

How A Flowchart Won \$14.5M In Fla. Woman's Fraud Suit

By **David Minsky**

Law360 (August 13, 2025, 6:47 PM EDT) -- In Mireya Cambero's lawsuit against her ex-husband Jose Fernando De Matos, her attorneys at Miami-based Diaz Reus LLP had to prove fraudulent transfers but avoid confusing a jury with voluminous, uninteresting business filings. The best way to do it, they decided, was to organize their evidence in an easily digestible flowchart.

Cambero's suit, which was filed in 2015, alleged years of abuse by De Matos, and was amended several times to include claims that De Matos transferred property and commercial assets held in his and Cambero's names to family, friends and other corporate entities, some of which were in South America.

After a seven-day trial and roughly three hours of deliberation on July 15, the jury awarded Cambero \$14.5 million in punitive and compensatory damages.

Gary Davidson of Diaz Reus, representing Cambero, entered the case in 2022 and obtained paperwork showing that a commercial property in Coral Gables had been transferred to an individual not connected to his client. Co-counsel Evan Stroman and Ibrahim Amir, also with Diaz Reus, got involved in the case in 2025 and 2024, respectively. The arduous process of tracing the transferred assets produced a large collection of what Cambero's attorneys described as dull business records, such as quitclaim deeds and corporate filings. Their flowchart stitched them all together in an easy-to-follow format.

"In every piece of litigation, there's a general challenge of how much detail you provide to the jury, and you always want to restrain yourself from providing too much," Davidson told Law360. "But from an evidentiary and appellate perspective, you got to have your record solid when it goes up to the court of appeal. Particularly in a fraudulent transfer case that spans many, many years, you've got to get it all in, and there's no easy way to do that, unfortunately."

In the late 1980s, Cambero worked at a laundromat and sold purses for about a decade before buying a butcher shop in Venezuela, according to Stroman.

Cambero met De Matos in 1996, and together they spent much of their time in Venezuela and Colombia, slowly growing a business empire.

The couple moved to the U.S. in 2009 and began buying real estate during the Great Recession, acquiring at least 35 properties. It was "a modern-day effort that you wouldn't have seen 50 years ago in Venezuela," Stroman told Law360.

At the height of their business operations, Davidson said, the couple had staffing, a separate distribution company for their butcher shop and significant income. Cambero had 50% ownership on paper and was also involved in the day-to-day operations, according to Davidson.

The couple's relationship was marked with horrific instances of domestic violence, including a 2011 rape, according to the suit. In 2013, the couple divorced.

Running up against the statute of limitations on claims of assault and battery, Cambero filed her lawsuit against De Matos in Miami-Dade County state civil court in 2015, according to her attorneys. Later that year, according to Stroman, De Matos began the process of transferring commercial assets

and properties held in his and his ex-wife's names to business associates and his daughter from a previous marriage.

The divestiture of assets accelerated after a state court judge granted Cambero permission to seek punitive damages against De Matos in 2016, giving her legal team the ability to obtain financial data such as tax returns for the purposes of proving her case, according to Stroman.

When Davidson, Stroman and Amir became involved in Cambero's lawsuit, they learned more about the corporate structure of the assets through a set of questions served on her ex-husband. Maria De Matos, his daughter from a previous marriage, had created a separate business entity in Florida that she used to transfer ownership of the assets, Amir told Law360.

To avoid confusing a jury with the complex web of asset transfers, Cambero's legal team devised a visual aid in the form of a flowchart. Davidson arranged the corporate information, while Amir organized the flowchart's data to show ownership of the assets at the time Cambero's lawsuit was filed, when they were transferred and their monetary value.

"You confuse, you lose," Stroman said.

One of the more powerful moments at trial, Stroman said, was when De Matos clarified some aspects of a corporate chart presented to him on the stand, effectively admitting that he transferred assets to a business associate based in South America. Stroman described it as a "reverse Perry Mason moment" in that it was the defendant who presented evidence to the jury in an unexpected and dramatic way, rather than the attorney.

In showing why Cambero didn't divorce De Matos earlier despite years of abuse, Davidson said his team presented evidence of "trauma bonding," or the idea that the more frequently abuse occurs in a domestic relationship, the harder it is to leave.

Photographic evidence of the 2011 rape, medical records and testimony of the responding police officer helped sway the jury in favor of Cambero, Davidson said.

"The jury had to make a choice early on who they would believe," Davidson said. "It was clear to the jury that one side was telling a story that could not exist with the other side. There's no gray area there."

According to court records, Maria De Matos and nine other defendants filed oppositions to the final judgment in late July. In their filings, the defendants argued that Cambero's counsel ignored a request to meet and confer before the final judgment was filed, and that Florida law doesn't allow prejudgment interest on unliquidated claims, as well as arguing that Maria De Matos was "completely exonerated by the jury" and shouldn't be included in the final judgment.

Cambero's attorneys told Law360 on Wednesday that their client believes the post-trial motions lack merit and her responses will be filed shortly with the court.

Counsel for the defendants did not immediately respond to emailed requests for comment on Tuesday.

Cambero is represented by Evan Stroman, Gary Davidson and Ibrahim Amir of Diaz Reus LLP.

De Matos is represented by Gustavo J. García-Montes of Gustavo J. García-Montes PA.

Maria Fernanda De Matos, Proyecto La Puerta CA, Mundo Carne Inc., Colonnade 101 SE Inc., Colonnade 115 SW Inc., Colonnade 116 SE Inc., Colonnade 110 SW Inc., Colonnade 318 SW Inc., Alejandro Akle and 12755 SW LLC are represented by Manuel Arthur Mesa of Mesa LLP.

The case is Mireya Cristina Cambero Cordero v. Jose Fernando De Matos Rebolledo, case number 2015-005641-CA-01, in the Eleventh Judicial Circuit Court of Florida.

--Editing by Alanna Weissman and Marygrace Anderson.

