \$50,000.00 to the Florida Department of Revenue, via two separate payments dated September 17, 2024, and October 3, 2024.

13. The remaining balance (\$49,960.00) was retained by the Law Office as earned attorney's fees in connection with legal services rendered to the parties involved.

14. In or around early 2025, Defendant Noir Seven LLC, through its agents or representatives, demanded the return of the entire \$99,960.00, claiming entitlement to the full amount.

15. A genuine dispute now exists among the parties regarding the proper ownership, use, and distribution of the funds that were received by the Law Office.

16. Plaintiffs are in doubt as to their legal rights and obligations concerning the funds and seeks declaratory relief from this Court to resolve the controversy.

17. On June 30, 2025, Hilal transferred fifty thousand dollars (\$50,000.00) from his personal account after the Law Office's authority was called into question for payments made to the Department of Revenue.

COUNT I – DECLARATORY JUDGMENT

18. Plaintiffs reallege and incorporate paragraphs 1 through 17 above as though fully set forth herein.

19. Plaintiffs seek a declaration of their rights and obligations as to the \$99,960.00 transferred to the Hilal Trust Account, specifically:

a. Whether the Law Office properly disbursed \$50,000.00 to the Florida Department of Revenue;

b. Whether the Law Office is entitled to retain the balance of the funds (\$49,960.00) as earned attorney's fees;

c. Whether Hilal is entitled to retain the personal funds in the amount of \$50,000.00 that he deposited in the Hilal Trust Account after the Law Office's authority to disburse to the DOR was questioned.

d. Whether the Department of Revenue is entitled to keep the funds paid to it by the Law Office or if it must return the funds to another party;

e. Whether any of the Defendants are entitled to any return or refund of the funds;

20. A present, actual, and bona fide controversy exists as to the parties' respective rights and legal relations concerning the funds at issue.

21. A declaration by this Court will serve a useful purpose in resolving the parties' dispute and avoiding future uncertainty and potential litigation.

WHEREFORE, Plaintiffs, LAW OFFICE OF ELIAS R. HILAL, P.A. and ELIAS R. HILAL, respectfully request that this Honorable Court:

A. Take jurisdiction over this matter.

B. Enter a judgment declaring that the Law Office lawfully disbursed \$50,000.00 to the Florida Department of Revenue.

C. Declare that the Law Office is entitled to retain the balance of the funds (\$49,960.00) as attorney's fees;

D. Declare that Plaintiffs have no remaining obligation to any Defendants regarding the \$99,960.00.

E. Declare that Hilal is entitled to the funds that he placed in the Hilal Trust Account;

F. Grant such other and further relief as the Court deems just and proper.

Dated: August 5, 2025.

By: NGV
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