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## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, CHANCERY DIVISION

RDG FUND-1 LLC, )  
RESIDENTIAL DYNAMIC GROUP LLC, )  
LAW OFFICES OF KEVIN A. SKALNIK, )  
KEVIN A. SKALNIK, and YUNG BONG LIM, )

Plaintiffs, )

v. )

GOTSIA PAVLOV, SALI PAVLOV a/k/a )  
SALLY PAVLOV, JURO KONSTANTINOV, )  
MECI KONSTANTINOV, GUSTI )  
KONSTANTINOV, DRAGANA MULTINOVIC, )  
the ILLINOIS SECRETARY OF STATE, and )  
JESSE WHITE, not individually, but solely in )  
his capacity as the Secretary of State of )  
the State of Illinois, the COOK COUNTY )  
RECORDER OF DEEDS, and EUGENE )  
"GENE" MOORE, not individually, but )  
solely in his capacity as the Cook County )  
Recorder of Deeds, )

Defendants. )

Case No. 11 CH 33638

Calendar 5



Doc#: 1135629044 Fee: \$48.00  
Eugene "Gene" Moore  
Cook County Recorder of Deeds  
Date: 12/22/2011 10:53 AM Pg: 1 of 7

### AMENDED JUDGMENT

THIS MATTER COMING TO BE HEARD ON the Motion for Default, Default Judgment and Entry of Injunctive and Declaratory relief ("Motion") by Plaintiffs, RDG Fund-1 LLC, Residential Dynamic Group LLC, Law Offices of Kevin A. Skalnik, Kevin A. Skalnik, and Yung Bong Lim, on Plaintiffs' Verified Amended Complaint for Injunctive and Other Relief ("Amended Complaint") and against Defendants, Gotsia Pavlov, Sali Pavlov a/k/a Sally Pavlov, Juro Konstantinov, Meci Konstantinov, Gusti Konstantinov, Dragana Multinovic, the Illinois Secretary of State and Jesse White, not individually, but solely in his capacity as the Secretary of State of the State of Illinois, the Cook County Recorder of Deeds and Eugene "Gene" Moore, not individually,

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but solely in his capacity as the Cook County Recorder of Deeds, all parties having received due notice, Defendants Gotsia Pavlov, Sali Pavlov a/k/a Sally Pavlov, Juro Konstantinov, Meci Konstantinov, Gusti Konstantinov, Dragana Multinovic having been found in default, and the Court being fully advised in the premises;

IT IS HEREBY ORDERED that:

- (1) Plaintiffs' Motion is granted;
- (2) Defendant Gotsia Pavlov and anyone acting in concert with or in participation with her are hereby barred and permanently enjoined from filing, recording or issuing with or through the Illinois Secretary of State, the Cook County Recorder of Deeds, or any Court, or elsewhere, any lien, deed, or document asserting any interest, title or claim, including but not limited to any UCC Financing Statement or UCC Financing Statement Amendment, Declaration of Assignee's Update of Patent, Maritime Lien, Notice of Maritime Lien, any document asserting Allodial Freehold Land Title, Law of the Flag document, Tenant Notice to Vacate (5-Day Notice) or eviction complaint related thereto, Form 1099 or other tax related document, or any deeds or any other bogus or fraudulent documents, concerning any Plaintiff or any of their agents, representatives, employees, officers, directors, attorneys, or the like, or regarding any property of any Plaintiff, including but not limited to the real property commonly known as 1427 Evergreen Terrace, Glenview, Illinois, 60025, **Permanent Index Number (P.I.N) 04-26-410-007-0000** (the Legal Description of the Property is attached hereto as **Exhibit A**) without prior order of this court granting permission to file, record or issue such document;
- (3) Defendants Gotsia Pavlov, Sali Pavlov a/k/a Sally Pavlov, Juro Konstantinov, Meci Konstantinov, Gusti Konstantinov and Dragana Multinovic and anyone acting in concert with or in participation with any of them are hereby barred and permanently enjoined from entering onto the premises of RDG Fund-1, LLC, Residential Dynamics Group, LLC, and Law Offices of Kevin A. Skalnik, all of which are located at 150 North Wacker Drive, Suite 650, Chicago, IL, without having first obtained the permission of an employee or authorized agent of one of these entities;
- (4) The following documents are without merit or basis, were improperly filed and/or recorded, are invalid and are void:
  - a. Quitclaim Deed (Recorder of Deeds document number 1008156052);
  - b. Declaration of Assignees [sic] Update of Patent (Recorder of Deeds document number 1018956009);

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- c. Declaration of Assignees [sic] Update of Patent (Recorder of Deeds document number 1022950031);
  - d. UCC Financing Statement Amendment (Recorder of Deeds document number 1107056014);
  - e. UCC Financing Statement (Secretary of State filing number 09112974, Recorder of Deeds document number 1115144074);
  - f. UCC Financing Statement (Secretary of State filing number 09112974, Recorder of Deeds document number 1121650010);
  - g. Notice of Claim of Maritime Lien (Recorder of Deeds document number 1121550049);
  - h. Allodial Freehold Land Title (Recorder of Deeds document number 1115144073);
  - i. Allodial Freehold Land Title (Recorder of Deeds document number 1119644061);
  - j. Law of the Flag document (Recorder of Deeds document number 1127057098); and
  - k. Tenant Notice to Vacate (5 Day Notice) issued by Gotsia Pavlov to Lim Bong d/b/a President Residential Dynamics Group, LLC.
- (5) Following this Court's entry of Temporary Restraining Order on October 12, 2011, Gotsia Pavlov issued a Form 1099-A tax form to Residential Dynamics Group LLC and recorded a UCC Financing Statement with the Illinois Secretary of State and Cook County Recorder of Deeds, which this Court determines to be invalid and void:
- a. Form 1099-A for tax year 2010 issued by Gotsia Pavlov to Residential Dynamics Group LLC; and
  - b. UCC Financing Statement (Secretary of State filing number 16749508, Recorder of Deeds document number 1131356020).
- (6) The Illinois Secretary of State shall expunge the following improperly filed documents and all related documents filed with the Illinois Secretary of State, from the records and all public records of the Illinois Secretary of State and State of Illinois, or elsewhere:

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- a. UCC Financing Statement (Secretary of State filing number 09112974, Recorder of Deeds document number 1115144074);
  - b. UCC Financing Statement (Secretary of State filing number 09112974, Recorder of Deeds document number 1121650010); and
  - c. UCC Financing Statement (Secretary of State filing number 16749508, Recorder of Deeds document number 1131356020).
- (7) Plaintiffs are awarded statutory damages against Gotsia Pavlov of \$500 under 810 ILCS 5/9-625 for each of the four (4) violations of the UCC resulting from Gotsia Pavlov's filing of the fraudulent UCC Financing Statements. Judgment in the amount of \$2,000.00 is hereby entered against Gotsia Pavlov and in favor of Plaintiffs;
  - (8) Plaintiffs are awarded as an element of their damages against Gotsia Pavlov their reasonable attorneys' fees and costs incurred as a result of having to bring this action to obtain the withdrawal and expungement of the fraudulent and bogus documents filed and issued by Gotsia Pavlov and to enjoin the filing of such bogus and fraudulent documents in the future, and to enjoin the Defendants from harassing, intimidating and otherwise engaging in illegal conduct interfering with Plaintiffs' business interests and contractual relations. Judgment is hereby entered against Gotsia Pavlov in the amount of \$31,599.80 and in favor of Plaintiffs;
  - (9) The Quitclaim Deed, Declarations, Allodial Titles, Law of the Flag document and any other claim of ownership or interest of Gotsia Pavlov in the real property commonly known as 1427 Evergreen Terrace, Glenview, Illinois, 60025, **Permanent Index Number (P.I.N) 04-26-410-007-0000** are invalid, without any basis whatsoever and conferred no rights to or interest in the Property to Gotsia Pavlov or anyone else. Gotsia Pavlov has no right to or interest in the real property commonly known as 1427 Evergreen Terrace, Glenview, Illinois, 60025, **Permanent Index Number (P.I.N) 04-26-410-007-0000**. Upon its purchase of the Property, RDG became the possessor of 100% of the ownership interest in the real property commonly known as 1427 Evergreen Terrace, Glenview, Illinois, 60025, **Permanent Index Number (P.I.N) 04-26-410-007-0000** and no action or recording by Gotsia Pavlov in any way limited or changed RDG's 100% ownership of the Property. In open court, RDG has represented that it sold the Property on or about December 15, 2011;
  - (10) The Cook County Recorder of Deeds shall record this Judgment Order with the records for **Permanent Index Number (P.I.N) 04-26-410-007-0000**, the P.I.N. for the real property commonly known as 1427 Evergreen Terrace, Glenview, Illinois;

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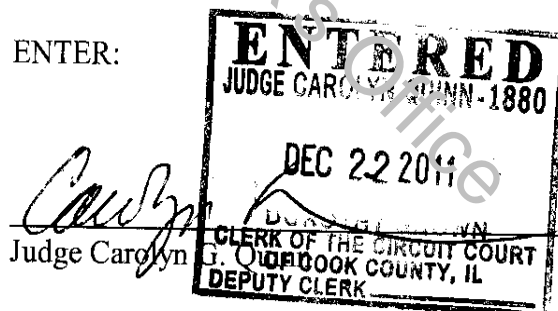
- (11) Based on the sworn testimony in the Verified Amended Complaint filed by Plaintiffs and such further proofs presented to the Court:
- a. Plaintiffs have a clearly ascertainable right in need of protection against the filing, recording or issuing with or through the Illinois Secretary of State, the Cook County Recorder of Deeds, or any Court, or elsewhere, any lien, deed, or document asserting any interest, title or claim, including but not limited to any UCC Financing Statement or UCC Financing Statement Amendment, Declaration of Assignee's Update of Patent, Maritime Lien, Notice of Maritime Lien, any document asserting Allodial Freehold Land Title, Law of the Flag document, Tenant Notice to Vacate (5-Day Notice) or eviction complaint related thereto, Form 1099 or other tax related document, or any deeds or any other bogus or fraudulent documents, concerning any Plaintiff or any of their agents, representatives, employees, officers, directors, attorneys, or the like, or regarding any property of any Plaintiff, by Defendant Gotsia Pavlov and all those in active concert or in participation with her. Further, Plaintiffs have a clearly ascertainable right in need of protection against the Defendants and all those in active concert or in participation with them engaging in any harassing, intimidating and otherwise illegal conduct with respect to Plaintiffs, any of their property or individuals working for Plaintiffs, including any interference by Defendants with Plaintiffs' business interests, contracts and activities;
  - b. Plaintiffs will suffer irreparable harm if any lien, deed, or document asserting any interest, title or claim, including but not limited to any UCC Financing Statement or UCC Financing Statement Amendment, Declaration of Assignee's Update of Patent, Maritime Lien, Notice of Maritime Lien, any document asserting Allodial Freehold Land Title, Law of the Flag document, Tenant Notice to Vacate (5-Day Notice) or eviction complaint related thereto, Form 1099 or other tax related document, or any deeds or any other bogus or fraudulent documents, concerning any Plaintiff or any of their agents, representatives, employees, officers, directors, attorneys, or the like, or regarding any property of any Plaintiff, are filed, recorded or issued by Defendant Gotsia Pavlov, and the cloud on Plaintiff's title to the Property created by such bogus and fraudulent filings, and the potential damage to Plaintiffs' credit posed by such filings, constitutes further irreparable harm to Plaintiffs. Further, Plaintiffs will suffer irreparable harm if Defendants and all those in active concert or in participation with them are not enjoined from engaging in any harassing, intimidating and otherwise illegal conduct with respect to Plaintiffs, any of their property or individuals working for Plaintiffs, including any interference by Defendants with Plaintiffs' business interests, contracts and activities; and

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- c. There is no adequate remedy at law to protect Plaintiffs from irreparable harm as a result of further liens, deeds, or documents asserting any interest, title or claim, including but not limited to any UCC Financing Statement or UCC Financing Statement Amendment, Declaration of Assignee's Update of Patent, Maritime Lien, Notice of Maritime Lien, any document asserting Yellowtail Freehold Land Title, Law of the Flag document, Tenant Notice to Vacate (5-Day Notice) or eviction complaint related thereto, Form 1099 or other tax related document, or any deeds or any other bogus or fraudulent documents, concerning any Plaintiff or any of their agents, representatives, employees, officers, directors, attorneys, or the like, or regarding any property of any Plaintiff, are filed, recorded or issued by Defendant Gotsia Pavlov, because the statutory penalty for violation of the Illinois UCC statute does not address the Plaintiffs' right to clear title in their property or the damage to their credit imposed on Plaintiffs as a result of the filing, recording or issuing of such bogus deeds, liens or fraudulent filings. Further, there is no adequate remedy at law to protect Plaintiffs from irreparable harm from Defendants and all those in active concert or in participation with them engaging in harassing, intimidating and otherwise illegal conduct with respect to Plaintiffs, any of their property or individuals working for Plaintiffs, including any interference by Defendants with Plaintiffs' business interests, contracts and activities
- (12) Plaintiffs are not required to post a bond with respect to the entry of or any of the provisions of this permanent injunction and judgment.
- (13) The Judgment entered in this matter took effect at 11:00 a.m. on December 20, 2011, and shall remain in effect until further order of Court. This Amended Judgment is entered nunc pro tunc effective 11:00 a.m. on December 20, 2011 and shall remain in effect until further order of Court.

Dated: December 22, 2011

ENTER:



Judge Carolyn Gunn

Kevin J. Todd  
 Hoogendoorn & Talbot LLP  
 122 South Michigan Avenue  
 Suite 1220  
 Chicago, Illinois 60603-6263  
 Ph: 312/786-2250  
 Firm No. 40494

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## Exhibit A

### LEGAL DESCRIPTION

LOT 6 OF SUNSET PARK, SUBDIVISION OF PART OF THE SOUTH 1/2 OF THE SOUTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 26, TOWNSHIP 42 NORTH, RANGE 12, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Property of Cook County Clerk's Office